

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N604962666

FACILITY: RIVERSIDE - WARNER 36 CPF		SRN / ID: N6049
LOCATION: 1022 GORMEYS RD SEC 26, CHESTONIA		DISTRICT: Cadillac
CITY: CHESTONIA		COUNTY: ANTRIM
CONTACT:		ACTIVITY DATE: 04/21/2022
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY 2022 onsite site inspection. Note data review will be completed and reported independently. sgl		
RESOLVED COMPLAINTS:		

On April 21, 2022, AQD District Staff conducted a site visit for the Riverside Warner 36 (N6049), located at 1022 Gormeys Road, (SW, SE of Section 25, T31N R5W), Crestonia Township, Antrim County, Elmira, Michigan.

The purpose of the site visit was to confirm equipment onsite with respect to Permit to Install (PTI) No. 600-96. Records review was/will be conducted and documented in separate reporting.

The referenced site was previously inspected on January 10, 2018. No compliance issues were identified as part of the 2018 compliance evaluations.

FACILITY

The referenced facility is a NG compressor station located southwest of Elmira, Michigan. The Facility is reported to process NG from the Antrim Formation.

To get to the site, District Staff travelled west on M-32 from the office to Elmira, and Dobleski Road. Staff turned south on Dobleski Road, and traveled approximately 0.5-miles to Mangles Road. From the intersection of Dobleski and Mangles turn left and travel approximately 0.5 miles to Gormeys Road. Gormeys Road runs N-S, and the Facility is located approximately 1-mile south of the intersection with Mangles Road. Note that the Facility is located amongst active farmland, and is not fenced or gated.

At the time of the site inspection, the skies were overcast, temps in the low 40s and >5 mph winds. No plumes were visible at the time of the site visit.

MAERS reporting for the Facility indicated that the Facility reported not operating for the calendar year 2021.

REGULATORY

Permitting - PTIs issued for the Facility include the following:

PTI	Issued	Voided	Issued to
600-96	November 21, 1996	NA	O.I.L. Energy Corp.

Federal Regulations - The referenced facility does not process or store petroleum liquids, nor store them onsite and is therefore appears to not be subject to 40 CFR Part 60 (New Source Performance Standards AKA NSPS) Subparts;

- K, Ka or Kb (Storage vessels for Petroleum Liquids);
- KKK (Equipment Leaks of VOC from onshore NG Processing Plants);
- VV (Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry);

With regards to the existing engine(s) it appears that based on install dates for the Caterpillar 3516 LE would not be subject to NSPS Subparts IIII and JJJJ for Compression Ignition (CI) RICE and Spark Ignition (SI) RICE, respectively. District staff requested clarification regarding applicability of RICE NESHAP for both engines. But the requested information was not provided during report preparation.

Subpart OOOO would apply to onshore affected facilities that are constructed, modified or reconstructed after August 23, 2011. Based on available information it appears that the referenced subpart is not applicable at this time but that future changes may be subject to the referenced subpart.

With respect to 40 CFR Part 63 (Maximum Achievable Control Technology Standards A.K.A. MACT) the following Subparts may apply:

- Subpart HH (HAPS from Oil and NG Production Facilities)
- Subpart ZZZZ (Reciprocating Internal Combustion Engine aka RICE)

With respect to Subpart HH, the affected unit is believed to be the dehy unit. However, the facility is not subject to the subpart if it's average throughput is less than 85K cubic meters/day (3 MMscf/day) or average benzene emissions are less than 0.9 Mg/yr (approximately 1 ton/yr). A compliance determination has not been made with respect to this subpart, and at the time of report preparation AQD does not have authority to enforce the subpart.

With respect to Subpart ZZZZ, the company at the time of report preparation has provided no information indicating that the existing RICE would not be subject to the referenced subpart. A compliance determination has not been made with respect to this subpart, and at the time of report preparation AQD has been delegated authority to implement and enforce the subpart. However, at this time compliance determinations for Federal requirements under Subpart ZZZZ for Area Sources have not been made.

EQUIPMENT

Equipment associated with the site at the time of April 21, 2022, site inspection included the following:

EQUIPMENT	INSTALLATION DATE	Comment
Iron Sponge	Unk	Log sheet indicated that filter was changed on April 19, 2022.

400 BBL AST	Unk	Brine, with lined secondary containment. Needs to be pumped out
NG Compressor (skid GCS 1026) with CAT 3516 LE, RICE	1997	Log Sheet reports Make JGK/4 and Sn F10707
Dehydrator	1990	

Chart recorders and sales meters were noted onsite. Log sheets are maintained onsite, indicating general no operational issues for the month. Operational data noted at the time of the inspection included:

RPMs: 902

Engine inlet temp: 61

Oil temp: 59

SUMMARY

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The purpose of the site visit was to confirm equipment onsite with respect to Permit to Install (PTI) No. 600-96. Records review was/will be conducted and documented in separate reporting.

Equipment identified onsite are consistent with those identified during the 2018 site inspection. No compliance issues were noted at the time of the April 21, 2022, onsite inspection.

NAME _____

DATE _____

SUPERVISOR _____