

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

N644338843

FACILITY: Enervest Operating - ASE 2		SRN / ID: N6443
LOCATION: T30N-R2W, Section 28, CHESTER TWP		DISTRICT: Cadillac
CITY: CHESTER TWP		COUNTY: OTSEGO
CONTACT: Jeff Riling, Operations Manager		ACTIVITY DATE: 02/28/2017
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2017 FCE.		
RESOLVED COMPLAINTS:		

I conducted a Full Compliance Evaluation (FCE) of the Enervest ASE-2 CPF located West of Turtle Lake Rd. in Otsego County to determine compliance with PTI 47-05A, Consent Order 31-2006 and the Air Pollution Control Rules. At the time of the inspection equipment at the facility consisted of one Caterpillar G3516 LE compressor engine, a dehydrator and one blowdown tank. The engine and dehy were operating at the time of the inspection. There were visible vapors from the dehy vent and mild odors, it appeared to be equipped with a condenser. The compressor engine control panel did not contain an operating tachometer but the daily inspection log sheet was present and indicated the most recently recorded engine speed was 1190 rpm. This is a low emission engine and is not equipped with a catalytic converter. There were no visible emissions from the engine stack. Consent Order 31-2006 covers N6443 ASE-2 as well as N6446 SCV CPF. The order requires compliance with PTI's 47-05A and 48-05A for these facilities respectively. The requirements of PTI 47-05A are as follows:

Process/Operational Limits

1.1 No later than 60 days after issuance of this permit, the permittee shall submit to the AQD District Supervisor, for review and approval, a malfunction abatement/preventative maintenance plan for EU-ASE-2-ENGINE.

Enervest LLC has a PM/MAP for this facility that covers the engine I observed on-site and was most recently updated on March 17, 2008.

1.2 The permittee shall not operate any engine equipped with an add-on control device for more than 200 hours per engine per year without that control device consistent with the malfunction abatement/preventative maintenance plan (pursuant to SC 1.1).

There is no add-on control equipment, the engine is not equipped with a catalytic converter.

Equipment

1.3 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 1.2.

There is no add-on control equipment.

Testing

1.4 NOx emission testing has not been requested by the AQD.

Monitoring

1.5 The permittee shall monitor, in a satisfactory manner, the natural gas usage from each engine included in EU-ASE-2-ENGINE on a monthly basis.

Monthly natural gas usage is monitored and records of monthly usage are maintained on the Compressor Engine Emissions - Record Keeping form (copy attached).

Recordkeeping/Reporting/Notification

1.6 The permittee shall maintain a log of all significant maintenance activities conducted and all repairs made to each engine included in EU-ASE-2-ENGINE and any associated air pollution control device (s).

A daily inspection log form was present on site at the time of the inspection, records provided after the inspection included the attached log of maintenance activities.

1.7 The permittee shall keep, in a satisfactory manner, for any engine equipped with an add-on control device, monthly and 12-month rolling time period records of the hours that such engine operated without the control device.

NA, there is no add-on control equipment.

1.8 The permittee shall keep, in a satisfactory manner, monthly fuel use records for EU-ASE-2-ENGINE

Enervest LLC keeps fuel usage records as indicated above. 2016 fuel usage ranged from 4.1220 - 4.635 MM cuft per month.

The following conditions apply to : FGFACILITY

Emission Limits

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirements
2.1	NOx	FGFACILITY	89 tpy	12-month rolling time period as determined at the end of each calendar month.	SC 2.5 and Appendix A	R336.1205(3)

Material Limits

2.2 The permittee shall only burn sweet natural gas in FGFACILITY.

The facility does not produce H2S according to the company.

Testing

2.3 H2S testing of fuel gas has not been requested by the AQD.

Recordkeeping / Reporting / Notification

2.4 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 15th day of the calendar month, for the previous calendar month.

2.5 The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period NOx emission calculation records for FGFACILITY.

NOX emissions records are maintained on the Compressor Engine Emissions - Record Keeping form. 2016 NOx emissions were 11.856 tons. The NOx emission limit is 89 tons per year. I noted that the natural gas heating value used on the calculation sheet was 763 btu/scf. The most recent natural gas analysis provided by ECT, Inc. on behalf of Enervest LLC indicates the heating value was 895 btu/scf (HHV). Recalculating the 2016 emissions with this heating value results in a total of 13.914 tons per year which is still well within the permit limits.

NAME  DATE 3-13-17 SUPERVISOR 