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

A offerin MEL ON 1. Off-Site inspection	
.C - Whitewater 32	SRN / ID: B9169
RSE CITY	DISTRICT: Cadillac
	COUNTY: GRAND TRAVERSE
ffairs Manager	ACTIVITY DATE: 12/20/2021
COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
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	.C - Whitewater 32 RSE CITY ffairs Manager

B9169 2022 Full Compliance Evaluation – Site Inspection and Records Review. PTI 642-96.

On December 20, 2021, I conducted and inspection of the Lambda Energy Resources, LLC (Lambda) Whitewater 32. The facility is located on Strombolis Rd. just north of Supply Rd. At the time of the inspection the weather was overcast, 35 degrees with SW winds at 15 mph. There were no odors or visible emissions present. The following equipment was observed on-site:

- Tanks, 5 oil and brine tanks, 2 water tanks (chloride remediation), 1 blow-down tank.
- 1 glycol dehydrator.
- 3 heaters (two operating).
- 1 compressor with electric motor.
- 1 remediation system.

The electric compressor motor appears to have been in place at least since the 11/26/2014 inspection when it was first noted. There are no RICE compressor engines on-site.

The special condition requirements from PTI 642-96 were reviewed as follows:

SC13. 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 twelvemonth rolling period. Since the compressor engine has been removed the only fuel burning equipment is the heaters and the glycol reboiler. Records provided by Lambda indicate that CO emissions average 0.01 tpy, VOC emissions average 0.00tpy, and NOx emissions average 0.02 tpy, all based on a 12-month rolling time period as of October 2021.

SC14. 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 Lambda indicate total HAPs average 0.034 tpy based on a 12-month rolling time period as of October 2021.

SC15. The facility is required to perform emissions calculations monthly. Review of the records submitted by Lambda indicates emissions calculations for the facility have been performed in a timely and correct manner.

SC16. 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)

SC17. All records are required to be available to the agency upon request. Records were submitted promptly upon request.

SC18. MAERS reporting for this facility has been completed in a timely and correct manner. See MACES for further details.

SC19. A maintenance log for this facility is required to be kept and is attached to this report. The log indicates that the facility was shut in from April 2020 to October 18, 2021.

SC20. Pursuant to Rules 604 and 605, no tanks at this facility are to have a capacity greater than 952 barrels. All tanks observed on site had less than 952 barrels capacity.

SC21. The facility is required to keep records of any bypass of engine control equipment. The engine at this facility has been removed, therefore this condition does not apply.

SC22. This facility is not subject to 40 CFR 60 Subpart KKK, therefore this condition does not apply.

SC23. As of the date of this inspection, stack testing has not been requested for this facility. Since the engine has been removed there is no need to request testing at this time.

## SC24. Only sweet gas as defined in Rule 119 is processed at this facility.

As a result of this FCE, it appears that the source is currently in compliance with PTI 642-96 and the air pollution control rules.

DATE \_\_\_\_\_\_ SUPERVISOR \_\_\_\_\_