

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

N752635557

FACILITY: BREITBURN OPERATING LP-BUSHMAN CPF		SRN / ID: N7526
LOCATION: T28N R2E SECTION 2, ELMER TWP		DISTRICT: Cadillac
CITY: ELMER TWP		COUNTY: OSCODA
CONTACT: Carolann Knapp , Environmental Specialist		ACTIVITY DATE: 07/12/2016
STAFF: Shane Nixon	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Onsite inspection and records review		
RESOLVED COMPLAINTS:		

AQD staff traveled to Oscoda County to perform an inspection of Breitburn's Bushman CPF. The purpose of the inspection was to determine the facility's compliance with Permit to Install (PTI) No. 230-05 and applicable state and federal air pollution control regulations.

The facility is comprised of a 16 cylinder Caterpillar compressor engine (no catalytic control, skid number GCS 1206) and associated compressor, two crude oil storage tanks (which are not equipped with a vapor recovery unit), a glycol dehydrator, separators (processing gas from the Antrim formation), a heater, a triethylene glycol storage tank and a methanol storage tank (each approximately 250 gallon capacity).

The compressor engine was operating at the time of the inspection and operating information recorded follow:

- Operating rate: 969 rpm
- Engine oil pressure: 55 psi
- Engine coolant temperature: 210°F

EUENGINE

1. **Emission Limits** – NOx and CO emissions are limited to 45.4 tons per 12 month rolling time period and 33.4 tons per 12 month rolling time period, respectively. Emission calculations (attached) provided by Breitburn demonstrate compliance with the emission limits. The highest NOx and CO emissions for the previous 12 months were 23.0 tons per 12 month rolling time period and 10.9 tons per 12 month rolling time period, respectively.
2. **Material Limits** – There are no material limits associated with this emission unit; therefore, this section is not applicable.
3. **Process/Operational Limits** – The facility previously submitted a preventative maintenance plan and malfunction abatement plan in accordance with the requirement of the PTI. Based upon logged maintenance activities (attached) on the compressor engine, Breitburn is performing the required maintenance.
4. **Equipment** – There are no applicable equipment restrictions associated with the emission unit at this time; therefore, this section is not applicable.
5. **Testing** – AQD staff has determined that stack testing to confirm emission factors used for calculating NOx and CO emissions is unnecessary at this time.
6. **Monitoring** – As per the requirements of the PTI, Breitburn is monitoring the natural gas usage on a continuous basis.
7. **Recordkeeping/Reporting/Notification** – As mentioned previously, records of monthly emission calculations and a log of maintenance activities are maintained and made to AQD staff upon request. Monthly and 12 month rolling time period records of natural gas usage was also available to AQD staff for review (attached).
8. **Stack/Vent Restrictions** – The stack associated with the EUENGINE appeared to be constructed in accordance with the parameters listed in the PTI.

FGFACILITY – All process equipment at the facility including equipment covered by other permits, grandfathered equipment and exempt equipment.

1. **Emission Limits** – NOx and CO emissions are each limited to 89 tons per 12 month rolling time period. Calculated emissions of NOx and CO are relatively consistent for the previous 12 months. The highest NOx and CO emissions are 23.1 tons per 12 month rolling time period and 11.0 tons per 12 month rolling time period, respectively, occurred in March 2016.
2. **Material Limits** – The facility is allowed to burn only sweet gas. The most recent gas analysis (attached) indicates the hydrogen sulfide concentration in the gas at the facility is non-detectable and AQD staff considers the gas to be sweet.
3. **Process/Operational Limits** – There are no process or operational limits associated with this flexible group; therefore, this section is not applicable.
4. **Equipment** – There are no equipment restrictions associated with this flexible group; therefore, this section is not applicable.
5. **Testing** – AQD staff requested records of the most recent gas analysis to demonstrate compliance with the requirement listed in Material Limits.
6. **Monitoring** – There are no monitoring requirements associated with this flexible group; therefore, this section is not applicable.
7. **Recordkeeping/Reporting/Notification** – Monthly and 12 month rolling NOx and CO emission calculations (attached) were made available to AQD staff. Review by staff determined the records to be complete and acceptable.
8. **Stack/Vent Restrictions** – There are no stack or vent restrictions associated with this flexible group; therefore, this section is not applicable.

Conclusion – Based upon the on-site inspection and records review, AQD staff considers the facility to be in compliance with PTI No. 230-05.

NAME Shane Nixon

DATE 7/15/16

SUPERVISOR 