

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

August 29, 2022

PERMIT TO INSTALL
119-22

ISSUED TO
White River Productions, LLC

LOCATED AT
11165 Chase Road
Montague, Michigan 49437

IN THE COUNTY OF
Muskegon

STATE REGISTRATION NUMBER
P1173

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: May 25, 2022	
DATE PERMIT TO INSTALL APPROVED: August 29, 2022	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUPRODUNIT01	Production unit for processing sour oil and natural gas from wells; (Friday/Comeau 1-2 wells); Hanover Skid Mounted Unit, 500,00 BTU/hr; gas fired	2007	FGPRODUCTION
EUPRODUNIT02	Production unit for processing sour oil and natural gas from wells; (Comeau 2-2 well); Hanover Skid Mounted Unit, 500,00 BTU/hr; gas fired	2007	FGPRODUCTION
EUPRODUNIT03	Production unit for processing sour oil and natural gas from wells; (Chase 1-2 well); Hanover Skid Mounted Unit, 500,00 BTU/hr; gas fired	2007	FGPRODUCTION
EUPRODUNIT04	Production unit for processing sour oil and natural gas from wells; (Hoeksema 1-11); Hanover Skid Mounted Unit, 500,00 BTU/hr; gas fired	2007	FGPRODUCTION
EUENGINE01	Natural gas fired compressor engine	2007	NA
EUTREAT01	Hanover skid mounted Heater treater that flashed off sour gas; 1.0 MMBTU/hr gas fired	2007	FGPRODUCTION
EULINEHEATER	Smith skid mounted line heater, 500,000 BTU/hr output, gas fired	2007	FGPRODUCTION
EUDEHY	Glycol dehydrator. Saturated water vapor is removed from natural gas by glycol dehydration. Vented to a vapor recovery unit or emergency/pressure relief flare.	2007	NA
EUTANK01	30,000-gallon capacity steel bullet oil storage tank, vapors collected by VRU and reinjected into well site	2007	FGPRODUCTION
EUTANK02	30,000-gallon capacity steel bullet oil storage tank, vapors collected by VRU and reinjected into well site	2007	FGPRODUCTION
EUTANK03	18,000-gallon capacity steel bullet water storage tank, vapors collected by VRU and reinjected into well site	2007	FGPRODUCTION
EUVRU	Fuller-CC-30 skid mounted vapor recovery unit; 30hp electric motor driven	2007	FGPRODUCTION1

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUSOURGASPLANT	Hydrogen sulfide is removed from the sour gas by the amine process and the residue gas is combusted in equipment onsite and the oil is sold. Hydrogen sulfide/acid gas is sent to an acid gas injection (AGI) system to be completely re-injected into oil or gas bearing geologic strata. There is also an emergency/pressure relief flare; 7.5 gpm Max circulation rate, normal rate 5 gpm	2007	NA
EUFLARE01	All system pressure relief lines from process equipment are piped to flare per OGMD rules. Also controls blow downs for maintenance of equipment will be bled to flare to be burned to avoid sour gas being vented to atmosphere. Has continuously burning pilot using sweet propane. Outage detector and auto ignite. If flare is not relit, the facility is shut down and employees called.	2007	FGPRODUCTION
EUPORTFLARE	Portable flare used at wells.	2007	FGPRODUCTION

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

EUDEHY EMISSION UNIT CONDITIONS
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DESCRIPTION

Glycol dehydrator. Saturated water vapor is removed from natural gas by glycol dehydration. Vented to a vapor recovery unit or emergency/pressure relief flare.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Vapor recovery Unit (VRU) or emergency/pressure relief flare.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUDEHY unless the glycol regenerator still is vented to the vapor recovery unit or the emergency/pressure relief flare. **(R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the glycol dehydrator unless the vapor recovery unit or emergency/pressure relief flare is installed and operating properly. Proper operation of the vapor recovery system includes capturing the VOC emissions and directing them to the suction side of the facility compressors. **(R 336.1910, R 336.1702(a))**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required records for EUDEHY in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205, R 336.1225, R 336.1702(a))**
2. If EUDEHY meets the exemption criteria in 40 CFR 63.764(e)(1)(i) for glycol dehydrators with actual annual average flow rate of natural gas less than 85,000 cubic meters per day, the actual flow rate of natural gas shall be determined using either of the procedures below:
 - a) The permittee shall install and operate a monitoring instrument that directly measures natural gas flow rate to the glycol dehydration unit with an accuracy of plus or minus 2 percent or better. The permittee shall convert annual natural gas flow rate to a daily average by dividing the annual flow rate by the number of days per year the glycol dehydration unit processed natural gas. **(40 CFR 63.772(b)(1)(i))**
 - b) The permittee shall document, to the AQD District Supervisor's satisfaction, that the actual annual average natural gas flow rate to the glycol dehydration unit is less than 85,000 cubic meters per day. **(40 CFR 63.772(b)(1)(ii))**

