

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

N019943611

FACILITY: Merit Energy Company - Springdale 25		SRN / ID: N0199
LOCATION: Plagany Rd, COPEMISH		DISTRICT: Cadillac
CITY: COPEMISH		COUNTY: MANISTEE
CONTACT: Vicki Kniss , Environmental Affairs Manager		ACTIVITY DATE: 03/08/2018
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2018 FCE		
RESOLVED COMPLAINTS:		

2018 Full Compliance Evaluation

I Conducted a Full Compliance Evaluation (FCE) of this facility to determine compliance with the Air Pollution Control Rules and PTI 49-04B. At the time of the inspection the weather was overcast, 30 degrees F with NW winds at 10 mph. I did not detect any odors outside of buildings or observe any visible emissions. The facility is equipped with a flare, there was no visible flame and no visible plume or opacity. The flare serves as a back-up control to the Dehy, relief valves, tank vapor recovery unit, and. There were three process heaters (two operating) and 4 four tanks, 2 containing production water, and 2 crude oil. There were two dehydrators, only one was operating. Gas sweetening plant equipment has been removed and replaced with an H2S scavenger system utilizing "Petrosweet HSW 700 scavenger" fluid.

At the time of the inspection there was one V-12 Waukesha Compressor engine on-site and operating. The engine was equipped with a catalytic converter and AFRC. Operating data was as follows:

Compressor Engine Operating Data	
Parameter	Reading
Unit Number	202
RPM	835 rpm. (direct reading, note on panel states to add 75 rpm to this reading)
Oil Pressure	NA
CC Diff. Press.	NA
CC Inlet Temp.	931
CC Outlet Temp.	1003
AFRC O2 L	.818V
AFRC O2 R	.818V
AFRC Stepper pos. L.	1471
AFRC Stepper Pos. R.	1623

Each reading matched readings on the March 2018 log form that was available on-site and was within permit limits or consistent with normal operation. The catalytic converter is equipped with tubing and fittings for a differential pressure reading but a gauge is not permanently attached.

Facility records were requested prior to the inspection. The records were received on 03/13/2018 and indicate that:

- 12-mos rolling average NOx emissions were 4.58 tons, the NOx limit is 9.4 tons
- 12-mos CO emissions were 6.28 tons, the CO limit is 17.4 tons.
- The compressor engine did not operate without the add-on control device (catalytic converter).
- The catalytic converter appeared to be installed and operating properly.
- Compressor engine natural gas usage is monitored and recorded, records indicate usage for 2017 was 2.4 MMcf.
- A log of maintenance activities is maintained and was provided (see attached).

The dehy is potentially subject to 40 CFR 63 Subpart HH but may be exempt because natural gas flowrate to the dehy is less than 85,000 cubic meters per day OR benzene emissions are less than 0.90 Mg/yr. The Springfield 25 is an area source of HAP so no further review of Subpart HH compliance was conducted.

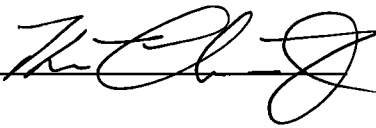
The compressor stack appears to meet the 10" max. diameter and 25' min. height requirement.

In accordance with PTI 49-04B there has been no reporting for this facility since the 4th quarter of 2008 since the sweetening plant was shut down in October 2008. The sweetening plant has been shut down but has not been completely separated from FG FACILITY since a vessel from the sweetening plant is being used for the H2S

scavenging process.

A soil remediation air sparge system was also observed on site.

Based on this Full Compliance Evaluation it appears that N1099 is currently in compliance with PTI 49-04B and the Air Pollution Control Rules.

NAME 

DATE 3-13-2018 SUPERVISOR 