

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

N609629239

FACILITY: Merit Energy Company - Otsego 10 CPF		SRN / ID: N6096
LOCATION: AMOCO RD, GAYLORD		DISTRICT: Cadillac
CITY: GAYLORD		COUNTY: OTSEGO
CONTACT:		ACTIVITY DATE: 04/22/2015
STAFF: Shane Nixon	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On site inspection and records review		
RESOLVED COMPLAINTS:		

AQD staff traveled to Otsego County to perform an inspection of the Otsego 10 CPF. The purpose of the inspection was to determine its compliance with Permit to Install No. 654-96.

The Otsego 10 facility consisted of two in-line heaters, a glycol dehydration system, a Caterpillar 3408TA compressor engine, three storage tanks, and four phase separators.

1. **Emission Limits** - Pursuant to Special Condition Nos. 13 and 14, the facility is limited to no more than 89 tons per 12 month rolling time period of carbon monoxide (CO), nitrogen oxides (NO_x), and volatile organic compounds (VOC) and no more than 9 tons per 12 month rolling time period for a single hazardous air pollutant (HAP) and no more than 22.5 tons per 12 month rolling time period for all HAPs combined. Records submitted by Ms. Vicki Kniss (attached) indicate that the facility is well below the emission limits contained in the Permit to Install. The highest emissions for the previous 12 months occurred in July 2014. Emission calculations provided by Ms. Kniss are below.

NO_x = 45.38 tons per 12 month rolling time period

CO = 3.41 tons per 12 month rolling time period

VOC = 6.78 tons per 12 month rolling time period

Aggregate HAP = 6.78 tons per 12 month rolling time period

NOTE: HAP emissions were accounted for in the VOC calculations. Total VOC emissions were less than 10 tons per year which means that any single HAP emissions is less than the 10 ton per year major source threshold.

2. **Material Limits** - There are no material limits associated with this facility; therefore, this section is not applicable.

3. **Process/Operational Restrictions** - Special Condition No. 24 requires the facility to process only sweet natural gas as defined in Rule 336.1119. The hydrogen sulfide concentration of the natural gas based on an August 2014 analysis indicates 1 ppm. The analysis demonstrates that the fuel burned at the facility meets the definition of sweet gas.

4. **Testing/Sampling** - There are no specific testing or sampling requirements associated with this facility; therefore, this section is not applicable.

5. **Monitoring/Recordkeeping** - Special Condition No. 15 requires the permittee to calculate and record the actual emissions of CO, VOC, NO_x, and HAPs from the facility. Records submitted by Ms. Kniss indicate that the requirement is being fulfilled.

Special Condition No. 16 requires the permittee to maintain records of monthly fuel consumption, monthly hydrocarbon liquids trucked, and the glycol circulation rate. Records submitted by Ms. Kniss indicate that the records are maintained and readily available.

Maintenance activities performed (attached) on the compressor engine were relatively minor in nature. The maintenance included scheduled service as well as replacing minor components.

6. **Reporting** - All reporting required by the Permit to Install was previously reviewed and documented.

7. Other - At the time of the inspection, there were no visible emissions observed from any of the stacks. The compressor engine was operating at the time of the inspection. Operating parameters observed and recorded during the inspection are below:

Engine oil pressure: 60 psi

Engine water temperature: 160°F

Compressor oil pressure: 55 psi

Conclusion - Based upon the on-site inspection and records review, AQD staff has determined the facility to be in compliance with Permit to Install No. 654-96 as well as 40 CFR 63 Subpart HH.

NAME

Shane Nixon

DATE

4/27/15

SUPERVISOR

[Signature]