As an alternative, if EUDEHY meets the exemption criteria in 40 CFR 63.764(e)(1)(ii) for glycol dehydrators with actual average benzene emissions less than 0.90 megagram per year, the emissions shall be determined either uncontrolled, or with federally enforceable controls in place and using either of the procedures below:

- c) The permittee shall determine actual average benzene emissions using the model GRI-GLYCalc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1). **(40 CFR 63.772(b)(2)(i))**
- d) The permittee shall determine an average mass rate of benzene emissions in kilograms per hour through direct measurement using the methods in 40 CFR 63.772(a)(1)(i) or (ii), or an alternative method according to 40 CFR 63.7(f). Annual emissions in kilograms per year shall be determined by multiplying the mass rate by the number of hours the unit is operated per year. This result shall be converted to megagrams per year. **(40 CFR 63.772(b)(2)(ii))**

- 3. If EUDEHY complies with the exemption criteria in 40 CFR 63.764(e)(1)(i) for glycol dehydrators with actual annual average flow rate of natural gas less than 85,000 cubic meters per day, the permittee shall keep records of the actual annual average natural gas throughput (in terms of natural gas flow rate to the glycol dehydration unit per day) as determined in accordance with SC VI.2. The permittee shall keep all records on file at a location approved by the AQD District Supervisor and make them available to the Department upon request. **(40 CFR 63.774(d)(1)(i))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

- 1. The permittee shall be in compliance with all applicable requirements of 40 CFR, Part 63, Subpart HH, National Emissions Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities. **(40 CFR Part 63 Subpart HH)**

EUSOURGASPLANT EMISSION UNIT CONDITIONS

DESCRIPTION

Hydrogen sulfide is removed from the sour gas by the amine process and the residue gas is combusted in equipment onsite and the oil is sold. Hydrogen sulfide/acid gas is sent to an acid gas injection (AGI) system to be completely re-injected into oil or gas bearing geologic strata. There is also an emergency/ pressure relief flare; 7.5 gpm Max circulation rate, normal rate 5 gpm

Flexible Group ID: FGPRODUCTION

POLLUTION CONTROL EQUIPMENT

Acid gas injection (AGI) system and emergency/pressure relief flare

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. No later than 60 days after issuance of this permit, the permittee shall implement and maintain a preventative maintenance / malfunction abatement plan (PM / MAP). If the PM/MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall revise the PM/MAP within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on pollution control device(s), or monitoring equipment during similar malfunction events, and a program for corrective actions for such events. Any revisions made to the PM/MAP shall be submitted to the AQD District Supervisor for review and approval. **(R 336.1205(1)(a), R 336.1910, R 336.1911)**
2. The permittee shall operate in compliance with an approved H₂S Monitoring Plan including the following information:
 - a) A diagram showing the location of all monitors at EUSOURGASPLANT;
 - b) A description of the monitoring equipment and the alarm systems and levels that will be utilized;
 - c) An overall plan for ensuring the monitors will be operated at all times when EUSOURGASPLANT is operating.

Modifications or revisions to the plan shall be submitted to and approved by the AQD District Supervisor. **(R 336.1205(1)(a), R 336.1403(5)(d))**

3. The permittee shall not operate EUSOURGASPLANT unless the AGI system and emergency/pressure relief flare are installed and operating properly, except as allowed in SC III.4. **(R 336.1205(1)(a), R 336.1403(1))**
4. If any malfunction or abnormal condition requires the permittee to temporarily limit or discontinue use of the AGI system and to bypass any acid gas to the emergency/pressure relief flare, the permittee shall immediately curtail all process inflow streams to the facility to minimal levels and shall otherwise operate the facility in a manner consistent with good air pollution control practices for minimizing emissions. If the malfunction or abnormal condition is not remedied within 240 minutes, the permittee shall commence shut-in of the facility and immediately stop routing any process inflow streams to the facility unless or until the acid gas can be re-routed to the AGI system. **(R 336.1205(1)(a), R 336.1403, R 336.1113(a))**

