

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

N634550664

FACILITY: BREITBURN OPERATING LP - GARFIELD 1-8 CPF		SRN / ID: N6345
LOCATION: SW 1/4, NE 1/4, NE 1/4, SEC 8, T25N, R5W, S BOARDMAN		DISTRICT: Gaylord
CITY: S BOARDMAN		COUNTY: KALKASKA
CONTACT:		ACTIVITY DATE: 12/19/2018
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: scheduled inspection and records review		
RESOLVED COMPLAINTS:		

On December 19, 2018, AQD Staff traveled to N6345 Breitburn Garfield 1-8 CPF, located in Garfield Township, Kalkaska County, for a scheduled inspection to determine compliance with PTI 75-12. This is a minor source.

The Garfield 1-8 CPF is an oil and gas production facility. Natural gas and brine fluids are extracted from wells drilled into producing reservoirs then transmitted through flow lines to a CPF. The gas is compressed by one engine.

REGULATORY DISCUSSION

PTI 75-12 was issued June 14, 2012 for one engine and a dehydration unit. The engine is a Caterpillar 398NA, 4 stroke, rich burn, 500 HP unit. The engine has a 3-way catalytic converter.

PTI 75-12 is a true minor source of nitrogen oxides (NO_x) and carbon monoxide (CO). The catalytic converter control on the engine has 90% NO_x control and 80% CO control. Without the control NO_x emissions would be 61.3 tpy, and CO emissions would be 66.1 tpy. These emissions are below ROP thresholds. Therefore any equal or lower-emitting engine that could replace the permitted engine per condition VII.1 of PTI 75-12 would also be below ROP thresholds.

The engine is subject to 40 CFR Part 63, Subpart ZZZZ, which has not been delegated to MDEQ from EPA.

The glycol dehydrator is subject to 40 CFR Part 63, Subpart HH, which has not been delegated to MDEQ from EPA. Per the eval form the dehydration unit is exempt, however must still meet the requirements of Subpart HH.

INSPECTION NOTES

The facility was operating during the inspection. There was a Caterpillar 398 engine and dehy onsite, and miscellaneous oil/gas related equipment.

No visible emissions or odors were present.

The engine was operating at 1180 RPM, 60 PSI oil pressure. The catalyst inlet was 989 degrees Fahrenheit (F) and outlet was 1016 degrees F.

RECORDS REVIEW, PTI 75-12

EUDEHY

The only requirement for EUDEHY is that the unit must comply with 40 CFR Part 63

Subpart HH.

EUENGINE1

II.1 - facility shall not burn sour gas - analysis dated 7/3/17 was provided, no sulfur is present (NIL).

III.3, VI.3 - the source is required to have a preventative maintenance / malfunction abatement plan (PM/MAP). The source has an approved PM/MAP plan onsite, and provided records as required. Maintenance has been provided such as replacing oxygen sensors, inspection of catalyst, washing catalyst, general maintenance.

VI.4 - facility must track hours that the engine operated without the control device, and may not operate more than 200 hours without the control device. Records were provided, the unit operated 1 hour in the past 12 months without control.

VI.5 - facility must track monthly fuel use records. Records were provided, the unit uses approximately 40,000 Mscf/month, with August 2018 being 38,080 Mscf/month.

VI.6 - facility must track monthly and 12 month rolling NOx emissions. Records were provided. As of August 2018, the monthly NOx was 0.4 tons, and 12 month rolling for NOx was 4.9 tpy. This is below permitted limit of 7.4 tpy.

VI.7 - facility must track monthly and 12 month rolling CO emissions. Records were provided. As of August of 2018, the monthly CO was 0.87 tons, and 12 month rolling for CO was 10.5. This is below the permitted limit of 14.4 tpy.

VIII.1 - SVENGINE1 is required to have a maximum of 16 inches diameter and minimum height of 30 feet. Based on visual estimates during the onsite inspection, the stack appears to meet this requirement.

COMPLIANCE DETERMINATION

Based on the scheduled inspection and records review, N6345 Breitburn Garfield 1-8 CPF was in compliance with PTI 75-12.

NAME Bobby Radulski

DATE 9/30/19

SUPERVISOR SN