

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

B916943081

FACILITY: Merit Energy Company - Whitewater 32		SRN / ID: B9169
LOCATION: SUPPLY RD, TRAVERSE CITY		DISTRICT: Cadillac
CITY: TRAVERSE CITY		COUNTY: GRAND TRAVERSE
CONTACT: Vicki Kniss , Environmental Affairs Manager		ACTIVITY DATE: 01/18/2018
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2018 FCE		
RESOLVED COMPLAINTS:		

**AQD staff Kurt Childs and Chance Collins conducted an inspection of this opt-out facility pursuant to Permit to Install number 642-96 and the Air Pollution Control Rules. Off-site observations indicated no visible emissions or odors downwind of the facility. At the time of the inspection the weather was overcast, 28 degrees with light winds from the Southwest.**

Equipment on site at the time of the inspection included:

- 5 AST's (2 oil, 3 brine) with vapor recovery
- 2 Water Tanks
- 1 blow-down tank
- One electric compressor
- One glycol dehydrator
- Three natural gas fired heaters, one of which appeared to be shut down.
- A soil remediation air sparge system.

Records regarding this facility were requested on January 19, 2018 and received on March 1, 2018. Maintenance records were provided for the past 12 months, emission calculations for the last 3 months of 2017. Since the natural gas fueled compressor engine was replaced by an electric motor air emissions are minimal.

Following are the findings of this inspection by permit Special Condition:

13. The Carbon Monoxide (CO), Volatile Organic Compounds (VOC), and Oxides of Nitrogen (NOx) annual emission rates from the oil and gas production facility (OGF) individually shall not exceed 89 tons per year based on a twelve-month rolling period. Records provided by the facility indicate that emissions of CO, VOC, and NOX from the heaters, which are the only remaining combustion source are all below one ton per year.
14. The annual emission rate of any individual Hazardous Air Pollutant (HAP) from the OGF shall be maintained below 9 tons per year based on a twelve-month rolling period, and the annual emission rate of total HAPs from the OGF shall be maintained below 22.5 tons per year based on a twelve-month rolling period. Records provided by the facility indicate total HAPs average 0.029 tpy based on a 12-month rolling time period.
15. The facility is required to perform emissions calculations monthly. Review of submitted records indicates emissions calculations for the facility have been performed in accordance with this requirement.
16. Records of the following are required to be kept. A sample of these are attached to this report:

Monthly fuel consumption, in million cubic feet (MMcf).  
Monthly crude/condensate throughput to the tanks, in barrels (bbls)  
Monthly hydrocarbon liquid trucked (bbls)  
Glycol circulated through the dehydrator , in gallons per minute (gpm)

17. All records are required to be available to the agency upon request. The requested records have been provided.
18. MAERS reporting for this facility has been completed in a timely and correct manner. 2016 MAERS report was submitted as required. See MACES for further details.
19. A maintenance log for this facility is required to be kept and is attached to this report.
20. Pursuant to Rules 604 and 605, no tanks at this facility are to have a capacity greater than 952 barrels. All tanks observed on site appeared to be below this capacity limit.
21. The facility is required to keep records of any bypass of engine control equipment. The engine at this facility has been removed therefore this condition no longer applies.
22. This facility is not subject to 40 CFR 60 Subpart KKK, therefore this condition does not apply.
23. As of the date of this inspection, stack testing has not been requested for this facility. Given the engine has been removed, testing is not recommended.
24. Only sweet gas as defined in Rule 119 is used in the process

At the time of the inspection, this facility appeared to be in compliance with PTI 642-96 and the Air Pollution Control Rules.

NAME



DATE

3-1-18

SUPERVISOR

