

Lapeer B5462 M.

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Breitburn Operating L.P. - Rich Field Gas Plant	SRN : B5462
Location : 7770 McTaggart Rd	District : Lansing
	County : LAPEER
City : NORTH BRANCH State: MI Zip Code : 48461	Compliance Status : Compliance
Source Class : MAJOR	Staff : Michelle Luplow
FCE Begin Date : 10/29/2018	FCE Completion Date : 12/2/2019
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
12/02/2019	ROP Monthly	Compliance	October 2019 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of October. Tail gas stream H2S was not diverted to the flare. Highest SO2 emissions were 1303 lbs on October 13th. GC used to determine all H2S concentrations. Breitburn's decision to flare all gas coming into the plant has resulted in higher daily SO2 emissions. Total SO2 emissions for October was 36,076 lbs. Tim Howard certified as Responsible Official.
11/08/2019	ROP R215 Notification	Compliance	Responsible Official Change from Joseph LaTulip, Operations Manager, to Tim Howard, VP of Operations
11/04/2019	ROP Semi 1 Cert	Compliance	Semi-annual certification 1/1/19 - 6/30/19 - no deviations reported based on the MI-ROP-B5462-2014b. Tim Howard certified as Responsible Official.

Activity Date	Activity Type	Compliance Status	Comments
11/01/2019	ROP Monthly	Compliance	<p>August 2019 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of August. Tail gas stream H2S was not diverted to the flare. Highest SO2 emissions were 2032 lbs on August 19th. GC used to determine all H2S concentrations. Breitburn's decision to flare all gas coming into the plant has resulted in higher daily SO2 emissions. Total SO2 emissions for August was 38,019 lbs. Tim Howard certified as Responsible Official.</p> <p>The August 19th SO2 emissions are reported higher than actual emissions - D. Donnelly said the VRU at the wellfield, which pulls the gas off the top of oil production and salt water tanks did not shut off and was therefore pulling in additional air from outside the wells, consequently increasing the mcf flow.</p>
11/01/2019	ROP Monthly	Compliance	<p>September 2019 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of September. Tail gas stream H2S was not diverted to the flare. Highest SO2 emissions were 1255 lbs on September 16th. GC used to determine all H2S concentrations. Breitburn's decision to flare all gas coming into the plant has resulted in higher daily SO2 emissions. Total SO2 emissions for September was 34,807 lbs. Tim Howard certified as Responsible Official.</p>
10/29/2019	Scheduled Inspection	Compliance	Scheduled, announced inspection to determine compliance with MI-ROP-B5462-2014b

Activity Date	Activity Type	Compliance Status	Comments
10/28/2019	ROP Monthly	Compliance	<p>May 2019 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO₂ (1183 lbs H₂S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of May. Tail gas stream H₂S was not diverted to the flare. Highest SO₂ emissions were 1,523 lbs on May 22nd. GC used to determine all H₂S concentrations. Breitburn's decision to flare all gas coming into the plant has resulted in higher daily SO₂ emissions. Total SO₂ emissions for May was 38,894 lbs. Tim Howard certified as Responsible Official.</p>
10/28/2019	ROP Monthly	Compliance	<p>June 2019 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO₂ (1183 lbs H₂S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of June. Tail gas stream H₂S was not diverted to the flare. Highest SO₂ emissions were 1,345 lbs on June 28th. GC used to determine all H₂S concentrations. Breitburn's decision to flare all gas coming into the plant has resulted in higher daily SO₂ emissions. Total SO₂ emissions for June was 36,222 lbs. Joseph Latulip certified as Responsible Official.</p>
10/28/2019	ROP Monthly	Compliance	<p>July 2019 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO₂ (1183 lbs H₂S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of July. Tail gas stream H₂S was not diverted to the flare. Highest SO₂ emissions were 1,369 lbs on July 18th. GC used to determine all H₂S concentrations. Breitburn's decision to flare all gas coming into the plant has resulted in higher daily SO₂ emissions. Total SO₂ emissions for July was 37,398 lbs. Joseph Latulip certified as Responsible Official.</p>

