

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

N781134745

FACILITY: SRW, Inc -- Central Lake 13 Facility		SRN / ID: N7811
LOCATION: SE 1/4 SEC 13 T31N R8W, CENTRAL LAKE		DISTRICT: Gaylord
CITY: CENTRAL LAKE		COUNTY: ANTRIM
CONTACT: John Stegman , Field Supt.		ACTIVITY DATE: 05/17/2016
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2016 FCE.		
RESOLVED COMPLAINTS:		

**SRN: N7811. Name: SRW Central Lake 13**

**Directions:** The facility is located in Antrim County, Central Lake Township. From Old State Road turn north onto Muckle Road and travel about 1.5 miles. The facility is on the west side of Muckle Road, north of Thurston Park Road and south of Bunker Hill Road.

**Application/Permit:** This is an Antrim gas facility. The application included a compressor engine and a glycol dehydration unit. On August 2, 2007 the AQD issued opt-out permit 181-07 which includes 88.3 tpy NOx from EUENGINE1, and 89.9 tpy NOx from FGFACILITY. The permit does not include a glycol dehydrator table.

**Malfunction Abatement Plan (MAP):** On January 30, 2008 the AQD approved the MAP. The MAP includes one Cat G399TAW rich burn engine with no catalytic converter and no AFRC.

**MAERS:** The 2015 MAERS reported source wide NOx emissions of 48 tons and the permitted limit is 89.9 tpy.

**Records:** The permittee provided records of:

- **Monthly fuel use in *MMSCF*.** The permit natural gas usage is in the unit of measurement *MMBtu*. Using a conversion, the submitted record shows natural gas usage below the permitted limit.
- **Monthly and 12-month rolling NOx emissions from EUENGINE1 and FGFACILITY.** The records show NOx emissions below the permitted limits.
- **Engine operation.** The record does not include catalyst inlet and outlet temperatures because the engine is not controlled.
- **Purchase order records associated with MAP maintenance.**

**MACTS:** This is a true minor facility for HAPs (below 10/25 tpy for individual/total HAPs) making the facility an area source for:

- 40 CFR, Part 63, Subpart HH, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, and
- 40 CFR, Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines for Area Sources.

The EPA has not delegated these Subparts to MI AQD and the Subparts were not reviewed.

**MACES:**

- Facility Information was reviewed and no change was made.
- Regulatory Info was reviewed and the following changes were made:
  - Subject To was updated to include 40 CFR Part 63 Subparts HH and ZZZZ.

**Brochure:** The inspection brochure will be forwarded to the permittee via email with the site inspection notes.

**Compliance:** A review of AQD files and MACES report generator show no outstanding violation.

**Inspection:** During the site visit the engine operated. No visible emissions were observed from the engine stack and there was a heat shimmer off the engine stack. Per a visual assessment, the engine stack appeared to meet the maximum diameter of 8-inches. The stack did not appear to meet the minimum height of 20-feet and AQD staff contacted the permittee and asked the permittee measure the stack height. The permittee confirmed the stack was not a minimum of 20 feet above ground level, and the stack was extended to "20+ feet from the ground" as John Stegman of SRW wrote in a May 27, 2016 email.

The engine skid had this identification: GCS U1268. A clip board near the engine included records for engine: gas pressure, suction, 1<sup>st</sup> iner stac, 2<sup>nd</sup> inter stage, etc. The records did not include catalyst inlet and outlet temperatures. In the exhaust stack off the engine is what appears to be the shell of a catalytic converter, no wires were associated with this shell. Per review of the 2015 MAERS, the permittee does not claim the engine has control. In the building are the glycol dehydrator, separators, a circular chart recorder, and various tanks including: Triethylene Glycol, Waste Oil, Methanol. Also on site are an iron sponge, and two tanks in a cement retaining area and there were 2-3 inches of water in the retaining area. There is a small out building with a small engine that appeared to run off the electrical grid. Overall the site is very tidy.

**Permit Conditions:**  
EUENGINE1

1.1, 1.8, 1.12. Records show the NO<sub>x</sub> emissions are below the permitted limit.

1.2 The AQD approved a MAP for the facility.

1.3, 1.5, 1.10. Not applicable, the engine does not have add on control.

1.4, 1.7, 1.11. The permit limits natural gas usage in EUENGINE1 to 30,609 *MMBtu* per year. Records from December 2015 show 16.95 *MMSCF* gas burned in the engine. Using conversion at this link <http://www.delekenergy.co.il/?pg=calc&CategoryID=198>, the December 2015 records shows 16,950 *MMBtu* natural gas used, which is below the permitted limit. Torello contacted the permittee and pointed out records are kept in a unit of measurement other than what is in the permit and to keep this in mind to assure ongoing compliance with the permit limit.

1.6 AQD has not requested verification of NO<sub>x</sub> emission factors.

1.9 As a demonstration of a log of maintenance activities conducted according to the MAP, purchase order records were provided.

1.13 As noted above, the permittee extended the engine stack to meet the minimum of 20 feet above ground level.

FGFACILITY

2.1, 2.4. Records show the NOx emissions are below the permitted limit.

2.2 This is an Antrim facility and sweet natural gas in FGFACILITY.

2.3 The permittee is timely in completing required calculations.

**Conclusions:** Via onsite inspection, review of records, and discussion with permittee staff, the permittee demonstrates compliance with the conditions of permit 181-07.

NAME Gloria Inello

DATE 6-2-16

SUPERVISOR 

