

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

N782524487

FACILITY: OMIMEX ENERGY -- Victory 32 Facility		SRN / ID: N7825
LOCATION: 3370 W. Fisher Road, LUDINGTON		DISTRICT: Cadillac
CITY: LUDINGTON		COUNTY: MASON
CONTACT:		ACTIVITY DATE: 03/11/2014
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2014 FCE inspection and records review.		
RESOLVED COMPLAINTS:		

I conducted a Full Compliance Evaluation of this facility including an on-site inspection and a review of recordkeeping and reporting. The facility is an opt-out source with respect to 40 CFR Part 70 (Title V/ROP) based on Permit to Install 208-07 which limits air emissions below major source thresholds. This facility is also an area source with respect to 40 CFR Part 63, specifically Subpart ZZZZ, the RICE MACT.

At the time of the inspection the equipment on site was as follows:

- 1 CAT G3408 4SRB compressor engine with no control.
- 2 glycol dehydrators.
- 2 process heaters. The common treater has been removed.
- 1 emergency flare.
- 2 storage tanks, 1 18,000 gallon NGL tank, 1210 barrel waste oil tank.

Compliance with PT I 208-70 was determined as follows:

#### EUENGINE1

- 1.1. NOx 87.6 TPY emission limit. Records of NOx emissions indicate actual emissions are 27.972 tons.
- 1.2. PM/MAP. The PM/MAP was submitted and approved 10/11/07 and updated for replacement of the compressor engine on 4/15/13.
- 1.3. Operation without control equipment. Not applicable, no control required on engine.
- 1.4. Natural gas usage not to exceed 48,040,050 cubic feet per year. Records indicate actual NG usage was 6,462,133 cubic feet.
- 1.5. Control device installed and operated satisfactory. Not applicable.
- 1.6. Testing required upon request of AQD. Testing has not been requested.
- 1.7. Monitor and record NG usage. The equipment is equipped with meters to monitor and record natural gas usage.
- 1.8. Emission calculation records. The required records are maintained and were provided (attached) upon request.
- 1.9. Maintain a log of all maintenance activities. Maintenance logs are maintained and were provided electronically but not attached due to the number of documents. The records were thoroughly maintained.

- 1.10. Maintain records of hours engine is operated without control device. Not applicable.
- 1.11. Monthly fuel use records. Records are maintained and were provided (attached) upon request.
- 1.12. Monthly and 12-mos. rolling NOx emission calculations. The required records are maintained and were provided (attached) upon request.
- 1.13. Stack parameters. No apparent change in stack dimensions.

#### FGFACILITY

- 2.1. NOx 89.4 TPY limit. Records of NOx emissions indicate actual emissions were 28.230 tons.
- 2.2. Except for emergency flaring of sour gas permittee shall only burn sweet natural gas. Gas usage records (attached) indicate only NG was burned.
- 2.3. Operate a continuously burning sweet gas pilot flame at the flare while processing natural gas. The flare did appear to have an operating pilot flame, the sound of flowing gas was present. There were no visible emissions from the flare.
- 2.4. Maintain records of emission calculations. See 2.1.
- 2.5. Monthly and 12 mos-rolling average NOx emissions calculations. The required records are maintained and were provided (attached) upon request.
- 2.6. Record the time and duration of each incidence of emergency flaring of sour gas. Records provided by Omimex indicate there were numerous flaring incidents usually associated with venting tanks and that the records are properly maintained.

#### REPORTING

There are no reporting requirements other than MAERS. The 2013 MAERS submittal has been submitted and reviewed the following annual emissions were reported:

CO = 2 tons

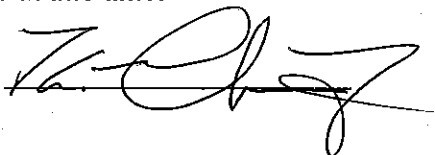
NOx = 21 tons

VOC = 1 ton

PM10 = < 1ton

The Omimex Victory 32 facility appears to be in compliance with PTI 208-07 and the Air Pollution Control Rules at this time.

NAME



DATE

3-26-14

SUPERVISOR

