

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

N753129776

FACILITY: BREITBURN OPERATING LP-LOB/UNCLE RAY'S CORNER		SRN / ID: N7531
LOCATION: T31N R2E SEC 22, BRILEY TWP		DISTRICT: Gaylord
CITY: BRILEY TWP		COUNTY: MONTMORENCY
CONTACT:		ACTIVITY DATE: 06/09/2015
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection and record review		
RESOLVED COMPLAINTS:		

On June 9, 2015, I inspected the Life of Briley / Uncle Ray's facility. I didn't find any violations of air pollution rules or of their permit, 237-05.

The facility has had equipment removed since the previous inspection. There was much removed pipe and equipment around, including what appeared to be sections of a stack of about 16 inches diameter. In previous inspections there were two natural gas fired compressor engines on site, but there was only one during this inspection. Records provided by the company indicate that EUENGINE1 is consuming fuel but EUENGINE2 is not consuming fuel or producing emissions; therefore EUENGINE2 must be the one which was removed. In addition, EUENGINE 1 is listed as Comp # 1050, and I found an engine labeled as GCS 1050 on site. EUENGINE2 is listed as Comp # 1132; in a previous inspection I found an engine labeled as GCS 1132 but that engine was not present for this inspection.

The facility contains a glycol dehydrator. Its burner stack is of about 8 inches diameter and 24 feet tall, exhausting unobstructed vertically upward. Permit 237-05 doesn't set any limits on the dimensions of this stack. The dehy burner is a Wenco Flame Arrested Burner rated at 200,000 btu (presumably btu per hour) according to its builder's plate. It was operating at the time of my inspection. There was no opacity from the burner stack. The glycol still vents were emitting wisps of "steam." There were moderate glycol odors near the dehydrator. I don't think they were strong enough to be detected offsite.

There is one Caterpillar natural gas fired compressor engine. It is labeled as GCS 1050 in metal characters welded to the engine mount. It was running at the time of my inspection. The digital control display indicated 57,212 hours of operation, 1279 RPM, 27 volts, oil pressure 52 PSI, coolant temperature 197 degrees f.

In my previous inspection I called the above engine the "north engine." The other engine onsite appeared to be identical. It was unit GCS 1132.

The remaining engine stack appeared to be in compliance with the dimensions set in Permit 237-05, Conditions 1.13 limiting the stack to a maximum diameter of 16 inches and a minimum height of 36 feet.

I found several small tanks. There was an oval steel tank, which might have contained coolant, one near the radiator of the engine. There were 300 gallon sized drum on stilt tanks labeled as methanol and triethylene glycol near the dehydrator, and a third one labeled Chevron Regal Engine Oil near the engine.

The facility includes three 400-barrel size tanks, two of which appear to be brine tanks. The third is outside the berm, not piped to anything, with access hatches off. There was such a tank during the previous inspection as well.

The two tanks that had been installed had no truck load-out and were piped to a salt-water disposal well. They are inside a berm that appears to be well maintained. The disposal well is labeled as Terra Energy Ltd / St Briley D4-22 SWD / Briley Twp Montmorency Co MI / SE 1/4 SE 1/4 SE 1/4 Sec 22 T21NR02E , Permit 50587 / In Case of Emergency 989-732-0869.

Maintenance appeared to be good.

The company provided facility records for me to review.

Permit 237-05, Table EUENGINE, Special Condition 1.8, requires maintaining a maintenance log as specified in a Malfunction Abatement Plan. A copy of this log is attached.

Condition 1.9 requires keeping track of any hours operating without the installed control device, if applicable. Records submitted indicate there is no add-on control device, so this does not apply.

Condition 1.10 requires monthly fuel use records. These are being kept. Fuel use for May, the month requested, was 5.5 MMCF for Engine 1 (and 0 for Engine 2).

Condition 1.11 requires monthly and 12-month NOx emission estimates. These were provided. For May, Engine 1 NOx was 3.36 tons/month and 40.3 tons/12 months. Permit limit is 45.4 tons/12 months per engine.

Condition 1.12 requires monthly and 12 month CO emission estimates. These were provided. For May, Engine 1 CO was 1.59 tons/month and 19.1 tons/12 months. Permit limit is 33.4 tons/12 months per engine.

Table FGFACILITY, condition 2.5, requires monthly and 12 month NOx and CO records. These records were provided. The vast bulk of the emissions come from the engine; total facility NOx is listed as 3.4 tons/month and 40 tons/12 months for January, vs. 3.36 tons/month and 40 tons/12 months for EUENGINE1 alone. Facility CO was 1.6 tons/month and 19 tons/12 months vs. 1.59 tons/month and 19 tons/12 months for EUENGINE1 alone; actually showing a bit less for the total facility than the engines, but this is probably due to rounding errors.

Breithurn has elected to show compliance with NSPS HH by tracking the volume of gas processed through the dehydrator. They state that daily average gas throughput was about 63,071 scm. The dehydrator is exempt from the more stringent control requirements of NSPS HH because these apply only if average throughput is 85,000 scm or more per day.

NAME William J Rogers L.

DATE 6/12/2015

SUPERVISOR 