

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

N624543258

FACILITY: ANR PIPELINE COMPANY WINFIELD DEHY PLANT		SRN / ID: N6245
LOCATION: 10680 N GREEN RD, HOWARD CITY		DISTRICT: Grand Rapids
CITY: HOWARD CITY		COUNTY: MONTCALM
CONTACT: Brad Stermer , Sr. Environmental Specialist		ACTIVITY DATE: 02/06/2018
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY'18 on-site inspection to determine the facility's compliance status with PTI No. 125-97 and any other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

On February 6, 2018 AQD staff Chris Robinson (CR) conducted a scheduled announced on-site inspection of the ANR Pipeline Company Winfield Dehydration Plant (Winfield, SRN N6245) in Howard City, Michigan. Records were reviewed remotely from the Woolfolk Compressor Station in Big Rapids, MI (SRN B7220, CA_B722043281) on February 6, 2018. The onsite inspection was conducted on February 13, 2018.

The Winfield dehydration Plant is located at 10680 North Green Road, in Howard City, Michigan. AQD staff CR arrived at this location at approximately 1:00 am on Tuesday February 13, 2018 to conduct an on-site scheduled announced inspection to determine the facility's compliance status with Permit to Install (PTI) No. 125-97 and any other applicable air quality rules and regulations. The Winfield dehy facility is typically an unmanned facility, therefore a meeting with Mr. Brad Stermer, ANR Sr. Environmental Specialist, was arranged. CR provided Mr. Stermer with proper AQD credentials. Mr. Stermer provided records on February 6, 2018 and a tour of the facility as well as pertinent information during the on-site inspection conducted on February 13, 2018. No visible emissions or odors were observed.

Weather conditions on February 13, 2018 were approximately 25°F overcast with south-southwest winds at approximately 8mph. No odors or visible emissions were observed.

Facility Description

The purpose of the Winfield Dehy Plant is to remove impurities from natural gas as it's withdrawn from the underground storage reservoirs. The natural gas is contacted with triethylene glycol in an absorption tower to remove moisture in order to meet pipeline dew point specifications. In addition to moisture, the glycol absorbs hydrocarbons from the gas. The rich glycol from the tower passes through a flash tank where light hydrocarbons are removed. The rich glycol then goes to the regeneration still where the moisture and glycol are separated by distillation. Hydrocarbons are also removed from the glycol. The regenerated glycol is then cycled back to the tower for reuse.

The Volatile Organic Compounds (VOC) / Hazardous Air Pollutants (HAP) emission points are the flash tank and the still. The regenerator still emissions are controlled by a glycol cooled condenser.

PTI No. 125-97 Compliance Evaluation

Permit to Install (PTI) no. 125-97 is an opt-out permit limiting the facility's VOC and HAP emissions. The facility is subject to the emission limits per **Special Conditions (SC) no. 13 and 14**.

Pollutant	Limit	Calculated	Below Limit?
VOC	323 lbs./day	*1.6 lb/day Max in January 2018 (26.4 total Tons for January 2018)	Yes
	30.3 tpy (12-month rolling)	0.064 tons	Yes
HAP (Individual)	9 tpy (12-month rolling)	0.007 tons	Yes
HAP (Aggregate)	22.5 tpy (12-month rolling)	0.026 tons	Yes

* Records were provided only for the months that the dehydration plant operated.

Special Condition no. 15 allows the AQD to request verification of VOC and/or HAP emission rates. Stack testing has not been requested due to the dry nature of the gas at this field.

Special Conditions no.16-21 and 27:

The glycol dehydrator's regenerative still is equipped with a condenser that is operated with an exhaust temperature of less than 115°F which is monitored continuously at the Woolfolk station. The exhaust temperature on February 6, 2018 was 15°F, which Mr. Stermer indicated is indicative of the average operating temperature for this facility. Exhaust temperatures are recorded on a daily basis, which are based on hourly averages. The facility does not have a temperature display on-site, therefore temperatures were not collected during the on-site visit conducted on February 13, 2018.

The glycol dehydrator is also equipped with a flash tank. Exhaust gases from the flash tank and condenser are discharged vertically to the ambient air. Stack dimensions were not explicitly measured but appeared to meet the permit requirements of having a maximum diameter of 3-inches and height of not less than 24-feet above ground level. Per discussions with Mr. Stermer, both the flash tank and condenser are operated at all times that the glycol dehydrator is operated.

Special Conditions no 22-26 only apply to thermal oxidizers, which the facility does not have at this time. .

Special Condition no. 28 limits the glycol dehydrator to 4,500 hours of operation per year based on a 12-month rolling time period. Records were provided and are attached. Based on these records the glycol dehydrator operated for a total of 827.8 hours from March 2017 through February 2018.

MAERS

The attached MAERS reports were completed on-time and as required by the facility and reviewed by CR. No changes were made to the database.

NESHAP 40CFR Part 63 Subpart HHH

The facility is not subject to the Natural Gas Transmission and Storage Facilities MACT for Glycol Dehydrators (Subpart HHH) because it is not a major source.

Consent Order

The previous inspection report (8N624526470) noted an active consent order (CO-11-1998), which CR discussed with Mr. Stermer. A review of AQD's records indicate that the consent order was terminated in 2000. CR provided a copy of the termination letter to Mr. Stermer.

General PTI for Soil Remediation System

The facility also retains a General Permit to Install for a soil remediation system. Per Mr. Stermer and as observed, only the pumps, thermal oxidizers and individual wells remain. Mr. Stermer indicated that ANR will request that this permit be voided.

Conclusion

Based on observations made during the February 6, 2018 records review and the February 13, 2018 on-site inspection, the ANR Pipeline Company Winfield Dehydration Plant appears to be in compliance with PTI No. 125 -97 and other applicable air quality rules and regulations.

NAME  _____DATE 2/27/2018SUPERVISOR  _____