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10/28/2019	ROP Other	Compliance	On 5/16/19 Breitburn staff met with North Branch Fire Department Chief Ken Jenson and discussed safety issues related to the Rich Field gas plant facility. Chief Jenson was provided with Breitburn's H2S Contingency plan, which has been updated with new contact information. The emergency response plan is required to be reviewed and updated annually according to EUGAS-TREATING ROP requirements.
05/13/2019	ROP Monthly	Compliance	March 2019 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of March. Tail gas stream H2S was not diverted to the flare. Highest SO2 emissions were 1496 lbs on March 15th. GC used to determine all H2S concentrations. Breitburn's decision to flare all gas coming into the plant has resulted in higher daily SO2 emissions. Total SO2 emissions for March was 42,758 lbs. Joseph Latulip certified as Responsible Official.
05/13/2019	ROP Monthly	Compliance	April 2019 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of April. Tail gas stream H2S was not diverted to the flare. Highest SO2 emissions were 1,334 lbs on April 13th and April 16th. GC used to determine all H2S concentrations. Breitburn's decision to flare all gas coming into the plant has resulted in higher daily SO2 emissions. Total SO2 emissions for April was 38,048 lbs. Joseph Latulip certified as Responsible Official.

Activity Date	Activity Type	Compliance Status	Comments
03/26/2019	ROP Monthly	Compliance	February 2019 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO ₂ (1183 lbs H ₂ S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of February. Tail gas stream H ₂ S was not diverted to the flare. Highest SO ₂ emissions were 1616 lbs on February 9th. GC used to determine all H ₂ S concentrations. Breitburn's decision to flare all gas coming into the plant has resulted in higher daily SO ₂ emissions. Total SO ₂ emissions for February was 39,843 lbs. Joseph Latulip certified as Responsible Official.
03/08/2019	ROP Annual Cert	Compliance	Annual Compliance Certification for January 1, 2018 through December 31, 2018. Joseph Latulip certified as Responsible Official. No deviations reported for the year.
03/08/2019	ROP SEMI 2 CERT	Compliance	Semi-annual certification - no deviations reported based on the MI-ROP-B5462-2014b version of the ROP. Joseph Latulip certified as Responsible Official.
02/15/2019	ROP Monthly	Compliance	January 2019 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO ₂ (1183 lbs H ₂ S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of January. Tail gas stream H ₂ S was not diverted to the flare. Highest SO ₂ emissions were 1543 lbs on January 1st. GC used to determine all H ₂ S concentrations. Breitburn's decision to flare all gas coming into the plant has resulted in higher daily SO ₂ emissions. Total SO ₂ emissions for January was 44,668 lbs. Joseph Latulip certified as Responsible Official.
02/07/2019	MAERS	Compliance	2018 MAERS, check MAERS for any review comments.

Activity Date	Activity Type	Compliance Status	Comments
01/25/2019	ROP Other	Compliance	Notification for Change in Responsible Official under Rule 216(l)(a)(v) Administrative Amendment. Effective January 11, 2019 Joseph Latulip, Operations Manager, will replace Michael Fairbanks as the Responsible Official for this source.
01/18/2019	ROP Monthly	Compliance	December 2018 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of December. Tail gas stream H2S was not diverted to the flare. Highest SO2 emissions were 1588 lbs on December 18th. GC used to determine all H2S concentrations, except for 12/19/18 when Drager tubes were used (GC maintenance conducted this day). Breitburn's decision to flare all gas coming into the plant has resulted in higher daily SO2 emissions. Total SO2 emissions for December was 45,729lbs. Michael Fairbanks certified as Responsible Official.
01/17/2019	MAERS		2018 MAERS, check MAERS for any review comments
01/17/2019	MAERS		
12/20/2018	ROP Monthly	Compliance	November 2018 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of November. Tail gas stream H2S was not diverted to the flare. Highest SO2 emissions were 1676 lbs on November 5th. Breitburn's decision to flare all gas coming into the plant has resulted in higher daily SO2 emissions. Total SO2 emissions for November was 46,030lbs. Michael Fairbanks certified as Responsible Official.

Activity Date	Activity Type	Compliance Status	Comments
11/21/2018	ROP Monthly	Compliance	<p>October 2018 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO₂ (1183 lbs H₂S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of October. Tail gas stream H₂S was not diverted to the flare. Highest SO₂ emissions were 1842 lbs on October 19th. Breitburn's decision to flare all gas coming into the plant has resulted in higher daily SO₂ emissions. Total SO₂ emissions for October was 50,835 lbs. Michael Fairbanks certified as Responsible Official.</p>

Name:

Michael Fairbanks

Date:

12/2/19

Supervisor:

B. M.