

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

P003939634

FACILITY: RIVERSIDE ENERGY MICHIGAN, LLC - VIENNA 14 CPF		SRN / ID: P0039
LOCATION: NE SE SW Section 14 T30N-R1E, VIENNA TWP		DISTRICT: Gaylord
CITY: VIENNA TWP		COUNTY: MONTMORENCY
CONTACT:		ACTIVITY DATE: 04/28/2017
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On April 28, 2017, I inspected the Vienna 14 CPF. On May 3, 2017, I reviewed records to determine compliance with this facility's recordkeeping requirements, as set forth in Air Use Permit 18-10.

Permit 18-10, Table EUDEHY, Condition VI.1, requires demonstrating compliance with the provisions of 40 CFR Part 63, Subpart HH, by demonstrating that the facility meets one of the exemptions from the more stringent requirements of this Subpart (if it does meet the exemption). One of the exemptions is for glycol dehydrators that process less than 85,000 standard cubic meters of gas per day, or roughly 3 million standard cubic feet per day. The company provided production information, attached, which shows that total facility production, sales and fuel gas combined, is about 1.1 or 1.2 million cubic feet per day. This adequately demonstrates that the facility meets the exemption. Therefore the facility is in compliance with this permit condition.

Table EUENGINE1, Conditions I.1 and I.2, set emission limits of 60 tons per year NOx and 30 tons per year CO. Emission estimates, attached, show 12 month rolling time period emissions of 15.49 tons NOx and 14.72 tons CO for the 12 months ending in March 2017. This complies with the permit conditions.

Condition III.1 requires a Malfunction Abatement Plan. The facility has one. AQD approved it July 15, 2010. This complies with the permit condition.

Condition IV.1 requires logging hours of operation without any add on control device. The engine at this facility doesn't have one, so this condition is not applicable.

Condition IV.2 requires a device to measure fuel gas usage in the engine. Conditions VI.2 and VI.5 require recording fuel usage for the engine. A log sheet, attached, includes daily fuel gas usage. This indicates a fuel monitoring device is probably in place as required by the permit condition. Fuel use is being recorded in compliance with the permit requirement.

Condition VI.4 requires logging hours of operation without any add on control device. There is no add on control device so this condition is not applicable.

Conditions VI.6 and VI.7 require keeping monthly and 12 month total NOx and CO emissions. A data sheet, attached, includes this information. This complies with the permit condition.

Condition VIII.1 sets stack dimensions. It calls for a maximum diameter of 12 inches and a minimum height of 37.7 feet. During my inspection I confirmed the stack was 12 inches in diameter. Based on rows of metal screws on the side of the compressor shed, which seemed to be spaced at 5 foot intervals, I estimated the shed wall height at about 20 feet. The stack height appeared to be about twice the height of the shed wall. If so, this would comply with the permit condition.

The stack was also unobstructed vertically upward, as required by the permit.

Table FGFACILITY, Condition II.1, prohibits burning sour gas at the facility. I did not see any evidence of sour gas at the facility.

COMMENTS:

I arrived on site about noon.

The compressor engine is a Caterpillar natural gas fired engine without catalytic oxidizer. It was running at the time of my inspection. There was no opacity in its exhaust. It did not have any unusual odors or vibrations. According to its instrument panel, manifold air temperature was 111 degrees f, manifold pressure 5 psi, oil filter pressure drop 7 psi, engine oil at 60 PSI. The coolant temperature gauge indicated 130 degrees f, but this is "on the bottom peg" and is unrealistically low for engine coolant temperature, so I suspect the gauge was not operating.

I got these values from the analog instruments on the engine control panel. Usually the analog instruments are a backup (at best) to the digital readout. There was a digital readout as well, but it appeared to be blank.

On leaving the facility I met a company employee, Ralph. He showed me his engine record clipboard, indicating the engine had been running at 1130 RPM the day before.

The engine was labeled GCS 1054 in metal letters welded to the engine mount, identifying it as Unit 1054 of the (former) Gas Compression Services Company.

There is a glycol dehydrator with a Wenco Flame Arrested Burner. According to its builder's plate it is rated at 125,000 BTU per hour. The burner stack was approximately 6 inches diameter and 22 feet high, exhausting unobstructed vertically upward. What appeared to be the still vent exited the side of the building and exhausted to a T fitting approximately 12 feet above ground level. There was some "steam" from this vent. There was no other opacity from the dehydrator. I noticed mild glycol odors downwind of the facility, about 20 feet away.

Tanks inside the compressor shed included two 300 gallon drum on stilt type tanks, one labeled as Chevron HDAX low ash gas engine oil and one as Chevron ISO 100 industrial lubricating oil. There were two orange tanks at floor level, labeled "Waste Oil;" they were larger than the drum on stilt tanks. By eye I estimated they might have a 400 or 500 gallon capacity.

Tanks outside the compressor shed included one oval steel tank near the engine radiator, probably for engine coolant; one 300 gallon drum on stilt tank labeled methyl alcohol, and one 300 gallon drum on stilt tank labeled triethylene glycol. The glycol and alcohol tanks were near the compressor shed wall near the point the dehydrator burner came through it. These tanks were over lined wooden berm structures.

I didn't see any oil field sized tanks such as a brine tank. I mentioned this to Ralph who confirmed there wasn't one. There is a well labeled as a salt water disposal well near the compressor shed. It seems likely brine is pumped directly down the disposal well without being sent to a brine tank first.

I didn't see any stained soils or other evidence of spills or leaks. Maintenance appeared good.

NAME William J. Royer Jr.

DATE 5/3/17

SUPERVISOR SRD