## DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

**ACTIVITY REPORT: Self Initiated Inspection** 

U51180990446869

FACILITY: Core Energy, Manistee B4-14		SRN / ID: U511809904
LOCATION: Manistee Township, Manistee		DISTRICT: Cadillac
CITY: Manistee		COUNTY: MANISTEE
CONTACT: Bob Tipsword , Operations Manager		ACTIVITY DATE: 10/05/2018
STAFF: Rob Dickman	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Compliance inspection	n of this unpermitted facility.	
RESOLVED COMPLAINTS:		

I performed and inspection of this Core Energy facility. The purpose of this inspection was to determine Core Energy's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); and the Michigan Air Pollution Control Rules. This facility began operation in July of 2015 and has no air permitting.

This facility processes crude oil and some natural gas from the State Manistee 2-14 well for sale. Equipment of interest on site includes:

- One Caterpillar six-cylinder compressor engine, Model 3306TA, Skid NGCS 566, uncontrolled
- One small process heater treater, one in line heater
- One small glycol dehydrator configured such that emissions go to the suction side of the compressor engine.
- Four 400 bbl. above ground storage tanks with containment. No vapor recovery.

A review of the manufacturers data regarding the 3306TA indicates a maximum heat input for the engine of 1.7 MMBtu/hr. This would indicate this engine is exempt from permitting under Rule 285(2)(g). Information provided by the facility indicates that the total heat input for the heater treater, in line heater, and dehy burner were approximately 1.6 MMBtu. This would indicate this equipment is exempt from permitting under Rule 282(2)(b)(i). The facility services one oil well. The glycol dehy is configured such that emissions from it are collected and routed to the suction side of the compressor. This would indicate this equipment is exempt from permitting under Rule 288(2)(b)(i). Finally, the above ground tanks are less than 40,000 gallons (16,800) and store sweet crude. This would indicate this equipment is exempt from permitting under Rule 284(2)(e)(i).

The exemptions for the heaters/burners and tanks are predicated on the premise that the gas being process is "sweet". A gas analysis provided by the facility for this site indicates 1.6 ppm of hydrogen sulfide in the gas. This equates to 0.07 grains hydrogen sulfide per 100 cubic feet of natural gas. Rule 119(dd) indicates sweet natural gas to be any gas with a content of less than 10.0 grains of hydrogen sulfide per 100 cubic feet of gas.

A review of the total uncontrolled emissions from this facility indicates that no pollutants are emitted at a rate that is above criteria as defined by Rule 119(e). Therefore, no equipment at the facility is excluded from exemption per Rule 278.

At the time of this inspection, this facility appears in compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); and the Michigan Air Pollution Control Rules. No further action is recommended.

DATE (1/7/16 SUPERVISOR