

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

N139744946

FACILITY: Merit Energy Company - Mentor Gas Plant		SRN / ID: N1397
LOCATION: 745 E. Hughes Lake Rd., UNION CORNERS		DISTRICT: Gaylord
CITY: UNION CORNERS		COUNTY: OSCODA
CONTACT:		ACTIVITY DATE: 06/21/2018
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection		
RESOLVED COMPLAINTS:		

On June 21, 2018, I inspected the Mentor Gas Plant. I did not find any violations. This was an unannounced inspection.

When I arrived on site, there was nobody present. Therefore I was not able to review records on site. Merit personnel sent me copies of the required records by email a few days after my inspection.

The facility is covered by Permit to Install 479-96, originally issued to Oryx Energy Company, January 21, 1997.

Special Condition 13 of the permit (the first special condition listed) requires there be no visible emissions. There were no visible emissions from the plant during my inspection. This complies with the permit condition.

Special Condition 14 requires there be no visible emissions from the emergency flare. There were none, in compliance with the permit condition. However, the emergency flare was not operating at the time of my inspection, so there is no information about whether it would have visible emissions when in use.

Special Condition 15 requires monitoring and recording of operational and emissions data. I forgot to ask for this. The facility submits emission reports to AQD each year, including throughput and emission data, so it appears this data is being kept.

Special Condition 16 requires a Leak Detection and Maintenance Plan. I could not find a copy of this plan in our files. Merit supplied one at my request. It was approved September of 2014.

Special Condition 17 requires that the Leak Detection and Maintenance Plan be updated annually. I can't find evidence in the files that this is being done. I will use enforcement discretion and not start an enforcement action over this. I will remind Merit of this requirement and suggest that they keep records of any reviews and updates to the plan performed in accordance with this permit condition.

Special Condition 18 requires that exhaust gasses from the emergency flare be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 10 inches at an elevation of not less than 35 feet above ground level. The flare appears to meet these requirements.

Special Condition 19 limits simultaneous operation of two compressors on site to no more than 500 hours annually. Special Condition 20 requires a written record of this. A copy of the written record is attached. It indicates that there was no simultaneous operation of the two compressors during 2016, 2017, and 2018. This complies with the permit conditions.

Special Condition 21 limits simultaneous operation of two generators on site to no more than 500 hours annually. Special Condition 22 requires a written record of this. A copy of the written record is attached. It indicates that as of June 4 the annual total simultaneous operation of the generators was "1:30 hours," as three sessions of 30 minutes each. This complies with the permit conditions.

COMMENTS:

I arrived on site about 11:30 AM. The facility did not appear much different from earlier inspections.

The two generators, Generator Set A and B, are in a shed south of the office, near the main gate. Set A was operating at the time of my inspection. There was no opacity. Each set exhausts unobstructed vertically upward through a stack of approximately 4 inches diameter and 24 feet height.

The same building contains two of what are probably glycol dehydrators, based on tanks labeled as ethylene glycol. Each has a "flame arrested burner," according to specification plates. One is rated at

125,000 BTU per hour heat input, and exhausts through a stack of approximately 6 inches diameter, 30 feet height, ending in a T shaped cap. The other is rated at 150,000 BTU per hour heat input and exhausts through a stack of approximately 12 inches diameter, 30 feet height, ending in a T shaped cap.

The compressor building, along the east side of the facility, contains three engine-driven compressors. One is labeled as out of service. Vicki Kniss of Merit reported, via email, "Both refrigerant compressors are still in service and are capable of running; the "out of service" re-compressor is in the same building as both refrigerant compressors... The Cat 342 is the primary refrigerant compressor, the 1197 Waukesha is the back-up. The Cat 3306 re-compressor is totally out of service."

At the time of my inspection the Cat 342 was operating. It was at 706 RPM. Engine oil pressure was 40 PSI, compressor oil pressure was 60 PSI.

I noted "miscellaneous small drums and containers" in the compressor building. There were two drum on stilt style tanks labeled as ethylene glycol near the generator building, a drum-shaped tank labeled Methyl Alcohol east of that. Near the 400 barrel tanks described below, I saw a vertical drum tank perhaps 10 feet diameter and 10 feet high, labeled Methanol; a drum on stilts tank set up to dispense small amounts of its contents; it was labeled Magcor EG-50; and a few 55 gallon drums with labels I couldn't make out, also set up to dispense small quantities of their contents.

There are 4 x 400-barrel standard size oil field storage tanks on site, three of which are labeled as condensate and the fourth as produced water. There are two pressure-style tanks, probably for more volatile condensate products; one I guessed might be 60 feet long by 12 feet diameter, the second smaller.

There is a truck loadout which is for condensate, according to labeling. It has a vapor return hose.

Maintenance appeared fair. There is an accumulation of apparently scrapped oil field equipment on site.

NAME William J Rogers, L.

DATE 6/28/18

SUPERVISOR 