

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

N746331790

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: Carolann Knapp ,		ACTIVITY DATE: 10/12/2015
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: site inspection and records review		
RESOLVED COMPLAINTS:		

On October 12, 2015 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-N7463-2014.

AQD Staff Gloria Torello and Becky Radulski were present at the inspection. Joe, an operator, was also present. Ron is the normal Operator at this site, Joe was filling in.

DEQ Inspection brochures have been previously emailed to Breitburn.

**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 major for the potential to emit NOx over 100 tons. The facility is not major for HAPs.

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.

The SW building contains EUENGINE1 - Caterpillar 3516 TALE 1340 hp, also known as #1185

engine oil temperature	175 F
engine oil pressure	60 psi
rpm	1120

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. Located outside the main entrance were 2 blue oil drums that appeared to have been recently delivered. Inside the building were 2 red used oil tanks, 2 hydraulic oil tanks on stilts in containment. There was also a dehy and o/w separator.

The N building contains EUENGINE2 - Caterpillar 3516 TALE 1340 hp, also known as #1106

engine oil temperature	174 F
engine oil pressure	62 psi
rpm	1135

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.

The SE building contains EUENGINE3 - Caterpillar 3516 TALE 1340 hp, also known as #1107

engine oil temperature	177 F
engine oil pressure	56 psi
rpm	1117

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.

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

The engine stacks are 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 V.1. AQD did not request the verification of H2S.

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 HH. 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	26.4	32.8	15.5
EUENGINE2	45.3	27.2	32.8	15.2
EUENGINE3	45.3	25.9	32.8	15.5

Based on the records provided, each engine meets the conditions of the emission limits.

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 June 2014. 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.

### MAERS

MAERS 2015 submittal was reviewed. See MAERS for details. The 2016 submittal will be reviewed during the 2016 MAERS season.

### MACES

MACES Facility and Regulatory screens were reviewed. The facility description was updated to add detail.

### COMPLIANCE DETERMINATION

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

NAME Becky Radulski

DATE 10/19/15

SUPERVISOR 

