

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

N607056444

FACILITY: Delta Oil Company - Avery 24/31		SRN / ID: N6070
LOCATION: SE SE SW T30N R03E SEC 31, ATLANTA		DISTRICT: Cadillac
CITY: ATLANTA		COUNTY: MONTMORENCY
CONTACT: CHRIS KOKENIS , PRESIDENT		ACTIVITY DATE: 11/10/2020
STAFF: Rob Dickman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection of this opt out source		
RESOLVED COMPLAINTS:		

The Delta Oil Company, Avery 31 is a natural gas compression station. Natural gas wells drilled to the Antrim formation supply the facility. Natural gas fires the engines that compress the natural gas into a pipeline. Moisture in the gas is removed via a glycol dehydrator prior to compression.

On November 10, 2020, I inspected this opt out source as per permit to install number 622-96. On October 13, 2020, a formal request for required records for this facility was made with a deadline to received said records of November 1, 2020. On December 1, 2020, having not received these records, a Violation Notice was sent to the facility. On December 15, 2020, records for this facility were received.

Prior to entering the facility, no odors were noted downwind and no visible emissions from any point were noted. The facility appeared in full operation. An inventory of pertinent equipment at the facility is as follows:

- One V-8 Caterpillar compressor with no control, Skid 540. Previous inspection indicated a Caterpillar V-16 engine here in 2016. Will check with facility and see when this engine was swapped out.
- One V-12 Caterpillar compressor with control, Unit GCS 1307
- Two Aboveground Storage Tanks (AST), One 400-barrel capacity and one 200 bbl.
- One glycol dehydrator.

Engine parameters recorded on site were:

V-8 Caterpillar, 379 TA, Unit U841S:

- RPM – 1141
- Oil Pressure – 39 psi
- Water temperature – 177 F

V-12 Caterpillar, 3512 LE, Unit U1307:

- RPM – 1162
- Oil Pressure – 59 psi
- Water temperature – 190 F

Following are the findings of this inspection by Permit Number 622-96 Special Condition:

13. Carbon Monoxide (CO), Volatile Organic Compounds (VOC), and Nitrogen Oxides (NOx) emissions from the whole facility are not to exceed 89 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. Records provided from the company indicated the following for the time period of October 2019 through October of 2020:

- CO emissions for the facility for August of 2020 were 17.29 tons based on a 12-month rolling time period as determined at the end of each calendar month.
- VOC emissions for the facility for August of 2020 were 2.602 tons based on a 12-month rolling time period as determined at the end of each calendar month.
- NOx emissions for the facility for August of 2020 were 64.22 tons based on a 12-month rolling time period as determined at the end of each calendar month.

14. HAPS emissions from the facility are not to exceed 9 tons per year on any individual HAP not 22.5 tons per year for total HAPS. Records provided from the company indicate that HAP emissions for the facility were below one ton per year.

15. It is undetermined if calculations for the regulated pollutants listed in #13 and 14 have been completed in a correct and timely manner as these records were not readily available. A review of the records received in response to the Violation Notice indicates compliance with emissions limits.

16. Records of the following process data were submitted in response to the Violation Notice:

- Fuel Consumption - Is being tracked and averaged 31.99 million cu. ft. per year based on a 12-month rolling time period as of September 2020.
- Crude/Condensate throughput – this facility does not process hydrocarbon liquids.
- Monthly hydrocarbon liquid trucked – this facility does not process hydrocarbon liquids.
- Glycol circulated through the glycol dehydrator – According to records, the dehydrator on site circulates at a rate of 2.004 gpm.

17. Monthly oil and gas processed records are required. These records were supplied by the facility in response to the Violation Notice. A sample of these records is attached to this report.

18. Emissions from this facility are required to be reported to MAERS annually. This reporting has been completed, reviewed, and documented by AQD staff.

19. Records of maintenance activities at this facility are being kept and were supplied as part of the response to the Violation Notice. A sample of these records is attached to this report.

20. AST capacity at the facility is limited to 952 barrels per tank, the tanks on site at the time of the inspection were less than this capacity.

21. The engine on site is uncontrolled, therefore, no records of bypass of control equipment and kept.

22. This facility is currently not subject to 40 CFR 60 Subpart KKK as no natural gas liquids are processed.

23. No stack testing has been required to be performed at this facility in the last 12 months and is currently not recommended.

24. The wells feeding the natural gas used at this facility are from the Antrim formation. Natural gas extracted from this formation is considered “sweet” by definition.

At the time of the inspection, this facility was not in compliance with their opt out permit as required records could not be produced upon request. However, these records were submitted in a timely manner in response to the Violation Notice and determined to be complaint. Additionally, the swapping out of engines at this facility is currently not allowed under the current permit. Assessment of this new engine as it relates to Rule 201 will need to be performed and appropriate action taken.

NAME _____

DATE _____

SUPERVISOR _____