

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

N608334290

FACILITY: Chester 18 CPF		SRN / ID: N6083
LOCATION: SW SE SW SEC 18 T30N R02W, CHESTER TWP		DISTRICT: Gaylord
CITY: CHESTER TWP		COUNTY: OTSEGO
CONTACT:		ACTIVITY DATE: 04/14/2016
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection and records review		
RESOLVED COMPLAINTS:		

. On April 14, 2016, I inspected the Ward Lake Chester 18 CPF, operated by EnerVest Operating Inc. I did not find any violations as a result of my inspection.

Permit 73-97C, conditions for EUDEHY:

Condition 1.1 prohibits using stripping gas in the dehy. GRI Gly-Calc estimates and my conversations with Enervest personnel both indicate they don't use stripping gas in this facility.

Condition 1.3 concerns compliance with 40 CFR 63 Subpart HH. The company does not have to comply with the more stringent control and recordkeeping requirements of this subpart if they can prove exemption by showing the dehy is a relatively minor source of air contaminants. The company has chosen to do this by using GRI GLY-CALC (copyright to GRI) to demonstrate that benzene emissions are below 0.90 megagrams (approximately one ton) per year. This is one of the ways of proving the facility qualifies for exemptions which the EPA allows in Subpart HH.

According to GLY-CALC results total VOC emissions are 0.0059 tons per year. Benzene if present is a fraction of this, therefore benzene emissions are below 0.0059 tons per year, which is in turn below 0.90 megagrams per year. Therefore the company has proven the facility qualifies for the exemptions under Subpart HH.

Condition 1.5 requires keeping track of benzene emissions. The GRI GLY-CALC results provided are sufficient for this purpose.

Condition 1.7 requires the still vent be at most 2" diameter at a minimum height of 7 feet above ground level. The still vent appeared to meet this requirement.

The dehy was operating at the time of my inspection. It had no opacity except for some "steam." There were mild glycol odors downwind of the dehy.

EUENGINE1 and EUENGINE2

At the time I inspected the facility it had only one compressor engine installed. A statement from Wayne Cockrum, Principal Engineer, who is Enervest's consultant for this site, reports that EUENGINE2 has been removed. Therefore conditions pertaining to EUENGINE2 are no longer applicable.

Condition 2.1 sets a NOX limit of 9.5 tons per 12 month rolling time period for EUENGINE1. Emission information, attached, claims NOx emissions of 5.768 tons NOX per 12 month rolling average as of November, 2015, the most recent data available at the time I requested emissions data from this facility, at the end of December. This complies with the emission limit.

Condition 2.2 requires a Preventative Maintenance and Malfunction Abatement Plan. We have an approved plan in our files, received July 18, 2012. s for these engines. I did not find the PM-MAPs in our files. A previous inspection reports that we have an approved PM-MAP for this facility in our files. It appears we have lost the PM-MAP. I will send a letter to the company requesting a new copy.

Condition 2.3 limits how many hours the engines may operate without their control devices (if any). The engine installed in this facility does not have any add on control device.

Condition 2.6 requires a fuel gas monitor for the engines. I could not identify these during my

inspection. Condition 2.10 requires fuel consumption records be kept. These are included in the emission estimate data, attached.

Condition 2.8 requires maintenance logs. Maintenance records are attached.

Condition 2.11 requires monthly and 12 month rolling average NOx calculations. These are in the emissions estimate data, attached.

The facility included only one compressor engine, a medium-sized natural gas fired Caterpillar model. It was running at 1661 RPM. Engine oil pressure was 60 PSI, compressor oil pressure was also 60 PSI.

The engine was operating with no opacity except for some heat shimmer in the exhaust.

Other equipment:

I saw some fire control equipment. It appeared to be a large fire extinguisher; it wasn't diesel-powered.

The facility included one 400 bbl sized tank and a smaller tank within a berm. The berm appeared well-maintained. The smaller tank was labeled as a brine tank; the 400 barrel was not labeled. Both appeared to be piped to a disposal well nearby and neither had equipment for regular truck pump-out, so they were both probably brine tanks. The disposal well was labeled Pewinsky D2-18 SWD. SWD is salt water disposal.

A second well between the compressor shed and the brine tanks was labeled Pewinski D2-16, with permit number 41858. This has a "horse head" pump mounted, to move some liquid. However, I didn't see any oil storage tanks on site.

Near the compressor shed, sitting at ground level inside a metal pan which serves as a berm, was a orange-painted metal tank. Although orange tanks are commonly waste oil this one was piped to the engine which was inside the shed, and looked as if it might be a coolant tank.

Next to the glycol dehydrator was a drum on stilts style tank which had been labeled glycol at one point, although the label is now largely painted over. There is another drum on stilts tank nearby labeled methanol.

The dehy burner stack doesn't have any permit limits on dimensions. It is about 6 inch diameter and 18 feet high, with a flat cap. There appears to be a condenser at the base of the still vent. The still vent does meet its permit limits of 2 inches diameter and 7 feet high. There was some "steam" from this vent; this was the only opacity I saw on site. The dehydrator had mild glycol odors downwind.

Other drums and tanks on site included two drums at north side of the shed marked Ice Chek 7195; inside the shed, a drum Chevron Industrial Oil; and drum on stilts tanks for Northern Energy Semi-Synthetic Motor Oil, Multipurpose R&O Oil ISO, SAE 40 Oil, Waste Oil, and some unlabeled empty drums. The drum on stilts tanks were above wooden berm structures; the waste oil tank also rested in one of these.

Maintenance appeared to be acceptable. I didn't notice any leaks or stained soils that might indicate there had been leaks or spills in the past.

NAME William J Rogers L.

DATE 4/21/16

SUPERVISOR 