

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

N614650647

FACILITY: TRENDWELL ANTRIM INC - BRILEY 9		SRN / ID: N6146
LOCATION: SW NW SE T30N R2E SEC 8, BRILEY TWP		DISTRICT: Gaylord
CITY: BRILEY TWP		COUNTY: MONTMORENCY
CONTACT:		ACTIVITY DATE: 12/14/2018
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: scheduled inspection and records review		
RESOLVED COMPLAINTS:		

On December 14, 2018 AQD Staff traveled to NN6146 Trendwell Briley 9 Central Production Facility (CPF), located in Briley Township, Montmorency County, for a scheduled inspection to determine compliance with PTI 704-96A. This is an opt out permit.

The Briley 9 CPF is an oil and gas production facility, extracting gas from the Antrim formation. Natural gas and brine fluids are extracted from wells drilled into producing reservoirs then transmitted through flow lines to a CPF. The gas is compressed by multiple engines.

LOCATION

The facility is located approximately 4 miles west of Atlanta. The access to the site is a dirt road on the south side of M-32, 0.5 miles east of Thorton Rd. The facility is located approximately 0.25 miles south of M-32.

REGULATORY DISCUSSION

PTI 704-96A was issued November 7, 2007 and is currently active. The permit is for four engines. Currently there are only 2 engines onsite.

PTI 704-96 was issued November 14, 1996, and voided November 7, 2007.

The engines are subject to 40 CFR Part 63, Subpart ZZZZ, which has not been delegated to MDEQ from EPA.

The glycol dehydrator is subject to 40 CFR Part 63, Subpart HH, which has not been delegated to MDEQ from EPA.

INSPECTION NOTES

During the inspection, there was clear sky, 39 degrees Fahrenheit and light snow on the ground. The facility has a sign at the entrance indicating the source name, location and emergency contact information. The facility is bermed and fenced. The gate into the facility was open during the inspection.

The source consists of two large buildings, each containing one engine. A tank storage area is located west of the building.

The east building contained a Caterpillar 3512 TA, 810 hp engine (EUENGINE3). The engine was operating with no visible emissions or odor present. The skid and clip board identify this unit as GCS 853, which matches the unit ID identified in a 2015 inspection. The engine has a muffler. During the inspection the engine was operating at 1144 RPM, 58 PSI oil pressure.

The west building contained a Caterpillar 399 TA, 930 bph engine with catalyst (EUENGINE1), and an oil water separator. The engine was operating with no visible emissions or odor present. The clipboard identifies this unit as Unit #951, which matches the unit ID identified in a 2015 inspection. The markings on the skid identify the unit as 3947-C; skid IDs from previous inspections were not available. The engine has a muffler. During the inspection the engine was operating at 1103 RPM, 54 PSI oil pressure.

The dehy was located north of the engine buildings. It was operating, no odors noted.

A bermed and lined tank storage area is west of the buildings. There were two tanks, approximately 300 and 400 bbl, that were unlabeled.

RECORDS REVIEW

PTI 704-96A – EUDEHY, EUNGINE1, EUENGINE2, EUENGINE3, EUENGINE4, FGENGINE5, FGFACILITY

EUDEHY – No requirements in the permit other than to comply with Subpart HH if applicable. MDEQ has not been delegated Subpart HH.

FGENGINE5 – the permit is for 4 engines. However, two engines have been removed. EUENGINE1 and EUENGINE3 remain.

Emission Limits – The nitrogen oxides (NOx) and carbon monoxide (CO) emissions are limited in the permit. The facility provided records; emissions for EUENGINE1 and EUENGINE3 as of September 2018 are as follows:

EUENGINE1 Pollutant	Permitted Limit (tpy)	Reported Emissions (tpy, monthly)	Reported Emissions (tpy, 12 month rolling)
NOx	9.3	0.37	4.82
CO	19.4	0.77	10.01

EUENGINE3 Pollutant	Permitted Limit (tpy)	Reported Emissions (tpy, monthly)	Reported Emissions (tpy, 12 month rolling)
NOx	19.3	1.00	13.23
CO	12.5	0.51	6.82

Records provided demonstrate compliance with the requirements.

Process/Operational Limits – The facility has a PM/MAP on file from 2016. Maintenance records were provided and reviewed.

Testing - Testing is required upon request to verify NOx and CO emissions. Testing is not being requested at this time.

Monitoring - The permittee is required to monitor natural gas usage for FGENGINES. Natural gas records were provided, demonstrating compliance with this requirement.

Record keeping/Notification - The permit allows for the engine to be replaced with an equivalent emitting or lower emitting engine, upon notification to AQD. AQD has not received notification of an engine switchout.

Stack/Vent Restrictions - The stacks are required to have a maximum of 12 inches diameter and minimum height above ground of 31.5 feet for EUENGINE1, and a maximum of 12 inches diameter and minimum height above ground of 37.5 feet for EUENGINE3. Based on visual estimates, the stacks meet these requirements.

MAERS

The facility is required to report annual emissions to MAERS. The 2018 submittal was reviewed, and the 2019 submittal will be reviewed once received. See MAERS for details.

MACES

MACES was reviewed, and the information screen updated.

COMPLIANCE DETERMINATION

Based on the scheduled inspection and records review, N6146 Trendwell Briley 9 CPF was in compliance with the requirements of permit 704-96A.

NAME Becky Radulski

DATE 9-27-19

SUPERVISOR 