

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

N612852934

<b>FACILITY:</b> BREITBURN OPERATING LP. - LIVINGSTON 17		<b>SRN / ID:</b> N6128
<b>LOCATION:</b> NW SW SEC 9 T31N R3W, LIVNGSTON TWP		<b>DISTRICT:</b> Gaylord
<b>CITY:</b> LIVNGSTON TWP		<b>COUNTY:</b> OTSEGO
<b>CONTACT:</b>		<b>ACTIVITY DATE:</b> 11/21/2019
<b>STAFF:</b> Becky Radulski	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> FY20 site inspection and records review		
<b>RESOLVED COMPLAINTS:</b>		

AQD Staff traveled to N6128 Breitburn Livingston 17 Central Production Facility (CPF), located in Elmira Township, Otsego County, for a scheduled inspection to determine compliance with PTI 686-96. This is an opt out permit.

### **LOCATION**

The facility is located in Livingston Township, Otsego County. From M-32, travel north on Murner Road 3 miles, turn east on Parmater Road. Travel 1 mile, then turn north onto Pyke School Road. The facility is on the east side of the road approximately 1/2 mile north of Parmater Road.

### **REGULATORY DISCUSSION**

PTI 686-96 was issued November 13, 1996 and is currently active. This is a MOGA permit, a specific engine identification was not provided in the application. The current engine, a Caterpillar 3516TALE (Unit #883), is the same engine and unit description as identified in previous inspection reports.

The engine is subject to 40 CFR Part 63, Subpart ZZZZ, which has not been delegated to MDEQ from EPA. The facility noted on the records that they are in compliance with Subpart ZZZZ regulations.

The dehy is subject to 40 CFR Part 63, Subpart HH, which also has not been delegated to MDEQ from EPA. The facility noted on their records that they are in compliance with Subpart HH regulations.

### **INSPECTION NOTES**

The facility consists of one building containing a lean burn Caterpillar 3516 engine with muffler, a glycol dehydration system, two small raised tanks labeled as triethylene glycol and methyl alcohol, a small contained tank farm, and an iron sponge (does not require a permit from AQD).

The engine was operating during the inspection, at 1025 RPM and 60 engine oil pressure. No visible emissions were noted.

The permit does not have exhaust stack requirements.

### **RECORDS REVIEW OF PTI 686-96**

Records were provided by Eric Hasso, HSE Advisor III, eric.hasso@mavresources.com, 989-

858-3212. Breitburn Operating is owned by Maverick Natural Resources.

**SC 13, 14, 15 EMISSION LIMITS:** The facility is limited to no more than 89 tons per 12 month rolling time period of carbon monoxide (CO), nitrogen oxides (NOx) and volatile organic compounds (VOCs); and no more than 9 tons per 12 month rolling time period for a single hazardous air pollutant (HAP) and no more than 22.5 tons per 12 month rolling time period for all combined HAPs. Based on records provided, 10.46 tons of NOx, 9.41 tons of CO and 2.51 VOC per 12 month rolling were emitted. No HAPS were emitted. These emissions are below the permitted limit.

**SC 16, 20 FUEL USE, MATERIAL TRACKING, DEHY CIRCULATION:**

Fuel use records are required and were provided, however there is no limit for fuel use. Natural gas usage is recorded on a continuous basis. The source uses approximately 2.5-3.1 MMcf per month.

Monthly crude/condensate throughput to the tanks (barrels) and monthly hydrocarbon liquid trucked (barrels) are required to be tracked. Records were provided indicating zero for each, crude/condensate and hydrocarbon are not processed at this site.

Glycol is circulated through the dehydrater at a rate of 0.22 gallons per minute. This site only processes natural gas from the Antrim Zone.

**SC 17 RECORD KEEPING:** The facility is required to complete calculations and make them available to AQD by the last day of the calendar month, for the previous calendar month. The records were kept and submitted to AQD as requested.

**SC 18 MAERS:** The facility is required to report annual emissions to MAERS. The 2019 submittal will be reviewed separately in the MAERS program, see MAERS for details.

**SC 19 PROCESS/OPERATIONAL RESTRICTIONS:** The facility is required to have a preventative maintenance / malfunction abatement plan (PM/MAP) for EUENGINE1. The source has an approved PM/MAP on file, with the approval letter dated November 10, 2011. Maintenance records were requested and provided. General maintenance was indicated on the maintenance log. The source is in compliance with this condition.

**SC 21 CONTROL DEVICE:** If the facility has a control device, they may bypass the control for no more than 48 hours per event, no more than 144 events per year. This site does not have added on control, therefore it is not subject to this condition.

**SC 22 40 CFR Part 60 Subpart KKK:** The facility must be in compliance with Subpart KKK. This site is not subject to Subpart KKK, therefore this condition does not apply.

**SC 23 TESTING/SAMPLING:** Testing is required if requested by AQD. AQD has not made this request.

**SC 24 GAS LIMITATIONS:** The facility may only process sweet gas. The facility confirmed they only process sweet gas and provided fuel analysis.

**MACES**

MACES was reviewed, and the information screen updated.

**COMPLIANCE DETERMINATION**

Based on the site inspection and records review, N6128 Breitburn Livingston 17 CPF is in compliance with the requirements of permit 686-96.

NAME \_\_\_\_\_

DATE \_\_\_\_\_

SUPERVISOR \_\_\_\_\_