

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

B756129770

FACILITY: Merit Energy Company - Goose Creek CPF		SRN / ID: B7561
LOCATION: SEC 32 BLUE LAKE TWP, KALKASKA		DISTRICT: Cadillac
CITY: KALKASKA		COUNTY: KALKASKA
CONTACT: Vicki Kniss , Environmental Affairs Manager		ACTIVITY DATE: 06/03/2015
STAFF: Shane Nixon	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On site inspection and records review		
RESOLVED COMPLAINTS:		

AQD staff traveled to the Goose Creek facility to perform an inspection. The purpose of the inspection was to determine the facility's compliance with Permit to Install No. 211-07 and applicable state and federal air pollution control regulations. Merit Energy personnel were not present at the time of the inspection.

The facility consisted of a small compressor engine, an iron sponge, five heaters, a glycol dehydrator, separators, storage tanks with a vapor recovery unit, and a flare.

At the time of the inspection visible emissions from the flare was 5% opacity, which is in compliance with Rule 301 and General Condition 11 of the Permit to Install.

EUDEHY - a glycol dehydration system processing gas from the Niagaran formation. VOCs from the dehydrator are controlled by a flare.

The permittee is not allowed to operate the dehydrator unless the flare is installed and operated in a satisfactory manner. It was determined the flare was operating properly based upon staff observations previously mentioned.

Stack parameters appeared to be consistent with the height and diameter restrictions contained in the Permit to Install.

EUENGINE1 - A small 116 horsepower compressor engine. The engine was not equipped with a catalyst. Operational parameters recorded at the time of the inspection are:

1,361 rpm

Engine oil pressure: 45 psi

Engine water temperature: 200°F

Emission Limits - NOx and CO emissions are each limited to 35 tons per year based on the 12 month rolling time period. Records submitted by Merit Energy indicates the indicates the highest NOx and CO emissions occurred in June 2014. NOx and CO emissions at that time were 13.71 tons per 12 month rolling time period and 8.83 tons per 12 month rolling time period, respectively.

Material Limits - There are no material limits associated with this emission unit; therefore, this section is not applicable.

Process/Operational Restrictions - The facility is required to implement and maintain a preventative maintenance and malfunction abatement plan (PM/MAP) EUENGINE1. File review for the facility demonstrates a PM/MAP was submitted to AQD for review and approval. Furthermore, records submitted by Merit Energy demonstrates service to the engine is performed on a regular basis to avoid catastrophic engine failure.

Equipment Restrictions - Add-on pollution control equipment is not currently installed on EUENGINE1; therefore, conditions pertaining to the control equipment are not applicable.

Testing - Testing of EUENGINE1 is required upon request by AQD. Based upon emission calculations, AQD does not feel testing needs to be conducted at this time.

Monitoring - As required by the Permit to Install, a device to monitor the natural gas usage was installed and operating at the time of the inspection.

Recordkeeping/Reporting - Monthly fuel use records, emission calculations, and a log of maintenance activities were available upon request by AQD staff. The records demonstrated compliance with the recordkeeping portions of the Permit to Install.

MAERS emission reporting was previously reviewed and documented.

Stack/Vent Restrictions - The maximum diameter for the engine is limited to 0.25 inches. AQD staff noted the discrepancy and pointed the error out to Mr. Sean Craven, Merit Energy. Mr. Craven intends to rectify the problem in the near future.

FGFACILITY - All process equipment at the facility including equipment covered by other permits, grandfathered equipment, and exempt equipment.

Emission Limits - NOx, CO, and VOC emissions are each limited to 40 tons per year based on a 12-month rolling time period. Records submitted by Merit Energy indicates the highest NOx, CO, and VOC emissions occurred in June 2014. NOx, CO, and VOC emissions at that time were 13.17 tons per 12 month rolling time period, 9.21 tons per 12 month rolling time period, and 0.15 tons per 12 month rolling time period, respectively.

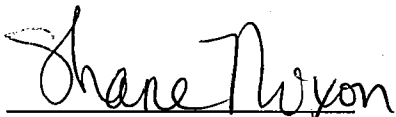
Material Limits - Sweet gas is the only fuel allowed to be burned at the facility. A gas analysis conducted on August 21, 2014 indicates the hydrogen sulfide content of the fuel is non-detect.

Process/Operational Restrictions - The facility is required to comply with 40 CFR Part 63 Subpart HH. However, AQD is not delegated regulatory authority to enforce the regulation and a demonstration of compliance was not conducted.

Recordkeeping/Notification - Monthly and 12 month rolling emission calculations were conducted and submitted in a timely manner upon request and demonstrates compliance with the emission limits contained in the Permit to Install.

Conclusion - Based upon the on-site inspection and records review, AQD staff have determined the facility to be in compliance with Permit to Install No. 211-07.

NAME



DATE

6/23/15

SUPERVISOR

