DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

| FACILITY: Merit Energy Co Brown 7 | | SRN / ID: B5589 |
|-----------------------------------|-------------------------------|---------------------------|
| LOCATION: Collins Rd., MANISTEE | | DISTRICT: Cadillac |
| CITY: MANISTEE | | COUNTY: MANISTEE |
| CONTACT: | | ACTIVITY DATE: 03/08/2018 |
| STAFF: Kurt Childs | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT |
| SUBJECT: 2018 FCE | | |
| RESOLVED COMPLAINTS: | | |

2018 Full Compliance Evaluation

The last FCE was conducted at this source March 25, 2014. In June 2015 the AQD received information from Merit Energy Company that the company was considering moving production from the Brown 7 to the Manistee 23. Only the separators at the Brown 7 would remain in service, for metering purposes, and the gas would continue on to the Manistee 23.

At the time of the inspection the weather was overcast, 31 degrees with N winds at 10 mph. There were no visible emissions or odors from any equipment at the plant.

I observed that the flare was not operating, nor was the tank vapor recovery unit. Compressors and engines/motors had been removed as has the glycol dehydrator. Both the iron sponges and the sweetening plant have been flanged off from other plant piping.

It appears that the plant has been shut in or is only being used as described above. A records request was made along with information regarding the operating status of the facility. A response was received on 3/13/2018 which indicated that the Brown 7 was taken out of service August 2015. As a result, there are no records since shut-down.

The re-installation of an internal combustion compressor engine would require permitting since the previously permitted engine has been removed and was previously replaced with an electric motor. Similarly, the dehy has been removed and would require a new permit if not exempt. As a result, PTI 25-05B could be voided at this time and Merit Energy has been notified in this regard.

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