

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

N703146307

FACILITY: BREITBURN OPERATING LP - FRASER 8 CPF		SRN / ID: N7031
LOCATION: Fraser Twp, Section 8, T16N, R4E, FRASER TWP		DISTRICT: Saginaw Bay
CITY: FRASER TWP		COUNTY: BAY
CONTACT: Carolann Knapp		ACTIVITY DATE: 09/26/2018
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Site inspection and records review		
RESOLVED COMPLAINTS:		

On September 26, 2018 Ben Witkopp of the Michigan Department of Environmental Quality - Air Quality Division (MDEQ-AQD) Stopped at the Breitburn Fraser 8 gas compressor & dehydration facility. It was not operating at the time. Required records were available and received through Carolann Knapp of Breitburn. The facility is covered by air use permit to install 301-01c. The permit has limits for NOx, CO, and VOC emissions. The NOx and CO limits are capped at 89 tpy so they keep the facility from being a major source and subject to Title V. The facility is no longer subject to NSPS for Equipment Leaks of VOC from Onshore Natural Gas Processing Plant - 40 CFR Part 60, Subpart A and KKK as the natural gas liquids are now processed at the company's Monitor 11 site. It is subject to the NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE) - 40 CFR Part 63, Subparts A and ZZZZ. The engines on site are not subject to NSPS JJJJ for Stationary Spark Ignition Engines due to the manufacturing dates though relocated to the site after July 2007.

The facility processes wet natural gas from three wells at this point in time. One is the Lahar 1-7, another is the Pross 1-12 and the last is the Garbolinski 1-11. At one time gas was also provided by the State Fraser 2-18 and the Geno 1-18. However, both wells are shut in now. The last three wells mentioned are owned by Northwood Energy.

The facility is comprised of heaters, dehydrators, and compressors. Water is removed to make pipeline quality natural gas. The gas is then compressed before entering the pipeline.

There are only two engines being used at this time. Engine A is a Waukesha 7042 GSI rated at 912 HP output and 7.11 mmbtu per hr heat input. Engine B is a Caterpillar 399 TA rated at 830 HP output and 6.71 mmbtu per hr heat input.

Engine A (booster) has no specific emission limit but does have conditions concerning the use of a three way catalyst and also requires fuel use records. Catalyst use and fuel use records indicated compliance

Engine B (the production compressor) has NOx and CO limits of 19.9 and 14.2 tons respectively per 12 month rolling time period. NOx emissions were only 2.6 tons while CO was 4.4.

The dehy units have a VOC limit of 24 tons per 12 month rolling time period. The highest level found in records was 4.2 tons. Wet gas analysis was being conducted as required.

The glycol used at the facility is recirculated in a closed loop. The dehy has serial number 01694. The glycol heater does have a stack for exhaust. Though two dehydrators are on site only one is being used. The other unit is completely disconnected from the facility. The permit specifies a maximum glycol recirculation rate of 3.0 gallons per minute. When records were checked the average daily totals were typically 350 to 470 gallons per day. These levels (about 0.3 gpm) are well below the 3.0 gpm limit. Kevin Clennan, the site operator, said the target is about 350 gpd.

The entire facility has NOx and CO limits of 89 tons each per 12 month rolling time period. NOx emissions were on 10.8 while CO was 15.6.

The facility has an outside contract for engine maintenance and performance monitoring. The results of their activity are given to Brietburn and input into a maintenance database. Proper maintenance was conducted as required.

The facility is considered to be in compliance.

NAME B. Witkopp

DATE 10-23-18 SUPERVISOR C. Kline