

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

N557343810

FACILITY: Consumers Energy - White Pigeon Compressor Station		SRN / ID: N5573
LOCATION: 68536 A ROAD, ROUTE 1, WHITE PIGEON		DISTRICT: Kalamazoo
CITY: WHITE PIGEON		COUNTY: SAINT JOSEPH
CONTACT: Bob Erdos ,		ACTIVITY DATE: 03/26/2018
STAFF: Dennis Dunlap	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

This was not a scheduled inspection. Bob Erdos is the contact person. The inspection began with a walkthrough of the facility. The facility is covered by ROP # MI-ROP-N5573-2018.

Plant 1 Auxiliary Bldg.

In the Plant 1 auxiliary building there is a natural gas-fired 2.68 MMBTU/hr. emergency generator (EUAUXGEN1). It is subject to 40 CFR Part 63 Subpart ZZZZ. The hours of operation are recorded each month and summed at the end of the year. The generator is on a maintenance schedule that includes testing the oil to determine when it should be changed.

There is a 2.5 MMBTU/hr. boiler installed in 1963 that heats a glycol/water mixture. Because of this glycol/water mixture it is exempt from the boiler MACT, DDDDD. This boiler is grandfathered.

There is a parts cleaner. The lid was closed, and rules were posted.

Plant 1

This building has four natural gas-fired compression engines., 1-5, 1-6, 1-2, and 1-1. The latter two are no longer used and are planned to be decommissioned. Engines 1-5 and 1-6 were not subject to NSR permitting requirements at the time that they were installed (after August 15, 1967). They are also not subject to 40 CFR Part 63 Subpart ZZZZ. Plant 1 also has 4 outside scrubbers used to remove water from natural gas. The collected liquid goes to distillate tanks 16 and 17. It appears that the scrubbers may be exempt by Rule 288(2)(d).

Plant 3

Plant 3 contains 4 natural gas-fired, lean burn, 4-stroke, spark ignited reciprocating engines, each with a 2-way catalyst for control of CO. These engines are labeled as 3-1, 3-2, 3-3, and 3-4. Engines 3-1 and 3-2 were running. The catalyst parameters for engine 3-1 were: catalyst diff. pressure 2.4; catalyst inlet temp. 742. For engine 3-2 the readings were: catalyst diff. pressure 1.6; catalyst inlet temp. 757. These parameters are within the allowed ranges. There are seven scrubbers inside the building for these engines and 4 outside. The distillate tank for these scrubbers is 3-7. These engines will be tested in April 2018 for CO and % CO reduction. This testing is for 40 CFR Part 63 Subpart ZZZZ.

Plant 3 Auxiliary Building

This building contains an 1,818 HP natural gas-fired emergency generator (EUEMERGGEN). It is subject to 40 CFR Part 63 Subpart ZZZZ and 40 Subpart Part 60 Subpart JJJJ. A stack test is required every three years. The last one was on March 28, 2017. This is a requirement from JJJJ. The hours of operation are recorded. The engine is on a maintenance schedule.

There is a 3 MMBTU/hr. natural gas-fired hot water heater (EUHEATER) that heats a glycol/water mixture (exempt from the boiler MACT).

There is a natural gas use limit. The boiler was within the use limit.

There is a cold cleaner. The lid was closed, and rules were posted. There is also a small enclosed sand blaster. This is exempt by Rule 285(2)(I)(vi)(B).

Plant 2

This building contains 4 natural gas-fired compression engines, 2-6, 2-5, 2-2, and 2-1. The engines are either grandfathered or exempt from needing a permit at the time of installation. There are 4 outside scrubbers for these engines. The distillate tanks for these scrubbers are 15 and 16. These engines are not subject to 40 CFR Part 63 Subpart ZZZZ.

Plant 2 Auxiliary Building

In the Plant 2 Auxiliary Building there is a natural gas-fired 2.68 MMBTU/hr. emergency generator (EUAUXGEN2). It is subject to 40 CFR Part 63 Subpart ZZZZ. The hours of operation are recorded each month and summed at the end of the year. The generator is on a maintenance schedule that includes testing the oil to determine when it should be changed.

The old hot water boiler has been removed and replaced by three separate 467,000 btu/hr boilers. They heat a water/glycol mixture and are exempt from the boiler MACT. The boilers are exempt from permitting by Rule 282(2)(b)(i).

There is a cold cleaner. it was in use at the time.

There are various oil, glycol, waste oil tanks, etc. at the facility. All meet a Rule 282 exemption.

Records Review

The hours of operation recording sheets for the emergency generators separate hours for maintenance checks and emergency use. Maintenance hours are limited to 100 hours per year. The engines were in compliance: Plant 3 generator- 32.19 hours in 2017; Plant 2 generator, 21.8 hours in 2017; Plant 1 generator, 27.2 hours in 2017.

The 12-month rolling total for natural gas usage for the Plant 3 heater was about 4,578.51 MSCF. This is in compliance.

There is a Continuous Parameter Monitoring System Plan for the 4 engines in Plant 3. There is also a PM/MAP for these engines which includes start-up and shut down.

The facility is keeping the facility-wide natural gas consumption rate per month as required in the source-wide table of the ROP.

Records were reviewed for the Plant 3 engines for pressure drop and catalyst inlet temp. It appeared that the readings were within the appropriate ranges. Engine 3-4 was down for maintenance in February 2018.

NAME Dennis Durdap

DATE 3/27/18

SUPERVISOR MD 3/28/2018