DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

| NI | 74 | 0 | വ | 0 | ٥ | o | 7 |
|----|----|---|---|---|---|---|---|
| | | | | | | | |

| | S CORP GOOSE LAKE FACILITY | SRN / ID: N7482 | | |
|-------------------------------|-----------------------------------|---------------------------|--|--|
| LOCATION: 17 MILE RD, LER | OY | DISTRICT: Cadillac | | |
| CITY: LEROY | | COUNTY: OSCEOLA | | |
| CONTACT: Bret Friend , Michig | gan District Manager | ACTIVITY DATE: 04/12/2017 | | |
| STAFF: Rob Dickman | COMPLIANCE STATUS: Non Compliance | SOURCE CLASS: SM OPT OUT | | |
| SUBJECT: Scheduled inspecti | on of this opt out source. | | | |
| RESOLVED COMPLAINTS: | | | | |

Inspected this source per Permit to Install 220-05. No odors or visible emissions were noted on site during the inspection. An inventory of pertinent equipment is as follows:

Engine 1, Waukesha I-6 Engine without catalytic controls

Engine 2, Two cylinder Ajax engine without catalytic controls

One small glycol dehy(exempt per Rule 288(2)(b)(i))

One flare, emergency, not in operation at the time of the inspection (exempt per Rule 288(2)(c))

Four 400 bbl AST's, one 200 bbl AST, and one 30k gallon AST (all exempt per Rule 284(2)(b)).

Two process heaters (exempt per Rule 282(2)(b)(i))

Following are the findings of the inspection per permit Special Condition:

EUDEHY

- 1.1 At least once each calendar year the permittee shall obtain, by sampling, an analysis of the wet gas stream. The most recent gas analysis performed for the facility is August of 2015. Records of this are attached. Also attached is an email from the facility indicating this is the most recent analysis they have.
- 1.2 All required calculations shall be completed by the 15th day of the calendar month. All emissions calculations are completed in a timely manner.
- 1.3 The permittee shall calculate the VOC emission rates from EUDEHY for each calendar year. Records provided from the facility indicate total VOC emissions for 2016 were 10.4 tons.

FGENGINES

- 2.1 The engines must have a MAP. A MAP was received by the AQD. This MAP was not date stamped but is dated January of 2006. In November of 2006 a letter was sent from the Cadillac D.O. requesting submission of a MAP. It is unclear if the MAP in the file is the response to that request. However, there is no record of the MAP being reviewed and approved. Records regarding maintenance at the facility are attached.
- 2.2 The permittee shall maintain a log of all significant maintenance activities conducted and all repairs made to each engine and any associated air pollution control device(s). A sample of maintenance records for the facility is attached.

FGFACILITY

3.1 The permittee shall only burn sweet natural gas in FGFACILITY. Wells feeding this facility pump natural gas only from what is considered "sweet" formations. Also, an attached email from the facility indicates that the gas stream was recently tested using stain tubes and no hydrogen sulfide was detected.

Process/Operational Limits

3.2 The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and KKK. The design capacity of this facility is less than ten million standard cubic feet per day. The facility also monitors natural gas throughput. This facility appears in compliance with the applicable parts of 40 CFR 60 Subpart

KKK.

- 3.3 Within 60 days of permit issuance for review and approval, a plan for compliance with 40 CFR 60 Subpart KKK. This was addressed as part of an enforcement action in June of 2013.
- 3.4 Verification of H2S and/or sulfur content of the natural gas burned in FGFACILITY may be required upon request. As indicated by the enclosed records and the attached email dated May 1, 2017, the facility has tested the gas stream recently using stain tubes and received non detect readings.

As a result of this inspection, a violation notice is recommended for failure to perform a gas analysis in 2016 per Special Condition 1.1 of PTI 220-05. Additionally, regarding Special Condition 2.1, the MAP located on file should be reviewed and approval, if warranted, should be sent to the company. Aside from these items, the facility was in compliance with their air permitting.

DATE SUPERVISOR_