

**Michigan Department of Environment, Great Lakes and Energy Air
Quality Division**

INSPECTION REPORT

N824253482

Facility Name: Breitburn Operating LP - ST. Garfield 9/10 **SRN/ID:** N8242
Address: STATE GARFIELD 9/10 SEC 9 **Source Class:** SM OPT OUT
City: KALKASKA
County: KALKASKA **Staff:** LEBLANCS
District: Gaylord

Inspection Date: 4/29/2020 **Inspection Type:** SCHED INSP **Compliance Status:** COMP

Inspection Comment: Onsite inspection component of FCE for Fiscal Year 2020 targeted Facility. Records review was completed prior to the site inspection by Gaylord District Staff. sgl

Inspection Remarks

INTRODUCTION

On April 29, 2020, Gaylord District Staff conducted a site inspection of the Breitburn Operating LP St. Garfield 9/10 Tank Battery Facility (N8246). The referenced Facility is located on Maple Road, in the NW ¼ of Section 9, T25N, R5W, East Part of Garfield Township, Kalkaska County, Michigan.

The referenced facility operates under PTI 40-09A.

At the time of the site inspection, the skies were mostly cloudy, with light winds from the E-NE, rain, and temperatures of approximately 40 degrees Fahrenheit. No visible emissions were noted from the compressor engine or heater treater stacks.

FACILITY

The St. Garfield Facility CPF is an unmanned, gated Facility located amongst large, undeveloped, wooded acreages of the Pere Marquette State Forest. Because the facility has the potential for dangerous concentrations of Hydrogen Sulfide, the gates as well as all the buildings are equipped with safety lights indicating whether it is safe to enter. A wind sock is also located onsite to indicate wind direction.

Readily available aerials indicate that the Facility was constructed prior to May 1993, with the compressor engines added between 2006 and 2011.

The Facility is located in SE Kalkaska County, Michigan. To get to the Facility, District Staff traveled east on 4-mile Road, from the intersection of 4-Mile Road and I-75 south of Grayling, Michigan. 4-Mile ends at South Military Road, from there Staff traveled south approximately 4-miles to the intersection of South Military Road and Fletcher Road. At Fletcher Road, make a right and travel west approximately 7- miles to Maple Road. Make a right-hand turn onto Maple Road, and travel north approximately 2 ¾-mile. You will have passed 8-mile road, and will see the facility to the west, before Maple Road curves and turns into 10-mile road. The facility is a gated, unmanned Facility.

PERMITTING/EQUIPMENT

The Facility presently operates under permit no. 40-09A. At the time of April 29, 2020 site visit, the Facility was operating and consisted of the following:

- Eight 400-barrel above ground storage tanks

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The referenced tanks have been previously been reported to be equipped with vapor recovery. Load outs were also noted onsite.

- Two heater treaters
- One flare (not operating at the time of the inspection)
- Two small compressors with associated Reciprocating Internal Combustion Engines (RICE)

The heater treaters and above ground storage tanks were within bermed, lined-secondary containment areas. All of which were full of water.

The two compressors were housed in small sheds, one on each side of the main drive. Stacks associated with the compressors were approximately twice the building heights and had previously been estimated to be approximately 25 ft high. Neither unit was equipped with a pollution control device. Panels indicating operational data for the compressor engines were not found in the compressor buildings, nor were log sheets documenting operational data. Of the two compressors, only the southern (EUENGINE1) was operating at the time of the inspection. This EU did have one parameter that was being monitored, which was voltage. The EU at the time of the site visit indicated 284 V. On the side of the compressor fan, in a paint pencil the following was documented "New Engine 7-26-16" and "New Head 11-12-19" indicating that since the 2015 site inspection that the previously existing Waukesha engine has been replaced or that an engine "swing" has occurred. Engine replacement or swings are allowed under PTI 40-09A, with notification to the District Office. Supplemental records review and communications with the Facility will be made to clarify the engine history.

The northern compressor (EUENGINE2 or EUENGINE2NEW) was not operating, and per the recent 2019 MAERs submittal did not operate for the 2019 calendar year. EUENGINE2 is reported to be an exempt engine under Rule 285(2)(g). The compressor skid was marked as "807".

SUMMARY

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Equipment identified at the time of the April 29, 2020, site inspection were consistent with District Files. With the exception of a potential Engine replacement/swing for EUENGINE1, the Facility appears to be in general compliance with their permit. Supplemental information regarding a historical engine replacement/swing will be evaluated and reported separately by District Staff.

Sharon LeBlanc Digitally signed by Sharon LeBlanc
Date: 2020.05.08 12:03:31 -0400

Shane Nixon Digitally signed by Shane Nixon
Date: 2020.05.08 12:04:00 -0400