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

N623432894

FACILITY: Merit Energy Company - Mancelona B		**SRN / ID:** N6234
LOCATION: Sand Lake Rd, MANCELONA		**DISTRICT:** Cadillac
CITY: MANCELONA		**COUNTY:** ANTRIM
CONTACT: Vicki Kniss ,		**ACTIVITY DATE:** 01/07/2016
STAFF: Rob Dickman	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Scheduled inspection of this opt-out source		
RESOLVED COMPLAINTS:		

Inspected this opt out source per Permit to Install (PTI) number 102-97A. Prior to entering the facility, no odors or visible emissions were noted. GPS Coordinates, 44.861436, 85.925824.

Equipment on site included:

One large Ajax compressor, uncontrolled, Unit 622 (Engine 1)
One small V-8 compressor, uncontrolled, Skid 201-869 (Engine 2)
One exempt (<952 bbl) 200 bbl AST, labelled "Blow Down"
Two process heaters, one of which was not in operation

Engine #2 appears to have catalytic control as there is a box to contain a catalyst installed at the exhaust of the engine. However, there is no catalytic element in the box, the engine is uncontrolled.

Following are the findings of the inspection by permit special condition. All required records were reviewed and some are attached to this report.

FGENGINES

EMISSION LIMITS

1.1a-d NOx emissions from Engine 1 are limited to 34 tons per year based on a 12-month rolling time period determined at the end of each calendar month. NOx emissions from November 2014 to November 2015 were 27.4 tons per year based on a 12-month rolling time period determined at the end of each calendar month. CO emissions from Engine 1 are limited to 20 tons per year based on a 12-month rolling time period determined at the end of each calendar month. CO emissions from November 2014 to November 2015 were 3.13 tons per year based on a 12-month rolling time period determined at the end of each calendar month. The facility was asked to check NOx emissions as they seemed comparatively low for an uncontrolled engine. The facility responded that the age and inefficiency of the engine contributed to the low emissions numbers.

NOx emissions from Engine 2 are limited to 49.8 tons per year based on a 12-month rolling time period determined at the end of each calendar month. NOx emissions from November 2014 to November 2015 were 32.94 tons per year based on a 12-month rolling time period determined at the end of each calendar month. CO emissions from Engine 2 are limited to 20 tons per year based on a 12-month rolling time period determined at the end of each calendar month. CO emissions from November 2014 to November 2015 were 2.31 tons per year based on a 12-month rolling time period determined at the end of each calendar month.

PROCESS/OPERATIONAL RESTRICTIONS

1.2 This facility is required to have an approved malfunction abatement plan. The plan for this facility was submitted on March 31, 2009 and was approved on April 30, 2009. A review of maintenance records indicates compliance with this MAP.

1.3 The facility is required to keep records of when the engine is run without the add-on control device. Neither engine at the facility is controlled.

DESIGN/EQUIPMENT PARAMETERS

1.4 The permittee shall not operate any engine that contains an add-on control device unless that device is installed, maintained, and operated in a satisfactory manner, except as specified in SC 1.3. Neither engine at the facility is controlled.

TESTING/SAMPLING

1.5 Testing to verify NOx and CO emissions may be required. As of the date of the inspection, this testing has not been requested and is not recommended at this time.

MONITORING

1.6 The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor the natural gas usage for the engine on a continuous basis. This device is installed and appears to be operating correctly.

RECORDKEEPING / REPORTING

1.7 Required emissions calculations are to be completed by the facility by the last day of the calendar month for the previous calendar month. The calculations appear correct and were available in a timely manner.

1.8 This facility is required to record maintenance activities pursuant to the MAP. This appears to have been completed in a timely and correct manner.

1.9 The facility is required to keep records of when the engine is run without the add-on control device. Neither engine at this facility is controlled.

1.10 The permittee shall keep, in a satisfactory manner, monthly fuel use for the engine. These records are being kept and were made available in a timely manner.

1.11 The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period NOx emission calculation records for the engine. These records are being kept and were made available in a timely manner.

1.12 The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period CO emission calculation records for the engine. These records are being kept and were made available in a timely manner.

STACK/VENT RESTRICTIONS

1.13a,b Stack parameters at the facility do not appear to have been modified and appear correct.

PERMIT DATES

1.14 The facility is required to have installed a natural gas monitoring device within 60 days of permit issuance. This device is installed at the time of the inspection.

1.15 The minimum stack height is in effect within 60 days of permit issuance. See item 1.13a,b.

<u>FGFACILITY</u>

MATERIAL LIMITS

2.1 The facility is required to burn only sweet natural gas at this facility. Natural gas consumed at this facility is pulled from sweet formations. A gas analysis dated 8/31/2015 indicated non-detectable H2S concentrations.

TESTING/SAMPLING

2.2 Verification of H2S and/or sulfur content of the natural gas burned in at the facility may be required upon request. Natural gas consumed at this facility is pulled from sweet formations. A gas analysis dated 8/31/2015 indicated non-detectable H2S concentrations. Requesting further analysis is not recommended at this time.

This facility is in compliance with their current air permitting.

NAME _____ DATE 1/11/16 SUPERVISOR _____