

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

P079339000

FACILITY: West Bay Exploration - Norvell 9 CTB		SRN / ID: P0793
LOCATION: 11123 Palmer Rd, BROOKLYN		DISTRICT: Jackson
CITY: BROOKLYN		COUNTY: JACKSON
CONTACT: Eric Johnson , Project Manager		ACTIVITY DATE: 03/01/2017
STAFF: Zachary Durham	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Scheduled inspection of the oil and gas facilities subject to NSPS OOOO.		
RESOLVED COMPLAINTS:		

**Contact**

Eric Johnson, Project Manager  
(231)777-3447  
[EJohnson@WestshoreConsulting.com](mailto:EJohnson@WestshoreConsulting.com)

**Purpose**

This was a scheduled inspection of the facility located at 11123 Palmer Rd, Brooklyn, MI owned and operated by West Bay Exploration. Scott Miller and I arrived at the facility at 10:40am on 3/1/17 to observe equipment exempt from requiring a Permit to Install (PTI). We met with Eric Johnson and Tim Baker.

**Background**

Attached to this report is a spreadsheet of equipment that is currently installed along with the original install date. The Norvell 9 initially began installation of equipment in 2010, starting with eight (8) process heaters, five (5) oil tanks, three (3) water tanks, a flare, and a vapor recovery unit (VRU). It is AQDs understanding that this equipment was installed before the facility began operations. Equipment was then added to the facility from 2011 – 2014 as the facility became active.

This facility is subject to the New Source Performance Standards (NSPS) in 40 CFR Part 60, Subpart OOOO for Crude Oil and Natural Gas Production, Transmission and Distribution facilities. This inspection was the result of a transmittal sent to AQD on behalf of West Bay, which indicated compliance with NSPS OOOO (see attached).

Because this facility is subject to an NSPS, they will be required to submit annually to the Michigan Air Emissions Reporting System (MAERS) going forward. Their first reporting year will be 2017.

The facility operates a glycol dehydration unit at this facility, which may be subject to the NESHAP in 40 CFR Part 63, Subpart HHH for Natural Gas Transmission and Storage Facilities. The State of Michigan does not have delegation for this regulation.

**Compliance Evaluation**

As identified in the attached spreadsheet, each individual piece of equipment is exempt from requiring a PTI. Furthermore, they have no uncontrolled emissions above Title V thresholds. It does not appear that the facility is required to obtain a PTI based on the information provided for any of the criteria pollutants or volatile organic compounds (VOC) at this time.

Uncontrolled and controlled hazardous air pollutants (HAP) are estimated at 7.3 and 0.4 tons per year, respectively. The majority of HAP emissions are generated as a result of the operation of the glycol dehydrator. The facility uses GlyCalc for these estimates.

The facility complies with the requirement to reduce emissions of VOC from tanks by at least 95% through the use of a closed loop VRU system and backup emergency flare.

Also attached are E&P Tanks 3.0 calculations and the facility as-built diagram. The estimate of controlled emissions of VOC from the E&P Tanks 3.0 software is less than 1 ton per year for this site.

**Compliance Determination and Recommendations**

After site inspection and review of the information provided, it appears that the facility is in compliance with AQD rules and regulations.

I recommend that the facility continue to maintain necessary record keeping documents as it pertains to exempt pieces of equipment as well as production and emission records for use in reporting to MAERS.

NAME Jack Dunham DATE 3/22/17 SUPERVISOR 