

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

B566870272

FACILITY: Lambda Energy Resources LLC - Frederic 20		SRN / ID: B5668
LOCATION: 10562 CAMERON BRIDGE RD, FREDERIC		DISTRICT: Gaylord
CITY: FREDERIC		COUNTY: CRAWFORD
CONTACT:		ACTIVITY DATE: 12/28/2023
STAFF: David Bowman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection FY 24		
RESOLVED COMPLAINTS:		

On 28 Dec 2023 I, David Bowman MI EGLE AQD, conducted a site inspection of B5668 Lambda Fred-20, located at 10562 Cameron Bridge Rd, Frederic. The site operates under the conditions of permit to install (PTI) 54-04A. The site was acquired by Lamba from Merit Energy and AQD was officially notified of the change on 16 July 2018.

The site is located approximately 3 miles west of North Kolka Creek Rd and Cameron Bridge Rd intersection. There is a drive that travels north from Cameron Bridge Rd that appears to be part of the ORV trail network in the area, at the drive is a small sign with the street address of 10562, in 2-inch block letters. The entrance is very soft sand, and it is recommended that only a 4WD vehicle be used to access the site.

The weather 40°F, light rain, and calm winds. There was little change to the site since the last inspection In July 2022. The site is not operating and did not appear to have much traffic. The gate is now secured and the tracks into the site appeared fairly old.

Nothing at the site was operating at the time of the inspection. There was no flow heard in any lines, the flare was not lit, and the engines/heaters/compressors were all offline and many tagged with "do not operate" tags. The electric panel did not have any lights or readouts functional at the time of the inspection.

Records were requested for the time period of 1 Sep 2022 to 21 Aug 2023. There were no records to review during that period due to the site not being operated. Emissions reporting supports that the site has not operated since 2019.

The emission units (EU) located at the site include:

EU ID	Description	Stack ID
EUFD20CMPENG1	Natural gas fired reciprocating engine	SVFD20ENG1

And flexible groups (FG) located at the site include:

FG ID	Description	Stack ID

FGTANKS	Four 16,800-gallon tanks controlled by a vapor recovery unit (VRU)	N/A
FGFACILITY	All process equipment at the facility including equipment covered by other permits, grandfathered, and exempt equipment	N/A

On 27 Jul 2007 PTI 54-04 was modified to PTI 54-04A removing the sour gas sweetening plant. This also removed the flare from the PTI. The Flare hardware appeared intact at the site, but was not lit nor in use. The equipment that would normally be associated with a sweetening plant was not present. There is a building nearest the flare that is mostly empty and was most likely the structure that housed the sweetening portion of the site.

EUFD20CMPENG1 special conditions (SC):

The engine was not operating and had a “do not operate” tag attached to it. It appeared to be in a state of repair. It is a Waukesha engine, but I was not able to locate a data plate on it. The check sheet was dated 24 October 2019. Emissions reporting indicates that the engine has not been operated since 2019.

SC 1.2 - Malfunction abatement plan (MAP) is required.

Discussion – an updated MAP was approved 30 Oct 2023.

SC 1.3 and SC 1.4- permittee shall not operated any engine equipped with an add-on control...

Discussion – the engine does not have control, so this SC does not apply.

SC 1.5 Upon request permittee shall verify the NOx emission factors...

Discussion – This has not been requested.

SC 1.6 Permittee shall monitor natural gas usage on continuous basis...

Discussion- equipment present appears to have a monitor; however, the site has not operated since 2019 so no usage has been reported.

SC 1.7 Permittee shall complete all required calculations...

Discussion – no records were submitted due to not operating.

SC 1.8 Permittee maintains a log of maintenance...

Discussion – no maintenance has been performed during the time period.

SC 1.9 Engine control...

Discussion – Engine has no control and therefore this condition does not apply.

SC 1.10 Permittee shall keep monthly fuel usage records...

Discussion – Site did not operate during the time period.

SC 1.11 Permittee shall keep monthly and 12-month rolling time period NOx emission calculations...

Discussion – Site did not operate during the time period.

SC 1.12a

Stack maximum Diameter	Estimated diameter	Minimum height above ground	Estimated height above ground
7"	7"	17'	17'

NOTE: The estimated diameter was estimated by eyeball. The estimated height was determined using the Nikon Forestry Pro II laser range finder.

FGFACILITY – There are two iron sponges that appear to be out of service; 8 heater/treater units of 3 MBTU/hr or smaller, making them exempt, and not currently operating; and there is a dehy system vented to a flash tank – but the glycol tank is empty.

SC 2.2 Shall not burn sour gas...

Discussion – There is no indication that sour gas is used at the site, but since it is not operating it is not possible to definitely state the type of gas that is used at the facility. Since there was a sweetening operation being conducted at the site in the past once it is operating again a verification of the type of gas used should be made.

SC 2.3 Permittee shall not burn more than 25,500,00 SCF in EUFD20ENG1 and not more than 67,700,000 SCF in FGFACILITY...

Discussion – Site was not operated during the time period so that amount of gas burned is zero.

SC 2.4 Permittee shall complete all required calculations in format acceptable...

Discussion -- There was no data to review so no format was needed.

SC 2.5 Permittee shall keep monthly and 12-month rolling time period NOx and VOC emissions...

Discussion – The site did not operate during the time period so there were no emissions to report. No 12-month rolling due to not operating for the 12 months prior to the request.

SC 2.6 Permittee shall keep monthly and 12-month rolling time period fuel usage records...

Discussion – The site did not operate during the time period so there was no fuel usage to report. No 12-month rolling due to not operating for the 12 months prior to the request.

NAME 

DATE 1-29-2024

SUPERVISOR 