

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

N606756436

FACILITY: Delta Oil Company - Boughner		SRN / ID: N6067
LOCATION: SE SE SE T31N R02W SEC28, GAYLORD		DISTRICT: Cadillac
CITY: GAYLORD		COUNTY: OTSEGO
CONTACT: CHRIS KOKENIS , PRESIDENT		ACTIVITY DATE: 10/21/2020
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, Boughner 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. A glycol dehydrator was used at the site previously but appeared dismantled at the time of this inspection.

On October 21, 2020, I inspected this opt out source as per permit to install number 619-96. 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, records for this facility were received.

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 six cylinder Caterpillar compressor with no control, Model G3406S, Unit U674-S
- One Aboveground Storage Tanks (AST), 400 barrel capacity, one other tank (200 bbl) has been removed since the last inspection (2016)
- A dismantled glycol dehy. This was noted in 2016. According to records, this dehy on site was decommissioned in September of 2015.

Engine parameters recorded on site were:

- RPM – 1354
- Oil Pressure – 32 psi
- Water temperature – 195 F

Following are the findings of this inspection by permit condition:

13. Carbon Monoxide (CO), Volatile Organic Compounds (VOC), and Nitrogen Oxides (NO_x) 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 1.63 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 0.31 tons based on a 12-month rolling time period as determined at the end of each calendar month.
- NO_x emissions for the facility for August of 2020 were 12.87 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 7.63 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 – According to records, the dehy on site was decommissioned in September of 2015.

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 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. The compressor engine at the facility is currently the only equipment emitting air pollutants. This engine, according to Caterpillar specifications, has a heat input rating of approximately 2.0 million BTU's per hour and the highest actual emissions noted were 13 tons per year of NOx. This engine is likely exempt under Rule 285(2)(g).

NAME _____

DATE _____

SUPERVISOR _____