

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

N747229402

FACILITY: BREITBURN OPERATING - CARBON BLACK ROHMAN EMPIRE		SRN / ID: N7472
LOCATION: SEC 29 TWP 30N 6E SE SW SW, 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:		

Directions. The facility is located in Alpena County, Green Township, in SE4, SW4, SW4, Section 29, T30N, R6E. From M-65, merge onto Elevere Road one mile, turn east on Black Road half mile. The facility is on the north side of Black Road.

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

- two 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 231-05. 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 permit includes:

- two natural gas fired reciprocating engines, and a
- glycol dehydration system.

MAP. On August 24, 2007 AQD approved the malfunction abatement plan (MAP). The MAP includes two Cat 3516 TALEs with no control or AFRC.

MAERS. The 2014 MAERS did not include emissions from the methanol storage equipment. EUENGINE2 was removed in 2012. 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. MAERS was updated: Source Type ROP was changed to SM OPT OUT, from minor. The 2014 MAERS included these facility wide emissions:

- 15 tons CO (33.4 tpy permitted for EUENGINE, and 89 tpy for FGFAILURE), and
- 31.9 tons NOx (45.4 tpy permitted for EUENGINE and 89 tpy for FGFAILURE).

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 EUENGINE1, EUENGINE2, and FGFAILURE,
- 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. There is one engine onsite and it operated during the site visit. Visible emissions on the engine stack

were less than 5 percent. Ear plugs are needed because of engine noise. The building doors were open. 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. It appeared one of the tank hatches was open. Torello left a message with Carolann Knapp, Breitburn, and asked if her staff could investigate the tank hatch. Later in the day Torello met Rich Hopp of Breitburn at the Minke Coat facility and told Rich about the tank hatch. Carolann communicated with Torello the hatch was not open. There are a few other smaller tanks onsite and outside.

A glycol dehydrator is on site. An outdoor cement pad holds a collection various old/rusted pipes.

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 on April 24, 2007.

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 231-05.

NAME

Gloria Torello

DATE

6-3-15

SUPERVISOR

[Signature]