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DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

FACILITY: O.I.L. ENERGY CORP. Big Wolf Facility		SRN / ID: N6053
LOCATION: SE4 NW4 T29N R1E SEC 36, LEWISTON		DISTRICT: Gaylord
CITY: LEWISTON		COUNTY: MONTMORENCY
CONTACT:		ACTIVITY DATE: 01/27/2015
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2015 Scheduled In	spection.	
RESOLVED COMPLAINTS:		

Directions. The facility is located in Montmorency County, Albert Township. From County Road 612 travel past the four corners in Lewiston and continue to Towline Road. Turn south onto Townline Road travel approximately one mile then turn west onto Big Wolf Lake Road. Travel about ½ mile then turn south on Boettcher Road. The CPF is on the west side of Boettcher Road. There is a fence around the facility.

Inspection. During the site visit the large compressor engine inside the large building was operating. A heat shimmer was observed off of the engine stack. The stack on the large compressor engine does not extend above the building roof. The permit does not include stack height requirements. The small generator engine in the small building was not operating. The doors on both buildings were closed. Onsite there is a glycol dehydrator, an iron sponge, and two tanks in a retaining area. Staff walked the perimeter of the facility. Odor from the glycol dehydrator was noted.

On 2/4/15 Torello spoke with Pat Thon, OIL 231-933-3600. When the facility was constructed there were two generator engines used to produce electricity to run the facility. One of the generator engines was removed. The remaining generator engine onsite is not operated. The facility uses electricity from the grid to operate.

Application. This is an Antrim gas facility with a "MOGA" permit from the mid-1990s.

Permit. On November 21, 1996 AQD issued permit604-96. The permit does not specifically identify equipment on site. The permit is written as an opt-out, allowing up to 89 tpy of NOx, VOC, and/or CO.

MAP. The engine does not have a catalytic converter. In MAERS, no control is claimed on the engines. Because the engines do not have control, no malfunction abatement plan will be requested.

MAERS. The 2014 MAERS reported a source wide total emissions of NOx of 10.5 tons (89 tpy permitted), CO 12.6 tons (89 tpy permitted), and VOC 2.5 tons (89 tpy permitted).

The 2014 MAERS includes two 3406 TA generators that did not operate, and one 3516 TALE compressor that did operate.

MACTS. The engines are subject to 40 CFR Part 63 Subpart ZZZZ. The glycol dehydrator is subject to 40 CFR Part 63 Subpart HH . This is an area source (minor for HAPs). The EPA has not delegated these Subparts to MI AQD and the Subparts were not reviewed.

MACES. Regulatory Info includes:

Regulatory Summary:

NOx and CO are marked Synthetic Minor; SO2, Pb, PM, and VOC are marked minor.

Subject to includes:

- 40 CFR Part 63 Subparts ZZZZ,
- 40 CFR Part 63 Subpart HH,
- FESOP (SM Opt-outs and 208a Sources),
- Permit NSR 604-96.

EPA Class is marked synthetic minor, and the CMS box is checked.

Records. On February 2, 2015 AQD requested records from OIL. AQD received the records on February 20, 2015. A review of records shows the NOx, CO, and VOC are below the permitted 89 tpy limit.

Permit Conditions: The special conditions (SC) of permit 604-96 are discussed below.

- SC 13, 14. In MAERS, and in supplied records the permittee reported NOx, CO and VOC emissions below the permitted 89 tpy.
- SC 15. The permittee calculated the actual emissions of CO, NOx, VOC, and HAPs, however instead of using the emission factors in Appendix A of permit 604-96, "Manufactures Specifications" were used. In MARES a formula or calculation was provided.
- SC 16. a.) Monthly fuel consumption records in million cubic feet are kept. b.) No crude/condensate is processed at the facility. c.) No hydrocarbon liquids are trucked from the facility. d.) Glycol circulated through the dehydrator is reported as 0.66 gallons per minute. There is not a permit limit on the gallons per minute glycol used.
- SC 17. Records were available upon request.
- SC 18. The permittee annually submits the MAERS.
- SC 19. Maintenance records are kept.
- SC 20. No crude oil is processed at the facility.
- SC 21. There is not a catalytic converter on the engine.
- SC 22. This facility is not subject to 40 CFR Part 40 Subpart KKK. The facility does not fractionate gas.
- SC 23. The AQD has not requested stack testing.
- SC 24. There is an iron sponge on site. AQD defines sour gas as containing more than 1 grain, or 15.9 ppmv, of hydrogen sulfide. In a letter to AQD from OIL and dated February 17, 2015, it includes:
 - ...the H2S concentration has remained below detection levels. The H2S measurement at the ... facility is averaging 2.3 ppm and has not exceeded 2.8 ppm for 2014. This equates to 0.17 grains of Hydrogen sulfide in the inlet gas stream for the Big Wolf Project."

Brochure: The inspection brochure will be forwarded to the permittee with the site inspection

notes via email.

A review of AQD files shows no outstanding violation.

Conclusions. Based onsite inspection and d review of records, the permittee demonstrates compliance with the conditions of permit 604-96.

NAME