DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

NIC	400	1252

1011001000		
FACILITY: TRENDWELL ANTRIM INC - VIENNA 16		SRN / ID: N6148
LOCATION: NE NW NE T30N R1E SEC 16, VIENNA TWP		DISTRICT: Cadillac
CITY: VIENNA TWP		COUNTY: MONTMORENCY
CONTACT:		ACTIVITY DATE: 04/21/2016
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2016 FCE.		
RESOLVED COMPLAINTS:		

2016 Full Compliance Evaluation (FCE) including site inspection and records review for Trendwell Energy Corporation (TEC) Vienna 16 CPF.

INTRODUCTION

I conducted an FCE including an on-site inspection and records review of the TEC Vienna 16 CPF to determine the facility's compliance with Permit to Install (PTI) No. 706-96A and the Air Pollution Control Rules. At the time of the inspection the weather was overcast, 50 degrees with light winds from the South. I did not observe any visible emissions or odors from the compressor engine stack. There were vapors visible from the dehy vent and mild odors. The site includes; an outdoor dehy, two tanks located in a containment area, one compressor building containing a single compressor and engine as well as the separators. This facility is permitted for, and previously contained, two compressors and a Caterpillar G398 engine (EUENGINE1) and G399 engine (EUENGINE2). EUENGINE1 has been removed. This change is reflected in the most recent MAP update from 4/16/2014.

COMPLIANCE EVALUATION

This facility has a dehydrator and PTI 706-96A lists the dehy but there are no requirements in 706-96A. The dehy was operating and it did not appear there was a condenser or flash tank. As noted above, there were visible vapors coming from the vent with associated odors.

FGENGINES – EUENGINE2 one Caterpillar 399HCTA. The engine has add-on controls. At the time of the inspection the engine was operating at 912 rpm and 57 psi oil pressure. These readings were consistent with those entered on the daily log sheet.

PROCESS/OPERATIONAL LIMITS

- 1.2 TEC is not allowed to operate the compressor unless a PM/MAP is submitted and approved by the AQD. The AQD approved the most recent PM/MAP update on 4/16/14.
- 1.3 Engines equipped with an add-on control device may not operate without the device for more than 200 hours per year. Records for 2014, 2015 and 2016 through March indicate the engines did not operate without the control devices.

EQUIPMENT and MONITORING

- 1.4 Add-on controls must be installed and operated in a satisfactory manner. Monthly records indicate the company is operating and maintaining the add-on control satisfactorily. Catalyst inlet and outlet temperatures are monitored and recorded daily. At the time of the inspection catalyst inlet temperature was 885 and outlet temperature was 966. These readings were consistent with entries on the daily log form and are within the operating parameters identified in the MAP.
- 1.6 Install, maintain and operate a device to monitor natural gas usage on a continuous basis. At the time of the inspection fuel usage was being monitored by an appropriate device.

TESTING

1.5 NOx and CO emissions are required to be verified by testing upon request of the AQD District Supervisor. At the time of the inspection the AQD had not made such a request.

RECORDKEEPING

- 1.7., 1.11. and 1.12. Calculate and maintain records of NOx and CO emissions. Recordkeeping submitted by TEC. indicates records of NOx and CO emissions are being maintained. The most recent 12 month rolling avg. emissions for EUENGINE2 (Cat 399, Unit 950) were 4.76 tons NOx and 8.16 tons CO. The monthly 12-month rolling avg. NOx and CO emissions were in compliance with the permit limits of 9.3 tpy NOx and 19.4 tpy CO for EUENGINE2.
- 1.8. A detailed log of significant maintenance activities is maintained and was submitted. There have been no changes to the permitted compressor engines.
- 1.9. Monthly records demonstrating the engine has not operated more than 200 hours without required add-on control. Based on the records provided (attached) the engine did not operate without the add-on control during the review period.
- 1.10. Monitor and record natural gas usage for each engine. The records provided indicate the 12-month rolling average natural gas usage for the review period was 37,286 Mcf for EUENGINE2. There is no limit on natural gas usage in the PTI but this data is used in the emissions calculations.

VIII STACK/VENT RESTRICTIONS - Stack parameters have not changed and the compressor engine stack appears to meet the parameters in the permit.

FGFACILITY – All process equipment at the facility including equipment covered by other permits, grandfathered equipment and exempt equipment.

TESTING and MATERIAL LIMITS

2.1., 2.2. Sweet gas is the only fuel allowed to be burned at the facility. The facility processes gas from the Antrim formation. Testing of gas composition for H2S has not been required at this time.

40 CFR 63 Subpart ZZZZ

TEC has submitted the required initial notification for EUENGINE 2 which is an area source under the MACT.

CONCLUSION

The 2015 MAERS report for this facility has submitted and reviewed.

Based upon the on-site inspection and records review, AQD staff concludes that the facility is currently in compliance with Permit to Install No. 706-96A and applicable state and federal regulations.

NAME