RESOLVED COMPLAINTS:

NZOEAAGOOA

DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

1793440301		T 2-11/1- 1-1-1
FACILITY: TUSCOLA ENERGY MCPHERSON A-1-24		SRN / ID: N7954
LOCATION: 6082 CASS CITY RD, AKRON		DISTRICT: Saginaw Bay
CITY: AKRON		COUNTY: TUSCOLA
CONTACT:		ACTIVITY DATE: 09/12/2018
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Site visit with OGMD:	staff	

Ben Witkopp of the Michigan Department of Environmental Quality - Air Quality Division (MDEQ-AQD) and Andrew Kent of the Oil, Gas, and Minerals Division (OGMD) stopped at the McPherson crude oil production facility. We hadn't been to the site since the company installed a taller flare as the result of permitting. The company also installed a Pro-Fire flare operating system.

In checking the overall system we noted the vent line from the pressure relief valve on the separator was open to the atmosphere. It should be venting directly to the flare as required by permit 14-09E. This is a violation of condition IV 2. A violation had been previously issued for the same issue back in 2016.

Previous discussions with the company lead to mutual records and data review for the source. The company questioned if the flow meter was reading correctly as the results showed being over the 310 pounds of H2S per day 21 times between June 17 and August 17, 2018. The data showed the meter reading zero at some times but showing values rising and falling throughout most of the various days. This data is indicative of a responding and recording meter. This facility is typically pumped 24 hours per day but that doesn't mean the flow can't be zero. The limit of 310 pounds of H2S per day is found in special condition II 1. It was found in permit 14-09D as well as in permit 14-09E issued July 13, 2018.

NAME B. Zithopy

DATE 9-27-18 SUPERVISOR C. Stare