

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

B916128690

FACILITY: Merit Energy Co. - Mayfield 16		SRN / ID: B9161
LOCATION: HARRAND RD, MAYFIELD		DISTRICT: Cadillac
CITY: MAYFIELD		COUNTY: GRAND TRAVERSE
CONTACT: Vicki Kniss , Environmental Affairs Manager		ACTIVITY DATE: 11/27/2014
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 634-96B. 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:

- Eight 400 bbl AST's with vapor recovery
- One V-12 compressor engine with no control
- One glycol dehydrator

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:

EUMF16-DH - Triethylene glycol dehydration system. Equipped with a flash tank and condenser.

I. EMISSION LIMITS – No emissions limits

II. MATERIAL LIMITS – No material limits

III. PROCESS/OPERATIONAL RESTRICTIONS

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.

IV. DESIGN/EQUIPMENT PARAMETERS

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

2. This EU is required to have a condenser installed on it. This equipment was in place.

V. TESTING/SAMPLING

1. A wet gas analysis of the gas coming in to the EU is required once per year. This analysis, dated 8/5/2014, is attached to this report.

VI. MONITORING/RECORDKEEPING

1. 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.

2, 3. 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.

4. As an alternative to criteria in 40 CFR 63.764(e)(1)(i), the facility can track benzene emissions. The facility has chosen to not exercise this alternative.

5. A wet gas analysis of the gas coming in to the EU is required once per year. This analysis, dated 8/5/2014, is attached to this report.

VII. REPORTING

1. The facility is required to submit notifications and reports for this EU pursuant to the MACT. MACT notification for this EU was received on 1/31/11. No other reporting is required.

VIII. STACK/VENT RESTRICTIONS

1. This stack appears in compliance with criteria listed in the permit and does not appear to have been recently altered.

IX. OTHER REQUIREMENTS– No other requirements

EUMF16-CM1 - Natural gas fired reciprocating engine with no controls

I. EMISSION LIMITS

1. NOx emissions are limited to 85.3 tons per year based on a twelve-month rolling period. Records provided by the facility indicate that NOx emissions average 30.23 tpy, all based on a 12-month rolling time period as of October 2014.

II. MATERIAL LIMITS

1. The natural gas usage for this EU is limited to 19.3 million cubic feet per 12-month rolling time period as determined at the end of each calendar month. Records submitted by the facility indicate natural gas usage was 6.9 million cubic feet per 12-month rolling time period as determined at the end of each calendar month.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. An amended MAP for this EU is required and was submitted on 6/24/14. An approval for it was sent on 6/25/14

2. 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.

IV. DESIGN/EQUIPMENT PARAMETERS

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

V. TESTING/SAMPLING

1. The facility may be required to verify NOx emissions. As of the date of the inspection, this has not been requested and is not recommended at this time.

VI. MONITORING/RECORDKEEPING

1. 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. A maintenance log for this EU is required to be kept and is attached to this report.

3. 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.

4. Natural gas usage records for this EU are required to be kept. A sample of these records is attached to this report.

5. NOx emissions records for this EU are required to be kept. These are being performed monthly in a satisfactory manner.

VII. REPORTING

1. The facility is required to notify the agency if the compressor engine is replaced. As of the date of the inspection, the engine has not been replaced.

VIII. STACK/VENT RESTRICTIONS

1. Stack parameters for this unit do not appear to have changed and appear correct.

IX. OTHER REQUIREMENTS

1. No other requirements

FGFACILITY

I. EMISSION LIMITS

1. NOx emissions are limited to 89.9 tons per year based on a twelve-month rolling period. Records provided by the facility indicate that NOx emissions average 31.32 tpy, all based on a 12-month rolling time period as of October 2014.

II. MATERIAL LIMITS

1. The facility is required to only burn sweet natural gas. An attached analysis of the gas indicates it is sweet per department definition.

III. PROCESS/OPERATIONAL RESTRICTIONS – No process or operational restrictions.

IV. DESIGN/EQUIPMENT PARAMETERS– No design or equipment restrictions

V. TESTING/SAMPLING

1. Verification of H2S and/or sulfur content of the natural gas burned in may be required upon request by the AQD District Supervisor. This verification was not requested but was supplied with the required wet natural gas analysis.

VI. MONITORING/RECORDKEEPING

1, 2. 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.

VII. REPORTING– No reporting requirements.

VIII. STACK/VENT RESTRICTIONS – There are no stack restrictions

IX. OTHER REQUIREMENTS – No other requirements

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

NAME



DATE

3/4/15

SUPERVISOR

