

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N623365271

FACILITY: Lambda Energy Resources LLC - Kalkaska F 24		SRN / ID: N6233
LOCATION: 500 SMITH LAKE RD, KALKASKA		DISTRICT: Cadillac
CITY: KALKASKA		COUNTY: KALKASKA
CONTACT:		ACTIVITY DATE: 11/01/2022
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2023 FCE.		
RESOLVED COMPLAINTS:		

2023 Full Compliance Evaluation: N6233 Lambda Energy LLC Kalkaska F 24, Kalkaska County

I conducted a Full Compliance Evaluation (FCE) of the Kalkaska F 24 to determine compliance with Permit to Install number 101-97 and the air pollution control Rules.

This facility is located down a long driveway east from Smith Lake Rd. which is a seasonal Rd. The entrance to the plant was gated so I walked down the long driveway into the site. The facility appeared to be shut in, none of the equipment was operating. The weather was clear, 62 degrees F with light wind from the Southwest. At the time of the inspection the following equipment was observed on site:

- Four 400 bbl. AST's with vapor recovery and one blow-down tank.
 - One Ajax engine/compressor with no control (Unit 615).
- One small glycol dehydrator located outdoors.
 - Three heaters, none of which appeared to be operating.

SC 13. Source-wide CO, VOC and NOx emission limits of 89 TPY each. Company emission calculations for the period from October 2021 through August 2022 indicate the plant has not operated, though the tanks have been in use. As a result some VOC emissions have been calculated. The most recent 12 month rolling time period VOC emissions were 0.255 tons per year.

SC 14. Maintain HAP emissions below Major source thresholds. As indicated by the total VOC emissions, HAP emissions are less than 10 tons per year.

SC 15. Monthly emission calculations based on a 12-month rolling time-period. The permittee maintains spreadsheets with monthly and 12-month rolling calculations of CO, VOC, NOx, SO2 and PM10. When operating, emissions factors from the engine manufacturers data sheet are used in the calculation, which is acceptable. The emission factors from Appendix A are not used.

SC 16. a. Monthly fuel consumption is monitored and recorded on the Engine Specification Calculation Spreadsheet record as "Fuel Usage." There is no limit on Fuel usage. There was no fuel usage during the review time period.

b. Tank thru-put of crude is monitored and recorded on the Monthly Emissions Summary records. There is no limit on tank thru-put. The records indicate the 12-mos rolling time period tank throughput was 4478 barrels in August 2021.

c. Monthly crude oil trucked is monitored and recorded on the Monthly Emission Summary records. There is no limit on the amount of crude oil trucked.

d. The glycol circulated thru the dehydrator is reported in gpm. This is a constant flow in gpm and not an accumulative number for an annual limit. The gpm is used in GRI Gly-Calc emission calculations.

SC 17. The monthly reports are maintained, and examples were provided to AQD.

SC 18. The MAERs is reported annually and was audited on 4/14/22.

SC 19. When applicable, maintenance records are maintained based on past reviews.

SC 20. The tanks are equipped with a vapor recovery system that was not operating at the time of the inspection.

SC 21. This facility has a small rich burn engine that is not equipped with catalytic converters; Therefore, there is no by-pass of pollution control equipment to record.

SC 22. This facility is not subject to Subpart KKK.

SC 23. The AQD has not requested stack testing to verify CO, VOC, NOx, or HAPs.

SC 24. Gas analysis not requested.

Based on the current operating status of the plant and review of equipment on-site, it appears that the facility is currently in compliance with PTI 101-97 and the air pollution control rules.

NAME



DATE

SUPERVISOR
