

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

N690751119

FACILITY: Paxton Resources, J.A. Bott		SRN / ID: N6907
LOCATION: NW NW NE Sec 13 T29N R03W, GAYLORD		DISTRICT: Cadillac
CITY: GAYLORD		COUNTY: OTSEGO
CONTACT:		ACTIVITY DATE: 10/28/2019
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2020 FCE.		
RESOLVED COMPLAINTS:		

Full Compliance Evaluation

I conducted a full compliance evaluation including site inspection and records review of the Paxton Resources J.A. Bott CPF located on Old State Rd. in Otsego Lake Township, Otsego County. The J.A. Bott is an opt-out facility with PTI 355-00. This facility was originally permitted on December 19, 200 by Paxton Resources. The facility is located directly south off of Old State Rd, but the only signs identifying the facility are one for Riverside Energy in case of emergency and one that says J.A. Bott on the back of the compressor building.

PTI 45-01A identifies the permitted equipment as:

EUENGINE01, a Caterpillar G398TA 500 HP compressor engine.

Emission limits in the PTI are as follows:

EUENGINE01,

- NOx = 11 pounds per hour.

There is also a glycol dehydration process on the site.

At the time of the inspection the equipment at the facility matched that in PTI 355-00. All of the equipment is located inside the one building on site. At the time of the inspection the compressor engine and dehy were operating. There were no visible emissions from the engine stack, and light vapor emissions along with mild odors from the dehy vent and no visible emissions from the reboiler stack.

The compressor engine stack appeared to meet the permit limits of 9" maximum diameter and 25' minimum height. There appears to be a catalytic converter housing in the exhaust system but no temperature sensors. The PTI application and final permit do not indicate or require a catalytic converter. EUENGINE01 was operating at 872 RPM and oil pressure was 47 psi. Readings on the daily log sheet appeared to match the observed operating parameters.

This source does not have a malfunction abatement plan, and one has not been requested.

Following the inspection, I contacted Mr. Chris Hansen of Paxton Resources and requested the following records:

- Dehy MACT exemption demonstration.
- Monthly and 12-month rolling time period NOx emissions calculations.
- 12-month rolling time period fuel use records.

On 11/14/2018 Mr. Hansen provided the following records which are attached:

- Gas sales, 12-month rolling.
- CO, NOx, VOC emissions 12-month rolling.
- Fuel usage.

Review of the records indicates that they were complete and up to date. The reported 12-month rolling time period emissions of 4 tons NOx were in compliance with the permit limits for NOx of 11 pounds per hour. Fuel usage was around 22 MMCF/year, the permit does not contain a limit on fuel usage. The Dehydrator is not subject to 40 CFR Part 63, Subpart HH because the actual flowrate of natural gas is less than 85,000 cubic meters per day (highest daily average flowrate in 2018 was 395 mcf/day, or 11,185 cubic meters).

The results of the inspection and records review indicate the facility is currently in compliance with PTI 355-00.

NAME 

DATE 11.2.19

SUPERVISOR 