DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

FACILITY: ENER VEST OPERATING		SRN / ID: N7435
LOCATION: SW/NE/SW OF S18, T29W, R3W, OTSEGO LAKE		DISTRICT: Gaylord
CITY: OTSEGO LAKE		COUNTY: OTSEGO
CONTACT: JEFF RILING , PRODUCTION MANAGER		ACTIVITY DATE: 03/15/2017
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY17 scheduled ins	pection	
RESOLVED COMPLAINTS:		

On March 15, 2017, AQD Staff traveled to N7453 EnerVest ASE-7 CPF (formerly owned by HRF) located in Otsego Lake Township, Otsego County, for a Full Compliance Evaluation (FCE) scheduled inspection to determine compliance with PTI 46-05. This source was listed on the 2017 minor inspection list.

The EnerVest ASE-7 CPF is a natural gas central production facility (CPF). Natural gas and brine fluids are extracted from wells drilled into producing reservoirs (Antrim Formation). Fluids are transmitted through flow lines to the CPF. The gas is compressed and dehydrated prior to pipeline transport. The facility contains a compressor engine, possible booster engine, dehy system and brine tank.

LOCATION

The facility is located on the west side of Passenheim Rd, just south of the National Weather Service, approximately $\frac{1}{4}$ mile south of Mancelona/Old State Rd. The facility did not have a gate across the driveway. It does have a fence surrounding the buildings. The fence was open at the time of the inspection.

REGULATORY DISCUSSION

Upon review of the records, PTI 46-05 is void.

9/26/05 - PTI 46-05 was voided by AQD.

8/24/05 - EnerVest requested PTI to be voided.

4/22/05 - PTI 46-05 was issued 4/22/05. The permit was for an Ajax 360 engine and dehy system (exempt).

Based on notes in the file, the permit was voided because production at the facility had declined and "emissions were below 40 tons for criteria pollutants". Calculations were provided showing actual and potential emissions. Both actual and permitted NOx were over 20 tpy. No exemptions in the void request or void approval were noted.

Engines: Upon further review, the facility must provide documentation showing the engines meets an exemption, or will be required to get a permit. Information was requested on 3/16/17 from Jeff Riling, EnerVest, with a request response date of 3/30/17.

Dehy: Rule 288(2)(b)(ii) exempts from permitting glycol dehydrators that only process natural gas fro the Antrim Zone. The original application indicates the wells are Antrim. Mike Shelton with OOGM confirmed that according to their database, wells in the area are Antrim. Niagran wells are also located in southern Otsego County within a mile of the source, so the 3/16/17 request to Jeff Riling asked that he confirm the wells are Antrim.

It is possible that the engine is subject to 40 CFR Part 63, Subpart ZZZZ, which has not been delegated to MDEQ from EPA.

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

INSPECTION NOTES The facility was identified as follows: EnerVest Operating LLC

ASE #7 Facility

NE/4 of the SW/4 Sec 18 T29N R3W

Emergency Phone 989-705-2803

The facility contains two large buildings and tank battery. The southern building contains an engine, possibly an Ajax 360. The engine was operating. The exhaust from the engine emits through a stack with a large vertical muffler on the north side of the building. No VE or odor noted from the exhaust. The maintenance clipboard for this engine identified the engine as 'DCP 360' and 'Unit #999813'. The unit was noted to have a catalytic converter on the clip board. Wires were noted for the catalytic converter however due to the layout, the catalytic converter was not identified. During the inspection the RPM was 960; the operator had been to the site earlier, the operator noted the Cat in temp as 509 F and exhaust as 594 F.

The northern building contains a smaller engine and dehy. The engine was operating, and exhausts through a small diameter (approximately 3 inch) stack through the roof. The stack has a muffler. No VE or odor noted. The engine was identified on the maintenance clipboard as Unit #200855, and was operating at 950 RPM. The dehy had steam, no odor at the time of the inspection.

Inside the buildings were several small tank and drums for used oil, engine oil, rust and oxidation prohibitor, all in containment.

A small tank battery is located in the NW corner of the property with one tank. The tank was under 400 bbl, and located inside a wooded containment that appeared to be lined.

Outside the southern building was a tank approximately 250 gallons that was unlabeled and inside containment which was over half way filled with ice. Two other tanks, approximately 250 gallons each, were located on the east side of the dehy building with a roof and containment.

MAERS

The facility has not been required to submit MAERS.

MACES

MACES was reviewed. It will be updated once AQD has received a response from Jeff Riling.

COMPLIANCE DETERMINATION

At this time the facility is in compliance. N7435 EnerVest ASE-7 CPF does not have any active permits. The facility has been requested to provide data which indicates they are exempt, or the facility will be required to submit a permit application. If it is determined that the equipment does not meet exemptions, the facility will at that time be in non-compliance until a permit is issued.

NAME Becky Kodulsky

DATE 3/6/17

SUPERVISOR

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