

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N614565777

FACILITY: TRENDWELL ANTRIM INC - BRILEY 6		SRN / ID: N6145
LOCATION: SE NW NW T30N R2E SEC 7, BRILEY TWP		DISTRICT: Gaylord
CITY: BRILEY TWP		COUNTY: MONTMORENCY
CONTACT: Danita Greene , Production and Environmental Compliance		ACTIVITY DATE: 12/13/2022
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2023 FCE.		
RESOLVED COMPLAINTS:		

On December 13, 2022, AQD Staff traveled to N6145 Trendwell Briley 6 Central Production Facility (CPF), located in Briley Township, Montmorency County, for a scheduled inspection to determine compliance with PTI 202-07. This is an opt out permit.

The Briley 6 CPF is an oil and gas production facility, extracting gas from the Antrim formation. Natural gas and brine fluids are extracted from wells drilled into producing reservoirs then transmitted through flow lines to a CPF. The gas is compressed by multiple engines.

LOCATION

The facility is located approximately 5 miles west of Atlanta. To access the road, turn northwest onto Manier Rd, which is located at the 90-degree curve west of Atlanta. Manier Rd is located on the first 90-degree curve west of Atlanta. Travel 0.5 miles north on Manier Rd. The site access is a dirt road on the east side of Manier Rd. The facility is approximately 0.10 mile from Manier Rd.

REGULATORY DISCUSSION

PTI 202-07 was issued October 4, 2007, and is currently active. The permit is for two engines and a glycol dehydration system.

PTI 703-96 was issued 11/14/96 and voided 2/28/97. Trendwell had requested the permit be void due to replacement engines being exempt.

The engines are subject to 40 CFR Part 63, Subpart ZZZZ, which has been delegated to EGLE from EPA. However, EGLE is not currently making compliance determinations for area sources.

The glycol dehydrator is subject to 40 CFR Part 63, Subpart HH, which has not been delegated to EGLE from EPA.

INSPECTION NOTES

During the inspection, the weather was overcast, 30 degrees Fahrenheit and light snow on the ground. The facility is bermed and fenced. The gate into the facility was open during the inspection.

The facility consists of one large building containing EUENGINE1, a Caterpillar 3516 LE 1265 hp engine (F-1112). The engine was operating with no visible emissions or odor present. The engine skid and clipboard identify this unit is Unit 1112. The

engine has a muffler but no catalytic converter. During the inspection the engine was operating at 1203 RPM and 52 PSI oil pressure.

A second engine was not located on site. It appears that a second building has been removed. MAERS indicates EUENGINE2 was dismantled 12/1/15.

The dehy was located south of the engine building. It was operating, no odors noted.

A bermed and lined tank storage area is east of the buildings. There were two tanks, both less than 400 bbl, that were unlabeled.

RECORDS REVIEW

PTI 202-07 – EUDEHY, EUNGINE1, EUENGINE2, FGFACILITY

EUDEHY – No requirements in the permit other than to comply with Subpart HH if applicable. EGLE has not been delegated Subpart HH.

FGENGINES – the permit is for 2 engines.

Emission Limits – The nitrogen oxides (NOx) and carbon monoxide (CO) emissions are limited in the permit. The facility provided records; emissions for EUENGINE1 and EUENGINE2 as of September 2022 are as follows:

EUENGINE1 Pollutant	Permitted Limit (tpy)	Reported Emissions (tpy, monthly)	Reported Emissions (tpy, 12 month rolling)
NOx	49.4	2.06	25.56
CO	23.1	1.01	12.50

EUENGINE2 Pollutant	Permitted Limit (tpy)	Reported Emissions (tpy, monthly)	Reported Emissions (tpy, 12 month rolling)
NOx	22.0	0	0
CO	18.8	0	0

EUENGINE2 was removed in December of 2015. A permit revision was not requested therefore Trendwell continues to report emissions for this engine.

Records provided demonstrate compliance with the requirements.

Process/Operational Limits – The facility has a PM/MAP on file from 8/2/22. The MAP indicates the engine as a Caterpillar 3516 LE 1265 hp with no catalyst or AFRC. Maintenance logs are maintained and indicate normal maintenance of each engine throughout the past year. No emission specific repairs required.

Testing - Testing is required upon request to verify NOx and CO emissions. Testing is not being requested at this time.

Monitoring - The permittee is required to monitor natural gas usage for FGENGINES. Natural gas records were provided, demonstrating compliance with this requirement.

Record keeping/Notification - The permit allows for the engine to be replaced with an equivalent emitting or lower emitting engine, upon notification to AQD. AQD has not received notification of an engine switch-out.

Stack/Vent Restrictions - The stacks are required to have a maximum of 12 inches diameter and minimum height above ground of 31.5 feet for EUENGINE1, and a maximum of 12 inches diameter and minimum height above ground of 40.5 feet for EUENGINE2. Based on visual estimates, the stack for EUENGINE1 meets these requirements; EUENGINE2 and its stack have been removed.

COMPLIANCE DETERMINATION

Based on the scheduled inspection and records review, N6145 Trendwell Briley 6 CPF was in compliance with the requirements of permit 202-07 and the Air Pollution Control Rules.

NAME



DATE _____

SUPERVISOR _____