

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

N817049041

FACILITY: RIVERSIDE - MT. MARIA CPF		SRN / ID: N8170
LOCATION: MT. MARIA CPF NE NE OF SEC 32 T28N R7E, ALCONA		DISTRICT: Gaylord
CITY: ALCONA		COUNTY: ALCONA
CONTACT: Natalie Schrader, Technical Assistant		ACTIVITY DATE: 05/30/2019
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Compliance inspection and record review for FCE		
RESOLVED COMPLAINTS:		

On May 30, 2019, I inspected the Riverside Energy Mt. Maria CPF for compliance with air quality rules and their Permit to Install, No. 329-08. Prior to this Ms. Natalie Schrader of Riverside provided me with records to review.

Permit 329-08, Table EUDEHY:

The facility has a glycol dehydrator. The US EPA has not delegated enforcement of the glycol dehydrator MACT to AQD. In previous inspections AQD had determined that this dehydrator met the exemption from the more stringent control requirements of NESHAP, 40 CFR 63, Subpart HH. That Subpart exempts glycol dehydrators which emit less than approximately 1 ton benzene per year. This facility met that exemption.

Table EUDEHY, Condition VIII.1, sets dehy vent dimensions as a maximum exhaust dimension of 2 inches and minimum height above ground of 10 feet. On site I estimated the dehy vent as 2 inches diameter at a height of 20 feet. This meets the permit condition.

Table EUENGINE1:

Conditions I.1 and I.2 set a NOx emission limit of 50 tons per 12 month rolling time period and a CO limit of 24 tons per 12 month rolling time period. According to facility records, attached, emissions in the 12 months leading up to and including February 2019 were 11.37 tons NOx and 10.80 tons CO. This complies with the permit conditions.

In our most recent previous inspection, in 2014, NOx and CO emissions were 24.5 tons and 23.3 tons, respectively.

Condition III.1 requires a Malfunction Abatement Plan. The company submitted one. AQD approved it July 15, 2010.

Condition III.2 limits hours of operation without any installed add on control device. This engine does not have one and did not have one in previous inspections. Therefore this condition is not applicable.

Condition IV.1 also refers to add on control devices and is therefore not applicable.

Condition IV.2 requires a device to monitor the amount of natural gas used as fuel in EUENGINE1. I did not find this device during my inspection. The facility records, attached, include fuel use in the engine. This indicates a fuel monitor is probably in place.

Condition VI.2 requires monitoring natural gas usage in EUENGINE1. The natural gas used is included in the attached records. This indicates fuel is probably being monitored correctly.

Condition VI.3 requires a maintenance log. Example data from the maintenance log is attached.

Condition VI.4 refers to add on control devices and is therefore not applicable.

Condition VI.5 requires keeping monthly fuel use records. These are in the attached facility records.

Conditions VI.6 and 7 require monthly and 12 month NOx and CO emissions calculations be kept. These are included in the attached facility records, as required.

Condition VIII.1 sets stack dimensions as a maximum diameter of 12 inches and a minimum height above ground of 36 feet. Using the length of the stack's shadow, I estimated stack height as about 40 feet. Stack diameter appeared to be 12 inches. This complies with the permit condition.

Table FGFACILITY:

Condition II.1 prohibits burning sour gas. I did not see any signs or equipment, nor did I notice any odors, which would lead me to think that the facility was violating this condition.

COMMENTS:

The facility is difficult to access. Riverside has provided me a key to their padlocks, so I was able to get in and out by myself. However, it might be advisable to arrange going there with a Riverside employee to make access easier.

The facility sign read

Riverside Energy Michigan LLC / (231) 995-4000 (989) 705-7665 / MT Maria CPF / T28N R7E Sec 32 NW 1/4 NE 1/4 NE 1/4 / Alcona Twp. Alcona Co.

I did not see any brine tank on site. However, there is a well on site labeled Pine Valley 1-32 SWD, Permit # 57911, T28N R7E Sec 32 NW 1/4 NE 1/4 NE 1/4 Alcona Twp Alcona Co. SWD indicates this is a salt water disposal well.

The glycol dehydrator has a Wenco flame arrested burner. According to its builder's plate it puts out 125,000 BTU per hour. Other than the still vent previously discussed it has a burner stack. This is about 6 inches diameter and 20 feet high, exhausting unobstructed vertically upward. There was no opacity from the burner stack. There was "steam" visible from the still vent. I noticed mild glycol odors downwind of the dehydrator; they were barely noticeable.

The engine was operating at the time of my inspection. It has no add on control device. It is a Caterpillar natural gas fired engine. According to its digital display it was running at 1182 RPM. Coolant temperature was 185 degrees f, voltage 27v, oil pressure 50 psi, hours of operation 93,287.

The engine stack exits the compressor shed horizontally through the west wall to a horizontal muffler, then bends through a pipe elbow to a tall stack which exhausts unobstructed vertically upward. There was no opacity in the exhaust. The engine had no unusual vibration. I did not notice any smoke or unusual odors in or around the facility.

Maintenance appears good. I did not see or hear any leaks. I did not see any stained soils which might have indicated prior leaks or spills.

NAME William J Rogers, Jr

DATE 6/4/19

SUPERVISOR 