DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

N618039442

FACILITY: WARD LAKE ENERGY, CHARLTON 21 CPF		**SRN / ID:** N6180
LOCATION: T30N R1W SEC 21, GAYLORD		**DISTRICT:** Gaylord
CITY: GAYLORD		**COUNTY:** OTSEGO
CONTACT:		**ACTIVITY DATE:** 04/14/2017
STAFF: Bill Rogers	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: Inspection in response to a permit void request		
RESOLVED COMPLAINTS:		

On April 14, 2016, I checked Charlton 21Facility in response to a request from Enervest to void its permit, PI 3-97B. PTI

In my opinion voiding the permit is appropriate, if the company wishes to do so. However, it turns out that this facility is not assigned to me. I will inform the assigned inspector via copy of this activity report, for her information.

My reasons for believing the permit can be voided are as follows:

- PI 3-97B is for a compressor engine and a glycol dehydrator.
- The engine and its shed have been removed.
- The dehydrator has not been removed. It was not operating at the time of my inspection. Presumably it could operate. However, it is a dehydrator at a facility that processes only Antrim formation gas, and is therefore exempt from the requirement to obtain a Permit to Install under an exemption, Rule 288(b)(ii).

The dehydrator is, however, still subject to Federal MACT standards. If Enervest should operate this dehydrator at this site they would still be required to show exemption from, or compliance with, the emission control requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63, Subpart HH.

Comments:

When I arrived on site I saw that the compressor engine and its shed were gone. The facility still contained the following:

One 400 barrel sized tank labeled brine tank, one smaller sized tank labeled "combustible," inside a berm.

A tall pressure vessel which might be an iron sponge, to remove small amounts of hydrogen sulfide from the gas being produced. Pipes, pipe fittings, smaller pressure vessels which looked as if they might include a phase separator or similar, but nothing with heaters.

One glycol dehydrator. It appeared to be of typical size, which would mean it had a burner with a capacity in the 75,000 to perhaps 125,000 btu/hr range, but I could not read the builder's plate. The dehydrator was silent and cold to the touch, so it could not have been operating at the time of the inspection. The dehydrator burner stack was perhaps 6" diameter by 18' high, unobstructed vertically upward. The still vent was perhaps 1 1/2 inches diameter by 10' high, ending in a T fitting.

There were no stained soils or other evidence of recent spills or leaks.

NAME William J Rogers J. DATE 4/20/17 SUPERVISOR SJN