

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

N614547655

FACILITY: TRENDWELL ANTRIM INC - BRILEY 6		SRN / ID: N6145
LOCATION: SE NW NW T30N R2E SEC 7, BRILEY TWP		DISTRICT: Gaylord
CITY: BRILEY TWP		COUNTY: MONTMORENCY
CONTACT: Danita Greene, Production and Environmental Compliance		ACTIVITY DATE: 12/14/2018
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: scheduled inspection and records review		
RESOLVED COMPLAINTS:		

On December 14, 2018 AQD Staff traveled to N6145 Trendwell Briley 6 Central Production Facility (CPF), located in Briley Township, Montmorency County, for a scheduled inspection to determine compliance with PTI 202-07. This is an opt out permit.

The Briley 6 CPF is an oil and gas production facility, extracting gas from the Antrim formation. Natural gas and brine fluids are extracted from wells drilled into producing reservoirs then transmitted through flow lines to a CPF. The gas is compressed by multiple engines.

#### LOCATION

The facility is located approximately 5 miles west of Atlanta. To access the road, turn northwest onto Manier Rd, which is located at the 90 degree curve west of Atlanta. Manier Rd is located on the first 90 degree curve west of Atlanta. Travel 0.5 miles north on Manier Rd. The site access is a dirt road on the east side of Manier Rd. The facility is approximately 0.10 mile from Manier Rd.

#### REGULATORY DISCUSSION

PTI 202-07 was issued October 4, 2007 and is currently active. The permit is for two engines and a glycol dehydration system.

PTI 703-96 was issued 11/14/96 and voided 2/28/97. Trendwell had requested the permit be void due to replacement engines being exempt.

The engines are subject to 40 CFR Part 63, Subpart ZZZZ, which has not been delegated to MDEQ from EPA.

The glycol dehydrator is subject to 40 CFR Part 63, Subpart HH, which has not been delegated to MDEQ from EPA.

#### INSPECTION NOTES

During the inspection, there was clear sky, 39 degrees Fahrenheit and light snow on the ground. The facility is bermed and fenced. The gate into the facility was open during the inspection.

The facility consists of one large building containing EUENGINE1, a Caterpillar 3516 LE 1265 hp engine (F-1112). The engine was operating with no visible emissions or odor present. The engine skid and clipboard identify this unit is Unit 1112, which matches the unit ID identified on a 2015 inspection report. The engine has a muffler. During the inspection the engine was operating at 1201 RPM and 53 PSI oil pressure.

A second engine was not located on site. MAERS indicates EUENGINE2 was dismantled 12/1/15.

The dehy was located south of the engine building. It was operating, no odors noted.

A bermed and lined tank storage area is east of the buildings. There were two tanks, approximately 200 and 400 bbl, that were unlabeled.

**RECORDS REVIEW**

PTI 202-07 – EUDEHY, EUNGINE1, EUENGINE2, FGFACILITY

EUDEHY – No requirements in the permit other than to comply with Subpart HH if applicable. MDEQ has not been delegated Subpart HH.

FGENGINES – the permit is for 2 engines.

Emission Limits – The nitrogen oxides (NOx) and carbon monoxide (CO) emissions are limited in the permit. The facility provided records; emissions for EUENGINE1 and EUENGINE2 as of September 2018 are as follows:

EUENGINE1 Pollutant	Permitted Limit (tpy)	Reported Emissions (tpy, monthly)	Reported Emissions (tpy, 12 month rolling)
NOx	49.4	2.45	29.66
CO	23.1	1.20	14.50

EUENGINE2 Pollutant	Permitted Limit (tpy)	Reported Emissions (tpy, monthly)	Reported Emissions (tpy, 12 month rolling)
NOx	22.0	0	0
CO	18.8	0	0

EUENGINE2 was removed in December of 2015. A permit revision was not requested therefore Trendwell continues to report emissions for this engine.

Records provided demonstrate compliance with the requirements.

Process/Operational Limits – The facility has a PM/MAP on file from 2016. The MAP indicates the engine as a Caterpillar 3512 LE 1265 hp lean burn. Maintenance records were provided and reviewed; records demonstrate compliance with the requirements.

Testing - Testing is required upon request to verify NOx and CO emissions. Testing is not being requested at this time.

Monitoring - The permittee is required to monitor natural gas usage for FGENGINES. Natural gas records were provided, demonstrating compliance with this requirement.

Record keeping/Notification - The permit allows for the engine to be replaced with an equivalent emitting or lower emitting engine, upon notification to AQD. AQD has not received notification of an engine switchover.

Stack/Vent Restrictions - The stacks are required to have a maximum of 12 inches diameter and minimum height above ground of 31.5 feet for EUENGINE1, and a maximum of 12 inches diameter and minimum height above ground of 37.5 feet for EUENGINE3. Based on visual estimates, the stack for EUENGINE1 meets these requirements; EUENGINE2 has been removed.

#### MAERS

The facility is required to report annual emissions to MAERS. The 2018 submittal was reviewed, and the 2019 submittal will be reviewed once received. See MAERS for details.

#### MACES

MACES was reviewed, and the information screen updated.

#### COMPLIANCE DETERMINATION

Based on the scheduled inspection and records review, N6145 Trendwell Briley 6 CPF was in compliance with the requirements of permit 202-07.

NAME Becky Radulski

DATE 1/22/19

SUPERVISOR \_\_\_\_\_

