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

FACILITY: WARD LAKE ENERGY, CHARLTON 21 CPF		SRN / ID: N6180
LOCATION: T30N R1W SEC 21, GAYLORD		DISTRICT: Gaylord
CITY: GAYLORD		COUNTY: OTSEGO
CONTACT:		ACTIVITY DATE: 01/14/2015
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: 2015 Site Inspection	in.	
RESOLVED COMPLAINTS:		

SRN: N6180 Name: Ward Lake Energy, Charlton 21 CPF

Please note, SRN N7204 and voided permit 269-02 issued to Ward Lake Energy are a duplicate files for the Chester 21 CPF in Otsego County. Ward Lake Energy's Chester 21 is covered under AQD's active SRN N6180 and permit 3-97B.

Directions. The facility is located in Otsego County, Charlton Township. From M-32 in Johannesburg, drive past the cemetery. The CPF access road is immediately south of the cemetery. Turn east and drive about ½ mile to the CPF.

Application. This is an Antrim gas facility with a "MOGA" permit originating in the mid-1990s. In 2006 AQD received permit application 3-97B. The application included one CAT 3508 compressor engine, and one gas dehydrator.

Permit. On March 16, 2006 the AQD issued permit 3-97B. The permit includes specific limits for the engine in EUENGINE, but there is not a glycol dehydrator table. The permit includes source wide limits in FGFACILTIY for all equipment at the site and limits emissions of both NOx and CO to 39 tpy. This is a true minor facility.

Site visit. The engine operated during the site visit. There were no visible emissions from the compressor engine stack. The engine muffler is outside the building and horizontal to the ground and the end of the stack extends above the peak of the building, but not by much. Permit 3-97B limits the engine stack to a maximum of 10 inches in diameter and a minimum of 19 feet above ground level. By visual estimate, the stack meets the stack limits. On site and outside there are two tanks in a retaining area, and a glycol dehydrator. A Ward Lake employee named John was onsite to change a chart which measures cubic feet of gas. John described the engine as a Cat 3508 which is consistent with the application and permit. The compressor engine does not have a catalytic converter.

MAP. Permit 3-97B required a MAP. On July 3, 2008 AQD approved a MAP for the facility. The engine does not have a catalytic converter. On 6/24/2008 Torello, AQD, wrote a note on the MAP: tx w/ Wayne Cockrum, Control AFRC. The records show ongoing engine maintenance and repairs.

MAERS. This is a minor permit and MAERS was not requested.

Records. On 1/6/15 AQD requested records, and AQD received records on 1/7/15 and 1/20/15. The permit requires records of gas usage, but does not limit gas usage. The records include gas usage. A review of records shows the NOx 12-month rolling emissions were at a high in November 2014 at 8.486 tons (39 tpy permitted), and CO 12-month rolling emissions were at a high in November 2014 at 6.854 tons (39 tpy permitted). Permit 3-97B also has NOx and CO limits in pounds per hour with testing as the demonstration of compliance. AQD has not requested the testing.

MACTS. The engine is 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:

Regulatory Summary:

- HAPs is marked minor, and Torello added:
- NOx minor, and
- CO minor.

EPA Class is marked minor, and the CMS box is not checked.

To Subject To was add:

- 40 CFR Part 63 Subparts ZZZZ,
- 40 CFR Part 63 Subpart HH, and
- Permit (NSR) 3-97B.

Brochure: The inspection brochure will be forwarded to the permittee with the site inspection notes via email.

Conclusions. The facility is in compliance with the conditions of permit 3-97B.

Copy: SRN N7204