

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

N699953178

FACILITY: Lambda Energy Resources LLC - Mayfield 28		SRN / ID: N6999
LOCATION: Mayfield TWP, MAYFIELD		DISTRICT: Cadillac
CITY: MAYFIELD		COUNTY: GRAND TRAVERSE
CONTACT:		ACTIVITY DATE: 04/01/2020
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2020 FCE.		
RESOLVED COMPLAINTS:		

2020 Full Compliance Evaluation: N6999 Lambda Energy LLC Mayfield 28, Grand Traverse County

I conducted a Full Compliance Evaluation (FCE) of the Mayfield 28 CPF to determine compliance with Permit to Install number 219-01C and the air pollution control Rules. This facility is located east off of Hannah Rd. South of W. Center Rd. in Mayfield Twp. The AQD had been previously notified that the facility was shut-in and that the well production from the site is being directed to the Mayfield 19 CPF. At the time of the inspection the facility did appear to be shut in, none of the equipment was operating. I did not detect any odors from any of the equipment at the facility. The weather was overcast, 45 degrees F with winds from the Northwest at 5-10 mph. At the time of the inspection the following equipment was observed on site:

Three 400 bbl. AST's.

One V-12 Caterpillar compressor engine. No cat, control panel locked out

One glycol dehydrator located outdoors. Direct vent to atmosphere (capped) no control.

One heater.

There was not a flare at this source.

Records provided by Lambda Energy indicate that the facility has been shut-in since February 2016 and there was no natural gas throughput in 2019. A review of MAERS data indicates there has been no throughput or emissions reported since 2016. MACES Operating Status was indicated as operating though the facility is clearly at least temporarily closed with regard to the engine and dehy.

PTI 219-01C Special Conditions

EUDEHY

I. EMISSION LIMITS - NA

II. MATERIAL LIMITS -NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The dehy is required to be in compliance with 40 CFR 63, Subpart HH by 1/2009. Pursuant to 40 CFR 63.764(e)(1)(i), the dehy appears to be exempt from this Subpart because annual average flow rate of natural gas is less than 85,000 cu. meters per day.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The facility is required to not operate the dehy unless the reboiler vent is plumbed to the vapor recovery system. The dehy does not appear to be configured in this manner. The still vent is a series of pipes in a "T" configuration. The ends of the T are currently capped but would otherwise vent directly to atmosphere. There is no flash tank. Previous reports indicated the still is plumbed to the reboiler burner. If the plant is re-started this will require further verification.

2. The facility is required to not operate the dehy unless the flash tank vent is plumbed to the

vapor recovery system. There is no flash tank.

V. TESTING/SAMPLING

1. The facility is required to analyze the gas used at least once per year for various parameters used to calculate emissions from the facility. The last sampling of this gas was completed in June of 2015. The plant has not operated since February 2016.

VI. MONITORING/RECORDKEEPING

1. Required calculations are to be completed by the facility by the last day of the calendar month for the previous calendar month. Calculations are currently not applicable.

2. If the dehy meets the exemption criteria in 40 CFR 63.764(e)(1)(i):

a) The facility is required to install a device to measure the gas process by the dehy. This device is installed.

b) The facility is required to keep records of the daily throughput of the dehy. These records have been maintained in the past in a satisfactory manner when the plant was operating.

c) and d) As an alternative to complying with exemption criteria the facility has the option to track benzene emissions to demonstrate exemption from Subpart HH. In the past this facility has chosen to not exercise this option.

3. The facility is required to analyze the gas used at least once per year for various parameters used to calculate emissions from the facility. The last sampling of this gas was completed in June of 2015. The plant has not operated since February 2016.

4. If the dehy meets the exemption criteria in 40 CFR 63.764(e)(1)(i), the facility shall keep records of actual natural gas flow rates. These records have been maintained in the past when the plant was operating.

