## DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION **ACTIVITY REPORT: Scheduled Inspection**

B888438558		
FACILITY: SUMMIT ESSEXVILLE NOLET ROAD FACILITY		SRN / ID: B8884
LOCATION: NOLET RD, ESSEXVILLE		DISTRICT: Saginaw Bay
CITY: ESSEXVILLE		COUNTY: BAY
CONTACT:		ACTIVITY DATE: 12/28/2016
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

Ben Witkopp of the Michigan Department of Environmental Quality - Air Quality Division (MDEQ-AQD) and Andrew Kent of the Office of Oil Gas and Minerals (OOGM) visited the crude oil production facility on Nolet Rd. owned by Summit Petroleum. The facility handles oil from four wells. The wells are located west of the facility. The operation and subsequent emissions are covered by air use permit 272-82A.

The wells sending sour oil to the facility, starting at the west and proceeding east towards the facility, are the Vermeesch 2-21, Hugo 1-21, Wiedyk 1-22, and the Krysak 2-22. The production is accomplished by pumping the wells in pairs and alternating the days of production. The Vermeesch and Hugo are paired as are the Wiedvk and Krysak.

The operation is required to have a shutdown system in place in the event of pilot flame failure in the incinerator. A thermocouple would cause a valve to trip at the inlet to the facility which would make oil back up in the pipeline and create pressure at the wellheads. Murphy switches at the wellheads would then shut down the pump jacks if the pressure exceeded the switch set points. Special condition 2.5 specifies the maximum set point pressure to be 220 psig. That set point was provided by the company during permitting.

The well head sites were checked in order from west to east. The Vermeesch was pumping and the pressure setpoint was 220. The Hugo was pumping and its pressure setting was also 220. The Wiedyk was not pumping. It should be noted the pressure setting was 280 which was well above the 220 specified in the permit. Lastly, the Kryszak was not pumping and its pressure setting was 170.

The production site has a flare system to burn vapors from the storage tanks. There is a drip tank, flame arrestor, pilot flame, and auto igniter for the flare. The pilot flame is fueled by commercial sweet gas. The flare is at least 20 ft tall and is equipped with a wind shroud.

A heater treater is located at the facility inlet. The gas produced from the heater treater is routed to an incinerator located east of the facility. The incinerator was operating at the time and no opacity was observed. It has a pilot flame fueled by commercial sweet gas. The incinerator meets its required height of 100 ft.

Records previously submitted were checked. SO2 emissions have limits of 62.8 pph. There is also a limit of 98 tons per year based on a 12 month rolling time period. Records for 2016 showed the highest SO2 emissions were just over 25 pph. The tons per 12 month rolling time period were less than 19. Individual records for the months of February and August 2016 were requested. Those records show the daily data. The records for February had some small issues. The 18th and 19th showed totals for gas flow but no gas production from individual wells. The 26th had a total of 9000 cfd but had individual well volumes of 8000 and 2000.

The records issues were discussed with Scott Huber. He explained the total flow is correct since that is metered. The individual well amounts of produced gas are obtained by proportioning the known total volumes to the known amounts of oil generated by each well. Therefore, the overall amounts of eventual emissions are correct.

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DATE D-21-12 SUPERVISOR C. Have