5. The permittee shall not operate EUSOURGASPLANT unless all sour gas emergency relief valves are exhausted to the emergency/pressure relief flare. **(R 336.1403(5)(c))**
6. In the event of indicated flame failure at the emergency/pressure relief flare, the process inflow streams will be automatically shut in. Operation of this facility shall not be restarted unless corrective measures taken to reignite the flame are successful. **(R 336.1403(5)(f), R 336.1403(2))**
7. The permittee shall automatically begin a safe and orderly shutdown of all process inflow streams to the facility if the concentration of H₂S is more than 100 ppm in any building enclosing a sweetening process. Full operation may resume only after successful corrective measures have been applied. **(R 336.1403(5)(e))**
8. The permittee shall expeditiously take corrective actions, consistent with good engineering practices to minimize the likelihood of a recurrence of any malfunction or abnormal condition. **(R 336.1205)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The emergency/pressure relief flare shall be equipped with a continuously burning pilot flame or automatic ignitors. **(R 336.1403(2))**
2. The emergency/pressure relief flare shall be equipped with failsafe flame sensors with an alarm activated by flame failure. **(R 336.1403(2))**

V. TESTING/SAMPLING

1. The permittee shall determine the representative hydrogen sulfide (H₂S) concentration in the treated gas exiting EUSOURGASPLANT at least once per calendar month, using colorimetric detector tubes (e.g. Draeger Tubes) or the equivalent. **(R 336.1205, R 336.1225)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall conduct a program of continuous monitoring of concentrations of H₂S in any building enclosing a sweetening process. The sensors shall be placed as close to process equipment as possible. The system shall be designed, installed and maintained to provide a visual alarm when the H₂S concentration is more than 50 ppm. **(R 336.1403(5)(d))**
2. The permittee shall monitor and record the volume of gas entering EUSOURGASPLANT in a manner acceptable to the AQD District Supervisor. The permittee shall maintain the monitoring system in proper operating condition. **(R 336.1205, R 336.1403(5)(a))**
3. The permittee shall record the H₂S concentration of treated gas leaving EUSOURGASPLANT on a monthly basis in accordance with SC V.1. The permittee shall keep the records on file at a location approved by the AQD District Supervisor and make them available to the Department upon request. **(R 336.1205, R 336.1225, 40 CFR 52.21(c) & (d))**
4. The permittee shall record the time and duration of each incidence of emergency flaring of sour gas. The permittee shall keep the records on file at a location approved by the AQD District Supervisor and make them available to the Department upon request. **(R 336.1205, R 336.1225, 40 CFR 52.21(c) & (d))**
5. The permittee shall maintain records of malfunctions and abnormal conditions. The records shall include the date, time, the cause of the malfunction or abnormal condition, and the corrective action taken and/or operational changes made to prevent a reoccurrence. **(R 336.1205(1)(a), R 336.1912)**

VII. REPORTING

1. Not later than 45 days following any venting of acid gas to the emergency/pressure relief flare, the permittee shall submit to the AQD District Supervisor a report that includes all of the information specified in SC VI.3. **(R 336.1205)**

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall install and maintain fencing and warning signs and/or other measures as necessary to prevent unauthorized individuals from entering the plant property or buildings. Signs shall read "Danger – Poison Gas" with at least one sign on each side of the plant property. **(R 336.1403(5)(b))**

EUENGINE01 EMISSION UNIT CONDITIONS
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DESCRIPTION

Natural gas fired compressor engine

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not burn any sour natural gas in EUENGINE01. Sour gas is defined as any gas containing more than 1 grain of hydrogen sulfide or more than 10 grains of total sulfur per 100 standard cubic feet. **(R 336.1205(1)(a))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. No later than 60 days after issuance of this permit, the permittee shall submit to the AQD District Supervisor, for review and approval, a preventative maintenance / malfunction abatement plan (PM/MAP) for EUENGINE01. After approval of the PM/MAP by the AQD District Supervisor, the permittee shall not operate EUENGINE01 unless the PM/MAP, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. At a minimum the plan shall include:
 - a) Identification of the equipment and, if applicable, air-cleaning device and the supervisory personnel responsible for overseeing the inspection, maintenance, and repair
 - b) Description of the items or conditions to be inspected and frequency of the inspections or repairs
 - c) Identification of the equipment and, if applicable, air-cleaning device, operating parameters that shall be monitored to detect a malfunction or failure, the normal operating range of these parameters and a description of the method of monitoring or surveillance procedures
 - d) Identification of the major replacement parts that shall be maintained in inventory for quick replacement
 - e) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits

