

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

N627944427

FACILITY: Merit Energy Company - RICCI 19 (BLUE LK)		SRN / ID: N6279
LOCATION: SUNSET TRAIL, KALKASKA		DISTRICT: Cadillac
CITY: KALKASKA		COUNTY: KALKASKA
CONTACT: Vicki Kniss , Environmental Affairs Manager		ACTIVITY DATE: 05/16/2018
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2018 FCE.		
RESOLVED COMPLAINTS:		

**2018 Full Compliance Evaluation: N6279 MEC Ricci 19 (Blue Lake), Kalkaska County**

I conducted a Full Compliance Evaluation (FCE) of the Ricci 19 to determine compliance with Permit to Install number 242-97 and the air pollution control Rules. I observed the site Prior to entering the facility, no odors were detected downwind and no visible emissions were present. The weather was clear, 76 degrees F with wind from the Southwest at 10 mph. At the time of the inspection the following equipment was observed on site:

- Three 400 bbl AST's with vapor recovery
- One Caterpillar twin turbo V-8 compressor engine with no control (Unit 305520) and one in-line six-cylinder engine that has been disconnected
- One glycol dehydrator
- Six 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 2017 12-month period were; CO 8.29 tons, VOC 1.71 tons, NOx 10.36 tons which are each below the 89 tons per year.

SC 14. Maintain HAP emissions below Major source thresholds. Total VOC emissions are less than 10 tons per year.

SC 15. Monthly emission calculations based on a 12-month rolling time-period. The permittee maintains monthly and 12-month rolling calculations of CO, VOC, NOx, SO2 and PM10. 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.

b. Tank thru-put of crude is monitored and recorded on the Monthly Emissions Summary records. There is no limit on tank thru-put.

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.

SC 19. Maintenance records are on file and 2017 maintenance records were provided to the AQD.

SC 20. The tanks are equipped with a vapor recovery system that was operating at the time of the inspection.

SC 21. See S.C. 20


SC 22. This facility has a lean burn engine that are not equipped with 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 2017 showing the Hydrogen Sulfide as non-detect at a detection level of 1 ppm.**

**As a result of this FCE, it appears that the facility is currently in compliance with PTI 242-97 and the air pollution control rules.**

NAME  DATE 5-22-18 SUPERVISOR SN