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

<u>U67220148562241</u>		
FACILITY: Federated Oil, Smith A4-34 Tank Battery		SRN / ID: U672201485
LOCATION: SW Corner of 80th Avenue and 7 mile Road, Evart		DISTRICT: Cadillac
CITY: Evart		COUNTY: OSCEOLA
CONTACT:		ACTIVITY DATE: 03/15/2022
STAFF: Rob Dickman	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self initiated inspection of this unregistered source.		
RESOLVED COMPLAINTS:		

Inspected this unregistered source for compliance with Part 55 Michigan Air Pollution Control Rules. This site was selected in response to recent odor complaints received by Jack Hybza, Oil, Gas, and Minerals Division (OGMD). This site collects and stores crude oil and condensate from three oil wells in to six Aboveground Storage Tanks (ASTs). These tanks are equipped with vapor recovery (VR) and collected vapors are controlled by a flare. The wells feeding this facility are considered "sour" by definition. Liquids including crude are loaded out by truck.

The tank battery consists of six AST's that have a capacity of 400 barrels each (approximately 17,000 gallons). Vapors from the tanks are collected by the VR equipment and sent to the flare. These tanks are exempt from air permitting under Rule 336.1284(2)(f) as they have a capacity of less than 40,000 gallons and are controlled by a VR unit.

The flare itself is possibly exempt from air permitting under Rule 336.1282(2)(g) if the gas burned emits less than 1 pound of sulfur dioxide per hour. The flare is homemade and does not have a flow meter on it or any indication of its capacity. The hydrogen sulfide concentration of the gas to the flare is approximately 1200 ppm according to conversations between Federated Oil and Mr. Hybza. Potentially, a request could be made for this information under Rule 336.1278a to prove flare emissions meet the criteria of the exemption.

Visible emissions from the flare, per Rule 336.1301, are not to exceed 20% opacity per any six-minute average with one six-minute average less than 27% per hour. Visible emissions readings taken on site averaged 7% across two six-minute runs. Therefore, the facility was in compliance with this rule at the time of these observations.

At the time of the inspection, this facility appeared in compliance with Air Pollution Control Rules. Given that odor and visible emissions issues are possible from this facility, it is recommended that AQD and OGMD consult and possibly send a joint informational letter to Federated Oil indicating the potential issues at this facility.

NAME Rol Sichman

DATE _____

SUPERVISOR_____