

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

N746532681

FACILITY: Linn Operating Inc. - Hayes 34		SRN / ID: N7465
LOCATION: SEC 34 29N 04W, GAYLORD		DISTRICT: Cadillac
CITY: GAYLORD		COUNTY: OTSEGO
CONTACT: Diane Lundin , Environmental Manager		ACTIVITY DATE: 12/02/2015
STAFF: Rob Dickman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection of this opt out source.		
RESOLVED COMPLAINTS:		

Inspected this opt out source per permit to install number 346-05. Prior to entering the facility, no odors or visible emissions were noted. GPS Coordinates, 44.9524, 84.7814.

An inventory of on-site equipment was taken:

- One V-16 Caterpillar Engine, without control (Engine 4)*
- One V-16 Caterpillar Engine, without control (Engine 1)
- Three exempt ASTs (400 bbl)
- One small glycol dehydrator

*There is a catalyst housing installed at the engine exhaust, however, the element has been removed (See letter from facility dated June 12, 2014). The facility will change their recordkeeping such that the catalyst is not listed with the engine.

It should be noted that four engines were noted in the permitting but two have been removed from service at this facility. The facility has been notified regarding updating their permit to reflect this change and they are considering it.

Following are the findings of the inspection by permit special condition. All required records were reviewed and some are attached to this report.

FGENGINES - The following table lists emissions limits for the sources in this group. Calculated emissions are based on a 12-month rolling time period determined at the end of each month between October 2014 and October 2015.

	Pollutant	Equipment	Emission Limit	Calculated Emissions
1.1a	NOx	EUENGINE1	23.4 tpy	14.7 tpy
1.1b	CO	EUENGINE1	21.4 tpy	13.3 tpy
1.1c	NOx	EUENGINE2	23.4 tpy	0 tpy
1.1d	CO	EUENGINE2	21.4 tpy	0 tpy
1.1e	NOx	EUENGINE3	23.4 tpy	0 tpy
1.1f	CO	EUENGINE3	21.4 tpy	0 tpy
1.1g	NOx	EUENGINE4	38.4 tpy	14.7 tpy
1.1h	CO	EUENGINE4	22.4 tpy	13.2 tpy

1.2 This facility is required to have an approved Malfunction Abatement Plan (MAP). This plan was approved in June of 2012 and is being followed.

1.3 Any engine at this facility equipped with air pollution control is limited to operate no more than 200 hours per year without the control device based on a 12 month rolling time period determined at the end of each calendar month. Engine #4 is the only engine with controls and there are no records of it operating without these controls in the last 12 months.

Equipment

1.4 Any engine equipped with air pollution controls at the facility is required to operate those controls in accordance with manufacturer's specifications and the MAP. Engine #4 is the only engine with

controls and there are no records of it operating without these controls in the last 12 months.

Testing

1.5 Stack testing for NOx and CO to verify emission factors can be requested by the AQD. No stack testing on any of the emission units at this facility has been requested or performed in the last 12 months. Stack testing at this time is not recommended.

Monitoring

1.6 The facility is required to have a device installed to measure natural gas usage. Equipment to measure natural gas usage for each engine at this facility has been installed and appears to be working properly. Records regarding natural gas usage are being kept and were available upon request.

Recordkeeping/Reporting/Notification

1.7 The facility is required to have all required calculations performed by the last calendar day of the month for the previous month. All necessary calculations required at this facility appear to have been performed in a timely manner and appear correct.

1.8 A log of all maintenance activities for the engines in this group is required to be kept. Records of these activities is being kept and was available for review upon request. This log appears complete. Also required is notification of any engine changeouts. None of the engines in this group have been changed out in the last 12 months. Engines 2 and 3 have been removed from the site.

1.9 Any engine at this facility equipped with air pollution control is required to keep records of when the engine operates without the control device. Neither engine is equipped with control, therefore, this condition does not apply.

1.10 The facility is required to keep monthly records of fuel usage. Monthly fuel use records for each engine are being kept properly and were available upon request.

1.11 The facility is required to keep monthly and 12-month rolling time period NOx and CO emission calculation records for each engine. These records are being kept in a timely manner and appear correct.

Stack/Vent Restrictions

1.12 a-d – With the exception of Engines 2 and 3, which have been removed, none of the stacks have been modified and appear correct.

FGFACILITY

Emission Limits - - The following table lists emissions limits for the sources in this group. Calculated emissions are based on a 12-month rolling time period determined at the end of each month between October 2014 and October 2015.

	Pollutant	Equipment	Limit	Calculated
2.1a	NOx	FGFACILITY	97.1 tpy	29.4 tpy
2.1b	CO	FGFACILITY	89 tpy	26.5 tpy

Material Limits

2.2 The facility is required to burn only sweet natural gas at the facility and only sweet natural gas is burned at the facility.

Testing

2.3 The AQD has the option to request testing of the natural gas. No material testing on the natural gas at this facility has been requested or performed in the last 12 months and is not recommended.

Recordkeeping / Reporting / Notification

2.4 The facility is required to have all required calculations performed by the last calendar day of the month for the previous month. All necessary calculations required at this facility appear to have been performed in a timely manner and appear correct.

2.5 The facility is required to keep monthly and 12-month rolling time period NOx and CO emission calculation records for the entire facility. These records are being kept in a timely manner and appear correct.

At the time of the inspection, this facility was in compliance with their opt-out permit.

NAME 

DATE 12/22/18

SUPERVISOR 