

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> MUSKEGON DEVELOPMENT--HEADQUARTERS-- Sour Zone CPF	<b>SRN :</b> N0924
<b>Location :</b> SE SE Section 29, T21N, R3W	<b>District :</b> Gaylord
	<b>County :</b> ROSCOMMON
<b>City :</b> HOUGHTON LAKE	<b>State:</b> MI <b>Zip Code :</b> 48629 <b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Sharon LeBlanc
<b>FCE Begin Date :</b> 10/1/2019	<b>FCE Completion Date :</b> 10/5/2020
<b>Comments :</b> FY 2021 FCE for sour gas site. sgl	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
10/05/2020	Scheduled Inspection	Compliance	FY 2021 Scheduled site inspection and records review.
09/14/2020	ROP Semi 1 Cert	Compliance	Electronic receipt of 2020 First Semiannual Cert submittal. sgl Hard copy received 9-18-20
08/27/2020	ROP Monthly	Compliance	<p>Monthly H2S emissions report for month of July 2020. Document reported SO2 emissions for month totaling 1.39 ton, with a 12-month rolling total of 15.85 ton SO2. Reported H2S concentrations were 40K ppm H2S consistent with concentrations reported for June 2020, and below the 50K ppm H2S used for PTI 194-18.</p> <p>EUHEATERTREATER is limited to 560 scf/day or 50.2 lb H2S/day, Heater Treater is reported to have used 8.90 Mcf/month, with H2S rates of 0.5 - 3.4 lb H2S/day.</p> <p>EUFLARESYSTEM is reported to have burned 403.58 Mcf/month NG. EUFLARESYSTEM is limited to a mass rate of H2S burned of 41,000 scf/day (41 Mscf/day) or 367.4 lb H2S/day. Reported rates for July 2020 ranged from 20.8 - 57.6 lbs H2S/day.sgl</p>

Activity Date	Activity Type	Compliance Status	Comments
08/03/2020	ROP Monthly	Compliance	<p>Monthly H2S emissions report for month of June 2020. Document reported SO2 emissions for month totaling 1.2 ton, with a 12-month rolling total of 15.43 ton SO2. Reported H2S concentrations were 40K ppm H2S, below the 50K ppm H2S used for PTI 194-18.</p> <p>EUHEATERTREATER is limited to 560 scf/day or 50.2 lb H2S/day, Heater Treater is reported to have used 16.27 Mcf/month, with H2S rates of 0.4 - 17.5 lb H2S/day.</p> <p>EUFLARESYSTEM is reported to have burned 340.93 Mcf/month NG. EUFLARESYSTEM is limited to a mass rate of H2S burned of 41,000 scf/day (41 Mscf/day) or 367.4 lb H2S/day. Reported rates for June 2020 ranged from 22.4 - 60.1 lbs H2S/day.sgl</p>
06/30/2020	ROP Monthly	Compliance	<p>Monthly H2S Emissions Report for May 2020 - Document reported SO2 emissions for month of May totaling 1.77 ton, with a 12-month rolling total of 15.55 ton SO2. Reported H2S concentrations were 60K ppm H2S, above the 50K ppm H2S used for PTI 194-18.</p> <p>EUHEATERTREATER is limited to 560 scf/day or 50.2 lb H2S/day, Heater Treater is reported to have used 21.99 Mcf/month, with H2S rates of 0.6 - 8.4 lb H2S/day.</p> <p>EUFLARESYSTEM is reported to have burned 328.61 Mcf/month NG. EUFLARESYSTEM is limited to a mass rate of H2S burned of 41,000 scf/day (41 Mscf/day) or 367.4 lb H2S/day. Reported rates for May 2020 ranged from 14 - 103.8 lbs H2S/day.</p>

