DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: On-site Inspection

N606556431

FACILITY: Delta Oil Company - Briley 31		SRN / ID: N6065		
LOCATION: SW NE SW T31N R02E SEC 31, ATLANTA		DISTRICT: Cadillac		
CITY: ATLANTA		COUNTY: MONTMORENCY		
CONTACT: Chris Kokenis , CEO		ACTIVITY DATE: 11/10/2020		
STAFF: Rob Dickman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT		
SUBJECT: Scheduled inspection of this opt out source				
RESOLVED COMPLAINTS:				

The Delta Oil Company, Briley 31 is a natural gas compression station. Natural gas wells drilled to the Antrim formation supply the facility. Natural gas fires the engines that compress the natural gas into a pipeline. Moisture in the gas is removed via a glycol dehydrator prior to compression.

On November 10, 2020, I inspected this opt out source as per permit to install number 617-96. On October 13, 2020 a formal request for required records for this facility was made with a deadline to received said records of November 1, 2020. On December 1, 2020, having not received these records, a Violation Notice was sent to the facility. On December 15, 2020, records for this facility were received.

The facility can be accessed from Meaford Road (N 45.032567, W 84.247404). Prior to entering the facility, no odors were noted downwind and no visible emissions from any point were noted. The facility appeared in full operation. An inventory of pertinent equipment at the facility is as follows:

- -One V-8 Caterpillar compressor with control, Model 379 TA, Unit 978-S
- -Two Aboveground Storage Tanks (AST), one 400-barrel capacity, one 200- barrel capacity

Engine parameters recorded on site were:

- RPM 1075
- Oil Pressure 58 psi
- Water temperature 205 F

The inspection in 2016 indicated a glycol dehydrator in operation at the site. This equipment appears to have been removed from service.

Following are the findings of this inspection by permit condition:

- 13. Carbon Monoxide (CO), Volatile Organic Compounds (VOC), and Nitrogen Oxides (NOx) emissions from the whole facility are not to exceed 89 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. Records provided from the company indicated the following for the time period of October 2019 through October of 2020:
- CO emissions for the facility for August of 2020 were 5.62 tons based on a 12-month rolling time period as determined at the end of each calendar month.
- VOC emissions for the facility for August of 2020 were 1.08 tons based on a 12-month rolling time period as determined at the end of each calendar month.
- NOx emissions for the facility for August of 2020 were 44.97 tons based on a 12-month rolling time period as determined at the end of each calendar month.
- 14. HAPS emissions from the facility are not to exceed 9 tons per year on any individual HAP not 22.5 tons per year for total HAPS. Records provided from the company indicate that HAP emissions for the facility were below one ton per year.
- 15. It is undetermined if calculations for the regulated pollutants listed in #13 and 14 have been completed in a correct and timely manner as these records were not readily available. A review of the records received in response to the Violation Notice indicates compliance with emissions limits.
- 16. Records of the following process data were submitted in response to the Violation Notice:
- Fuel Consumption Is being tracked and averaged 26.47 million cu. ft. per year based on a 12-month rolling time period as of September 2020.
- Crude/Condensate throughput this facility does not process hydrocarbon liquids.

- Monthly hydrocarbon liquid trucked this facility does not process hydrocarbon liquids.
- Glycol circulated through the dehy this dehy has been removed from service and has not operated in the last 12 months.
- 17. Monthly oil and gas processed records are required. These records were supplied by the facility in response to the Violation Notice. A sample of these records is attached to this report.
- 18. Emissions from this facility are required to be reported to MAERS annually. This reporting has been completed, reviewed, and documented by AQD staff.
- 19. Records of maintenance activities at this facility are being kept and were supplied as part of the response to the Violation Notice. A sample of these records is attached to this report.
- 20. AST size at the facility is limited to 952 barrels, the largest tank on site at the time of the inspection was 400 bbl.
- 21. There were no records of bypass of any control device because there are no control devices.
- 22. This facility is currently not subject to 40 CFR 60 Subpart KKK as no natural gas liquids are processed.
- 23. No stack testing has been required to be performed at this facility in the last 12 months and is currently not recommended.
- 24. The wells feeding the natural gas used at this facility are from the Antrim formation. Natural gas extracted from this formation is considered "sweet" by definition.

At the time of the inspection, this facility was not in compliance with their opt out permit as required records could not be produced upon request. However, these records were submitted in a timely manner in response to the Violation Notice and determined to be complaint. No further action is recommended at this time.

GPS Coordinates: N 45.02.199, W 84.	13.994		
NAME	DATE	SUPERVISOR	