

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

N746353064

FACILITY: BREITBURN OPERATING LP - ELMER FUDD EAST		SRN / ID: N7463
LOCATION: SEC 07 T28N R03E NE SE, COMINS		DISTRICT: Gaylord
CITY: COMINS		COUNTY: OSCODA
CONTACT:		ACTIVITY DATE: 11/25/2019
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: FY20 scheduled inspection		
RESOLVED COMPLAINTS:		

AQD Staff traveled to N7463 Breitburn Operating Elmer Fudd East CPF located in Clinton Township, Oscoda County for a Full Compliance Evaluation (FCE) scheduled inspection to determine compliance with MI-ROP-N7463-2019. AQD Inspector Becky Radulski was present at the inspection.

LOCATION

The source is located on Boiling Springs Road, 2 miles south of the Montmorency/Oscoda County line, approximately 4 miles west of M-33. Boiling Springs Road directly connects to M-33. Traveling west on Boiling Springs, facility is located on the right.

EQUIPMENT ON SITE

The facility consists of 3 lean burn engines – each a Caterpillar 3516 TALE 1340 hp, glycol dehydrator system and a lined tank with two 400 bbl brine tanks in a lined containment area.

The facility processes natural gas from the Antrim zone. The 3 engines compress gas and send it to a production pipeline for further processing.

REGULATORY DISCUSSION

The facility is a major source subject to a Renewable Operating Permit (ROP), MI-ROP-N7463-2019, because the potential to emit nitrogen oxides (NOx) is over 100 tons per year. The facility is not major for HAPs. The ROP expires January 1, 2024. An administratively complete ROP renewal application is due by June 1, 2023.

The engines are subject to 40 CFR Part 63, Subpart ZZZZ, which has not been delegated to MDEQ from EPA.

The glycol dehydration system is subject to 40 CFR Part 63, Subpart HH, which also has not been delegated to MDEQ from EPA.

INSPECTION NOTES

There are 3 large buildings on site. All engines were operating during the inspection. One glycol dehydration system serves all the engines. The dehy system was operating, no odors or VE noted.

EUENGINE1 - Caterpillar 3516 TALE 1340 hp, also known as #1185:

EUENGINE1 is located in the SW building, the one closest to the lined tank farm. There were several green storage tanks (oil and dehy chemicals) on stilts in containment located outside

the building. The stack has a muffler, no control, and what appears to be a silencer. Inside the building were red used oil tanks and hydraulic oil tanks on stilts in containment. There was also a dehy and o/w separator.

engine oil pressure	55 psi
rpm	1108

EUENGINE2 - Caterpillar 3516 TALE 1340 hp, also known as #1106:

EUENGINE2 is located in the N building. The stack has a muffler, no control, and what appears to be a silencer. Inside the building was a red used oil tank, several blue oil drums in containment. There was also an o/w separator.

engine oil pressure	55 psi
rpm	1099

EUENGINE3 - Caterpillar 3516 TALE 1340 hp, also known as #1107:

EUENGINE3 is located in the SE building. The stack has a muffler, no control, and what appears to be a silencer. Inside the building was a red used oil tank, blue oil tank in containment. There was also an o/w separator.

engine oil pressure	55 psi
rpm	1092

No VE or odor from any compressor engine stack or glycol dehydrator system.

The engine stacks are each required to have a minimum height of 39 feet, maximum diameter of 16 inches – based on visual observation, the stacks appear to meet this condition.

RECORDS REVIEW

The special conditions (SC) of the ROP are as follows:

Source-Wide (SW) – all equipment at site

SC I.1. The facility has a SW limit of 136 tons/NOx per year, based on 12 month rolling. Records provided indicate the current 12 month rolling is 54.1 tons NOx, which is below the permitted limit.

SC 1.2. The facility has a SW limit of 98.7 tons/CO per year, based on 12 month rolling. Records provided indicate the current 12 month rolling is 2.3 tons CO, which is below the permitted limit.

SC III.1. The facility confirmed it burns only sweet natural gas.

SC VI.1. The permittee calculates and maintains monthly and 12-month rolling CO and NOx emission calculations records. Records were provided up request.

EUDEHY – glycol dehydration system processing gas from the Antrim formation zone, contains a 125,000 BTU/HR heat input natural gas fired burner

SC VI. Monitoring/Recordkeeping - The facility is subject to 40 CFR Part 63 Subpart HHH. All indications are the facility is in compliance with the requirements of the subpart.

FGENGINES – Three natural gas-fired reciprocating engines. Caterpillar model 3-3516 TALE, 1340 horsepower each

SC I.1, I.2 - Each engine in FGENGINES has NOx and CO limit. Records were requested and provided as follows:

Engine:	NOx Limit (tpy, 12 mo rolling)	NOx Reported (tpy, 12 mo rolling)	CO Limit (tpy, 12 mo rolling)	CO Reported (tpy, 12 mo rolling)
EUENGINE1	45.3	14.5	32.8	10.5
EUENGINE2	45.3	20.3	32.8	10.0
EUENGINE3	45.3	16.5	32.8	8.5

SC III.1, VI.2 MAP - The facility has an AQD approved MAP. Approval was given on April 24, 2007. Daily maintenance records were reviewed onsite. Compressor maintenance logs were requested and provided. Records show on-going engine maintenance. The engines are lean burn and do not have control.

SC. III.2 and 3, VI.3. The engines do not have add-on control, these conditions are not applicable.

SC V.1. The most recent stack test took place in May 2019. The facility met the conditions of the ROP.

SC VI.1, VI.4 Natural gas usage is monitored and recorded. Fuel use records were provided and are attached. The permit does not limit fuel use.

SC VI.5 and 6. NOx and CO records are kept on a monthly and 12-month rolling basis.

SC VIII. 1, 2 and 3. Per a visual estimate, the stacks meet the permit requirements.

COMPLIANCE DETERMINATION

Based on the scheduled inspection, N7463 Breitburn Elmer Fudd East CPF appears to be in compliance with ROP-MI-N7463-2014. Records are reviewed separately.

Becky
Radulski

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Becky Radulski
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