5. As an alternative to complying with exemption criteria the facility has the option to track benzene emissions to demonstrate exemption from Subpart HH. This facility has chosen to not exercise this option.

VII. REPORTING

1. The facility is required to submit reporting pursuant to 40 CFR 63.775. However, the dehy meets the exemption criteria in 40 CFR 63.764(e)(1)(i). Therefore, this reporting is not required.

VIII. STACK/VENT RESTRICTIONS -NA

IX. OTHER REQUIREMENTS -NA

EUENGINE1

I. EMISSION LIMITS

1. NO_x emissions from this engine are limited to 87.6 tons per year based on a 12-month rolling time period determined at the end of each calendar month. The plant has not operated during this review period. Therefore there have been no NO_x emissions.

II. MATERIAL LIMITS

1. The natural gas usage for the engine shall not exceed 26 million cubic feet per 12-month rolling time period as determined at the end of each calendar month. The plant has not operated

during this review period. Therefore there has not been any gas usage for the engine.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. This facility is required to have an approved malfunction abatement plan. The plan for this facility was submitted on March 31, 2009 and was approved on April 30, 2009.
2. The facility is required to keep records of when the engine is run without the add on control device. The compressor engine on site is not controlled therefore this condition does not apply

IV. DESIGN/EQUIPMENT PARAMETERS

1. 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 III.2. The compressor engine on site is not controlled therefore this condition does not apply
2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor the natural gas usage for the engine on a continuous basis. This device is installed.

V. TESTING/SAMPLING

1. Testing to verify NOx emissions may be required. As of the date of the inspection, this testing has not been requested in the past.

VI. MONITORING/RECORDKEEPING

1. Required calculations are to be completed by the facility by the last day of the calendar month for the previous calendar month. The calculations are not currently applicable due to the plant shut-in.
2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor the natural gas usage for the engine on a continuous basis. This device is installed.
3. This facility is required to record maintenance activities pursuant to the MAP. There have not been relevant maintenance activities during the reporting period due to the plant shut-in.
4. The facility is required to keep records of when the engine is run without the add on control device. The compressor engine on site is not controlled therefore this condition does not apply
5. The permittee shall keep, in a satisfactory manner, monthly fuel use for the engine. Not currently applicable due to plant shut-in.
6. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period NOx emission calculation records for the engine. Not currently applicable due to plant shut-in.

VII. REPORTING

1. The facility is required to notify the agency of any engine change out. No notifications have been received and the engine does not appear to have been changed.

VIII. STACK/VENT RESTRICTIONS

1. Stack parameters at the facility do not appear to have been modified and appear correct.

IX. OTHER REQUIREMENTS -NA

FGFACILITY

I. EMISSION LIMITS

1. NO_x emissions from this facility are limited to 89.9 tons per year based on a 12-month rolling time period determined at the end of each calendar month. Not currently applicable due to plant shut-in.

II. MATERIAL LIMITS

1. The facility is required to burn only sweet natural gas at this facility. The most recent annual gas analysis indicated non detectable H₂S concentrations.

III. PROCESS/OPERATIONAL RESTRICTIONS -NA**IV. DESIGN/EQUIPMENT PARAMETERS -NA****V. TESTING/SAMPLING**

1. Verification of H₂S and/or sulfur content of the natural gas burned in at the facility may be required upon request. Not currently applicable due to plant shut-in.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. All required calculations are required to be completed in a timely manner. Not currently applicable due to plant shut-in.

2. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period NO_x emission calculation records for the facility. Not currently applicable due to plant shut-in.

VII. REPORTING -NA**VIII. STACK/VENT RESTRICTIONS -NA****IX. OTHER REQUIREMENTS -NA**

Under the current operating status for this facility, it appears to be in compliance with PTI 219-01C and the air pollution control rules. Prior to re-starting the facility it will be necessary to ensure the glycol dehydrator is meeting the pollution control requirements of the PTI.

NAME 

DATE 4-1-20

SUPERVISOR

