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

N782634474

FACILITY: LINN Operating INC - S Rust B2-10 (Webber Crk) CPF		SRN / ID: N7826
LOCATION: SE NW SEC 10, RUST TWP		DISTRICT: Gaylord
CITY: RUST TWP		COUNTY: MONTMORENCY
CONTACT:		ACTIVITY DATE: 06/07/2016
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Site inspection and record review for FCE		
RESOLVED COMPLAINTS:		

On May 9, 2016, I inspected the Webber Creek CPF. I was there to inspect the BreitBurn Cattle Antrim facility which is co-located with the Webber Creek. I thought this was a self-initiated inspection of the Webber Creek facility, but it is on my scheduled inspection for this year. I had forgotten that.

In order to complete a FCE, I asked Linn Operating for records as required by the Webber Creek permit, PTI 212-07. They supplied the records I requested. This report combines my site inspection of May 9 with a record review conducted June 7.

Permit 212-07, Special Conditions 1.1a and b set a NOx limit of 4.6 tons per 12 month time period and a CO limit of 9.9 tons per 12 month rolling time period. An example page of the emissions results the company supplied is attached. It reports estimated emissions of 2.7 tons NOx and 5.9 tons CO per 12 month rolling time period. This complies with the permit conditions.

Condition 1.2 requires a malfunction abatement plan. The company supplied a MAP, which was later approved by the AQD, on August 6, 2007. This complies with the permit condition.

Condition 1.3 limits operating without the add on control device to 200 hours per year. Example records, attached, claim the engine has not operated without its catalytic oxidizer. This complies with the permit condition.

Condition 1.4 requires pollution control devices be installed and operating properly. During my site inspection I saw the catalytic oxidizer. It appeared to be installed properly. Catalyst data sheets, example attached, indicate a temperature rise across the catalyst which means it is burning contaminants from the exhaust stream passing through. This suggests the device is operating properly, in compliance with the permit condition.

Condition 1.5 requires stack testing upon AQD request. AQD has not requested stack testing, so this condition is not applicable. However, data sheets, example attached, indicate that the operator performed informal testing to confirm that the catalytic oxidizer was reducing emissions.

Condition 1.6 requires a device to monitor fuel use. I couldn't identify one during my site inspection. Detailed fuel use information, example data attached, suggests that such a fuel monitoring device exists.

Condition 1.7 requires performing all required calculations by the 15th of the following month unless otherwise specified. Data was available as I requested when I requested it, so it appears the company is in compliance with this permit condition.

Condition 1.8 requires a maintenance log. The company supplied copies of maintenance sheets which satisfy this permit condition. An example sheet is attached.

Condition 1.9 requires a log of hours of operation without the add-on control device. This log is being kept, in compliance with the permit condition. An example sheet is attached.

Conditions 1.11 and 1.12 require monthly and 12 month NOx and CO emissions calculations. These are being done in compliance with the permit. They are included on an example data sheet, attached.

Condition 1.13 requires the engine stack to have a maximum diameter of 10 inches and a minimum elevation, at the exhaust point, of 30 feet above ground level, exhausting unobstructed vertically upward. I was not able to measure the stack height during my inspection but it appeared to be of the specified dimensions, at least approximately. It exhausts unobstructed vertically upward.

In addition to permit conditions, the operator of this facility must comply with NSPS Subpart HH for glycol dehydrators. This subpart requires stringent emission control unless the operator can show exemption in one of two ways: By showing that actual annual natural gas flow rates are less than 85,000 standard cubic meters (approximately 3 million standard cubic feet) per day, or by showing that benzene emissions are less than 0.90 megagrams (approximately one ton) per year.

According to a statement from Linn Energy's consultant, attached, the Weber Creek (sic) facility is one of 27 CPFs for which Linn has demonstrated exemption by measuring flow. Flow measurements indicate the facility processes less than 3 million standard cubic feet per day. The attached data indicates this conclusion is reasonable. In my opinion the operator has shown compliance with Subpart HH by demonstrating that the Webber Creek facility meets exemption from Subpart HH's emission control requirements.

Field Inspection:

The facility has one small Caterpillar natural gas fired compressor engine with a catalytic oxidizer. Stack height appeared to be 35-40 feet or so with a diameter of about a foot, unobstructed vertically upward. There was no opacity.

The engine was running at 1026 RPM according to its instrument panel. I took the temperature of the exhaust pipe either side of the catalytic oxidizer, using our remote IR thermometer. I got 537 degrees f on the inlet side and 578 on the outlet side. A temperature rise across the catalytic oxidizer indicates it is burning contaminants from the exhaust stream, and therefore suggests it is operating properly.

The facility shed contains two standard 300 gallon size drum on stilt tanks, one labeled as engine oil and one as ISO 150 industrial oil. The facility also shares a cluster of four 400-barrel tanks, inside a berm, with the adjacent Cattle Antrim facility. Two of these tanks are labeled slop tanks and two are unlabeled, but are probably brine tanks. They are all inside a lined berm.

The facility includes a glycol dehydrator. The burner on the dehydrator seemed to be unlabeled, but looked to be of standard size, which are usually 100,000 or more commonly 125,000 BTU per hour. The burner stack was 6 inches diameter and perhaps 24 feet tall. The still vent was a pipe perhaps 2 inches in diameter, ending in a T fitting at about 27 feet above ground level.

Maintenance appeared good. I didn't notice any odors or opacity. I didn't see any leaks or spills. I didn't see any stained soils which might indicate there had been leaks or spills in the past.

NAME William J Rogers L. DATE 6/10/2016 SUPERVISOR