DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N794474734

FACILITY: VCP Michigan - ASE 8		**SRN / ID:** N7944
LOCATION: NW NE NW SEC 18, LEWISTON		**DISTRICT:** Cadillac
CITY: LEWISTON		**COUNTY:** MONTMORENCY
CONTACT:		**ACTIVITY DATE:** 10/29/2024
STAFF: Tammie Puite	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** MINOR
SUBJECT: Site inspection to become familiar with source as the newly assigned inspector.		
RESOLVED COMPLAINTS:		

The VCP Michigan, LLC, ASE 8, is a natural gas central processing facility (CPF) located in Albert Township, Montmorency County. To access this facility, From M-32, Go South on Meridian Line Road out of Vienna Corners for 4 miles. Turn Left and at County Road F 38. The facility has a locked gate, and is a ¼ mile walk in. This facility processes sweet natural gas from low-pressure Antrim formation wells that flow to the facility via buried flowlines. Upon reaching the facility, the gas is compressed and directed through a Tri ethylene glycol dehydrator for moisture removal. Following dehydration, natural gas is directed to a sales pipeline.

I performed an inspection on this source with respect to Permit to Install (PTI) numbers 399-07. An onsite inspection was performed on October 29, 2024. Upon arrival on site, no odors were noted downwind and no visible emissions from any point were noted. The facility appeared in full operation. The facility was found to have good housekeeping practices that met with industry standards.

Equipment Onsite:

CAT G3508 NA, 8 cylinder, 255 HP, 190 KW, 1800 RPM, Engine Serial # GNB01862, Unit # 104453 – Uncontrolled via Stack with a muffler, Rebuild Date 1/21/21.

- No catalytic emission control
- Operating at 948 RPM
- Oil Pressure – 45 psi
- Altronic Meter – 302 ºF

1 Slop tank was present on site, located inside secondary containment, direct vent to air. Exempt under R336.1284(2)(e)

Tri ethylene Glycol Dehydrator – Via Stack – Previous records supplied, show that this process meets the exemption criteria listed in the permit. This unit was operating during my visit. There are a few buckets catching drips, that are located inside the secondary containment.

- Dehy Tower PSI 1000
- Reboiler Temp 375ºF

There is a water separator and a gas separator inside the building.

<u>Permit to Install 399-07</u>:

EUDEHY -

The dehy is required to comply with the provisions of National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63, Subpart HH as applicable. This dehy is exempt from the conditions of this Subpart as previous records provided by the facility indicate the facility processes well below the exemption threshold of 85,000 scm/day

EUENGINES –

Nitrogen Oxides (NOx) emissions from this facility are not to exceed 46.5 tons per year. Limit is based on a 12-month rolling time period as determined at the end of each calendar month. Compliance with this emission limit is demonstrated through recordkeeping and emissions calculations. I will submit a separate records request with the company to determine compliance with this limit.

The permitted engine a EUENGINE is for a CAT 3408, 405 HP Engine, with 11.9 NOx uncontrolled emissions = 46.5 TPY, going to SVENGINE Stack. The engine onsite is a CAT 3408NA, 255 HP Engine with 25.64 Nox uncontrolled = 60.6 TPY. Which is a higher emitting engine than was permitted. The Permit does not allow for the swap out of a equal or lower emitting engine, which is a permit condition that is often found in permits associated with this industry. I will follow up with the company to get this corrected.

A Malfunction Abatement Plan is required for this facility. A plan was previously submitted and approved in 2008. Since the plan is for the previous company owner, and the wrong engine, I will request that the company submit and updated plan.

The engine is only equipped to burn natural gas. Also, as required, it is equipped with a device to measure the amount of natural gas being used for fuel.

No stack testing has been required to be performed at this facility in the last 12 months.

Records of maintenance activities at this facility have been provided in previous requests. There were no records onsite, but the facility was being maintained, and vehicle tracks were evident, demonstrating that the company is monitoring the facility per industry standards.

The exhaust stack for the engine is to have a maximum diameter of 8 inches and a minimum height above ground of at least 33 feet. The stack appears to meet these requirements. The stack is equipped with a muffler for noise control. It does not have any catalytic control device.

The facility is to comply with the provisions of 40 CFR Part 63, Subpart HH. By complying with the provisions listed in the PTI, the facility is in compliance with the MACT.

