## DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

**ACTIVITY REPORT: Scheduled Inspection** 

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FACILITY: Merit Energy Company - Charlton 7 CPF		SRN / ID: N6089	
LOCATION: Sawyer Rd, JOHANNESBURG		DISTRICT: Cadillac	
CITY: JOHANNESBURG		COUNTY: OTSEGO	
CONTACT:		ACTIVITY DATE: 01/11/2017	
STAFF: Shane Nixon	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT	
SUBJECT: On-site inspection and record	ds review.	•	
RESOLVED COMPLAINTS:			

AQD staff traveled to Otsego County to perform an inspection of the Charlton 7 CPF. The purpose of the inspection was to determine the facility's compliance with Permit to Install No. 647-96. No facility personnel were present at the time of the inspection.

The facility is comprised of four heaters, one glycol dehydrator, a gas compressor powered by an electric motor, a flare, and seven storage tanks equipped with a vapor recovery unit. In 2009, a natural gas-fired compressor engine was removed and replaced with the electric motor. The volume of natural gas produced from the facility is low and the flare is used to burn the gas in lieu of compressing the gas into the sales pipeline. As a result of low gas production, the glycol dehydrator is not used resulting in zero emissions for the previous 12 months.

Carbon monoxide, volatile organic compounds, and oxides of nitrogen emissions are each limited to 89 tons per 12 month rolling time period. Emissions calculations submitted by Merit Energy indicates compliance with the emission limits.  $NO_x$  and CO emissions from the facility are very low due to the absence of a natural gas fired compressor engine. Based on the attached calculations,  $NO_x$  and CO emissions are typically between 0.02 and 0.11 tons per 12 month rolling time period. The highest VOC emissions occurred in September 2016 and was in compliance with the emission limit. During that time, VOC emissions were 0.12 tons per 12 month rolling time period.

HAP emissions are limited to less than 9 tons per 12 month rolling time period for individual HAPs and less than 22.5 tons per 12 month rolling time period for total HAPs. Total HAP emissions from the facility has been zero as a result of the glycol dehydrator not in operation.

As required by the PTI, records of fuel consumption, crude/condensate throughput to the tanks, monthly hydrocarbon liquids trucked, and maintenance logs were maintained. These records were available upon request (attached).

This facility is considered to be an opt-out source based on the emission limits contained in the Permit to Install. However, the true potential emissions of the facility would classify it as a minor source. Mr. Sean Craven, Merit Energy, is aware of the facility's status and indicated that a decision to void the permit or pursue a minor source PTI will be made by Merit Energy at a later time.

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