

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

N712323587

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| FACILITY: Paxton Resources, Moe Larry Curly CPF | | SRN / ID: N7123 |
| LOCATION: T28N R4E Sec 1, COMINS | | DISTRICT: Gaylord |
| CITY: COMINS | | COUNTY: OSCODA |
| CONTACT: Chris Hansen , Paxton Resources | | ACTIVITY DATE: 11/06/2013 |
| STAFF: Gloria Torello | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT |
| SUBJECT: Fiscal Year 2014 Target Inspection. | | |
| RESOLVED COMPLAINTS: | | |

Directions to facility: M65 to Doctor's Club Road west to T-in-the-road at Oscoda Trail, turn left. The facility is about 1/4 mile down on the right. See the inside of the blue permit file for a map to the facility.

At this Paxton Resources central production facility (CPF) located in Oscoda County, natural gas from multiple high pressure Antrim wells is passed through a dehydrator and compressed to remove liquid hydrocarbons and water and to control gas pressure necessary for further pipeline transport. PTI 91-02 permitted one Caterpillar 399 TA compressor engine rated at 930 hp with a catalytic converter. There is a malfunction abatement plan (MAP) with this permit.

There is a glycol dehydrator on site and the ^{dehydrator} facility is subject 40 CFR Part 63 Subpart HH. The ^{dehy} facility is an area source. The AQD does not have EPA delegation of Subpart HH and the conditions of Subpart HH were not reviewed at this time.

On November 6, 2013 Gloria Torello, AQD, visited the site. The engine was operating and no visible emissions were observed from the engine stack. Glycol dehydrator odors were noted. A clipboard contained records, but no sheet was found for catalytic converter temperatures records. The exhaust temp on the gauge was 1135 degrees F, and ~~ROP~~ ⁹⁶⁰ ~~960~~ ^{°F}. The inspection brochure will be emailed to the permittee. Chris Hansen of Paxton Resources provided records.

EUENGINE

Special condition (SC) 1.1a. Records show the NOx emissions are consistently below the permitted 17 tpy. The 2012 MAERS reported 4 tons of NOx source wide emissions.

SC1.2. There is a catalytic converter on the engine. Chris' records show daily catalytic inlet and outlet temperature readings.

SC 1.3 The permittee keeps gas consumption records. The permit does not limited gas consumption.

SC 1.4 a. Monthly and 12-month rolling NOx emission rate records are kept.

SC 1.4 b. This condition and the MAP require maintenance on the catalytic converter (cc). The records provided show some of the maintenance on the cc is made, but Torello called Chris on 12/18/13 and requested more records showing compliance with the MAP requirements.

SC 1.5. A visual estimate indicated the stack is a maximum of 12 inches in diameter and a minimum of 16 feet above ground level.

MAP

Records show the cc inlet and outlet temperatures are taken daily. The CC operating pressure is logged monthly. (6.0)

Records were requesting showing the O2 sensor on the AFRC is replaced. (8.0)

Records show on 1/17/13 use of the portable emissions analyzer. (10.0)

MAP records are kept and made available to AQD. (14.0)

NAME Gloria TorelloDATE 12-18-13SUPERVISOR 