Activity Date	Activity Type	Compliance Status	Comments
06/02/2020	ROP Monthly	Compliance	<p>H2S Emission Monthly Reporting for April 2020. Document reported SO2 emissions for month of April totaling 0.89 ton, with a 12-month rolling total of 14.67 ton SO2. Reported H2S concentrations were 40K ppm H2S. below the 50K ppm H2S used for PTI 194-18.</p> <p>EUHEATERTREATER is limited to 560 scf/day or 50.2 lb H2S/day, Heater Treater is reported to have used 30 Mcf/month, with H2S rates of 0-7.7 lb H2S/day.</p> <p>EUFLARESYSTEM is reported to have burned 233.67 Mcf/month NG. EUFLARESYSTEM is limited to a mass rate of H2S burned of 41,000 scf/day (41 Mscf/day) or 367.4 lb H2S/day. Reported rates for April 2020 ranged from 1.1- 44.7 lbs H2S/day.</p>
05/06/2020	ROP Monthly	Compliance	<p>Monthly H2S Report March 2020- Document reflects both gas to heater treater and flare. Total hydrogen sulfide for month of March 2020 is 1505.80 lb/month. SO2 for month of March was reported to be 2830.91 lbs. Hydrogen sulfide concentration for gas stream was reported to be 60K ppm.No monthly or 12-month rolling emission limits exist for H2S or SO2 in the ROP. sgl</p>
03/31/2020	MAERS	Compliance	<p>2019 MAERS submitted on 2/13/2020. Cert form received prior to receipt of Maers form by district office. Heater treater not in use to date. sgl</p>

Activity Date	Activity Type	Compliance Status	Comments
03/31/2020	ROP Monthly	Compliance	<p>Monthly H2S report for February 2020-</p> <p>Hydrogen Sulfide totals reported for February 2020 was 1454 lb H2S/month, well above the 859.77 lbs H2S/month reported for January 2020, and within the totals reported for the period of June -December 2019 ranged from 1073.77 lbs - 1901.22 lbs H2S/month.</p> <p>SO2 totals reported for the Month of February 2020 was 2734.8 lbs The 12 month rolling total of SO2 was reported for the month of February 2020 was 14.73 tons.</p> <p>The Hydrogen Sulfide Content for the month of February 2020 was reported to be 60K ppm. H2S content for January 2020 was 45K ppm. The hydrogen sulfide concentration reported for the month of October was 60K ppm and reflected a high for the period of June-December 2019.</p> <p>No monthly or 12-month rolling emission limits exist for H2S or SO2 in the ROP. sgl</p>

Activity Date	Activity Type	Compliance Status	Comments
02/27/2020	ROP Monthly	Compliance	<p>Monthly H2S Emission Report Monthly H2S report for January 2020-</p> <p>Hydrogen Sulfide totals reported for January 2020 were 859.77 lbs H2S/month, well below the totals for each of the previous 6 months. Totals reported for the period of June -December 2019 ranged from 1073.77 lbs - 1901.22 lbs H2S/month.</p> <p>Flow was reported to be 213.20 MCF/Month for the month of January 2020, Flow reported for the period of June thru December 2019 ranged from 230.60 MCF/month (June) to 374.8 MCF/month (September).</p> <p>SO2 totals reported for the Month of January 2020 were 1616.4 lbs. The 12 month rolling total of SO2 was reported for the month of January 2020 was 14.12 tons.</p> <p>The Hydrogen Sulfide Content for the month of January 2020 was 45K ppm. The hydrogen sulfide concentration reported for the month of October was 60K ppm and reflected a high for the period of June-December 2019.</p> <p>No monthly or 12-month rolling emission limits exist for H2S or SO2 in the ROP. sgl</p>
01/29/2020	ROP Annual Cert	Compliance	Facility reports that for the 2019 calendar year no compliance issues occurred. sgl
01/29/2020	ROP SEMI 2 CERT	Compliance	Facility reports no compliance for all of 2019, including the second half of the calendar year. sgl

