

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N756159936

FACILITY: RIVERSIDE ENERGY MICHIGAN, LLC - Livingston 21		SRN / ID: N7561
LOCATION: SW4 SW4 SEC 21, T31N, R3 W, LIVNGSTON TWP		DISTRICT: Gaylord
CITY: LIVNGSTON TWP		COUNTY: OTSEGO
CONTACT: Natalie Schrader , Environmental Specialist		ACTIVITY DATE: 09/16/2021
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2021 FCE.		
RESOLVED COMPLAINTS:		

On September 16, 2021, I traveled to N7561 Riverside Livingston 21 Central Production Facility (CPF), located in Livingston Township, Otsego County, for a scheduled inspection to determine compliance with PTI 347-05. This is an opt out permit.

The Livingston 21 CPF is an oil and gas production facility, extracting gas from the Antrim formation. Natural gas and brine fluids are extracted from wells drilled into producing reservoirs then transmitted through flow lines to a CPF. The gas is compressed by one engine. Riverside Energy became the owner of this facility on September 1, 2021.

LOCATION

The facility is located on the north side of Gaylord, 2 miles north of M-32, on the west side of I-75. To reach the facility from M-32, drive north on Murner Rd, turn east on Five-Lakes Rd, turn north on Meecher Rd, turn right on Allis Rd and follow until the road ends at the facility.

REGULATORY DISCUSSION

PTI 347-05 was issued March 28, 2006, and is currently active. The permit was issued for one Caterpillar 3516 TALE lean burn compressor engine and a glycol dehydration system.

The engine is subject to 40 CFR Part 63, Subpart ZZZZ, which has not been delegated to MDEQ from EPA.

The glycol dehydrator is subject to 40 CFR Part 63, Subpart HH, which has not been delegated to MDEQ from EPA.

INSPECTION NOTES

During the inspection, the sky was clear, 70 degrees F with southwest winds at 10 mph. The facility has a sign on the building indicating the source name, location and emergency contact information. The facility does not have a fence or gate.

The facility consists of one building containing one engine, a tank storage area, a glycol dehydrator unit and several hydraulic/engine oil and used oil tanks. The facility is in a rural area adjacent to I-75. The doors to the building were open.

The engine was operating. No visible emissions or odor were present. The skid for the engine was labeled as GCS 1202. The clipboard identified the engine as a Cat 3516, Unit 1202. The engine exhaust stack was equipped with a muffler and visually appeared to meet the height requirements on the permit.

The dehydrator is located inside the same building and was also operating. No significant odors were detected. The dehy is not equipped with a control device only a drip tank and atmospheric vent (outside the building).

East of the building is a lined, bermed tank storage area. The tank storage area is fenced and gated. There are two tanks, approximately 200 bbl in the storage area, and one smaller raised tank. There was a minimal amount of water in the containment area.

RECORDS REVIEW

PTI 347-05: EUDEHY, EUENGINE, FGFACILITY, FGMETHANOL

EUENGINE – natural gas fired reciprocating engine. Noted in permit application as a Caterpillar 3516 lean burn compressor engine.

Emission Limits – The nitrogen oxides (NOx) and carbon monoxide (CO) are limited to 45.4 tpy and 33.4 tpy, respectively, based on 12 month rolling period. The facility provided records indicating the 12-mos rolling NOx and CO emissions as of August 2021 were 13.29 and 12.62 tpy, respectively. The highest 12 month totals reported were for December 2020 at 15.07 tpy for NOx and 14.31 tpy for CO. Reported emissions for NOx and CO demonstrate compliance with the permitted limits.

Process/Operational Limits – The facility has an approved PM/MAP on file, with approval letter dated August 9, 2007. The MAP identifies this engine as a Caterpillar 3516 lean burn with no AFRC, Unit #1202. This coincides with observations made on site. Maintenance records were provided and reviewed; records demonstrate compliance with the permitted requirements.

Testing - Testing is required upon request to verify NOx and CO emissions. Testing is not being requested at this time.

Monitoring - The permittee is required to monitor natural gas usage for EUENGINE. Natural gas records were provided and reviewed; the engine has a natural gas throughput of approximately 4,000 mcf/month. The provided records demonstrate compliance with this requirement.

Record keeping/Notification - The permit allows for the engine to be replaced with an equivalent emitting or lower emitting engine, upon notification to AQD. AQD has not received notification of an engine switch out. The permittee shall also provide records as required for NOx and CO calculations. Records were provided, demonstrating compliance with this requirement.

Stack/Vent Restrictions - The stack for EUENGINE is required to have a maximum of 16 inches diameter and minimum height above ground of 40 feet. Based on visual estimates during the onsite inspection, the stack for EUENGINE meets these requirements.

FGFACILITY – All process equipment at the facility including equipment covered by other permits, grand-fathered equipment and exempt equipment. Per the permit eval form, the opt-out limits of 89 tpy NOx and 89 tpy CO were into the permit to ensure the source remains minor if exempt equipment is installed onsite.

Emission Limits – The nitrogen oxides (NOx) and carbon monoxide (CO) are each limited to 89 tpy, based on 12 month rolling period. The facility provided records indicating the NOx and CO emissions as of August 2020 were 13.29 and 12.62 tpy, respectively, based on 12 month rolling time period. The highest 12 month totals reported were 15.07 tpy for NOx and 14.31 tpy for CO. Reported emissions for NOx and CO demonstrate compliance with the permitted limits.

Material Limits – The permit only allows for the burning of sweet natural gas in FCFACILITY. The most recent gas analysis dated 4/27/17 indicated a hydrogen sulfide content reported as NIL (none).

Testing - Testing is required upon request to verify NOx and CO emissions. Testing is not being requested at this time.

Record keeping/Notification - The permittee shall provide records as required for NOx and CO calculations. Records were provided, demonstrating compliance with this requirement.

MAERS

The facility is required to report annual emissions to MAERS. The 2020 submittal was reviewed. See the attached MAERS emissions summary for details.

MACES

MACES was reviewed, and the information screen updated.

COMPLIANCE DETERMINATION

Based on the scheduled inspection and records review, N7561 Riverside Livingston 21 CPF was in compliance with the requirements of permit 347-05.

NAME 

DATE _____

SUPERVISOR _____