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

| B916928273 | | |
|--|-------------------------------|---------------------------|
| FACILITY: Merit Energy Company - Whitewater 32 | | SRN / ID: 89169 |
| LOCATION: SUPPLY RD, TRAVERSE CITY | | DISTRICT: Cadillac |
| CITY: TRAVERSE CITY | | COUNTY: GRAND TRAVERSE |
| CONTACT: Vicki Kniss, Environmental Affairs Manager | | ACTIVITY DATE: 11/26/2014 |
| STAFF: Rob Dickman | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT |
| SUBJECT: Scheduled inspection of this opt out source | | |
| RESOLVED COMPLAINTS: | | |

Inspected this opt out facility pursuant to Permit to Install number 642-96. Prior to entering the facility, no odors were noted downwind of it outside the property line. A list of the pertinent equipment on site was as follows:

- Nine 400 bbl AST's with vapor recovery
- One electric compressor
- One glycol dehydrator
- Three natural gas fired heaters

A Caterpillar 3306TA compressor engine is noted in past records but has been removed from the site. Records would indicate that this engine did not operate in the last 12 months.

Records regarding this facility were requested on November 17, 2014 and received on December 2, 2014. The request was for the last 12 months of complete records, therefore, the records from November of 2013 through October of 2014 were reviewed. These records appeared complete.

Following are the findings of this inspection by permit Special Condition:

- 13. The Carbon Monoxide (CO), Volatile Organic Compounds (VOC), and Oxides of Nitrogen (NOx) annual emission rates from the oil and gas production facility (OGF) individually shall not exceed 89 tons per year based on a twelve-month rolling period. Records provided by the facility indicate that CO emissions average 0.0 tpy, VOC emissions average 0.028 tpy, and NOx emissions average 0.0 tpy, all based on a 12month rolling time period as of October 2014.
- 14. The annual emission rate of any individual Hazardous Air Pollutant (HAP) from the OGF shall be maintained below 9 tons per year based on a twelve-month rolling period, and the annual emission rate of total HAPs from the OGF shall be maintained below 22.5 tons per year based on a twelve-month rolling period. Records provided by the facility indicate total HAPs average 0.022 tpy based on a 12-month rolling time period as of October 2014.
- 15. The facility is required to perform emissions calculations monthly. Review of submitted records indicates emissions calculations for the facility have been performed in a timely and correct manner.
- 16. Records of the following are required to be kept. A sample of these are attached to this report:

Monthly fuel consumption, in million cubic feet (MMcf).

Monthly crude/condensate throughput to the tanks, in barrels (bbls) Monthly hydrocarbon liquid trucked (bbls) Glycol circulated through the dehydrator, in gallons per minute (gpm)

- 17. All records are required to be available to the agency upon request. As described above, when requested, records were submitted promptly.
- 18. MAERS reporting for this facility has been completed in a timely and correct manner. See MACES for further details.
- 19. A maintenance log for this facility is required to be kept and is attached to this report
- 20. Pursuant to Rules 604 and 605, no tanks at this facility are to have a capacity greater than 952 barrels. All tanks noted on site were smaller (400 bbl).
- 21. The facility is required to keep records of any bypass of engine control equipment. The engine at this facility has been removed. However, prior to removal the engine was not controlled, therefore this condition does not apply.
- 22. This facility is not subject to 40 CFR 60 Subpart KKK, therefore this condition does not apply.
- 23. As of the date of this inspection, stack testing has not been requested for this facility. Given the engine has been removed, emissions are low, and good compliance history, requesting testing is not recommended.
- 24. Only sweet gas as defined in Rule 119 is used in the process

At the time of the inspection, this facility was in compliance with their air permit.

NAME

DATE 1/14/15

SUPERVISOR