

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

N746229378

FACILITY: BREITBURN OPERATING LP.-BLUE HERRON/JACK SPRATT		SRN / ID: N7462
LOCATION: SEC 24 30N 05E NE NE SE, LACHINE		DISTRICT: Gaylord
CITY: LACHINE		COUNTY: ALPENA
CONTACT: Carolann Knapp , BreitBurn Management		ACTIVITY DATE: 05/07/2015
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2015 FCE.		
RESOLVED COMPLAINTS:		

**SRN: N7462 Name: Breitburn Operating LP, Blue Herron/Jack Spratt**

Directions. The facility is located in Alpena County in NE4, NE4, SE4, Section 24, T30N, R5E. From M-65 turn west on Duncan Road, travel one mile to Cousineau Road, turn south. The facility is on the west side of Cousineau Road between Duncan and LeRoy Roads.

Application. This 2005 application for an Antrim gas CPF included:

- one Cat 3516 TALE,
- one Cat 3516 TALE,
- a glycol dehydration system,
- three 400-barrel brine storage tanks, and
- one 300-gallon methanol storage tank.

Permit. On March 28, 2006 the AQD issued opt-out permit 236-05. The Eval Form includes, "the methanol storage equipment is not exempt under Rule 284... the methanol storage tank equipment is included in the permit to avoid having to do monthly Rule 290 calculations, but no special conditions are needed due to the exempt status." The Eval Form also includes, "the application stated there are two engines at the facility. ...the consultant said there is now only one engine. Therefore, the permit conditions were revised to reflect a single engine." The permit includes:

- one natural gas fired reciprocating engine, and a
- glycol dehydration system.

MAP. On August 9, 2007 AQD approved the malfunction abatement plan (MAP). The MAP includes:

- one Cat 3516 lean burn with no control, and
- one Cat 3516 lean burn with no control "Not Included in PTI."

On July 6, 2015 AQD staff sent Carolann Knapp of Breitburn a request to update the MAP to include the one engine on site.

MAERS. The 2014 MAERS did not include emissions from the methanol storage equipment. Breitburn uses the engine manufacturer (Waukesha, Caterpillar) emission factors spec sheet for calculating and recording the monthly and 12-month rolling emissions, unless the permit states emission factors from stack testing shall be used in the calculations. The 2014 MAERS included these facility wide emissions:

- 16 tons CO (33.4 tpy permitted for EUENGINE), and
- 33.7 tons NOx (45.4 tpy permitted for EUENGINE).

Records. Breitburn consistently maintains their records, and makes records available to AQD upon request. The records demonstrate compliance with the permit limits and MAP. The records included:

- Natural gas throughput,
- NOx and CO emission rates from EUENGINE, and FG FACILITY,
- Certificate of Analysis for the gas, and
- Compressor maintenance log.

MACTS. The engine is subject to 40 CFR Part 63 Subpart ZZZZ. The glycol dehydrator is subject to 40 CFR



Part 63 Subpart HH . This is an area source (minor for HAPs). The EPA has not delegated Subparts ZZZZ and HH to MI AQD and the Subparts were not reviewed.

MACES' Facility Information and Regulatory Information were reviewed and updated as needed.

Brochure: The inspection brochure will be forwarded to the permittee with the site inspection notes via email.

Compliance. A review of MACES report generator shows no outstanding violation.

Inspection. The engine operated during the site visit. The engine stack had no visible emissions. Ear plugs are needed because of engine noise. The building doors were open. The engine muffler is outside of the building.

By visual assessment the engine stack meets the permitted limits of a maximum of 16 inches in diameter and minimum of 36 feet above grade. The engine does not have a catalytic converter. Clip boards on site contain records of engine operating parameters including: RPM, oil pressure, oil temperature, water pressure, water temperature, and suction pressure. There are two large tanks in a lined retaining area which has some standing water. One large tank is outside of the retaining area and has rust on the bottom-it appears this tank was recently replaced with one of the two tanks in the retaining area. A glycol dehydrator is on site. On the north side of the building are the remains of a cement pad, on the pad are various pipes and other equipment.

Permit Conditions:

#### EUENGINE

SC 1.1a & b, 1.11. Records from the permittee show 12-month rolling NOx emissions below the permitted 45.4 tpy, and CO emissions below the permitted 33.4 tpy.

SC 1.2, 1.3, 1.4, 1.8. The AQD approved a MAP for the facility.

SC 1.5. Breitburn submitted a Certificate of Analysis showing the gas has a hydrogen sulfide content of Non-Detect. Rule 119(i) defines sour gas as containing more than 1 grain of Hydrogen Sulfide, which is equal to 15.9 ppm(v).

SC 1.6. Submitted records show natural gas usage is monitored and recorded. The permit does not limit natural gas throughput.

SC 1.7. Calculations are available to the AQD.

SC 1.9. Not applicable, the engines are not controlled.

SC 1.10. Fuel use records are kept.

SC 1.12.a & b. A visual estimate showed the muffler stacks dimensions comply with the permit conditions.

#### FGFACILITY

SC 2.1a. & b. Records from the permittee show 12-month rolling NOx and CO emissions below the permitted 89 tpy.

SC 2.2, 2.3. Breitburn submitted a Certificate of Analysis showing the gas has a hydrogen sulfide content of Non-Detect. Rule 119(i) defines sour gas as containing more than 1 grain of Hydrogen Sulfide, which is equal to 15.9 ppm(v).

SC 2.4, 2.5. Records are kept.

Conclusions. Via onsite inspection and review of records, the permittee demonstrates compliance with the conditions of permit 236-05.

NAME

Gloria Inello

DATE

7-6-15

SUPERVISOR

[Signature]