If the plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the plan within 45 days after such an event occurs and submit the revised plan for approval to the AQD District Supervisor. Should the AQD determine the PM/MAP to be inadequate, the AQD District Supervisor may request modification of the plan to address those inadequacies. **(R 336.1205, R 336.1702(a), R 336.1911, R 336.1912, 40 CFR 52.21(c) & (d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The nameplate capacity of EUENGINE01 shall not exceed 145 hp (at 1800rpm) as documented by the equipment manufacturer. **(R 336.1205(1)(a))**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall keep on file the technical data sheets for each engine in EUENGINE01 and make them available upon request. **(R 336.1205, R 336.1702(a))**
2. The permittee shall maintain a log of all maintenance activities conducted according to the PM/MAP (pursuant to SC III.1). The permittee shall keep this log on file at a location approved by the AQD District Supervisor and make it available to the Department upon request. **(R 336.1205, R 336.1702(a), R 336.1911, 40 CFR 52.21(c) & (d))**

VII. REPORTING

1. Except as provided in R 336.1285, if the engine is replaced with an equivalent-emitting or lower-emitting engine, the permittee shall notify the AQD District Supervisor of such change-out and submit acceptable emissions data to show that the alternate engine is equivalent-emitting or lower-emitting. The data shall be submitted within 30-days of the engine change out. **(R 336.1205, R 336.1702(a), R 336.1911, 40 CFR 52.21(c) & (d))**

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVENGINE01	6	20	40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ for Stationary Reciprocating Internal Combustion Engines. **(40 CFR Part 63, Subpart A & Subpart ZZZZ)**

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGPRODUCTION	All permitted sour gas and oil production equipment at the facility.	EUPRODUNIT01, EUPRODUNIT02, EUPRODUNIT03, EUPRODUNIT04, EUTREATER01, EULINEHEATER, EUTANK01, EUTANK02, EUTANK03, EUVRU, EUFLARE01, EUPORTFLARE

FGPRODUCTION FLEXIBLE GROUP CONDITIONS

DESCRIPTION

All permitted sour gas and oil production equipment at the facility.

Emission Unit: EUSOURGASPLANT, EUPRODUNIT01, EUPRODUNIT02, EUPRODUNIT03, EUPRODUNIT04, EUTREATER01, EULINEHEATER, EUTANK01, EUTANK02, EUTANK03, EUVRU, EUFLARE01, EUPORTFLARE

POLLUTION CONTROL EQUIPMENT

Vapor recovery Unit (VRU) or emergency/pressure relief flare, portable flare

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not allow sour gas from storage tanks, oil/gas separators, heater treaters, or other equipment in FGPRODUCTION to be emitted to the atmosphere without collecting it with the vapor recovery unit or burning in a flare, incinerator, or equivalent control device. **(R 336.1205(1)(a), R 336.1224, R 336.1225, R 336.1403, R 336.1702(a), R 336.1901, R 336.1910)**
2. No later than 60 days after issuance of this permit, the permittee shall submit to the AQD District Supervisor, for review and approval, a preventative maintenance / abatement plan (PM/MAP) for operation of the control equipment associated with FGPRODUCTION. After approval of the PM/MAP by the AQD District Supervisor, the permittee shall not operate FGPRODUCTION unless the PM/MAP, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. At a minimum the plan shall include:
 - a) Identification of the equipment and, if applicable, air-cleaning device and the supervisory personnel responsible for overseeing the inspection, maintenance, and repair.
 - b) Description of the items or conditions to be inspected and frequency of the inspections or repairs.
 - c) Identification of the equipment and, if applicable, air-cleaning device, operating parameters that shall be monitored to detect a malfunction or failure, the normal operating range of these parameters and a description of the method of monitoring or surveillance procedures.
 - d) Identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - e) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If the plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the plan within 45 days after such an event occurs and submit the revised plan for approval to the AQD District Supervisor. Should the AQD determine the PM/MAP to be inadequate, the AQD District Supervisor may request modification of the plan to address those inadequacies. **(R 336.1205(1)(a), R 336.1224, R 336.1225, R 336.1403, R 336.1702(a), R 336.1901, R 336.1910, R 336.1911, R 336.1912)**

