

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

N610423583

FACILITY: BREITBURN OPERATING LP - ELMER FUDD 1		SRN / ID: N6104
LOCATION: SW/4, NE/4, NE/4, T28N, R2E SEC 5, ELMER TWP		DISTRICT: Gaylord
CITY: ELMER TWP		COUNTY: OSCODA
CONTACT: Carrolann Knapp, Environmental Specialist		ACTIVITY DATE: 11/06/2013
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Fiscal Year 2014 Inspection.		
RESOLVED COMPLAINTS:		

**2014 Fiscal Year.**

Directions to site: County Road 612 to Granholm Road south. Go past Big Wolf Lake Road, go past Hermanson Road. Curve west. At the very sharp southerly curve continue straight. Do NOT curve south. Go straight and this road is Eastwood Road but it does not have a sign. Immediately to the south/left is the 2-track into N6104.

This Breitburn facility is permitted for two Caterpillar 3516 TALE lean burn compressor engine 1340 hp. Both reciprocating engines burn natural gas. Also on site are a glycol dehydrator, two brine tanks, and one methanol storage tank. This is an Antrim CPF.

The engines are subject to 40 CFR Part 63 Subpart ZZZZ. The glycol dehydrator is subject to 40 CFR Part 63 Subpart HH. This is an area source. The EPA has not delegated these Subparts to MI AQD and these Subparts were not reviewed.

At the facility, Gloria Torello and Becky Radulski of AQD met Rusty from Exteran. Rusty has responsibilities for running the engines. On site are two Caterpillar 3516 lean burn engines. Both engines operated during the site visit. No visible emissions or odors were noted from the engines. Neither engine has a catalytic converter. The engine stacks looked to be at least 16 inches in diameter and 34.5 feet above ground level.

One of the engines has an air/fuel ratio control (AFRC). The malfunction abatement plan (MAP) requires the replacement of the oxygen sensor on the AFRC after 90 -110 days of operation, or if the AFRC unit or lifetime sensor indicates need. The approved Malfunction Abatement Plan (MAP) shows one of the engines has an AFRC and the other engine does not have an AFRC.

Rusty described how there is a different schedule for changing an AFRC other than the schedule described in the MAP. On November 7, 2013 Torello sent Carolann Knap of Breitburn an email and asked about the AFRC maintenance. On 12/19/13 Torello spoke with Carolann and Carolann said she was assured by Breitburn's maintenance staff the AFRC maintenance follows the MAP.

The one glycol dehydrator on site serves both engines. The glycol dehydrator operated during the site visit. No odors were noted from the glycol dehydrator during this site visit.

The tank battery has two tanks and is lined with a black pit liner.

