

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

N612828321

FACILITY: BREITBURN OPERATING LP. - LIVINGSTON 17		SRN / ID: N6128
LOCATION: NW SW SEC 9 T31N R3W, LIVINGSTON TWP		DISTRICT: Gaylord
CITY: LIVINGSTON TWP		COUNTY: OTSEGO
CONTACT: Carolann Knapp , Environmental Specialist		ACTIVITY DATE: 10/29/2014
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2015 Site Inspection.		
RESOLVED COMPLAINTS:		

**SRN: N6128, Name: Breitburn Livingston 17 CPF**

**Directions.** The facility is located in Otsego County, Livingston Township. From M-32 turn north on Murner Road, turn east on Parmater Road, turn north on Pyke School Road. The CPF is between Pyke School Road and Martindale Road.

**Application.** This is an Antrim gas facility with a "MOGA" permit from the mid-1990s.

**Permit.** On November 12, 1996 the AQD issued permit 686-96. This is an opt-out permit because the permit allows for 89 tons per year of CO, NOx, and/or VOC, and 9 tpy of an individual and/or 25 tpy total HAPs).

**This is a MOGA permit.** Because the engine specific emission factors are used to calculate emissions, an updated Appendix A will not be requested.

**MAP.** This is a MOGA permit. Because the engine does not have control, a Malfunction Abatement Plan will not be requested.

**MAERS.** The 2014 MAERS will be reviewed when it is received. The 2013 MAERS reported 8 tons CO, 9 tons NOx, and 2 tons VOC. The permit allows for 89 tpy of each.

**Records.** On October 29, 2014 the AQD requested records. On October 29, 2014 Breitburn submitted the records. A review of records shows the CO, NOx, VOC, and HAPs are below the permitted limits.

**MACTS.** 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 (minor for HAPs). The EPA has not delegated these Subparts to MI AQD and the Subparts were not reviewed.

**MACES.** Regulatory Info includes:

EPA Class is synthetic minor. Fee Category is blank. HAPs is <sup>synthetic</sup> minor, NOx is Synthetic Minor, and Torello added CO and VOC synthetic minor.

**Subject to includes:**

- 40 CFR Part 63 Subparts ZZZZ,
- 40 CFR Part 63 Subpart HH, and
- FESOP (SM Opt-outs and 208a Sources), and Torello added
- Permit (NSR) 686-96.

**Brochure:** The inspection brochure will be forwarded to the permittee with the site

inspection notes via email.

**Compliance.** A review of AQD files and MACES report generator show no outstanding violation.

**Inspection.** AQD staff met Mr. Dave Johnston of Breitburn at the facility during the site visit. Dave confirmed there is one engine on site, a Cat 399 with no control. The engine was operating during the visit. A heat shimmer was noted on the engine stack, but no visible emissions. Engine noise was noted. On site are a glycol dehydrator, and two tanks in a retained area. There is an iron sponge onsite. Dave said the iron sponge was added about 10 years ago because the gas has light H<sub>2</sub>S. An AQD permit is not required for an iron sponge. There are methanol and glycol tanks onsite.

There is notable erosion on the hillside upon which the facility sits. Torello shared this information with Andrea Sullivan, DEQ OOGM. Andrea said she would discuss the erosion with Breitburn staff.

**Permit 686-96 Special Conditions (SC):**

SCs 13, 14, 15. Records show the permitted emissions are below the permitted limit.

SC 16. The permittee keeps records of monthly fuel consumption in mmcf, and glycol circulated through the dehydrator, there are no permit limits on monthly fuel consumption or glycol circulated. The facility does not process crude/condensate, or truck hydrocarbon liquid.

SC 17. The permittee keeps records and makes records available to the AQD.

SC 18. The permittee consistently submits a MAERs report for this facility.

SC 20. The condition is not applicable because crude/condensate is not stored at the facility.

SC 21. The condition is not applicable because the engine does not have a control device.

SC 22. The condition is not applicable because gas is not fractionated at the facility.

SC. 23. AQD has not requested testing.

SC 24. Records received on March 10, 2015 show gas analytical data, hydrogen sulfide by length of stain tube as ND, or non-detect.

**Conclusions.** Based on the site visit, review of records, and the information above, AQD staff determines the permittee is in compliance with the conditions of permit 686-96.

NAME

Glenn Torello

DATE

3-10-15

SUPERVISOR

