

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

N639174701

FACILITY: VCP Michigan - Briley 8		SRN / ID: N6391
LOCATION: NW NW SEC 8 T31N R2E, BRILEY TWP		DISTRICT: Cadillac
CITY: BRILEY TWP		COUNTY: MONTMORENCY
CONTACT: Sandy Mankowski ,		ACTIVITY DATE: 10/30/2024
STAFF: Tammie Puite	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Site Inspection to become familiar with the facility since I am the new assigned inspector.		
RESOLVED COMPLAINTS:		

The VCP Michigan, LLC, Briley 8, is a natural gas central processing facility (CPF) located in Briley Township, Montmorency County. To access this facility, From M-33, Go west on County Road 622 for 3 miles. Turn Left and head South on Roth Road for 2 miles. The facility is just past a big bend, and is on the west side of the road.

This facility processes sweet natural gas from low-pressure Antrim formation wells that flow to the facility via buried flowlines. Upon reaching the facility, the gas is compressed and directed through a Tri ethylene glycol dehydrator for moisture removal. Following dehydration, natural gas is directed to a sales pipeline.

I performed an inspection on this source with respect to Permit to Install (PTI) numbers 22-08. An onsite inspection was performed on October 30, 2024. Upon arrival on site, no odors were noted downwind and no visible emissions from any point were noted. The facility appeared in full operation, and from the monthly log onsite, has been in full operation. The facility was found to have good housekeeping practices that met with industry standards.

Equipment Onsite:

CAT 3516TA, 1265HP, 1400 RPM, 16 Cylinder Engine Serial # 4ZK00612, Unit # 701634 – Uncontrolled via Stack (22-08)

- No catalytic emission control
- Operating at 1057 RPM
- Oil Pressure – 52 psi
- Hour Meter - 64919

3 tanks were present on site, All located inside secondary containment. 2-400 BBL Brine Tanks, and 1-200 BBL Slop Tank. All Exempt under 336.1284(2)(e)

Tri ethylene Glycol Dehydrator – Via Stack – Previous records supplied, show that this process meets the exemption criteria listed in the permit. This unit was operating during my visit. There are a few buckets catching drips, that are located inside the secondary containment.

- Dehy Tower PSI 1050
- Dehy Tower Temp 98°F
- Reboiler Temp 250°F
- Glycol Pump SPM 6

There is a Onan Electric Generator onsite:

- Serial # 0869131560
- 25 KW
- 1800 RPM
- Hour Meter – 3503.2

There is a water separator and a gas separator inside the building.

Permit to Install 22-08:

EUDEHY -

The dehy is required to comply with the provisions of National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63, Subpart HH as applicable. This dehy is exempt from the conditions of this Subpart as previous records provided by the facility indicate the facility processes well below the exemption threshold of 85,000 scm/day

FGENGINES –

Nitrogen Oxides (NOx) emissions from this facility are not to exceed 82.9 tons per year. Carbon Monoxide (CO) emissions are not to exceed 37.4 tons per year. Both limits are based on a 12-month rolling time period as determined at the end of each calendar month. Compliance with these emissions limits is demonstrated through recordkeeping and emissions calculations. A request for records will be sent to the company to determine compliance with this condition, and a separate report will be created for the review of these records.

There are two permitted engines a EUENGINE1 is a CAT 3406 TA, 325 HP Engine going to SVENGINE1 Stack, and EUENGINE2 is a Superior 2408 GTL, 1600 HP engine, going to SVENGINE2 stack. Neither engine is onsite, and the Permit does not allow for the swap out of a equal or lower emitting engine, which is a permit condition that is often found in permits associated with this industry. Looking into historical records, this error has gone unnoticed for a long period of time. I will follow up with the company to get this corrected.

A Malfunction Abatement Plan is required for this facility. A plan was previously submitted and approved in October of 2010. Since neither of the permitted engines are on site, I will request that the company submit an updated plan.



Image 1(VCP-Briley 8) : Facility Exterior - Showing the Stack, and the Dehy building.



Image 2(3 AST Tanks) : 2 Brine Tanks and 1 Slop Tank - all meet exemptions.



Image 3(CAT3516TA) : 16 Cylinder Engine, 1400 RPM, 1,266 HP



Image 4(CAT Engine) : Closeup of Engine Showing Size, and that it is made by Caterpillar.



Image 5(Engine Tag) : Serial # 4ZK00612, 1265 HP and 1400 RPM Engine

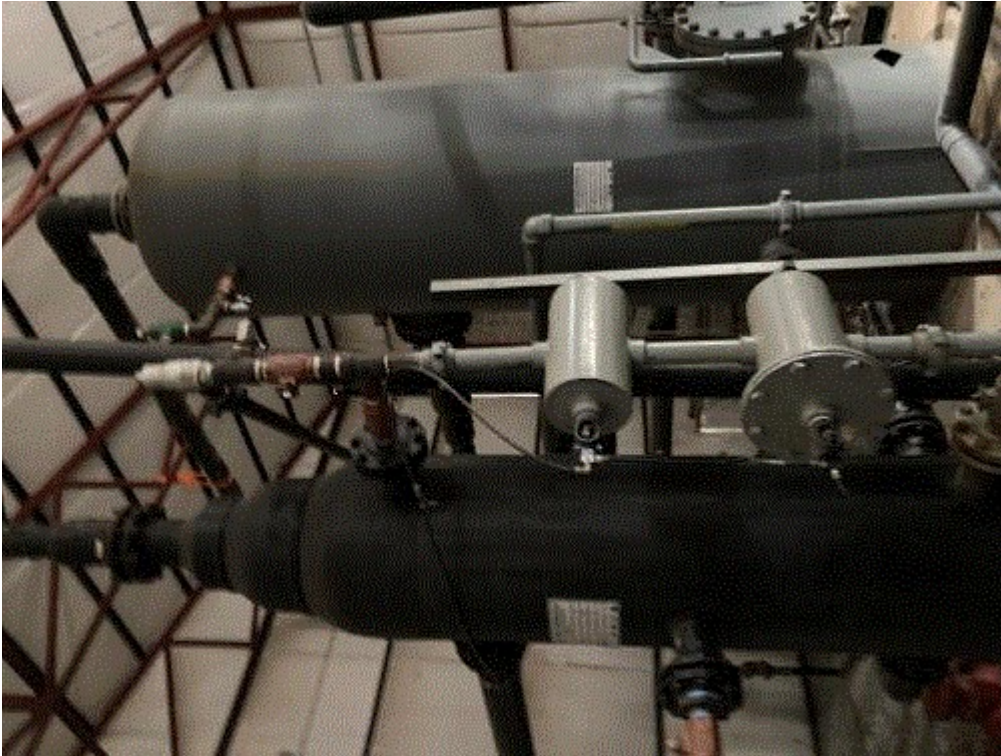


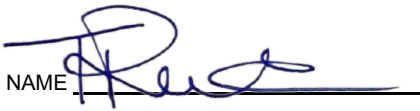
Image 6(Seperators) : 2 - Separators - 1 for water and 1 or gas.



Image 7(Dehy) : Building housing the Tri ethylene Glycol Dehydrator



Image 8(Dehy Reboiler) : Reboiler was operating at 250 Deg F.

NAME 

DATE 12-4-24

SUPERVISOR 