

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

N674437774

FACILITY: Breitburn Operating LP - Fontinalis 25		SRN / ID: N6744
LOCATION: SW/4, NE/4, SEC 25 CORWITH TWP, VANDERBILT		DISTRICT: Gaylord
CITY: VANDERBILT		COUNTY: OTSEGO
CONTACT: Carolann Knapp, Environmental Specialist		ACTIVITY DATE: 11/14/2016
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY17 inspection		
RESOLVED COMPLAINTS:		

On November 14, 2016, AQD Staff traveled to N6744 Breitburn Fontinalis 25 CPF located in Corwith Township, Otsego County for a Full Compliance Evaluation (FCE) scheduled inspection to determine compliance with PTI 1-00D. This is an opt out permit.

The Fontinalis 25 CPF is a natural gas production facility. It processes natural gas from Antrim wells to dehydrate and compress the gas prior to pipeline transport. The facility currently operates 2 compressor engines, a dehy system and storage tanks.

**LOCATION**

The facility is located on the west side of Cherwinsky Road, just south of Sturgeon Road, approximately 2 miles east of Vanderbilt. The facility is gated and located approximately ½ mile west of Cherwinsky. The gate was unlocked at the time of the inspection. A map has been attached to the permit file.

**REGULATORY DISCUSSION**

PTI 1-00 issued 4/28/2000, VOIDED 12/13/2000 3 engines.

PTI 1-00A issued 12/13/2000, VOIDED 9/5/2001 added 4<sup>th</sup> engine.

PTI 1-00B issued 9/5/2001, VOIDED 10/3/2005 changed 4<sup>th</sup> engine to a rich burn with catalytic converter.

PTI 1-00C issued 10/3/2005, VOIDED 6/24/2008 add condition allowing for engine switch out of equal or lesser emitting; FGFACILITY CO and NOx both over 100 tons. This PTI was not marked as VOID in permit cards and is shown as an active permit. Lansing was contacted, Sue Thelen has updated permit cards to reflect the void date of 6/24/2008, as the equipment at the facility is now covered by PTI 1-00D.

PTI 1-00D permitted 6/24/2008, active permit. Revised to opt out of ROP. Remains 4 engines, must monitor RPM daily (SC1.13); Emission factors resort to worse case (75% load factors) if the load through the engines goes below 80%. NOx and CO for FGFACILITY are each 99.9 tpy.

This permit contains SC 1.8, which allows for the replacement of the existing engine with one of equivalent or lower emissions without a permit modification. The facility must notify and provide calculations to AQD to demonstrate emissions are no higher than permitted limits – the replacement engine can be with or without control.

Per SC 1.8, Breitburn notified AQD on August 26, 2015 of an equivalent-emitting engine change for EUENGINE1. A Caterpillar 3516 was replaced with a Caterpillar 3516. In 2012, records provided by Breitburn identify EUENGINE1 as Unit 1105; while at the facility for this inspection it was noted that the current skid for EUENGINE1 is stamped as 1105, as do current records. Email correspondence with Breitburn indicates they switched out the engine only, not including the metal skid.

This is an opt out source. As mentioned in the description for PTI 1-00D above, the facility has potential to be over 100 tons for NOx and CO, however have restricted emissions based on load and RPM. As a result, the permitted emissions are limited for NOx and CO for FGFACILITY to 99.9 tpy each.

The facility is not major for HAPS.

The engines are subject to 40 CFR Part 63, Subpart ZZZZ, which has not been delegated to MDEQ from EPA.

In addition to the permitted equipment, there are also the following equipment noted in PTI 1-00D's permit evaluation notes: an Antrim dehydration system, a methanol storage tank, and four brine storage tanks.

The dehydration system is subject to 40 CFR Part 63, Subpart HH, which has not been delegated to MDEQ from EPA.

**INSPECTION NOTES**

The facility consists of 2 large green compressor buildings and a small green dehy building. The two large buildings are at the far west end of the open area, with the dehy building located between them. Each large building contained one engine and one compressor. The engines, EUENGINE1 and EUENGINE2, are both Caterpillar 3516 and were both operating.

EUENGINE1 - The west large building contained Unit GCS 1105. The engine is a Caterpillar 3516 and was operating during the inspection. No odors or VE noted from the exhaust. The stack has a silencer and a muffler. Inside the building were blue engine oil tanks and a red used oil tank. The unit was operating as follows:

RPM	1300
Engine Oil Pressure	55 psi
Engine Oil Temperature	209 F

EUENGINE2 - The east large building contained Unit GCS 1233. The engine is a Caterpillar 3516 and was operating during the inspection. No odors or VE noted from the exhaust. The stack has a silencer and a muffler. Inside the building were blue engine oil tanks and a red used oil tank. The unit was operating as follows:

RPM	1308
Engine Oil Pressure	54 psi
Engine Oil Temperature	210 F

EUENGINE3 - A concrete pad with no engine or compressor is at the NW corner of the open area. This pad formerly contained EUENGINE3. Miscellaneous parts are still stored in the area. Notes from a previous inspection indicate EUENGINE3 was removed in August 2011.

EUENGINE4 - The engine and compressor for EUENGINE4 are still located onsite. The building that had formerly been around the unit has been removed. Piping has also been removed; the unit is not functional as is. The engine was not operating during a 2012 inspection, and notes from that inspection report indicate it has been shut in since December 2007.

Glycol Dehydrator – There is no table in the PTI for the dehy. The unit was operating, there was steam and a slight odor. There are 3 small tank located inside containment on the east side of the dehy building. The tanks contained methanol, sulfa clear and corrosion inhibitor.

Tank Farm – There are 4 tanks located in a black lined and bermed containment area on the east end of the open area. The tanks appear to be 400 bbl, and are not labeled. The permit application indicates they are brine storage.

Based on visual estimates, the stack heights for EUEGINE1 and EUENGINE2 meet height and diameter requirements (16 inch maximum diameter, 40 feet minimum height). The engines are loud, even though exhaust for each engine is equipped with a silencer and muffler. The CPF does not have close neighbors, no noise complaints have been entered in the file.

**MAERS**

The 2016 emissions will be reviewed when received. Any issues will be noted in MAERS and resolved separately.

**MACES**

MACES was reviewed. The Regulatory Summary screen was updated to include CO. The description on the Facility Information screen was updated.

**COMPLIANCE DETERMINATION**

Based on the scheduled inspection, N6744 Breitburn Fontinalis 25 CPF appears to be in compliance with the PTI. Records are reviewed separately.

NAME Becky Radulski

DATE 11/21/16

SUPERVISOR 

