

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

N627953379

FACILITY: Lambda Energy Resources LLC - Ricci 19 (Blue Lk)		SRN / ID: N6279
LOCATION: SUNSET TRAIL, KALKASKA		DISTRICT: Cadillac
CITY: KALKASKA		COUNTY: KALKASKA
CONTACT:		ACTIVITY DATE: 04/16/2020
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SMOPT OUT
SUBJECT: Compliance inspection PTI 242-97.		
RESOLVED COMPLAINTS:		

Self Initiated Inspection: N6279 Lambda Ricci 19 (Blue Lake), Kalkaska County

I conducted a self initiated inspection of the Ricci 19 to fulfill the AQD's responsibility to ensure protection of the public health under the limitations inherent during the COVID 19 disease outbreak. While in the area for a scheduled inspection on April 16, 2020, I also conducted a compliance inspection of the Ricci 19 CPF. During the inspection I evaluated compliance with Permit to Install number 242-97 and the air pollution control Rules.

I observed the site Prior to entering the facility, no odors were detected downwind and no visible emissions were present. The weather was clear, 35 degrees F with wind from the West at 10 mph. At the time of the inspection the following equipment was observed on site:

- Three 400 bbl AST's with operating vapor recovery
- One Caterpillar twin turbo V-8 compressor engine with no control (Unit 305520) and one in-line six-cylinder engine and compressor that has been dismantled
- One glycol dehydrator that was operating
- Three heaters, which appeared to be operating

SC 13. Source-wide CO, VOC and NOx emission limits of 89 TPY each. Company emission calculations for the 2019 12-month period were; CO 9 tons, VOC 2 tons, NOx 11 tons which are each below the 89 tons per year.

SC 14. Maintain HAP emissions below Major source thresholds. Total VOC emissions are less than 10 tons per year.

SC 15. Monthly emission calculations based on a 12-month rolling time-period. The permittee maintains monthly and 12-month rolling calculations of CO, VOC, NOx, SO2 and PM10. Emissions factors from the engine manufacturers data sheet are used in the calculation, which is acceptable. The emission factors from Appendix A are not used.

SC 16. a. Monthly fuel consumption is monitored and recorded on the Engine Specification Calculation Spreadsheet record as "Fuel Usage." There is no limit on Fuel usage.

b. Tank thru-put of crude is monitored and recorded on the Monthly Emissions Summary records. There is no limit on tank thru-put.

c. Monthly crude oil trucked is monitored and recorded on the Monthly Emission Summary records. There is no limit on the amount of crude oil trucked.

d. The glycol circulated thru the dehydrator is reported in gpm. This is a constant flow in gpm and not an accumulative number for an annual limit. The gpm is used in GRI Gly-Calc emission calculations.

SC 17. The monthly reports are maintained, and examples were provided to AQD.

SC 18. The 2019 MAERS report was submitted timely and complete.

SC 19. Maintenance records were not reviewed but have been provided in the past.

SC 20. The tanks are equipped with a vapor recovery system that was operating at the time of the inspection.

SC 21. See S.C. 20

SC 22. This facility has a lean burn engine that is not equipped with a catalytic converter. Therefore, there is no by-pass of pollution control equipment to record.

SC 23. This facility is not subject to Subpart KKK.

SC 24. The AQD has not requested stack testing to verify CO, VOC, NOx, or HAPs.

SC 25. Fuel analysis Certificate of Analysis from 2017 showed the Hydrogen Sulfide as non-detect at a detection level of 1 ppm.

As a result of this inspection, it appears that this source is currently in compliance with PTT 242-97 and the air pollution control rules.

NAME



DATE 4-16-20

SUPERVISOR

