

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B913928287

FACILITY: Merit Energy Co. - Blair 36 CPF		SRN / ID: B9139
LOCATION: 550 Clous Road, KINGSLEY		DISTRICT: Cadillac
CITY: KINGSLEY		COUNTY: GRAND TRAVERSE
CONTACT: Randy Sanders , Operations Manager		ACTIVITY DATE: 11/26/2014
STAFF: Rob Dickman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection of this opt out source.		
RESOLVED COMPLAINTS:		

Inspected this opt out facility pursuant to Permit to Install number 632-96B. Prior to entering the facility, no odors were noted downwind of it outside the property line. A list of the pertinent equipment on site was as follows:

- Five 400 bbl AST's with vapor recovery
- One V-12 compressor engine (not in operation)
- One electric compressor
- One glycol dehydrator
- Five natural gas fired heaters

Records would indicate that this engine has at least not operated in the last 12 months.

Records regarding this facility were requested on November 17, 2014 and received on December 2, 2014. The request was for the last 12 months of complete records, therefore, the records from November of 2013 through October of 2014 were reviewed. These records appeared complete.

Following are the findings of this inspection by permit Special Condition:

Glycol Dehydrator - This EU is equipped with a flash tank and condenser.

1.1 This EU is required to be in compliance with all provisions of 40 CFR 60 Subpart HH. Upon inspection, this appears to be the case.

1.2 This EU is required to have a flash tank installed on it. This equipment was in place.

1.3 A wet gas analysis of the gas coming in to the EU is required once per year. This analysis, dated 8/11/2014, is attached to this report.

1.4 Natural gas flow to the EU is required to be measured and reported to demonstrate it meets the exemption criteria pursuant to 40 CFR 63.764(e)(1)(i) (must be less than 85,000 cu. meters/day based on an annual average). Records indicate this is being performed and a sample of this record is attached. For October 2014, the daily average is 10,647 cu. meters based on an annual average.

1.5 If the facility chooses to meet the exemption criteria pursuant to 40 CFR 63.764(e)(1)(ii), benzene emissions must be recorded. The facility has chosen to meet the exemption criteria pursuant to 63.764(e)(1)(i), therefore, this condition does not apply. (See item 1.8)

1.6 The facility is required to perform emissions calculations for this EU monthly. Review of submitted records indicates emissions calculations for the facility have been performed in a timely and correct manner.

1.7 Records of the wet gas analysis of the gas coming in to the EU are required to be kept. This analysis, dated 8/11/2014, is attached to this report.

1.8 If the EU meets the exemption criteria pursuant to 40 CFR 63.764(e)(1)(i) for glycol dehydrators, records of natural gas throughput are required. The EU meets the exemption and these records are attached to this report.

1.9 If the EU meets the exemption criteria in 40 CFR 63.764(e)(1)(i) for glycol dehydrators, records of VOC emissions are required. These records are being kept.

1.10 The facility is required to submit notifications and reports for this EU pursuant to the MACT. MACT notification for this EU was received on 1/27/11. No other reporting is required.

1.11 Stack parameters for this EU do not appear to have changed and appear correct.

Compressor - The compressor is a Waukesha model, V-12 with no add on control device. This engine was not in operation at the time of the inspection.

2.1 NOx emissions from this EU are limited to 86.3 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. Records submitted by the facility indicate that this engine has not operated in the last 12 months and therefore had zero emissions.

2.2 The natural gas usage for this EU is limited to 22 million cubic feet per 12-month rolling time period as determined at the end of each calendar month. Records submitted by the facility indicate that this engine has not operated in the last 12 months and therefore had zero natural gas usage.

2.3 A PMMAP for this EU is required and was submitted on 12/11/2007. No approval for it could be located.

2.4 The facility is not allowed to bypass any control device for this EU for more than 200 hours per year. The compressor does not have an add-on control device. Therefore, this condition does not apply.

2.5 The facility must maintain a control device for this EU if used. The compressor does not have an add-on control device. Therefore, this condition does not apply.

2.6 If requested by the AQD, the facility must perform stack testing on this EU to verify emission rates. As of the date of this inspection, stack testing has not been requested for this facility. Given the engine has been removed, emissions are low, and good compliance history, requesting testing is not recommended.

2.7 The facility is required to maintain a device to measure natural gas usage for this EU. This device was in place and operating.

2.8 The facility is required to perform emissions calculations monthly. Review of submitted records indicates emissions calculations for the facility have been performed in a timely and correct manner.

- 2.9 A maintenance log for this EU is required to be kept and is attached to this report.
- 2.10 The facility is required to keep records of any bypass of any control device. The compressor does not have an add-on control device. Therefore, this condition does not apply.
- 2.11 Natural gas usage records for this EU are required to be kept. A sample of these records is attached to this report.
- 2.12 NOx emissions records for this EU are required to be kept. These are being performed monthly in a satisfactory manner.
- 2.13 Stack parameters for this unit do not appear to have changed and appear correct.
- 2.14 A natural gas monitoring device is to be installed within 60 days of permit issuance. This condition is historic and has been performed by the facility.
- 2.15 The stack height is to apply within 60 days of permit issuance. This condition is historic and has been performed by the facility.

Facility Wide

- 3.1 NOx emissions from the facility are limited to 89.9 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. Records submitted by the facility indicate that as of 10/2014, NOx emissions were 0.12 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.
- 3.2 The facility is required to only burn sweet natural gas. An attached analysis of the gas indicates it is sweet per department definition.
- 3.3 The facility may be required to verify H2S and sulfur content of the gas. As of the date of the inspection, this has not been requested and is not recommended at this time.
- 3.4, 3.5 The facility is required to perform emissions calculations monthly. Review of submitted records indicates emissions calculations for the facility have been performed in a timely and correct manner.

At the time of the inspection, this facility was in compliance with their air permit.

NAME



DATE

1/15/15

SUPERVISOR

