

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

N618530632

FACILITY: ANTRIM DEVELOPMENT CORP - TOWER		SRN / ID: N6185
LOCATION: T29N R4W SEC 10, HAYES TWP		DISTRICT: Gaylord
CITY: HAYES TWP		COUNTY: OTSEGO
CONTACT: MICHAEL MESBERGEN , ENGINEER		ACTIVITY DATE: 08/07/2015
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection and record review		
RESOLVED COMPLAINTS:		

On August 7, 2014, I inspected the Tower Facility, off Hayes Tower Road, Hayes Township, Otsego County. I didn't find any violations. The facility is covered by Air Use Permit 739-96.

Permit Conditions:

Permit 739-96, Special Condition 13, sets Carbon Monoxide, Nitrogen Oxides, and VOC emission limits of 89 tons each. Emission estimates, attached, claim 12 month time period emissions of 9.05 tons CO, 7.54 tons NOx, and 1.03 tons VOC. This complies with the permit.

Special Condition 14 sets HAP limits of 9 tons of an individual HAP or 22.5 tons of all HAPs combined. HAPs are VOCs, and total VOC emissions were about 1 ton, so I deduce HAP emissions were within limits.

Special Condition 16 requires measuring monthly fuel consumption and the glycol circulation rate in GPM. This information is in the data provided by the company, attached. This condition also requires recording oil and/or other hydrocarbon liquid throughput, but the facility does not produce any. Therefore that part of the condition is not applicable.

Special Condition 17 requires keeping reports of oil and gas processed per month and providing that information on request. This information is included in the data provided by the company, attached.

Special Condition 18 requires reporting emissions to the Department's emission inventory. The company did this.

The facility is subject to NSPS HH for the glycol dehydrator. Calculations provided by the company indicate emissions from the dehydrator of 0.031 tons VOC per year. Glycol dehydrators with less than 0.90 megagrams (approximately one ton) of benzene emissions per year are exempt from NSPS HH. Although the company did not specifically claim this exemption, benzene is a VOC and VOCs from the dehydrator were well under 1 ton. I conclude they qualify for this exemption.

Inspection:

The facility sign reads as Antrim Development Corp, Emergency 616-941-4557, Hayes Twp/ Otsego Co , Tower Central Production Facility, Location: Part of NW/4 Section 10 T29N - R4W.

The facility includes one large comperssor engine fired with natural gas. The engine has no catalytic oxidizer. It was running at the time of my inspection. I didn't find any unit numbers on the engine. It was running at 1047 RPM. Engine oil pressure was 63 PSI, compressor oil pressure was 57 PSI, engine coolant temperature was 208 degrees f.

The engine exhaust leaves the building through the side. It goes to a horizontal muffler with an elbow downstream of the muffler directing the exhaust unobstructed vertically upward. Elevation of the exhaust was approximately 14 feet. This is quite low but the permit doesn't set a minimum height. Diameter appeared to be about 12 inches. There was no opacity in the exhaust.

There was one 400-barrel sized tank in a lined berm. It appeared to be a brine tank.

There is a glycol dehydrator in a separate shed near the compressor shed. It was operating at the time of my inspection. It had no opacity except for wisps of steam. The burner vent was about six inches diameter, perhaps 20 feet high, with a flat cap. The still vent was emitting much "steam." When looking

toward the sun through the plume (which is not proper for judging opacity levels) I could see slight opacity in the plume other than the steam, a slight bluish haze after trail-off. There was a moderate glycol odor near the dehydrator. The still vent was about 1.5 or 2 inches in diameter at an elevation of about 14 feet above ground level.

The builder's plate on the dehy burner gave its construction date as 1990. The plate had the number 125M stamped on it. This may have been the burner capacity; 125,000 BTU per hour is a common burner size for glycol dehydrators in this area.

Other than the brine tank, I saw various other small tanks on site. Inside the compressor shed I saw two 300 gallon drum on stilt style tanks, one labeled as engine oil and one as industrial oil. There was a larger tank on the ground. It had a funnel in its top. It appeared to be a waste oil tank. There were three 55 gallon drums in an area marked "Used Antifreeze Here" and a 55 gallon drum of "Techni-Hib" (a rust inhibitor).

Near the dehy shed I saw one 300 gallon drum on stilts style tank marked as triethylene glycol.

I noted some drums on the ground. There were some pump jacks, pipes, other unused equipment and miscellaneous junk on site. Maintenance appeared fair. I didn't notice any odors on site.

Maintenance appeared fair. There was some rust on the brine tank. There were several other small tanks, pipes, and such on site which appeared not to be connected to anything, so most likely are just being stored here.

NAME

William J Rogers Jr.

DATE

8/17/2015

SUPERVISOR

