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

N096363691

FACILITY: BAILER AND DESHAW		SRN / ID: N0963
LOCATION: WISNER TWSP, WISNER		DISTRICT: Bay City
CITY: WISNER		COUNTY: TUSCOLA
CONTACT: Brett Polley , Field Supervisor		ACTIVITY DATE: 07/05/2022
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: On-site inspection		
RESOLVED COMPLAINTS:		

An onsite inspection and records review was conducted by Air Quality Division (AQD) staff Adam Shaffer (AS) of the Bailer and Deshaw (BD) site specifically the Wisner Oil Field Akron, MI location. Applicable records were requested and later received on June 10, 2022, to verify compliance with permit to install (PTI) No. 4-85A. A joint in-person inspection consisting of AQD staff AS and Oil, Gas, and Minerals Division (OGMD) staff Kasey Todd (KD) to verify onsite compliance was completed on July 5, 2022.

Facility Description

TE is an oil production company with various oil well sites located in Michigan. This site is in operation with PTI No. 4-85A. The facility is a true minor source for all criteria pollutants.

Compliance Evaluation

A request was sent to Ms. Kristin Wade, Office Manager, for various records required by PTI No. 4-85A. The records were received on June 10, 2022 and will be discussed further in this report. An onsite inspection was completed July 5, 2022. AQD staff AS and OGMD staff KD arrived in the area at approximately 10am. Weather conditions were westerly winds and partly cloudy skies. AQD and OGMD staff met onsite with Mr. Brett Polley, Field Supervisor, who provided a tour of the area and answered site specific questions. Requested records were provided by Ms. Kristin Wade, Office Manager.

As mentioned above, BD is an oil production company. The various stages of onsite processes were reviewed during the inspection and will be discussed further below.

PTI No. 4-85A

The one emission unit in this permit is for a flare (EUFLARE2) that is used for combusting gas from the C. Cosens #2 well. Two oil storage wells and a fluid gas separator are associated with the C. Cosens #2 well.

Per Special Condition (SC) I.1, this site is subject to a 3.5 lb/hr SO2 emission limit for the flare. No monitoring / recordkeeping or process / design requirements are in PTI No. 4-85A to demonstrate compliance with this emission limit. After review of historical documents, it appears that this limit would be met based on satisfactory operation of the flare and no significant change in oil production. Based on the observations made at the time of the inspection and records reviewed, this emission limit appears to be being met.

Per SC VI.1, the permittee shall monitor and record the oil and brine production on a monthly basis. Records were requested and provided for select time periods. Based on the records reviewed, it appears that overall BD is keeping track of monthly oil and brine production records.

One stack is listed in association with this permit. Though the dimensions were not measured at the time of the inspection, they appear consistent with what is listed in PTI No. 4-85A.

The C. Cosens #2 wellhead was not operating at the time of the inspection. Speaking with company staff, this wellhead appears to run for one hour a day, six days a week. The two associated oil storage tanks vent unobstructed to the atmosphere. No recent oil staining was noted around the storage tanks and fluid gas separator.

The EUFLARE #2 was observed during the course of the inspection and was in operation. No shroud was observed for the flare at the time of the inspection and speaking with company staff appears to have never been in operation with a flare shroud. The flare is manually lit, and it appears the off gases from the two well (C. Cosens #2 / Elek #1) fluid gas separators are what is sent to and controlled by the flare. Additional information regarding the Elek #1 well site is discussed further below. A pressure gauge was noted on the line from the well sites for off-gas to the flare. At the time of the inspection the pressure gauge read 20 lbs. Speaking with company staff it appears the line with open and close based on how much off gas is going through at the time to the flare. Company staff stated that there have been no recent issues with the flare. The flare appeared to be operating satisfactorily. No evidence of any recent spills was observed beneath the flare.

Additional Observations

During the inspection while speaking with company staff, it was determined the EUFLARE2 also combusts off-gases from the Elek #1 well site. Associated with this wellhead is two oil storage tanks and one fluid gas separator. The Elek #1 wellhead was observed in operation at the time of the inspection. Speaking with company staff this wellhead appears to operate four hours a day six days week. The two oil storage tanks associated with this wellhead vent unobstructed to the atmosphere. No recent oil staining was noted around the storage tanks and fluid gas separator. Company staff had stated the Elek #1 well is a sweet oil well. Upon review, the Elek #1 well does not appear to be part of PTI No. 4-85A. Upon review of historical OGMD records, H2S testing was completed in 1983 and 1987 for this wellhead. Both test results appeared to indicate a H2S concentration of 0 ppm. Based on the test results, the off gases being sent to the EUFLARE2 from the Elek #1 well site appear to be exempt per Rule 288(2)(c). The sweet oil storage tanks would appear to be exempt per Rule 284(2)(e).

Two additional oil storage tanks were observed to the south of EUFLARE #2. The two tanks vent unobstructed to the atmosphere and were stated by company staff to be for sweet oil storage. The wellhead for the two oil storage tanks was noted to the north of the area. The sweet oil storage tanks would appear to be exempt per Rule 284(2)(e).

Conclusion

Based on the facility walkthrough, observations made, and records received, BD appears to be in compliance with PTI No. 4-85A and applicable air pollution control rules.

NAME Adam J. Fuller DATE 07/11/22 SUPERVISOR C. Hare