

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

N701564872

FACILITY: RIVERSIDE - ECHO LAKE 6 CPF		SRN / ID: N7015
LOCATION: SE SE SE T29N R4W, SEC 6, GAYLORD		DISTRICT: Gaylord
CITY: GAYLORD		COUNTY: OTSEGO
CONTACT: Natalie Schrader , Environmental Specialist		ACTIVITY DATE: 04/18/2022
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY22 scheduled inspection and records review		
RESOLVED COMPLAINTS:		

AQD Staff traveled to N7015 Riverside 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 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, glycol dehydration 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.

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. Notification was received on 6/4/18 of a like for like Caterpillar 399TA, 830 hp switch out.

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, while the glycol dehydrator is subject to 40 CFR Part 63, Subpart HH. Subpart HH has not been delegated to EGLE from EPA. Subpart ZZZZ has been delegated to EGLE, however the AQD is not

completing compliance determinations for Subpart ZZZZ for area sources at this time.

INSPECTION NOTES

The engine was operating during the inspection. No VE or odors present. The engine stack has a catalytic converter, silencer and muffler.

During the inspection the unit was operating as follows:

RPM 799

**Engine Oil 55 psi
Pressure**

Cat Inlet Temp, F 815

**Cat Outlet Temp, 888
F**

Inside the facility are several small oil tanks which are in containment. 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.

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

RECORDS REVIEW

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EUENGINE

SC 1.1 requires a MAP. An approved MAP is on file. Records are maintained and provided as requested.

SC 1.2, 1.3, 1.8 require the facility to track engine use without control and limit to under 200 hours. Records were provided, the engine was not operated without control.

SC 1.4 requires testing at AQD's request. AQD has not made a request to test at this time.

SC 1.5, 1.9 require fuel use to be maintained. Fuel use for past 12 months was 21.9 MMCF.

SC 1.7 allows engine switch out for equivalent emitting engines with notification to AQD.

SC 1.10a requires the stack to be a minimum of 45 feet above ground and maximum of 16 inches diameter. Based on visual estimates, the stack appears to meet these requirements.

FGFACILITY

SC 2.1a limits the nitrogen oxides (NOx) at the facility to 25 tpy. Emissions were reported as 1 tpy in past 12 months.

MAERS

MAERS was reviewed as received. Any issues will be noted in MAERS and resolved.

MACES

MACES information was reviewed and updated.

COMPLIANCE DETERMINATION

Based on the scheduled inspection and records review, N7015 Riverside Echo Lake CPF appears to be in compliance with the PTL.

NAME Becky Radulski

DATE 7-6-23

SUPERVISOR Shane Nixon