

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Other

N583124792

FACILITY: Breitburn Energy Company - Wilderness/Hayes 29		SRN / ID: N5831
LOCATION: 10875 Geronimo Trail, GAYLORD		DISTRICT: Cadillac
CITY: GAYLORD		COUNTY: OTSEGO
CONTACT: Diane Lundin , Sr. EHS Representative (Linn Energy)		ACTIVITY DATE: 04/04/2014
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Linn Energy's ROP Renewal Technical Review		
RESOLVED COMPLAINTS:		

N5831 – Wilderness/Hayes 29 Facility – Section 2

Part A General Information

1. a. The NAICS is correct
b. Address is correct
2. Corrected the owner name from **Breitburn Energy Company – Wilderness/Hayes 29** to: **Section 1 – Breitburn Operating LP – Wilderness CO2 Central Production Facility Section 2 – Linn Energy – Hayes 29 Compressor Station** (The ROP is now sectioned out)
3. Confidential Information:
None
4. Contact and Responsible Information:
Contact Information - 1 listed. Responsible Official - 1 listed.
5. Additional Information
- No AI-001 forms.

Part B Application Submittal Information

1. Compliance Statement
 - a. All boxes checked yes
 - b. Appears to have no missing information

Part C Source Requirement Information

1. MEARS: Breitburn Operating, LP reported emissions from all units for year 2012 MAERS report
2. Federal ozone-depleting substances program: Facility is not subject.
3. Federal Prevention of Accidental Release Program: Facility is not subject.
4. Greenhouse Gas Emissions: Facility is not subject.
5. CAIR: Facility is not subject.
6. Acid Rain: Facility is not subject.
7. Required Plans: Yes
 - a. A1 NARRATIVE – (Not applied) Air Use Permit Application and a Linn Operating Inc. Preventative Maintenance/Malfunction Abatement Plan and EPA 40 CFR, Part 63 Subpart ZZZZ Maintenance Plan
8. Additional Information: Yes
 - a. AI-001 is the enclosed NARRATIVE additional information

Part D Exempt emission unit information

1. No exempt emission units reported.
2. NA
3. NA

Part G: Exempt Emission Units under 281(h), 285(r), 287(c), or 290

- No R281(h), R 285(r)(iv), R287(c), or R290 exempt emission units.

Part E Existing ROP Information

1. E1. The source purposes changes made to add EUMACTZZZZ to reflect EPA 40 CFR Part 63 ZZZZ requirements, and updated engine description of EUENGINEH29. Refer to Part H below.
2. E2. EUENGINEH29 was reported in the most recent MAERS of 2012, and has not changed.
3. E3. EUENGINEH29 is no longer subject CAM to since the rich burn engine with a catalytic converter was replaced by a lean burn engine with an oxidation catalyst.

4. The emission units identified in the existing ROP do not produce fugitive dust emissions.
5. No emission units have been modified or reconstructed.
6. No emission units have been dismantled.

Part F Permit to Install (PTI) Information

1. F1. No new PTIs have been added since the previous ROP.
2. F2-F7. NA

Part H Requirements for Addition of Change

1. H1. Changes were added to the ROP that were not identified in Parts F or G above.
2. – 4. H2 – H4. Breitburn's ownership was removed from Linn's version of the ROP, EUENGINEH29 description was updated, and EUMACTZZZ Table was added (supplied by Linn Operating, Inc.) for the RICE MACT requirements for area sources.
5. H5. The facility is not subject to consent orders or judgments
6. – 8. H6-H8. The source did not add, change, or delete the Source-wide Conditions, emission limit requirements, or Material Limit Requirements
- H9-H13 and H15. The source added EUMACTZZZZ Table to include the applicable requirements for emission units subject to 40 CFR Part 63 Subpart ZZZZ for an area source.
- H14. No proposed changes, additions, or deletions to the stack/vent restrictions were made.
9. H6-H15: The requirements that were deleted from the previous ROP were the requirements that pertained to Breitburn and are covered under Section 1 of the working draft ROP.
10. – 11. Changes are addressed in Part H, 2-4 above.

Compliance Plans

- The facility is in compliance and has indicated they will be in compliance when the ROP is issued.

Review of Working Draft (from Company's Mark-Up)

1. No changes were made to the Source-Wide Conditions Table.
2. EUENGINE1, EUENGINE2, EUENGINE3, EUENGINE4, EUENGINE5, and EUENGINE6, Emission Unit IDs were completely removed from the Emission Unit Summary Table. This is not shown in the track changes.
The Emission Unit Description and Installation Date for EUENGINEH29 was updated, the capacity for EUGLYCOLDEHYDRATOR was updated, and EUMACTZZZZ Emission Unit ID was added to the Emission Unit Summary Table.
3. The correct information is listed for each emission unit, description of emission unit, and control equipment. No flexible groups for Section 2 of the ROP.
4. Material limits are not applicable for EUGLYCOLDEHYDRATOR and EUENGINEH29. Emission limits are not applicable for EUGLYCOLDEHYDRATOR. Emission limits for EUENGINEH29 shows conditions V.1 and VI.6; however there is no VI.6 and it is actually VI.5, this was corrected in the working draft of the ROP.
5. -6. The control equipment is addressed through the MAP and each emission limit has an enforceable requirement used to demonstrate compliance. The EUMACTZZZZ was not reviewed by DEQ
7. The wording of all conditions appears to be enforceable.
8. Plans are ready to be included for Public Comment.
9. – 11. UARs and Appendices were reviewed for each emission unit and flexible group.

AQD Changes throughout ROP review:

1. Added HAP limits to the Source-Wide Conditions Table using UAR R336.1213(2)(d), and added Condition VI.3 to monitor HAP emissions. Since Linn uses an oxidation catalyst to stay below HAP limits, so they stay an area source.
2. The Source-Wide Conditions Table mentioned "Equipment" as FGFACILITY. The ROP doesn't contain a table for FGFACILITY. So I left the table blank under "Equipment" and added "Stationary Source" in each condition that mentioned FGFACILITY, in Sections 1 and 2 of the ROP.
3. EUENGINEH29 has an oxidation catalysts, therefore, I incorporated Process/Operational Restrictions, and Monitoring/Recordkeeping requirements for temperature and differential pressure readings into these conditions.
4. Took out the condition from EUGLYCOLDEHYDRATOR Table "The permittee shall submit all applicable notifications and reports required by 40 CFR 63.775 by the dates specified in 40 CFR 63.775. (40 CFR

63.775)" because there is no required reporting for the facility with respect to 40 CFR Part 63 Subpart HH. Linn uses tri-ethylene glycol for the glycol dehydrator system at the stationary source.

NAME *Camp Owens*

DATE *4/4/14*

SUPERVISOR 