

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

N627923970

FACILITY: Merit Energy Company - RICCI 19 (BLUE LK)		SRN / ID: N6279
LOCATION: SUNSET TRAIL, KALKASKA		DISTRICT: Gaylord
CITY: KALKASKA		COUNTY: KALKASKA
CONTACT: Vicki Kniss, Environmental Affairs Manager		ACTIVITY DATE: 10/30/2013
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2014 Fiscal Year Site Inspection.		
RESOLVED COMPLAINTS:		

At this Merit Energy central production facility (CPF) located in Kalkaska County, gas and crude from Niagarian wells are extracted, fluids are transmitted through flow lines. The temperature of the fluids is increased by inline heaters, and the fluids are separated. The gas is compressed by gas fired internal combustion compressor engines. Saturated water vapor is removed by glycol hydration and the residue gas is sold. If liquids are present in the stream they are separated and stored in tank batteries with fixed roofs. Crude is trucked off site.

MAERS 2012 included one CAT 3508 LE engine, one glycol dehydrator, and several tanks.

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. The EPA has not delegated these Subparts to MI AQD and these Subparts were not reviewed.

This is a mid-1990's MOGA permit. There is not a catalytic converter on the engine. With the lean burn engine and no pollution control equipment, a malfunction abatement plan will not be requested.

On October 30, 2013 Gloria Torello inspected the site. The engine was operating. The engine does not have a catalytic converter. No visible emissions were observed off the engine muffler. Light petroleum odors were noted. The glycol dehydrator had a heat shimmer. The tanks in the tank battery are connected with pipes for control. The tanks were in a retaining area. The retaining area had a foot of standing water. Pond weeds were growing in the water. Overall the site was tidy. An adjacent building was empty.

The special conditions (SC) of the permit are listed below.

SC 13. The 2012 MAERS reported source wide emissions of CO 8.8 tons, NOx 11 tons which are below the 89 tons per year. The received records show 12-month rolling emissions of these pollutants below 89 tons per year.

SC 14. The records do not include HAP emissions.

SC 15. The permittee makes monthly and 12-month rolling calculations of CO, NOx and VOC. Updated emissions factors are used in the calculation, the emission factors from Appendix A are not used-there is not an objection to this.

SC 16. a. Monthly fuel consumption is monitored and recorded on the Engine Specification Calculation Spreadsheet record as "Fuel Usage."

b. Tank thru-put of crude is monitored and recorded on the Monthly Emissions Summary records.

c. Monthly crude oil trucked is monitored and recorded on the Monthly Emission Summary records.

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.

SC 17. The monthly reports are on file and were made available to AQD.

SC 18. The MAERs is reported annually.

SC 19. Maintenance records are on file and were reviewed by AQD staff in Vicki Kniss' office.

SC 20. The tanks have an interconnected pipe system serving as a pollution control system.

SC 21. The tanks have an interconnected pipe system serving as a pollution control system.

SC 22. This facility has lean burn engines and no catalytic converters; therefore there is no by-pass of pollution control equipment to record.

SC 23. This facility is not subject to Subpart KKK.

SC 24. The AQD has not requested stack testing to verify CO, VOC, NOx, or HAPs.

SC 25. The records include a Certificate of Analysis showing the Hydrogen Sulfide as non-detect.

NAME

Gloria Juello

DATE

12-19-13

SUPERVISOR

