

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

N614665800

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: Danita Greene , Production and Environmental Compliance		ACTIVITY DATE: 12/13/2022
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2023 FCE.		
RESOLVED COMPLAINTS:		

On December 13, 2022 AQD Staff traveled to N6146 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 drive 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. The driveway entrance is gated at M-32 and was closed at the time of the inspection.

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 been delegated to EGLE from EPA. However, EGLE is not currently making compliance determinations for area sources.

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

INSPECTION NOTES

During the inspection, the weather was overcast, 30 degrees Fahrenheit, light wind, 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. The engine has a muffler but no catalytic converter. During the inspection the engine was operating at 1144 RPM, 57 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. The markings on the skid identify the unit as 3947-C. The engine has a muffler and catalytic converter. During the inspection the engine was operating at 1050 RPM, 53 PSI oil pressure. The catalyst inlet temperature was 937 degrees F and the outlet temperature was 1049 degrees F. These readings were consistent with those observed on the daily inspection log sheet that was present.

The dehy was located north of the engine buildings. It was operating, moderate odors were 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, FGENGINES, FGFACILITY

Records provided by Trendwell included fuel usage, NOx and CO emissions calculations, Maintenance logs, catalytic converter temperature logs and records of hours of operation with-out the catalytic converter.

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

FGENGINES – 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 2022 are as follows:

EUENGINE1	Permitted	Reported	Reported
Pollutant	Limit (tpy)	Emissions	Emissions (tpy, 12 month rolling)
		(tpy, monthly)	
NOx	9.3	0.41	4.89
CO	19.4	0.84	10.16

EUENGINE3	Permitted	Reported	Reported
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Pollutant	Limit (tpy)	Emissions (tpy, monthly)	Emissions (tpy, 12 month rolling)
NOx	19.3	1.14	13.85
CO	12.5	0.59	7.14

Records provided demonstrate compliance with the emission limit requirements.

EUENGINE1 had 25 hours of operation without the catalyst but is allowed up to 200 hours per year.

Process/Operational Limits – The facility has a PM/MAP on file from 8/02/22. Maintenance logs are maintained and indicate normal maintenance of each engine throughout the past year. No emission specific repairs required.

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 switch-out.

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.

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 and the Air Pollution Control Rules.

NAME  DATE _____ SUPERVISOR _____