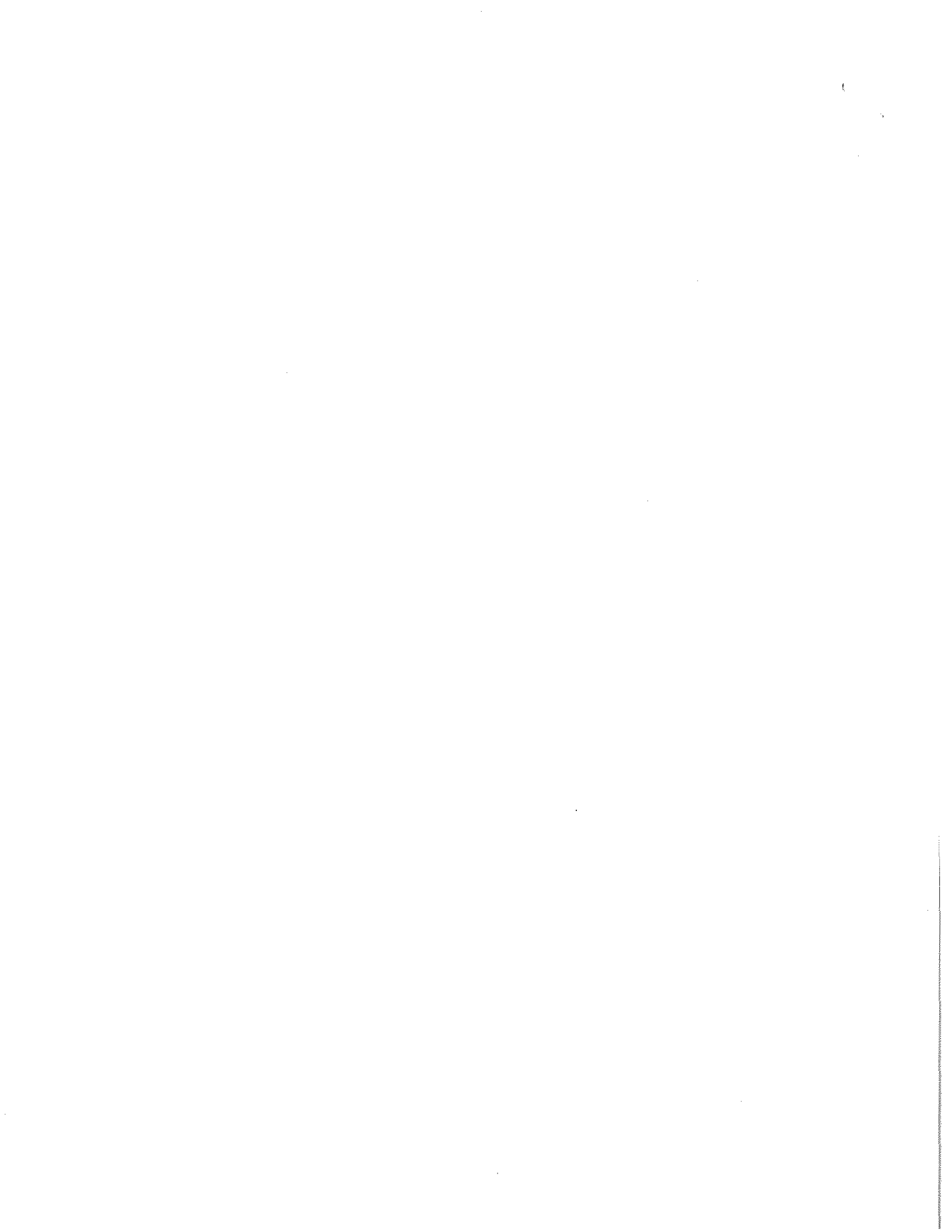
The special conditions (SC) of the permit are discussed below.

SC 1.1a and 1.1b. Records show NO<sub>x</sub> 12-month rolling emissions below 89 tpy, and CO emissions below 65 tpy. MAERS 2012 reported less than the permitted 89 tpy NO<sub>x</sub>, and 65 tpy CO.

SC 1.2. The AQD approved the MAP on July 29, 2013.

SC 1.3. Both engines are lean burn, and do not have a catalytic converter. One engine has an AFRC. The AFRC is not a control device and records of AFRC down time are not required.

SC 1.4. Both engines are lean burn, and do not have a catalytic converter. The AFRC is not a control device and records of AFRC down time are not required.



SC 1.5. The AQD has not requested testing to verify NOx emission factors.

SC 1.6. Natural gas usage is monitored.

SC 1.7. Records of calculations are kept and are available to the AQD.

1.8. Records of maintenance log are kept and available to the AQD.

1.9. The AFRC is not a control device and records of AFRC down time are not required.

1.10. Records of monthly fuel use records for each engine are kept. The permit does not limit fuel use.

1.11. Calculations of monthly and 12-month rolling NOx and CO emissions are kept and available to the AQD.

1.12. A visual evaluation estimated the engine stacks are a maximum of 16 inches in diameter, and at least 134 feet above ground level.

MAP

Records showing engine maintenance are on file and available to the AQD.

The AFRC has a lifetime sensor and records indicate it has not needed to be replaced.

The permittee has not had to re-synchronize the engine and the AFRC as the AFRC has not gone out of the normal range of 0-1% O2. The AFRC maintenance schedule is followed. Carolann said the AFRC sensor provides information on the percent life left in the AFRC. An AFRC cost approximately \$800.00.

NAME Glenn Inello

DATE 12-19-13

SUPERVISOR 