At the time of this inspection, this facility appears to be in violation of the permit. I will submit a records request to verify what equipment is onsite and that the company is keeping the correct emission records.

Image 1(N7944 Facility) : Exterior image showing 1 tanks, and 2 stacks.

Image 2(EUENGINE) : Engine on site. Skid #104453, 948RPM, 45 PSI, 302 Deg F

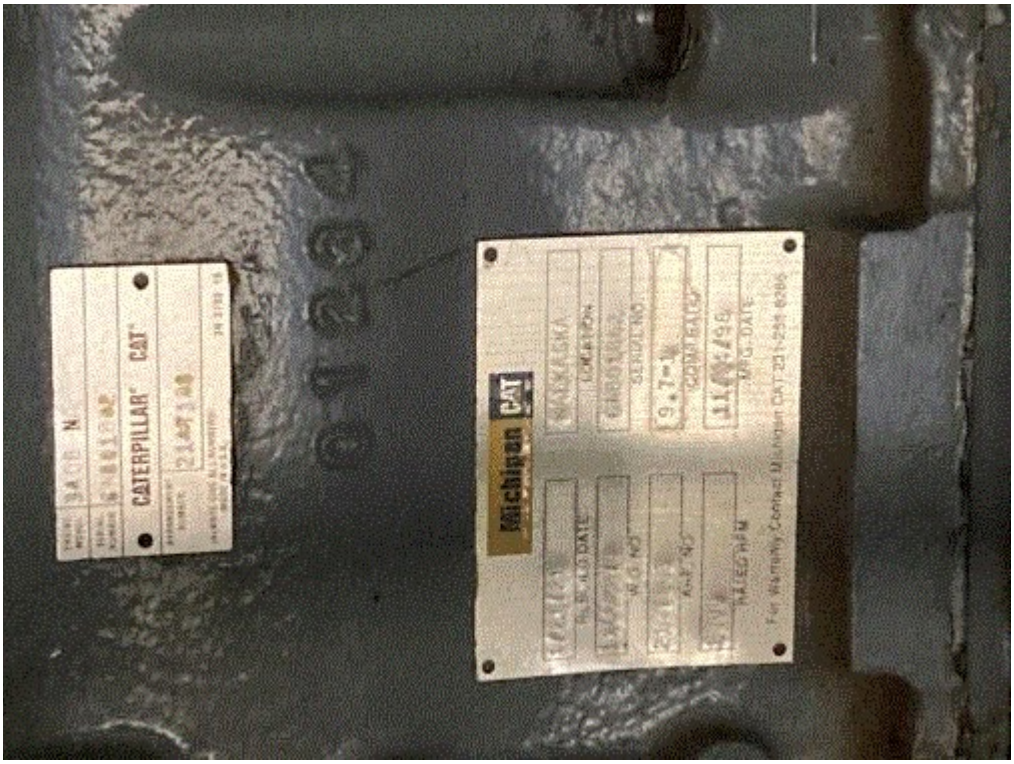

Image 3(Engine Tag) : CAT G3508 NA, 8 cylinder, 255 HP, 190 KW, 1800 RPM, Engine Serial # GNB01862 Rebuild Date 1/21/21

