

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

N782434602

FACILITY: SRW, Inc -- Forest Home 12 Facility		SRN / ID: N7824
LOCATION: SW 1/4 NE 1/4 SEC 12 T30N R8W, BELLAIRE		DISTRICT: Gaylord
CITY: BELLAIRE		COUNTY: ANTRIM
CONTACT:		ACTIVITY DATE: 05/17/2016
STAFF: Becky Radulski	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: scheduled inspection FY16		
RESOLVED COMPLAINTS:		

AQD Staff traveled to N7824 SRW Forest Home 12 CPF located in Forest Home Township, Antrim County for a Full Compliance Evaluation (FCE) scheduled inspection to determine compliance with PTI 207-07. This is an opt out source.

DEQ Inspection brochures have been previously emailed to SRW.

The SRW Forest Home 12 CPF removes condensate and water from natural gas. The natural gas is produced at remote Antrim formation wells and transported to the site at low pressure by pipeline. The natural gas enters a compressor, driven by a natural gas fired engine, where it is compressed from approximately 3 psig to approximately 1010 psig. After compression, the natural gas enters a glycol dehydration unit which removes water vapor from the gas stream.

#### LOCATION

The facility is located on the west side of M-88 between Bellaire and Central Lake. The site is not visible from the road. The CPF is accessed by a gravel road on the south side of a residence just south of the 90 degree turn in Section 12 of Forest Home Township.

#### REGULATORY DISCUSSION

The permit (PTI 207-07) for this facility was issued in August 2007. This is an opt out source. The CPF was originally permitted with a Caterpillar G398. In June 2009 it was removed and replaced with a Caterpillar G342. The facility provided a letter to AQD dated June 9, 2009 notifying of the engine change out to a lower emitting engine and providing emission calculations. The engine change out is allowed per SC 1.8 of the permit.

The facility is not major for HAPs.

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

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

#### INSPECTION NOTES

The facility includes 1 large white building containing a Caterpillar compressor engine. The facility was NOT in operation. The chart recorder and maintenance clip board inside the building indicate the compressor engine last operated in November of 2015. A note on the gauge display read "unit pickled 12/4/15". The engine was identified as with engine skid #AR408.

Inside the facility is a dehy and oil water separator, both located on concrete pads. Several small tanks contained used oil, engine oil, methyl alcohol and triethylene glycol, contained.

There is an iron sponge on site on the north side of the compressor building. The hatch door to the iron sponge was open.

The stack has a muffler, no catalytic convertor. The permit requires the stack to emit a minimum of 20 feet above ground level and discharge unobstructed vertically upwards to ambient air. The stack height was estimated to be 15 feet based on an actual measurement of the lowest section of the exterior wall between the foundation and first row of bolts, which was 4 feet. In addition, the stack emits air to the left, or west, instead of upward. Both of these issues constitute a violation of the permit. A picture is

attached.

A small concrete contained tank battery is located onsite east of the building containing 2 tanks, approximately 400 and 200 bbl each. No water appeared to be in bottom of concrete containment, which is not surprising as there was not much rain previous to the inspection. There is a small building on the north side of the tank containment with a small electric generator inside.

The facility has a MAP. Records were requested and will be reviewed separately.

**MAERS**

The 2016 submittal has been reviewed, no issues.

**MACES and FILES**

MACES Facility and Regulatory screens were reviewed. Updated MACT screen to include Rice MACT.

**COMPLIANCE DETERMINATION**

Based on the scheduled inspection, N57824 SRW Forest Home 12 is NOT in compliance with the conditions of the permit, specifically the stack height and discharge directions. A Violation Notification letter will be sent.

Records are reviewed separately.