

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

N701537430

FACILITY: BREITBURN OPERATING LP. - ECHO LAKE 6 CPF		SRN / ID: N7015
LOCATION: SE SE SE T29N R4W, SEC 6, GAYLORD		DISTRICT: Gaylord
CITY: GAYLORD		COUNTY: OTSEGO
CONTACT: Carolann Knapp, Environmental Specialist		ACTIVITY DATE: 11/02/2016
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: scheduled inspection		
RESOLVED COMPLAINTS:		

AQD Staff traveled to N7015 Breitburn Energy Echo Lake CPF located in Hayes Township, Otsego County for a Full Compliance Evaluation (FCE) scheduled inspection to determine compliance with PTI 273-01B. This is an opt out permit. The CPF was initially inspection on 11/1/16 however the unit was temporarily shutdown, undergoing routine maintenance; the CPF was then inspected 11/2/16 to view CPF in operation.

The Echo Lake CPF is a natural gas production facility. It processes natural gas from Antrim wells to dehydrate and compress the gas prior to pipeline transport. The facility contains a compressor engine, dehy system and storage tanks.

LOCATION

The facility is located in Hayes Township, Otsego County. Travel south of M-32 on Hayes Tower to Spring Gay Rd. Go west on Spring Gay Rd to Pencil Lake. Take Pencil Lake to Tittabawasee Trail. CPF is located about 1 mile south of Pencil Lake Rd.

REGULATORY DISCUSSION

Permit 273-01B was issued 12/20/05. The permit was modified at that time to raise the NOx limit from 12 to 25 tpy. According to the eval notes, there was no new equipment added. The company requested the increase to allow for installation of exempt equipment which would not need a permit modification but would need to be included in the FGFACILITY NOx limit. ~~Also noted in the eval notes.~~

This permit contains SC 1.7, which allows for the replacement of the existing engine with one of equivalent or lower emissions without a permit modification. The facility must notify and provide calculations to AQD to demonstrate emissions are no higher than permitted limits – the replacement engine can be with or without control.

This is an opt out source. The existing engine PTE for NOx is over 100 tpy (according to file notes, however the application incorrectly calculated NOx PTE around 20 tpy, taking into account the control equipment). File notes also reference that the uncontrolled PTE for CO is around 65 tpy, however a CO limit was not included in the PTI.

The facility is not major for HAPS.

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

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

INSPECTION NOTES

The engine was operating during the inspection. No VE or odors present. The engine stack has a catalytic converter, silencer and muffler. The skid ID is stamped as "GCS 760".

During the inspection the unit was operating as follows:

RPM	804
Engine Oil Pressure	61 psi
Cat Inlet Temp, F	809
Cat Outlet Temp, F	875

Inside the facility are several small tanks which are contained. The tanks contain oil for the engine. A red used oil tank is also located inside the building.

Outside the facility are several tanks under 500 gallons (sulfa; methyl alcohol, triethylene glycol), all contained. A lined tank battery is located onsite. There are 3 storage tanks in the lined containment area – the application identifies them as 2 brine storage tanks, 400 barrels each, and 1 methanol storage tank, 400 gallons.

It appears that 2 lines enter on the east side of the facility.

Based on visual estimate, the stack meets height and diameter requirements (45 minimum height, 18 inch maximum diameter).

MAERS

The 2016 emissions will be reviewed when received. Any issues will be noted in MAERS and resolved separately.

MACES

MACES facility information and regulatory summary screens were updated to reflect the current equipment at the facility.

COMPLIANCE DETERMINATION

Based on the scheduled inspection, N7015 Breitburn Energy Echo Lake CPF appears to be in compliance with the PTI. Records are reviewed separately.

NAME

Becky Rodulski

DATE

11/2/16

SUPERVISOR

[Signature]