

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Enervest, CHARLTON 11/12, VIENNA 18 CPF	SRN : N6082
Location : SW NE NW Sec 11 T30N R1W Brown Road	District : Gaylord
	County : OTSEGO
City : CHARLTON TWP State: MI Zip Code : 49735	Compliance Status : Compliance
Source Class : SM OPT OUT	Staff : Bill Rogers
FCE Begin Date : 4/14/2015	FCE Completion Date : 4/14/2016
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
04/14/2016	Scheduled Inspection	Compliance	Scheduled inspection and record review
02/12/2016	MAERS	Compliance	2015 MAERS, Check MAERS for any review comments

Name: William J Regan Jr

Date: 4/22/2016

Supervisor: SN

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

N608234295

FACILITY: Enervest, CHARLTON 11/12, VIENNA 18 CPF		SRN / ID: N6082
LOCATION: SW NE NW Sec 11 T30N R1W, CHARLTON TWP		DISTRICT: Gaylord
CITY: CHARLTON TWP		COUNTY: OTSEGO
CONTACT:		ACTIVITY DATE: 04/14/2016
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection and record review		
RESOLVED COMPLAINTS:		

On April 14, 2016, I inspected the Charlton 11/12 Facility. The facility was not operating at the time of my inspection. There was no compressor engine inside the compressor shed. The glycol dehydrator was still present but was not operating.

Geological Survey tells me this CPF was still active in their records as of April 1. I will keep track of this facility. Actions we should take differ depending on whether the facility is shut down permanently or whether I happened to catch them in the middle of an engine switch.

Dehydrator:

Permit 74-97A, Condition VI.1, requires showing compliance with NESHAP 40 CFR 63 Subpart HH by demonstrating that benzene emissions are less than approximately one ton per year. Other options are possible, but this is the means the operator has chosen to show compliance. GRI Gly-Calc results are attached indicating total non methane VOC emissions are estimated as 0.0247 tons per year. As benzene would be part of this, and as this is far less than one ton, this information is sufficient to show compliance with the permit and with Subpart HH.

The permit doesn't contain stack dimensions for the dehydrator. The still vent, estimating by eye, looked about two inches diameter and 12 feet high. The burner stack was perhaps six inches diameter and 16 feet high, with a flat cap.

EUENGINE:

As no engines are present, requirements to operate control equipment and to have a malfunction abatement plan are not currently applicable. A new engine will require a new MAP and possibly new control equipment, if and when a new engine is installed.

EUENGINE, Condition I.1, sets a NOx limit of 83 tons per year. The most recent 12 month total listed in emissions data, attached, indicates 56 tons per year. This complies with the emission limit.

Condition I.2 sets a CO limit of 7 tons per year. The most recent 12 month total listed in emissions data, attached, indicates 3.8 tons per year. This complies with the emission limit.

Condition IV.2 requires a fuel gas usage monitor. Emissions data, attached, contains fuel gas usage data, which indicates that a monitor was installed when the engine was operating.

Condition VI.2 and VI.5 require fuel gas monitoring and records. These are being kept. Example data is attached.

Condition VI.3 requires a maintenance log. Records for this are attached.

Condition VI.6 requires monthly and 12 month NOx emission records. These are being kept. Example data is attached.

Condition VI.7 requires monthly and 12 month CO emission records. These are being kept. Example data is attached.

Table FGFACILITY, Condition I.1, prohibits burning sour gas. The facility still included an iron sponge. This indicates that some of the gas produced had H2S in it, so sour gas is a concern. If the gas were

burned as fuel only after passing through the iron sponge, and if the iron sponge works properly, this should comply with the permit condition. Further investigation may be warranted if the facility returns to operation.

The facility did not include a brine tank at the time of my inspection. There was a tank smaller than the common 400 barrel size, inside a well maintained line berm. The tank was labeled "slop tank." The berm appeared well maintained but was nearly full of standing water.

MISCELLANEOUS:

The compressor shed still contained two 550 gallon drum on stilts tanks of lubricating oil, Multipurpose ISO and Conoco ElMar La 40; also a smaller tank of semi-synthetic motor oil SAE 40. There were several 55 gallon drums labeled as engine coolant.

NAME William J. Reynolds DATE 4/22/2016 SUPERVISOR SKJ