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

N790065805		
FACILITY: TRENDWELL ANTRIM INC - Briley 7 Satellite		SRN / ID: N7900
LOCATION: BRILEY 7 SATELLITE CPF, BRILEY TWP		DISTRICT: Gaylord
CITY: BRILEY TWP		COUNTY: MONTMORENCY
CONTACT: Danita Greene, Production and Environmental Compliance		ACTIVITY DATE: 12/13/2022
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2023 FCE.		
RESOLVED COMPLAINTS:		

On December 13, 2022 AQD Staff traveled to N7900 Trendwell Briley 7 Satellite Central Production Facility (CPF), located in Briley Township, Montmorency County, for a scheduled inspection to determine compliance with PTI 348-07. This is an opt out permit.

The Briley 7 Satellite CPF is an oil and gas production facility, extracting gas from the Antrim formation. Natural gas and brine fluids are extracted from wells drilled into producing reservoirs then transmitted through flow lines to a CPF. The gas is compressed by one engine.

LOCATION

The facility is located 4.5 miles west of Atlanta, a quarter mile north of M-32 on Thorton Road. The facility is on the east side of Thorton Road and is visible from Thorton.

REGULATORY DISCUSSION

PTI 348-07 was issued January 9, 2008 and is currently active. The permit was issued for one Caterpillar G3306/203 HP engine without control.

The engine is subject to 40 CFR Part 63, Subpart ZZZZ, which has been delegated to EGLE from EPA. However, EGLE is not currently making compliance determinations for area sources.

INSPECTION NOTES

During the inspection, the sky was overcast, 30 degrees Fahrenheit, light winds and light snow on the ground. The facility has a sign at the entrance indicating the source name, location and emergency contact information. The entrance to the facility was open.

The facility consists of one small building containing one engine. A tank storage area is located east of the building. The facility has trees and a soil berm surrounding it. The doors to the building were closed.

The engine is a Caterpillar G3306 HCTA with catalyst and was operating during the inspection. There is no Skid ID number for the engine, no serial number was visible on the engine. The engine was an in-line 6-cylinder model operating at 1230 RPM with 70 psi engine oil. No visible emissions or odors were detected. The permit is issued with no catalytic convertor required, however there is a catalytic converter on the engine exhaust. The catalyst inlet temperature was 935 degrees F and the outlet

temperature was 865 degrees F (temperatures inverted). Daily inspection logs indicate this has been the operating condition throughout 2022.

A bermed and lined tank storage area is east of the building. There was one tank, less than 400 bbl, that was unlabeled.

RECORDS REVIEW

PTI 348-07, EUENGINE1 – natural gas fired reciprocating engine (Caterpillar 3306, 203 hp).

Emission Limits – The nitrogen oxides (NOx) are limited to 42 tons per year, based on 12 month rolling average. Records were provided. As of September 2022, NOx emissions were 1.87 tpy, based on 12-month rolling. Carbon monoxide (CO) emissions were also reported although not required in the permit. CO emissions were 2.64 tpy, based on 12-month rolling. Records provided demonstrate compliance with the requirements.

Process/Operational Limits – The facility has a PM/MAP on file from 8/02/22. The MAP indicates the engine is a Caterpillar 3306 HCTA with catalytic converter, and no AFRC. Maintenance logs are maintained and indicate normal maintenance of each engine throughout the past year. No emission specific repairs required. Though the engine was permitted without a catalytic converter, the permit does contain requirements limiting engines equipped with a control device from operating more than 200 hours without the control device, consistent with the MAP. EUENGINE1 had 27 hours of operation without the catalyst.

Testing - Testing is required upon request to verify NOx emissions. Testing is not being requested at this time.

Monitoring - The permittee is required to monitor natural gas usage for EUENGINE1. Natural gas records were provided, demonstrating compliance with this requirement.

Record keeping/Notification - The permit allows for the engine to be replaced with an equivalent emitting or lower emitting engine, upon notification to AQD. AQD has not received notification of an engine switch-out.

Stack/Vent Restrictions - The stack is required to have a maximum of 4 inches diameter and minimum height above ground of 30 feet. Based on visual estimate, the stack meets these requirements.

COMPLIANCE DETERMINATION

Based on the scheduled inspection and records review, N7900 Trendwell Briley 7 Satellite CPF is in compliance with the requirements of permit 348-07 and the Air Pollution Control Rules.

NAME _____ DATE ____ SUPERVISOR _____