

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

P079438820

FACILITY: West Bay Exploration - Leoni 13 CTB		SRN / ID: P0794
LOCATION: 8401 Dorrell Rd, JACKSON		DISTRICT: Jackson
CITY: JACKSON		COUNTY: JACKSON
CONTACT: Eric Johnson , Project Manager		ACTIVITY DATE: 03/01/2017
STAFF: Zachary Durham	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Inspection of an oil and gas central processing facility with permit exempt equipment. This facility is subject to NSPS OOOO.		
RESOLVED COMPLAINTS:		

Contact

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Purpose

This was a scheduled, announced inspection of the oil and gas central processing facilities located at 8401 Dorrell Rd, Jackson, MI. Scott Miller and I arrived on site at about 9:00am on 3/1/2017 and met with Eric Johnson and Tim Baker. This facility consists of equipment exempt from requiring a Permit to Install (PTI) under AQD rules.

Background

This inspection was the result of a transmittal made on behalf of West Bay by their consultant, Eric Johnson (Note: the original submittal has been placed in the file for Norvell 9 under SRN P0793). The reported information was part of annual reporting for 40 CFR Part 60, Subpart OOOO (NSPS OOOO). Due to the facility being subject to NSPS OOOO, I determined that the sites listed in the report would be required to submit annually to the Michigan Air Emissions Report System (MAERS) going forward. In doing so, this facility was provided with a State Registration Number (SRN) and entered into our database for tracking compliance, emission reporting, and billing associated fees.

Regarding this site, on 11/6/2014 Eric Johnson and Tim Baker met with Sersena White and Scott Miller to discuss a rich burn engine being installed at this facility that did not meet exemption criteria based on Potential to Emit (PTE) of Nitrogen Oxides (NOx). This engine has since been replaced with a lean burn engine that is exempt from requiring a PTI.

Compliance Evaluation

Included in this report is the spreadsheet identifying installed facility equipment, E&P Tanks 3.0 modeling data, and the Leoni 13 CTB as-built site drawing.

The attached spreadsheet includes each exemption that applies to individual pieces of equipment. The total uncontrolled PTE of each criteria pollutant is below Title V thresholds. As installed the site consists of a flare, vapor recovery unit (VRU), 2 compressor engines, five process heaters, six oil tanks, one water tank, and a Natural Gas Liquids (NGL) tank.

Tank emissions are routed to the VRU and backup flare for control purposes. The E&P Tanks 3.0 model shows uncontrolled Volatile Organic Compounds (VOC) is about 25 tons per year. Considering a 95% control,

estimates are at less than 2 tons per year facility wide. The 95% control on the tanks appears to be in compliance with NSPS OOOO.

It does not appear that this facility requires a PTI at this time.

Compliance Determination and Recommendations

Following site inspection and review of the records provided, it appears that this facility is in compliance with AQD rules and regulations.

I recommend that the facility continue to maintain necessary record keeping documents as it pertains to exempt pieces of equipment as well as production and emission records for use in reporting to MAERS.

NAME Zack Durham DATE 3/23/17 SUPERVISOR [Signature]