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

N733031919

FACILITY: Hudson Pipeline and Processing - Hudson 34 CPF		**SRN / ID:** N7330
LOCATION: 04950 Camp Ten Rd, BOYNE FALLS		**DISTRICT:** Cadillac
CITY: BOYNE FALLS		**COUNTY:** CHARLEVOIX
CONTACT:		**ACTIVITY DATE:** 10/21/2015
STAFF: Kurt Childs	**COMPLIANCE STATUS:**	**SOURCE CLASS:** SM OPT OUT
SUBJECT: 2016 FCE.		
RESOLVED COMPLAINTS:		

FCE compliance inspection and records review.

The Hudson 34 site is a natural gas conditioning (dehydration, CO2 removal) and compression facility. I inspected the site on 10/21/15, and observed the following equipment:

1 CO2 removal plant with two heaters.
1 blow down tank
2 compressor engines (EUENGINE1, EUENGINE2)
2 glycol dehydrators (Warner, Great Lakes)
2 iron sponge vessels

There are no gas liquids separation equipment, in-line heaters, or flare.

At the time of the inspection, the CO2 plant was not operating, both dehy's appeared to be in operation, the vents are shared and vapors were visible from the vent. The two remaining compressor engines were operating (compressor engine EUENGINE3) has been removed.

The application for PTI 35-04D identified the compressor engines on-site as one CAT 3516 LE engine (EUENGINE1), one CAT 3408 TALE engine (EUENGINE2), Unit ID's on the compressor engine control panels identifies EUENGINE2 as NGCS 807 (north building), EUENGINE1 is identified as NGCS155 (south building). Each of the remaining engines is a low emission design and is not equipped with external emission control devices, though the exhaust for EUENGINE2 did contain a housing for a catalytic converter.

At the time of the inspection I observed the following information for each of the engines:

EUENGINE1, CAT 3516 LE
The engine was running at 1133 rpm, oil pressure 55 psi, temperature 194 degrees F. This was consistent with data on the log sheet in the compressor building. There did not appear to be a catalytic converter in place in the exhaust system of the engine.

EUENGINE2, CAT 3408 TALE
The engine was running at 1124 rpm, oil pressure 50 psi, temperature 250 degrees F. This was consistent with data on the log sheet in the compressor building. A catalytic converter housing was in place in the exhaust system of the engine but there were no temperature sensors.

As indicated above, there are two dehydration systems at the facility. The dehy's are equipped with condensers and there were moderately strong odors present. Iron sponges were in place and are used to remove H2S from the gas.

The blow down tank sits in a lined containment structure. At the time of the inspection the containment area was being pumped out by a vac truck.

Following the inspection I contacted Mr. Jim Peters and requested emissions, fuel usage, and maintenance records from the company. The records were received on 11/24, 25/ 2015 and 12/3/2015. The maintenance records for EUENGINE 1 came from Natural Gas Compression Systems and the maintenance records for EUENGINE2 came from Exterran. The NGCS records are attached and are in a one page per record format. The records for EUNGINE2 were also provided electronically and consist of multiple pages per record. The total Exterran submittal was 155 pages so the records were reviewed but are not attached. The records indicated routine maintenance of EUENGINE1 and replacement of cylinder heads during 2015. Routine maintenance was also performed on EUENGINE2. Fuel use and emission records indicate the maximum NOx, CO, VOC and HAP 12-month rolling time period emissions were below the FGFACILITY emission limits in PTI 35-04D as follows:

	NOx	CO	VOC	HAP (benzene and formaldehyde)
EUENGINE1	17.218	21.838	5.459	2.440
EUENGINE2	24.010	26.085	3.144	0.451
TOTAL	41.228	47.923	8.603	2.891
FGFACILITY Limits	58 TPY	58 TPY	20 TPY	22 TPY

These records were reviewed and were found to be complete and in compliance with the PTI requirements.

A revised PM/MAP plan had been previously submitted by the company on 4/22/11 and approved on 5/05/11.

The 2014MAERS report was submitted and subsequently reviewed on 5/05/2015.

At this time it appears that the facility is in compliance with PTI 35-04D and the Air Pollution Control Rules.

NAME _____ DATE 12-7-15 SUPERVISOR _____