

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

B649733093

|   |                               |                           |
|---|-------------------------------|---------------------------|
| FACILITY: JAGUAR ENERGY - OTSEGO LAKE 27 GAS PLANT          |                               | SRN / ID: B6497           |
| LOCATION: 27 E MARLETTE RD, WATERS                          |                               | DISTRICT: Gaylord         |
| CITY: WATERS  |                               | COUNTY: OTSEGO            |
| CONTACT: John Ward  |                               | ACTIVITY DATE: 12/15/2015 |
| STAFF: Gloria Torello                                       | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MAJOR       |
| SUBJECT: Site visit to observe the replaced chart recorder. |                               |                           |
| RESOLVED COMPLAINTS:  |                               |                           |

On December 15, 2015 Gloria Torello and Becky Radulski of AQD staff met Mr. John Ward at the Jaguar Sour Gas Ventures facility. The purpose of the visit was to observe the new 7-Day Chart recording device. The new multiphase recording device was installed in response to AQD's violation notice dated September 22, 2015.

The new 7-Day Chart recording device is in place. The meter was calibrated by PMR Services in Traverse City. AQD staff looked at some of the 7-Day circular chart records. On the circular chart, blue ink represents static pressure and red ink represents the differential pressure. There are some periods with the ink below zero. Mr. Ward echoed what he wrote in his email on 10/19/15:

"There will still be some periods with pen responses where ink may mark below the zero line on differential, but this is not an inaccuracy. The integrators computer accounts for that in calculations the same way a modern electronic (computerized) meter would do in the measurement software."

The chart for October 23, 2015 had readings of zero. The "Michigan Orifice Meter Measurement" for October 23, 2015 did not include zero readings. This was discussed. The day/night may not be aligned to read noon-to-noon, for example. Mr. Ward was going to communicate with Rachel from PMR Services to discuss.

Both Antrim and Niagaran gas are processed at the facility. The Niagaran gas can be wet. When a wet slug of Niagaran gas goes thru the process, it causes the meter to monitor no/zero gas which is recorded on the chart, and the wet gas can cause a reading *below* zero.

A revised MAP was submitted to AQD on 12/4/15. Becky Radulski will review the MAP.

NAME Gloria Torello DATE 1-27-16 SUPERVISOR 