

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Breitburn Operating L.P. - Rich Field Gas Plant		SRN :	B5462
Location : 7770 McTaggart Rd		District :	Lansing
		County :	LAPEER
City : NORTH BRANCH	State: MI	Zip Code : 48461	Compliance Status : Compliance
Source Class : MAJOR	Staff :		Michelle Luplow
FCE Begin Date : 8/22/2015	FCE Completion Date :	8/22/2016	
Comments :			

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/16/2016	ROP Monthly	Compliance	July 2016 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of July. Tail gas stream H2S was not diverted to the flare. Breitburn does not have plans to treat sour gas anymore. Highest SO2 emissions were 1008 lbs on July 17. Breitburn's decision to flare all gas coming into the plant has resulted in higher daily SO2 emissions. Total SO2 emissions for July was 29031 lbs. Michael Fairbanks, Responsible Official.
07/27/2016	Scheduled Inspection		Scheduled compliance inspection to determine compliance with MI-ROP-B5462-2014b.

Activity Date	Activity Type	Compliance Status	Comments
07/12/2016	ROP Monthly	Compliance	June 2016 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of June. Tail gas stream H2S was not diverted to the flare. Breitburn does not have plans to treat sour gas anymore. Highest SO2 emissions were 1063.4 lbs on June 1. Breitburn's decision to flare all gas coming into the plant has resulted in higher daily SO2 emissions. Total SO2 emissions for June was 28,008 lbs. Michael Fairbanks, Responsible Official.
06/08/2016	ROP Monthly	Compliance	May 2016 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of May. Tail gas stream H2S was not diverted to the flare. Breitburn does not have plans to treat sour gas anymore. Highest SO2 emissions were 1215.3 lbs on May 3. Breitburn's decision to flare all gas coming into the plant has resulted in higher daily SO2 emissions. Total SO2 emissions for May was 33,584 lbs. Michael Fairbanks, Responsible Official.
06/01/2016	ROP Monthly	Compliance	April 2016 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of April. Tail gas stream H2S was not diverted to the flare. Breitburn does not have plans to treat sour gas anymore. Highest SO2 emissions were 1230.1 lbs on April 11. Breitburn's decision to flare all gas coming into the plant has resulted in higher daily SO2 emissions. Total SO2 emissions for April was 33,587 lbs. Michael Fairbanks, Responsible Official.

Activity Date	Activity Type	Compliance Status	Comments
04/22/2016	ROP Monthly	Compliance	<p>March 2016 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of March. Tail gas stream H2S was not diverted to the flare. Breitburn does not have plans to treat sour gas anymore. Highest SO2 emissions were 1230.8 lbs on March 13. These higher-than-normally-operated SO2 values are the result of Breitburn's decision to flare all gas coming into the plant. Michael Fairbanks, Responsible Official.</p>
03/08/2016	ROP Monthly	Compliance	<p>February 2016 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of February. Tail gas stream H2S was not diverted to the flare and Breitburn does not have plans to treat sour gas anymore. Highest SO2 emissions were 1376 lbs on February 14. These higher-than-normally-operated SO2 values are the result of Breitburn's decision to flare all gas coming into the plant. Michael Fairbanks, Responsible Official.</p>
03/08/2016	MAERS	Compliance	<p>Check MAERS for any review comments. Certified by Michael Fairbanks 2/22/2016. Breitburn was asked to resubmit this certification because during 2015 Breitburn was regulated under 2 ROP's: MI-ROP-B5462-2014a and MI-ROP-B5462-2014b. The resubmittals contain certifications under both ROPs: 2014a 1/1/2015 - 4/14/2015 and 2014b 4/15/2015-12/31/2015. Corrected certs rec'd 4/7/16.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/02/2016	ROP Monthly	Compliance	January 2016 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for the entire month of January. Tail gas stream H2S was not diverted to the flare and Breitburn does not have plans to treat sour gas anymore. Highest SO2 emissions were 1541 lbs on January 19. These higher-than-normally-operated SO2 values are the result of Breitburn's decision to flare all gas coming into the plant. Michael Fairbanks, Responsible Official.
02/29/2016	ROP Annual Cert	Compliance	Annual Compliance Certification for January 1, 2015 through December 31, 2015. Michael Fairbanks, Responsible Official. No deviations reported for the year. Breiburn was regulated under 2 ROP's in 2015: MI-ROP-B5462-2014a and MI-ROP-B5462-2014b. I asked for Breitburn to resubmit the cert to certify under both ROPs. Resubmitted certs rec'd 4/7/16.
02/29/2016	ROP SEMI 2 CERT	Compliance	Semi-annual certification - no deviations reported based on the MI-ROP-B5462-2014b version of the ROP. Michael Fairbanks, Responsible Official.
01/22/2016	ROP Monthly	Compliance	December 2015 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for 3 days. Tail gas stream H2S was diverted to the flare for 1 days. Highest SO2 emissions were 1394.5 lbs on December 31. These higher-than-normally-operated SO2 values are the result of Breitburn's decision to flare all gas coming into the plant. Michael Fairbanks, Responsible Official.

Activity Date	Activity Type	Compliance Status	Comments
12/21/2015	Meeting Notes	Compliance	Discussion concerning Breitburn returning to flaring off all gas instead of treating the gas and only using the flare for emergencies. Included discussion of triggering PSD if using an exemption for the "change." Conclusion: Breitburn is allowed to return to flaring off all gas under permit limits for SO2 without triggering the need for a permit or PSD review.
12/15/2015	ROP Monthly	Compliance	November 2015 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for 4 days. Tail gas stream H2S was diverted to the flare for 4 days. Highest SO2 emissions were 1147 lbs on November 29. Michael Fairbanks, Responsible Official.
12/04/2015	ROP Monthly	Compliance	October 2015 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was not diverted to the flare in October. Tail gas stream H2S was diverted to the flare for 11 days. Highest SO2 emissions were 115.8 lbs October 15. Michael Fairbanks, Responsible Official.
10/23/2015	ROP Monthly	Compliance	September 2015 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. No gas from inlet or from tail gas stream was diverted to the flare during this time. Michael Fairbanks, Responsible Official.

Activity Date	Activity Type	Compliance Status	Comments
10/13/2015	Other	Compliance	PCE - Evaluation of Emergency Response Plan (ERP) and associated documents referenced in the ERP. An emergency response plan is required in SC IX.4 under EUGASTREATING and is required to be reviewed prior to June 1 each year. BreitBurn revised their ERP and had it reviewed by local emergency responders on May 6, 2015. AQD received the plan on June 2, 2015. ERP has been approved 10/13/15, but recommendations were made to include the PEAS hotline number in the ERP, as well as provide AQD with BreitBurn's "H2S Contingency Plan," "Operator Qualification Program" and "Operating & Maintenance Procedures Manual" as referenced in the ERP.
09/22/2015	ROP Semi 1 Cert	Compliance	Semi-annual certification 1/1/15 - 6/30/15 - no deviations reported based on the MI-ROP-B5462-2014. Michael Fairbanks, Responsible Official.
09/22/2015	ROP Monthly	Compliance	August 2015 hydrogen sulfide monitoring report for Rule 403. Report indicates compliance with permit limits. Limit is 2227 lb SO2 (1183 lbs H2S)/ 24 hour consecutive period. Inlet sour gas was diverted to the flare for 1 day. Tail gas stream H2S was diverted to the flare for 0 days. SO2 emitted only on August 20 at a total of 539 lbs. Michael Fairbanks, Responsible Official.

Name: Michael Bryan Date: 8/22/16

Supervisor: 