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

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C - Mayfield 23	SRN / ID: B5587
	DISTRICT: Cadillac
	COUNTY: GRAND TRAVERSE
Manager	ACTIVITY DATE: 01/27/2021
COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
	C - Mayfield 23 Manager

2021 Full Compliance Evaluation: site inspection and records review

I conducted an inspection of the Merit Energy Company (MEC) Mayfield 23 facility to determine compliance with PTI 193-08 and the Air Pollution Control Rules The Mayfield 23 CPF is an opt-out source. Equipment on site includes the well header and separator building with separators for each well. There is one in-line heater (no longer used), a dehydrator, one stock tank, one in ground flare tank, one permitted compressor engine and two engines that have been dismantled and removed from the plant permit. The facility also includes a sulfinol gas sweetening plant that includes a sulfinol reboiler and two flares for H2S control. The facility was shut-in at the time of the inspection had has not been operating since November 2019 according to Lambda Energy.

The facility is surrounded by a fence that is properly marked with H2S warning signs. Neither of the flares were operating, there were no odors and no sound indicating operation of any of the equipment. There do not appear to have been any changes to the equipment on site since the last inspection.

Only the Caterpillar 3408TA V-8 compressor engine is still permitted to operate at the site. This engine is not equipped with a catalytic converter. At the time of the inspection it was not operating. The other two engines are a Waukesha V-12 and a Worthington 5LHC4 375hp that have been dismantled and have not operated in recent years. They have also been removed from the current permit.

This facility is an area source with regard to National Emission Standards for Hazardous Air Pollutant regulations for Reciprocating Internal Combustion Engines; Industrial, Commercial and Institutional Boilers and Process Heaters; and the Oil and Gas Production Facility MACT (subpart HH). The AQD does not currently have enforcement delegation for these regulations therefore no compliance determination was made. However, as previously determined, the dehydrator processes less than 85,000 cubic meters of natural gas and is therefore has no applicable requirements under subpart HH.

Because the plant has been shut-in during the review period, no records were reviewed.

The PTI requires that quarterly reports of the 24-hour time period mass flow rate of hydrogen sulfide (used to demonstrate compliance with the SO2 emission limit) and the volumetric gas flow rate are submitted to the AQD. Those reports have been reviewed as they are received and have not indicated any exceedances of the SO2 limit of 485 pounds per 24-hr period. These reports have been submitted throughout the review period but indicated no throughput.

The 2019 MAERS report was received and reviewed during the FCE review period..

As a result of my site inspection records review and reporting review it appears the Mayfield 23 CPF is in compliance with PTI 193-08 and the Air Pollution Control Rules at this time due to the operational status of the facility.

NAME_____

DATE _____

SUPERVISOR