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

N759262668

FACILITY: RIVERSIDE - CUSTER 7 CPF		**SRN / ID:** N7592
LOCATION: 3996 DB Trail, CUSTER TWP		**DISTRICT:** Cadillac
CITY: CUSTER TWP		**COUNTY:** ANTRIM
CONTACT:		**ACTIVITY DATE:** 04/21/2022
STAFF: Sharon LeBlanc	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: FY2022 onsite site inspection. Data review to be reported separately. sgl		
RESOLVED COMPLAINTS:		

On April 21, 2022, AQD District Staff conducted a site visit for the Riverside Custer 7 CPF (N7592), located at 3996 D&B Trail, (SE, SE, SW of Section 9, T29N R7W), Custer Township, Bellaire, Antrim County, Michigan.

The purpose of the site visit was to confirm equipment onsite with respect to Permit to Install (PTI) No. 96-06D. Records review was/will be conducted and documented in separate reporting.

The referenced site was previously inspected on December 4, 2018. No compliance issues were identified as part of the 2018 compliance evaluations.

FACILITY

The referenced facility is a NG compressor station located in Bellaire, Michigan. The Facility is reported to process NG from the Antrim Formation.

To get to the site, District Staff travelled approximately 7-miles west on CR-88 from it's intersection with M-131 in Mancelona, Michigan. At the intersection of CR-88 with Lady of the Woods Road, make a left and travel south approximately 0.50-miles to the intersection of D&B Trail. Note that Swain's Junk Yard will be located on the east/left side of the reoad. At D&B Trail make a left and travel east for less than ¼ mile, the site is on the north (left) side of the road. Note that the Facility is located at the SE corner of what historically has been part of Swain's Junk Yard.

A review of aerials indicated that the site was constructed after 2005.

At the time of the site inspection, the skies were overcast, temps in the low 40s with little to no winds. No plumes were visible at the time of the site visit.

MAERS review indicated that the Facility reported not operating for the calendar year 2021. However, both existing NG-fired compressors were operating at the time of the April 21, 2022, site inspection. Onsite operator reported that one or both compressors may be replaced in the future by the existing onsite electric engine.

REGULATORY

<u>Permitting</u> - PTIs issued for the Facility include the following:

PTI	Issued	Voided	Issued to

96-06D	**1/22/2018**	**NA**	**Riverside Energy Michigan LLC**
96-06C	**7/19/2010**	**1/22/2018**	**Riverside Energy Michigan LLC**
96-06B	**10/30/2009**	**7/19/2010**	**O.I.L. Energy Corporation**
96-06A	**4/19/2007**	**10/30/2009**	**O.I.L. Energy Corporation**
96-06	**5/8/2006**	**4/19/2007**	**O.I.L. Energy Corporation**

Federal Regulations - The referenced facility does not process or store petroleum liquids, nor store them onsite and is therefore appears to not be subject to 40 CFR Part 60 (New Source Performance Standards AKA NSPS) Subparts;

- K, Ka or Kb (Storage vessels for Petroleum Liquids);
- KKK (Equipment Leaks of VOC from onshore NG Processing Plants);
- VV (Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry);

With regards to the existing engine(s) it appears that based on install dates for the Caterpillar 3516 LE would not be subject to NSPS Subparts IIII and JJJJ for Compression Ignition (CI) RICE and Spark Ignition (SI) RICE, respectively. District staff requested clarification regarding applicability of RICE NESHAP for both engines. But the requested information was not provided during report preparation.

Subpart OOOO would apply to onshore affected facilities that are constructed, modified or reconstructed after August 23, 2011. Based on available information it appears that the referenced subpart is not applicable at this time but that future changes may be subject to the referenced subpart.

With respect to 40 CFR Part 63 (Maximum Achievable Control Technology Standards A.K.A. MACT) the following Subparts may apply:

- Subpart HH (HAPS from Oil and NG Production Facilities)
- Subpart ZZZZ (Reciprocating Internal Combustion Engine aka RICE)

With respect to Subpart HH, the affected unit is believed to be the dehy unit. However, the facility is not subject to the subpart if it's average throughput is less than 85K cubic meters/day (3 MMscf/day) or average benzene emissions are less than 0.9 Mg/yr (approximately 1 ton/yr). A

compliance determination has not been made with respect to this subpart, and at the time of report preparation AQD does not have authority to enforce the subpart.

With respect to Subpart ZZZZ, the company at the time of report preparation has provided no information indicating that the existing RICE would not be subject to the referenced subpart. A compliance determination has not been made with respect to this subpart, and at the time of report preparation AQD has been delegated authority to implement and enforce the subpart. However, at this time compliance determinations for Federal requirements under Subpart ZZZZ for Area Sources have not been made.

EQUIPMENT

Equipment associated with the site at the time of April 21, 2022, site inspection included the following:

EQUIPMENT	INSTALLATION DATE	Comment
400 BBL AST	Unk	Brine, with lined secondary containment.
Iron Sponge	Unk	Not in use
NG Compressor with CAT 3516 LE, RICE, uncontrolled	2007	Unit 191
NG Compressor with CAT 3512 LE, RICE, uncontrolled	2007	Unit 192
NG Compressor with Electric 400 HP, CAT 3408 TA	UNK	Documented present in 2011 FCE
Dehydrator	2007	

Operating parameters were found to be recorded on daily log sheets. The operating parameters were reported were consistent with the parameters reported below at the time of the site inspection.

Unit	RPMs	Oil Temp (degrees F)

Unit 191	**1251**	**206**
Unit 192	**1055**	**193**

SUMMARY

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No compliance issues were identified in conjunction with the 2018 site evaluation activities, nor were any compliance issues noted with respect to the April 21, 2022, site inspection.

Sharon LeBlanc, Environmental Quality Analyst
Digitally signed by Sharon LeBlanc, Environmental Quality Analyst
Date: 2022.06.09 10:16:11 -04'00'

NAME _____ DATE _____

Shane Nixon, Cadillac/ Gaylord District Supervisor
Digitally signed by Shane Nixon, Cadillac/Gaylord District Supervisor
Date: 2022.06.09 10:15:19 -04'00'

SUPERVISOR _____