

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

N790150649

FACILITY: TRENDWELL ANTRIM INC - WOLF CREEK CPF		SRN / ID: N7901
LOCATION: NW NE SEC 20, CALEDONIA TWP		DISTRICT: Gaylord
CITY: CALEDONIA TWP		COUNTY: ALCONA
CONTACT:		ACTIVITY DATE: 05/31/2019
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: scheduled inspection and records review		
RESOLVED COMPLAINTS:		

On May 31, 2019 traveled to N7901 Trendwell Wolf Creek CPF located in Caledonia Township, Alcona County for an unannounced scheduled inspection to determine compliance with PTI 349-07. This is an opt-out source.

LOCATION

The source is located west of Hubbard Lake. From M-32, travel south on M-65, turn east onto Hubbard lake Trail and follow approximately 7 miles. Turn left/north onto Yukon Rd (private road, many signs at entrance), follow 1-2 miles. The source is located next to a Breitburn facility (N8070). Trendwell Wolf Creek is the eastern CPF, which is the second facility on the access road.

EQUIPMENT ON SITE

The facility consists of 2 engines - a permitted Caterpillar 3406 engine with catalyst and a Caterpillar 3516, 1085 hp, lean burn engine.

Onsite there is a glycol dehydrator, a tank farm with 2 tanks under 400 bbl.

Next to the Trendwell facility is a Breitburn CPF (N8070). During the permitted phase it was determined that the two CPFs operate independently from each other, and even if the emissions from both sources were combined they would not be a Title V facility, therefore they are 2 sources.

Breitburn sends its brine to the Trendwell facility for disposal.

The permit was originally issued 1-11-08 with two engines - a Caterpillar 3306 with no control, and a Caterpillar 3516LE, no control. In 2009 Trendwell submitted a PTI application to change the Caterpillar 3306 to a Caterpillar 3406 with catalytic convertor. The application was voided per Jeremy Hoeh in AQD Permits and the change could be accomplished under the flexibility of SC 2.8, which allows for change out of equivalent or lesser emitting engines. Trendwell sent a notification letter 8-18-09.

REGULATORY DISCUSSION

PTI 349-07is for 2 engines and a dehy.

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

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

INSPECTION NOTES

During the inspection the Caterpillar 3516 engine was operating and the Caterpillar 3406 engine was not. The Caterpillar 3406 was also not operating during the previous inspection in August of 2015. No visible emissions or odors were noted.

The Caterpillar 3516 was operating at 984 RPM and had engine oil pressure of 65 PSI. The unit was identified on its skid as GCS 848.

A glycol dehydrator, a lined tank farm with 2 tanks under 400 bbl, and a brine injection well is located onsite. Several small storage tanks – used oil, engine oil are inside the building.

The stack for EUENGINE1 is required to have a minimum height of 42 feet and 4 inch maximum diameter, and EUENGINE2 a minimum height of 33 feet and 12 maximum diameter – based on visual observation, the stacks appear to meet this condition.

RECORDS, SPECIAL CONDITIONS:

SC 2.6, 2.10, 2.11 - Emission Limits and throughputs:

EUENGINE1 - Cat 3406, 215 hp - not operating. no emissions reported in the past 12 months of records submitted (from September 2018). Per Danita Green (Trendwell - 616-866-5024, danita@trendwellenergy.com), this unit has not been used since 2010, and is currently not planned to be used at Wolf Creek. It is kept onsite in the event it is needed at another location.

EUENGINE2 - Cat 3516, 1085 hp as follows:

Parameter:	EUENGINE2	
	Limit	Reported
NOx (tpy, 12 month rolling)	22	9.83
CO(tpy, 12 month rolling)	NA	7.56
Fuel (MMCF, 12 month rolling)	NA	29.2

Reported emissions are based on September 2018. Emissions are under permitted limits.

SC 2.2, 2.3, 2.4, 2.8, 2.9 - Maintenance and PM-MAP:

The facility has an approved MAP from 2014, approval letter dated 4-16-14. The engines are correctly listed in Appendix A of MAP. Records received were reviewed and meet conditions of MAP.

Records show EUENGINE1 did not operate in the past 12 months, therefore operated zero hours without the catalyst. The permit allows for 200 hours.

SC 2.12a, 2.12b - Stacks:

The stack for Engine 1 is required to have a minimum height of 42 feet and maximum diameter of 4 inches. The stack for Engine 2 is required to have a minimum height of 33 feet and maximum diameter of 12 inches. Based on visual observation during the site inspection, the stacks appear to meet these conditions.

MAERS

MAERS have been reviewed, no issues. See MAERS for details.

COMPLIANCE DETERMINATION

Based on the scheduled inspection, the facility appears to be in compliance with PTI 349-07.
Records were reviewed separately.

NAME Becky Radulovic

DATE 9-27-19

SUPERVISOR SN

