

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

U05240567173836

<b>FACILITY:</b> Green River West CPF		<b>SRN / ID:</b> U052405671
<b>LOCATION:</b> 7866 M-88, Mancelona		<b>DISTRICT:</b> Gaylord
<b>CITY:</b> Mancelona		<b>COUNTY:</b> ANTRIM
<b>CONTACT:</b> Natalie Schrader , Compliance Coordinator		<b>ACTIVITY DATE:</b> 07/02/2024
<b>STAFF:</b> Lindsey Wells	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b>
<b>SUBJECT:</b> self-initiated inspection, no further action recommended, facility claims exemption from Rule 201 permitting, notification is of record -LW;		
<b>RESOLVED COMPLAINTS:</b>		

**Introduction**

On July 2, 2024, AQD District staff Lindsey Wells and Tammie Puite mobilized to the Green River West Central Production Facility (CPF) to conduct an unscheduled, unannounced compliance inspection. The CPF is an unregistered facility that is located in Section 11 in Custer Township of Antrim County (Township 29 north, range 7 west, T29N-R7W). The facility is currently operated by Riverside Energy. A photo of the site signage is included at the end of the report. The current operator reports the site as previously an unregistered facility. Staff logged the site into the air database which assigned U052405671.

The purpose of the on-site inspection was to determine compliance with the Michigan Air Pollution Control rules.

**Summary**

Based on the evaluation it appears the facility operates in general compliance with the air pollution control rules. No apparent information that would prohibit the use of Rule 201 exemptions was noted. No further action is recommended at this time, however because the facility is surrounded by privately owned parcels, it is recommended that the remote status of the engine be assessed periodically for MACT subpart ZZZZ. At the time of inspection a review of aeriels indicate 2 buildings within a quarter mile radius of the compressor building.

**Facility Information**

The facility is a CPF that compresses and dehydrates natural gas prior to transfer to a pipeline. Separators remove condensate and water from natural gas which is then compressed, dehydrated, and sent to a pipeline.

The referenced facility is classified as a true minor source that operates under exemptions per Riverside's 2021 determination letter located in district files.

**Permits of Record**

A review of aerial photographs shows the area as undeveloped in 1993. The site first appears in 1998. The only file of record is the February 1, 2021 notification from Riverside Energy reporting their acquisition of the site and assertion that the CPF operates under Rule 201 exemptions.

**Equipment of Record**

The 2/1/21 notification reports a single compressor engine, a Caterpillar 3516 LE rated at 1085 horsepower. Riverside included an engine specification sheet and reported that the actual emissions from the compressor are below the significance levels in Rule 119, thus the use of exemptions is not prohibited. Riverside claims exemption from permitting via Rule 282(2)(b)(i) for fuel burning oil and gas production equipment rated less than 50 million BTU per hour burning sweet natural gas only.

**Facility Access**

Staff accessed the facility via M-88 north from Mancelona. The nearest crossroad to the east is Schuss Mtn road and to the west is Del Mason road. At the time of inspection, All Lakes Lift and Dock sales is located immediately to the west of the access drive. Although not easily visible from the road as the drive is located on a curve, a green address marker reads 7866. The access road is on the southbound side of M88 although this section of M88 is oriented east/west, making it the eastbound lane. After the main gate, the access road splits to two forks. The right fork ends at the Little Bighorn and General Custer C1-11 well sites and the left fork ends at the Custer CPF.

At the time of inspection the CPF layout appeared as follows:

The site is unmanned, and a single green building is present, housing the compressor and other equipment. The driveway encircles the property. What appear to be (2) iron sponge towers are located in front of the compressor building. Visible behind the sponges is a storage tank in a containment area.

**On-Site Inspection Notes**

At the time of the 7/2/2024 inspection, the ambient temperature was 62 degrees (Fahrenheit), conditions were intermittent light winds and rain. No visible emissions were observed. The compressor was operating at the time of the inspection.

A single compressor engine is present on a skid labeled GCS 888. The following readings were noted from the CAT supervisory panel 1182 rpm, 152943 (presumed hours), and 56 psi (presumed oil pressure). The meter on the block read 95431 and the engine was noted as having 16 cylinders (8 per side). An Exterrta tag affixed to the engine dated 6/28/13 reads serial number 4EK00169. An operator's daily log was present, as was an iron sponge log with weekly readings. A small triethylene glycol tank was observed near the dehydrator. What appears to be a sales meter was present and the digital panel read 0.13 O2. Also present were a large separator tower and what appeared to be a fuel bottle.

**Compliance Evaluation:**

The facility does not have a permit and is therefore not required to report annual emissions to the air emissions reporting system.

The facility may be subject to federal regulations. Subparts frequently associated with this source category are identified below. Note however that compliance with these subparts has not been determined as part of this evaluation.

With respect to Maximum Achievable Control Technology Standards (MACT 40 CFR 63) the following subparts may apply:

- MACT Subpart HH (Hazardous Air Pollutants (HAPs) from oil and natural gas production facilities
- MACT Subpart ZZZZ (HAPS from Stationary Engines)

The facility's 2021 notification details that the engine is subject to MACT Subpart ZZZZ.

The facility has one dehydrator on-site that may be subject to MACT Subpart HH. In response to staff request, the provided a production record summary for the evaluation period demonstrating exemption due to gas throughput of less than 3 million standard cubic feet per day (MMSCF). The provided record indicated an average throughput of less than 1430 MSCF per day, which is 1.43 MMSCF. The facility's 2021 notification claims that the dehydrator is exempt from permitting via Rule 290 for de minimus VOC emissions, Rule 282(b)(i) for fuel burning oil and gas production equipment rated less than 50 MMBTU/hr burning sweet natural gas only, and Rule 288(b)(ii) for dehydrators processing gas from the antrim zone formation.

With respect to New Source Performance Standards (40 CFR Part 60 NSPS) commonly associated with this source category are discussed below. Note that no compliance determinations have been made with respect to the following subparts.

- NSPS Subparts K, Ka or Kb (Storage vessels for Petroleum Liquids); At the time of the inspection the storage tanks present appear to be smaller than the lowest threshold of approximately 19,815 gallons or 471 barrels (bbl).
- NSPS Subpart KKK (Equipment Leaks of VOC from onshore natural gas processing plants); The facility does not appear to currently process (extract or fractionate) natural gas liquids from field gas.
- NSPS Subpart OOOO (Standards of Performance for Crude Oil and NG Production, Transmission and Distribution) and Subpart OOOOa would apply to onshore affected facilities that are constructed, modified or reconstructed after August 23, 2011, and September 18, 2015, respectively. Based on available information it appears that the referenced subpart is not applicable at this time but that future changes may be subject to the referenced subpart
- NSPS Subpart JJJJ for Spark Ignition (SI) Reciprocating Internal Combustion Engines (RICE) may apply in the future for subsequent/additional engines. Based on information included in the 2021 notification, the engine predates the applicability of JJJJ by virtue of a reported pre 2000 manufacture date.

Based on observations at the time of the July 2, 2024 site inspection and review of records provided by facility staff, the facility appears to be operating in general compliance with applicable requirements.



Postal address marker



Right fork: Custer C1-11 well site



Left fork: Green River West CPF

NAME Lindsey Wells

DATE 12-2-24

SUPERVISOR Shane Nixon