

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

N694644373

FACILITY: RIVERSIDE - OLD VANDY SOUTH CPF		SRN / ID: N6946
LOCATION: NW NW NW Sec 6, LIVNGSTON TWP		DISTRICT: Gaylord
CITY: LIVNGSTON TWP		COUNTY: OTSEGO
CONTACT: Natalie Schrader ,		ACTIVITY DATE: 05/04/2018
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On May 4, 2018, I inspected the Riverside Old Vandy South CPF. I didn't find any violations during my inspection.

The facility is located about a mile north of the intersection of Townline Road and Martindale Road. Townline Road ends at Martindale. Continue north another mile along the line of Townline Road. There is a gate near Martindale Road, but this was unlocked and open when I got there.

The facility is covered by Permit to Install 81-09A.

Permit 81-09A, Table EUDEHY, requires complying with all provisions of the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63, Subpart HH. AQD has not been delegated authority to enforce this Subpart, so I did not make a compliance determination.

Table FGENGINES lists two engines, EUENGINE1 and EUENGINE3. EUENGINE1 has no control, EUENGINE3 has a catalyst.

Conditions I.1, 2, 3, and 4 set emissions limits for NOx and CO for EUENGINE1 and EUENGINE3. Emissions reports from Riverside (attached) include their estimates for emissions:

EUENGINE1, limit 44.5 TPY NOx, estimated actual 15.63; limit 26.7 TPY CO, estimated actual 14.85. EUENGINE3, limit 7.5 TPY NOx, estimated actual 3.66; limit 15 tpy CO, estimated actual 12.32. These reported emissions comply with the permit conditions.

Condition III.1 requires a Malfunction Abatement Plan. The company submitted one. AQD approved it January 9, 2015.

Condition III.2 prohibits operating any engine which has an add on control device for more than 200 hours per year without that control device. In her reply to my request for records, Ms. Schrader reported the facility has not operated without the catalyst this year.

Condition IV.1 requires add on control devices be installed and operating properly. During my inspection the catalyst on EUENGINE3 appeared to be installed and operating properly.

Condition IV.2 requires a device to monitor engine fuel use. During my inspection I saw a circular chart which was recording facility fuel as several lines; this appears to be the readout for the required fuel monitoring device. Facility records include fuel use for each engine independently and for other processes on site.

Condition VI.2 requires monitoring and recording fuel use for each engine. Condition VI.5 requires keeping records of this. This information is included in the attached records Riverside provided to us.

Condition VI.3 requires a maintenance log for the engines. A combined maintenance log for engines and compressors is maintained; example sheets are attached.

Condition VI.4 requires keeping track of hours of operation of EUENGINE3 without its catalyst. Ms. Schrader informed me that there are no hours of operation without the catalyst so far.

Condition VI.6 and VI.7 requires keeping monthly and 12 month NOx and CO estimates. These are included in the attached pages which Riverside provided to us.

Condition VIII.1 and VIII.2 require stacks for EUENGINE and EUENGINE3 to have a maximum exhaust diameter of 12 inches at a minimum height above ground of 44 feet. The stacks I saw on site appeared to meet these requirements.

Table FGFACILITY, Condition II.1, prohibits using sour gas as fuel at the facility. I did not see or smell anything that made me think there was a violation of this condition.

COMMENTS:

I reached this facility during a rainstorm, in wet weather. It wasn't that difficult but I would advise a four wheel drive pickup truck be used.

The facility includes an iron sponge, indicating some hydrogen sulfide is being removed from gas produced through this facility.

The glycol dehydrator burner vent was about 6 inches diameter and 30 feet high, terminating in a flat cap. The still vent was about one inch diameter and 30 feet high, terminating in a T shaped pipe fitting. I did not see any opacity or "steam" from either stack, but it was raining at the time and I might have missed "steam." There were mild glycol odors near the dehydrator.

There are two medium sized Caterpillar natural gas fired compressor engines inside the compressor shed. The one to the south is labeled Unit # 1087 in a sticker on the instrument panel cabinet and GCS 1087 in metal characters welded to the engine mount. From facility records and descriptions in the permit, this should be EUENGINE1. The engine to the north is labeled Unit # 811 with a sticker on the instrument panel cabinet and GCS 811 in metal characters welded to the engine mount. It is equipped with a catalytic oxidizer. From facility records and descriptions in the permit, this should be EUENGINE3.

According to its digital readout, EUENGINE1 was running at 1250 RPM. There was no smoke or unusual vibration. Analog engine instruments reported engine coolant 200 degrees f, compressor oil temperature 200 degrees f, engine oil pressure 60 psi, compressor oil pressure 70 PSI.

According to its digital readout, EUENGINE3 was running at 1227 RPM. There was no smoke or unusual vibration. Analog engine instruments reported engine oil pressure 40 PSI, engine water temperature 190 degrees f, and compressor oil pressure 55. The temperature readout for the catalytic oxidizer reported 913 degrees f. According to an engine numbers table on a clipboard, today's catalyst inlet temperature was 914 degrees f, outlet temperature 988 degrees f. A temperature increase across the catalytic oxidizer indicates it is burning pollutants from the exhaust stream, which hints that it is probably operating properly.

I looked for storage tanks. The facility does not have a brine tank or slop tank that I could find. It does have a salt water disposal well on site with pipes running to it. The sign on the well identified it as The St Livingston A 1-6 SWD, Permit #51490.

Minor tanks on site included: Near EUENGINE1, and again near EUENGINE3, pairs of 300 gallon drum on stilts tanks over metal berm structures, one of each pair labeled Chevron HDAX 5200 Low Ash Gas Engine Oil, the other of each pair labeled Chevron American Industrial Oil ISO 100.

Waste oil and coolant tanks, one each near each engine. They are drum shaped tanks larger than 300 gallons and enclosed in wooden berm structures. They are the same except the coolant tank near EUENGINE1 is painted orange, as waste oil tanks usually are, and the one near EUENGINE3 is painted green.

Several covered 55 gallon drums labeled as containing used oil filters. One 55 gallon drum labeled Spill Kit.

Outside, near the glycol dehydrator, one drum on stilts tank of the standard 300 gallon size labeled Triethylene Glycol and a larger drum on stilts tank labeled Methyl Alcohol. Both over berm structures.

Maintenance appeared to be good. Ground outside was wet so I couldn't see whether there were any stained soils or other evidence of leaks or spills, but I didn't see any inside the compressor shed.

NAME William J. Rogers Jr.

DATE 5/19/18

SUPERVISOR 