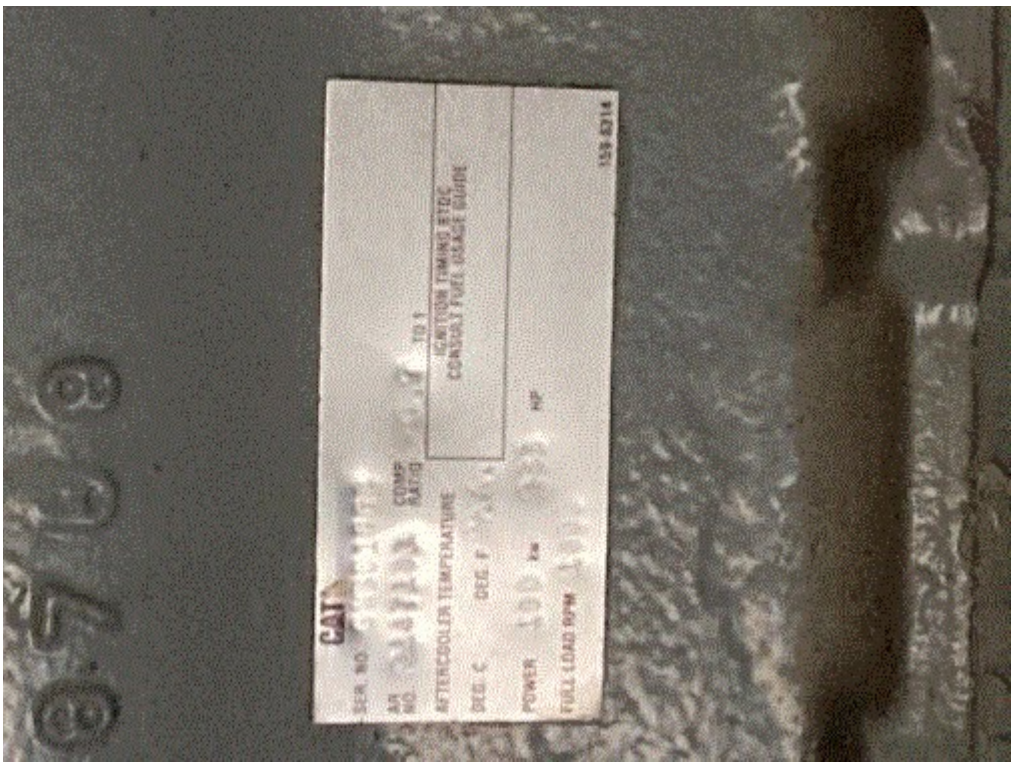

Image 4(Engine Tag 2) : Engine Tag 2

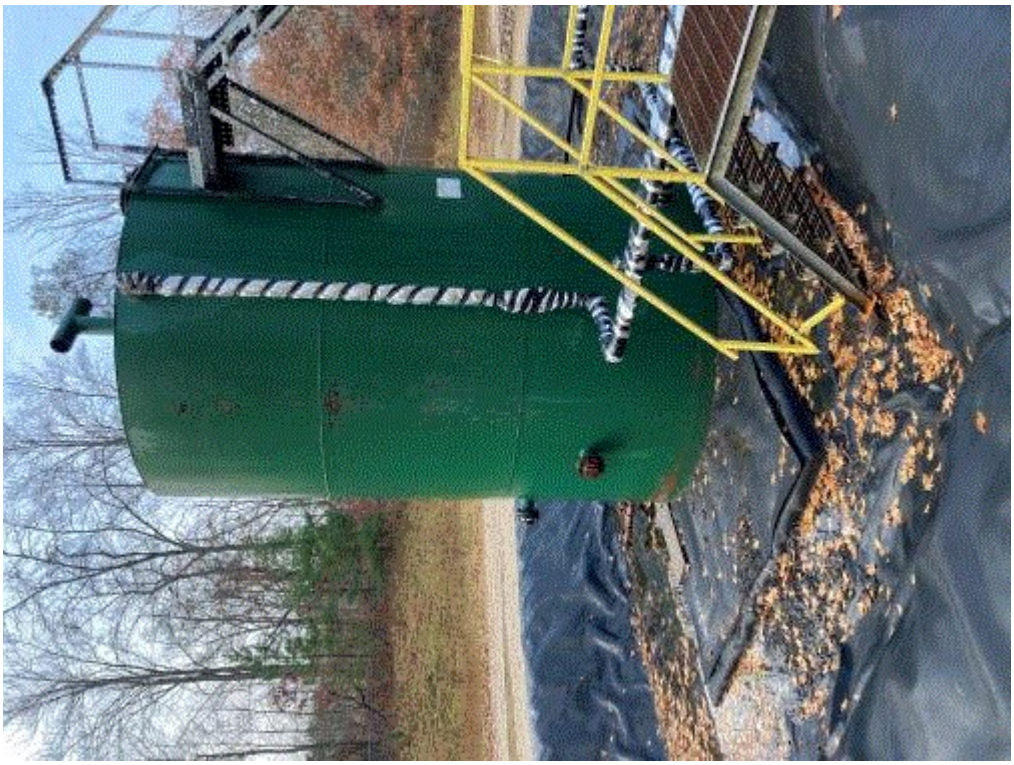

Image 5(AST) : Slop Tank Direct Vent.

Image 6(Dehy) : Dehy Unit, Reboiler temp 375 Deg F, Dehy Tower PSI 1000.

NAME _____ DATE 12-4-24 SUPERVISOR _____