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DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Self initiated Inspection

1610204032			
FACILITY: RIVERSIDE - GIL	CHRIST CPF	SRN / ID: N6152	
LOCATION: NE4 NW4 SW4	SEC 35, T29N-R3E, LOUD TWP	DISTRICT: Gaylord	
CITY: LOUD TWP		COUNTY: MONTMORENCY	
CONTACT: Natalie Schrader, Compliance Coordinator		ACTIVITY DATE: 06/26/2020	
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT	
SUBJECT: verification of eng	ne removal and replacement activities- permit void req	uest anticipated to be received the week of June 30,	
2020. sgl			
RESOLVED COMPLAINTS:			

On June 26, 2020, AQD District Staff conducted a site visit to the Riverside Energy Michigan, LLC (AKA Riverside), Gilchrist CPF (N6152), (AKA Gilchrist Creek 1-35 CPF). The referenced Facility is located in NE ¼, NW ¼, SW ¼, Section 35, T29N — R 3E, Loud Township, Montmorency County, Michigan. The referenced facility presently operates under Permit to Install No. 711-96.

District Staff received notification electronically indicating that engine removal activities as outlined in previous electronic correspondence dated April 13, 2020, had been completed earlier that week. Site visits activities were conducted with the intent of verifying completion of activities for anticipated permit voidance.

Previous site inspection activities had been conducted March 16, 2020, as part of FCE activities for the 2020 fiscal year.

FACILITY

The referenced facility is operated by Riverside. The station is reported to service Antrim Formation wells in the area. Activities onsite include separation of gas and brine from the incoming gas stream and compression of the gas in the lines.

The Facility is a gated and unmanned Facility. The road marker at the drive indicated an address of 1479 Abbe Road. Located in the SW quarter of Montmorency County, adjacent properties are predominantly undeveloped large acreages leased by the oil and gas industry.

REGULATORY

<u>Permitting</u>-The referenced facility operated under Permit to Install (PTI) No. 711-96, which was issued in 1996 to the Facility, which was operated by Wolverine Environmental Production, Inc. The PTI was issued as an opt-out permit, but not a Rule 201 permit and was issued around the same time as other Michigan Oil and Gas Association (MOGA) permits that did not undergo 201 reviews. The PTI conditions were generic and refer to the stationary source as a whole rather than conditions that address individual pieces of equipment.

At the time of permitting the facility consisted of one Ajax Natural Gas (NG) fired, 280 HP compressor and one Waukesha 842 HP, NG-fired compressor. In addition, the Facility included one glycol dehydration unit with reboiler and was reported to have the potential to emit over 100 tons of NOx. The referenced permit limits the emissions to 89 tons per year for NOx, CO and VOCs.

As previously indicated a request for permit void is anticipated to be received the week of June 29, 2020.

EQUIPMENT

A review of District Files and MAERs records indicates the following equipment having been associated with the facility.

EQUIPMENT	DESCRIPTION	INSTALL DATE	DISMANTLE DATE	OTHER
EU-280AJAX CM 3007	Ajax Rich Burn 280 HP No control	Jan. 1996	June 22, 2020	
EU- WAUK7042 or EUENGINE #3006 Sn 166346	Waukesha L7042 GU Rich Burn 802 HP (rated at 1024 HP) with 3-way catalyst & AFRC	9/1/1992	June 23, 2020	Engine Pedigree dated 4/14/2011. Riverside indicated that this is the date of an engine swing.
EXEMPT # 4089	CAT 3516 1085 HP	6/25/2020	NA	Engine reported to be from P0984 Hwy 65 Facility
EU- DEHYSTILL	Kimray 40/15 pump	9/1/1992	NA	

SUMMARY

On June 26, 2020, AQD District Staff conducted a site visit to complete FCE activities for the Riverside Energy Michigan, LLC (AKA Riverside), Gilchrist CPF (N6152), (AKA Gilchrist Creek 1-35 CPF). The referenced Facility is located in NE ¼, NW ¼, SW ¼, Section 35, T29N — R 3E, Loud Township, Montmorency County, Michigan. The Waukesha 1024 HP and Ajax 280 Hp engines previously permitted operated under Permit to Install No. 711-96 have been removed onsite and have been replaced with a CAT 3516 engine previously operated at the Riverside Hwy 65 Facility (P0984).

A request for voidance of PTI 711-96 is anticipated to be received from Riverside. The newly installed engine is exempt from Rule 201 permitting.

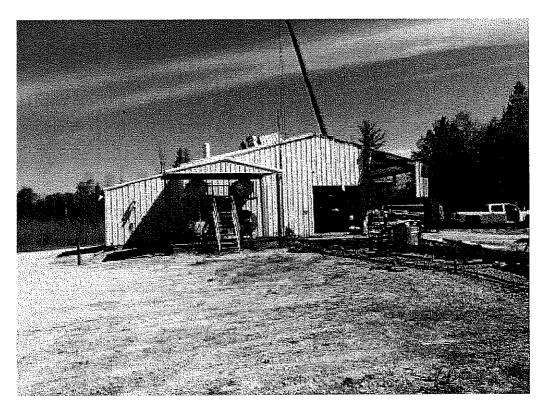


Image 1(view from south): view of engine building from south. Note that new engine is being located in the eastern half of building.

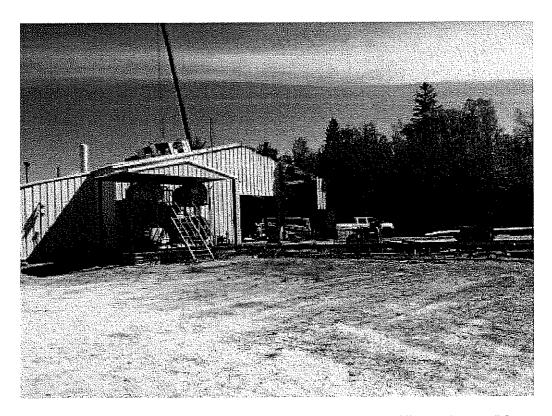


Image 2(view from SW): another southerly view, in this one the removal of the eastern wall for removal of old engine, and installation of new unit is more visible.

NAME		DATE	SUPERVISOR
Sharon LeBlanc	Digitally signed by Sharon LeBlanc Date: 2020.07.15 08:28:39 -04'00'		Shane Nixon Digitally signed by Shane Nixon Date: 2020.07.15 08:29:07