Activity Date	Activity Type	Compliance Status	Comments
01/29/2020	ROP Monthly	Compliance	<p>Monthly H2S Emission Report Monthly H2S report for December 2019-</p> <p>Hydrogen Sulfide totals reported for December 2019 were 1557.91 lbs H2S/Month. Totals reported for the period of June -November 2019 ranged from 1073.77 lbs - 1901.22 lbs H2S/month.</p> <p>Flow was reported to be 289.74 MCF/Month for the month of December, Flow reported for the period of June thru November 2019 ranged from 230.60 MCF/month (June) to 374.8 MCF/month (September).</p> <p>SO2 totals reported for the Month of December were 2928.86 lbs. The 12 month rolling total of SO2 was reported for the month of December 2019 was 14.60 tons.</p> <p>The Hydrogen Sulfide Content for the month of December was 60K ppm. The hydrogen sulfide concentration reported for the month of October was 60K ppm and reflected a high for the period of June-November 2019. Concentrations of 50K ppm concentrations reported for July, August and September 2019. Concentrations of 45K ppm were reported for May, June and November 2019.</p> <p>No monthly or 12-month rolling emission limits exist for H2S or SO2 in the ROP. sgl</p>

Activity Date	Activity Type	Compliance Status	Comments
01/07/2020	ROP Monthly	Compliance	<p>Monthly H2S report for November 2019- Note submittal did not contain an original cert form. The requested replacement form was received on 1/9/2020. sgl</p> <p>Hydrogen Sulfide totals reported for November 2019 were 1240.13 lbs H2S/Month. October 2019, totaled 1901.22 lbs/month. Totals reported for the period of June - September 2019 ranged from 1073.77 lbs - 1679.39 lbs H2S/month.</p> <p>Flow was reported to be 307.52 MCF/Month for the month of November, down from the flow of 353.59 MCF/Month reported for October 2019. Flow reported for the period of June thru September 2019 ranged from 230.60 MCF/month (June) to 374.8 MCF/month (September).</p> <p>SO2 totals reported for the Month of November was 2331.45 lbs. The 12 month rolling total of SO2 was reported for the month of November 2019 was 14.27 tons.</p> <p>The Hydrogen Sulfide Content for the month of November was 45K ppm. The hydrogen sulfide concentration reported for the month of October was 60K ppm and reflected a high for the period of June-November 2019. Concentrations of 50K ppm concentrations reported for July, August and September 2019, and the 45K ppm were reported for May and June 2019.</p> <p>No monthly or 12-month rolling emission limits exist for H2S or SO2 in the ROP. sgl</p>

Activity Date	Activity Type	Compliance Status	Comments
11/26/2019	ROP Monthly	Compliance	<p>Monthly H2S report for October 2019 -</p> <p>Hydrogen Sulfide totals reported for October 2019, totaled 1901.22 lbs/month. Totals reported for the period of June -September 2019 ranged from 1073.77 lbs - 1679.39 lbs H2S/month.</p> <p>Flow was reported to be 353.59 MCF/Month for the month of August, down from the flow of 374.80 MCF/Month reported for September 2019. Flow reported for the period of June thru September 2019 ranged from 230.60 MCF/month (June) to 374.8 MCF/month (September).</p> <p>SO2 totals reported for the Month of October was 3574.3 lbs. The 12 month rolling total of SO2 was reported for the month of October 2019 was 14.39 tons.</p> <p>The Hydrogen Sulfide Content for the month of October was 60K ppm, up from the 50K ppm concentrations reported for July, August and September 2019, and the 45K ppm reported for May and June 2019.</p> <p>No monthly or 12-month rolling emission limits exist for H2S or SO2 in the ROP. sgl</p>

Activity Date	Activity Type	Compliance Status	Comments
11/01/2019	ROP Monthly	Compliance	<p>Monthly H2S Emissions Report for September 2019.</p> <p>Totals reported for August and September 2019 included 1073.77 lbs and 1679.39 lbs of H2S/month - a which is above the high of 1408.58 lbs of H2S (June 2019) reported for the period of June through August 2019. Flow was reported to be 374.80 MCF/Month. Flow reported for the period of June thru August 2019 was 349.29 MCF/month reported for June 2019.</p> <p>SO2 totals reported for the Month of September was 3157.25 lbs. The 12 month rolling total of SO2 was reported for the month of September 2019 was 14.48 tons.</p> <p>The Hydrogen Sulfide Content for the month of September 2019 was reported to be 50K ppm, consistent with levels reported for July and August 2019, but up from the concentration of 45K ppm reported for May and June 2019.sgl</p>

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Date: \_\_\_\_\_

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