

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

N618924978

FACILITY: MUSKEGON DEVELOPMENT, Lower Chub Lake/Viking Lake		SRN / ID: N6189
LOCATION: T29 N R2W SEC 18, CHESTER TWP		DISTRICT: Gaylord
CITY: CHESTER TWP		COUNTY: OTSEGO
CONTACT: MICHAEL MESBERGEN, ENGINEER		ACTIVITY DATE: 04/22/2014
STAFF: Gloria Torello	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2014 FCE.		
RESOLVED COMPLAINTS:		

N6189 Muskegon Development, Lower Chub and Viking Lake Central Production Facility.

Directions. The facility is located in Otsego County, Chester Township. From Old State Road turn south onto Lower Chub Lake Road, travel approximately $\frac{3}{4}$ mile, the facility is on the right and there is a sign identifying the site.

Although there are two CPFs, the site is considered one facility. Facility is on AQD's opt-out list.

Application. This is an Antrim gas facility with a "MOGA" permit from the mid-1990s. The application included the Lower Chub/Viking Lake Facilities which are two central production facilities located at the same geographic location. **Application 743-96** included:

- two "clean or catalytic" compressor engines with 500 and 700 HP,
- one "naturally aspirated" compressor engine with 500 HP,
- two "reboiler-glycol" with 125 Mbtu/hr,
- two "dehydrator" with 0.67 gmp.

Permit. **Permit 743-96** was issued on December 18, 1996. The permit application includes two engines which are described in Table 2 as:

- two clean/catalytic, and
- one naturally aspirated.

*On **May 25, 2007** the permittee sent AQD a **letter**. A review of the file shows no response from AQD to the May 25, 2007 letter. The letter requested a change to the permit's Appendix A and "proposed emission factors...for the revised Appendix A..." including:

- Cat 398 w/ cc: NOx 0.132 and CO 0.278, and
- Cat 3512: NOx 0.222 and CO 0.251.

MAP. On March 10, 2010 the AQD approved the malfunction abatement plan (MAP). The **MAP** includes three CAT engines:

- 398 rich burn with catalytic converter and AFRC,
- 3406 rich burn, and
- 3516 lean burn.

MAERS. The **2013 MAERS** included these emission units:

- Cat 3512LCTA - LOWER CHUB LAKE,

- Cat 3406TA - LOWER CHUBB,
- Cat G3406TA Engine - Viking Lake.
- GLYCOL DEHYDRATOR Lower Chub

*The 2013 MAERs used "emission basis other" for the engine emission factors and included no attachment describing *other*. Future MAERs to include an emission basis. (The May 25, 2007 proposed emission factors.)

*The 2013 MAERs reported NOx emissions were 102 tons which exceeds the permitted annual NOx emissions from the facility of 89 tpy.

*As described above, there is a discrepancy which AQD needs to address regarding engine identification among:

- **Permit 743-96,**
- **the permittee's letter of May 25, 2007,**
- **MAP,** and the
- **2013 MAERs.**

*The MAP needs to be updated to accurately include the emission units (engines) onsite.

On March 27, 2013 Torello sent Mike Mesbergen, N6189, an email requesting records to show compliance with the MAP. AQD received the records on May 23, 2014.

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:

Regulatory Summary:

- NOx is marked Synthetic Minor and HAPs is marked minor.

Subject to:

- 40 CFR Part 63 Subparts ZZZ,
- 40 CFR Part 63 Subpart HH, and
- FESOP (SM Opt-outs and 208a Sources)

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

Inspection.

During the site visit all three engines and the two glycol dehydrators operated. No visible emissions were noted. There was a slight odor from the glycol dehydrators. The two facilities are within one fenced area. Each engine is in its own building. Each glycol dehydrator is in its own building. The tank retaining areas had standing water-the spring melt was in progress. The permit has no stack conditions.

The fenced area is being used as outdoor storage for what appeared to be old equipment including pipes and a dismantled engine which was partially buried in snow.

The Lower Chubb facility is to the north and two engines, and two large tanks in a retaining area.

The Viking Lake facility is to the south and has one large engine with a catalytic converter. Torello could not find the clip board with the daily readings of catalytic inlet and outlet temperature. The MAP requires daily recordkeeping of the cc in/out temps.

*Follow-up needed.

NAME Gloria Torello DATE 12-1-14 SUPERVISOR [Signature]
for
4-22-14