

DEPARTMENT OF ENVIRONMENTAL QUALITY  
 AIR QUALITY DIVISION  
 ACTIVITY REPORT: ROP Tech Review Notes

N294029135

FACILITY: DCP Antrim Gas LLC		SRN / ID: N2940
LOCATION: 6250 OLD STATE RD, JOHANNESBURG		DISTRICT: Cadillac
CITY: JOHANNESBURG		COUNTY: OTSEGO
CONTACT:		ACTIVITY DATE: 04/13/2015
STAFF: Shane Nixon	COMPLIANCE STATUS:	SOURCE CLASS: MAJOR
SUBJECT: Core Energy and DCP Antrim Gas stationary source determination		
RESOLVED COMPLAINTS:		

During the review of the DCP Antrim Gas ROP renewal application, AQD staff made the determination that Core Energy and DCP Antrim Gas were one stationary source. The determination was based on the fact that the two facilities are adjacent and controlled by the same person despite the difference in each facility's 2-digit major source code. Staff sent Core Energy a letter dated April 16, 2104 indicating such and requested Core Energy to submit a Renewable Operating Permit application. Core Energy submitted a response which disagreed with AQD's determination which primarily argued that the two facilities are not controlled by the same person.

Stationary source is defined in Part 1 definitions as all buildings, structures, facilities, or installations which emit or have the potential to emit one or more air contaminants, which are located at one or more contiguous or adjacent properties, which are under the control of the same person, and which have the same 2-digit major group code associated with their primary activity. In addition, a stationary source includes any other buildings, structures, facilities, or installations which emit or have the potential to emit one or more air contaminants, which are located at one or more contiguous or adjacent properties, which are under the control of the same person, and which have a different 2-digit major group code, but which support the primary activity if ~~more than~~ 50% or more of their output is dedicated to the primary activity.

After further review, AQD staff disagrees with Core Energy's response regarding the control relationship based on conversations with DCP Antrim Gas personnel stating that DCP can cease providing carbon dioxide to Core Energy at any time as there are no contractual obligations. The Core Energy facility is located for the sole purpose of receiving carbon dioxide from DCP Antrim Gas and compressing the gas for enhanced oil recovery. Those points further strengthens AQD staff's opinion that there is indeed a control relationship.

AQD staff have concluded, however, the facilities will continue operation as separate stationary sources. The primary activity associated for the two stationary sources is the removal of carbon dioxide from natural gas. Core Energy does not support the primary activity as it receives carbon dioxide that was stripped from the natural gas by DCP Antrim Gas. DCP Antrim Gas personnel states that the facility can comply with its carbon monoxide emission limits regardless if Core Energy receives carbon dioxide.

NAME Shane Nixon

DATE 4/14/15

SUPERVISOR JB