

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

B916428291

FACILITY: MERIT ENERGY CO. - PARADISE 19 CPF		SRN / ID: B9164
LOCATION: BLAIR TOWNHALL RD, KINGSLEY		DISTRICT: Cadillac
CITY: KINGSLEY		COUNTY: GRAND TRAVERSE
CONTACT: Vicki Kniss , Environmental Affairs Manager		ACTIVITY DATE: 11/26/2014
STAFF: Rob Dickman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection and records review of this opt out source.		
RESOLVED COMPLAINTS:		

Inspected this opt out facility pursuant to Permit to Install number 657-96A. 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:

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

- 1.1 This EU is required to have a flash tank installed on it. This equipment was in place.
- 1.2 A wet gas analysis of the gas coming in to the EU is required once per year. This analysis, dated 8/14/2014, is attached to this report.
- 1.3 Records of the wet gas analysis of the gas coming in to the EU are required to be kept. This analysis, dated 8/14/2014, is attached to this report.

Compressor - The compressor is a Waukesha model, V-12 with no add on control device.

- 2.1 NOx emissions from this EU are limited to 85 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 emitted 61.68 tons per year based on a 12-month rolling time period as determined at the end of each calendar month as of October 2014.
- 2.2 The natural gas usage for this EU is limited to 23.5 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 used 17.6 million cubic feet per 12-month rolling time period as determined at the end of each calendar month as of October 2014.
- 2.3 A PMMAP for this EU is required and was approved 9/2007.

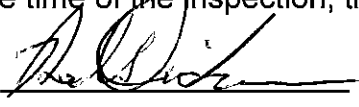
- 2.4 The facility is not allowed to bypass any control device for this EU for more than 200 hours per year. The compressor does not have an add-on control device. Therefore, this condition does not apply.
- 2.5 The facility must maintain a control device for this EU if used. The compressor does not 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 and 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 NO_x emissions records for this EU are required to be kept. These are being performed monthly in a satisfactory manner.
- 2.13 CO emissions records for this EU are required to be kept. These are being performed monthly in a satisfactory manner.
- 2.14 Stack parameters for this unit do not appear to have changed and appear correct.

Facility Wide

- 3.1 NO_x 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, NO_x emissions were 62.55 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 is required to comply with 40 CFR 60 Subpart KKK. This facility does not have equipment on site who's expressed purpose is to remove saleable natural gas liquids. Therefore, this condition does not apply.
- 3.4 The facility is required to comply with 40 CFR 63 Subpart HH. The facility currently tracks natural gas throughput for the dehy and is therefore in compliance.
- 3.5 The facility may be required to verify H₂S and sulfur content of the gas. The attached analysis contains this analysis and indicates it is sweet per department definition.

3.6, 3.7 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 