3. The permittee shall not operate FGPRODUCTION unless the vapor recovery unit (VRU) is installed and operated properly. **(R 336.1205(1)(a), R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall properly operate all of the following: **(R 336.1224, R 336.1225, R 336.1403, R 336.1702(a), R 336.1910)**
 - a) A continuously burning pilot flame at the flare. Pilot fuel shall be only sweet gas. Sweet gas is defined as any gas containing 1 grain or less of hydrogen sulfide (approximately 16 ppmv) or 10 grains or less of total sulfur per 100 standard cubic feet.
 - b) A mechanism that will automatically stop fluid flow into the facility in the event that the flare pilot flame is extinguished. The permittee shall not resume fluid flow into FGOILPRODUCTION unless the flare pilot flame is re-ignited and maintained.
2. The flare shall be properly engineered. **(R 336.1224, R 336.1225, R 336.1403, R 336.1702(a), R 336.1910)**
3. The permittee shall not load out any tank unless a vapor return system is installed, maintained and operated in a satisfactory manner. **(R 336.1205(1)(a), R 336.1224, R 336.1225, R 336.1702(a))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Verification of H₂S and/or sulfur content of the natural gas burned in FGPRODUCTION may be required upon request by the AQD District Supervisor. **(R 336.1205(1))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall record each time and duration of each incidence EUPORTFLARE & EUFLARE01 is used. The permittee shall keep the records on file at a location approved by the AQD District Supervisor and make them available to the Department upon request. **(R 336.1205, 40 CFR 52.21(c) & (d))**
3. The permittee shall maintain a log of all maintenance activities conducted according to the PM/MAP (pursuant to SC III.2). The permittee shall keep this log on file at a location approved by the AQD District Supervisor and make it available to the Department upon request. **(R 336.1205(1)(a), R 336.1911, R 336.1912)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVFLARE01	4	50	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVHEATER	12	20	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

APPENDIX A Calculations For Flaring Incidents

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in EUSOURGASPLANT.

Venting Acid Gas to the Emergency/Pressure Relief Flare:

$$\text{Tons } SO_2 = FR \times TD \times \text{Conc}(H_2S) \times 8.44 \times 10^{-5}$$

Where:

FR = Average flow rate to the emergency/pressure relief flare during the venting of acid gas to the flare (scf per hour)

TD = Total duration of venting of acid gas to the emergency/pressure relief flare (hours)

$\text{Conc}(H_2S)$ = Average concentration of H_2S in the acid gas vented to the emergency/pressure relief flare. (scf H_2S per scf gas)

$$8.44 \times 10^{-5} = \frac{\text{lbmol } H_2S}{379 \text{ scf } H_2S} \times \frac{64 \text{ lb } SO_2}{\text{lbmol } H_2S} \times \frac{\text{ton}}{2000 \text{ lbs}}$$

**Preventative Maintenance / Malfunction Abatement Plan (PM / MAP)
 Content Checklist for Engines Required to Submit a PM / MAP**

PM / MAP Content		Location	
		Page	Section / Table
1	Contact Person		
Engines			
2	Engine Identification: Include the engine make / model and type of engine (i.e. rich or lean burn). Identify engines with add on control and AFRC. If add on control is present, identify type of control.		
3	Engine Operating Variables To Be Monitored. Include a copy of the normal engine maintenance log.		
4	Corrective procedures or operational changes that will be taken in the event of a malfunction.		
5	Major parts replacement inventory for engines.		
Add-On Controls			
6	Catalytic Converter operating variables to be monitored. Include the method and frequency of monitoring these variables; provide the normal operating range of these variables.		
7	Corrective actions to be taken in event of malfunction of the catalytic converter.		
8	AFRC O ₂ Sensor replacement schedule or operating variables to be monitored		
9	Corrective actions to be taken in event of malfunction of the AFRC		
10	Emission testing utilizing portable analyzer		
11	Scheduled maintenance of control equipment		
12	Major parts replacement inventory for add on control.		
13	Identify supervisory personnel responsible for overseeing inspection, maintenance and repair of add on controls.		
14	Recordkeeping and retention of records.		
15	Updates of PM / MAP as necessary.		

Guidance Document
For Preventative Maintenance / Malfunction Abatement Plan (PM / MAP) Checklist

1. Contact Person: Include the name, title, telephone number (extension if applicable) and e-mail address for the person that may be contacted with questions regarding this Preventative Maintenance / Malfunction Abatement Plan (PM / MAP) with the transmittal letter accompanying the PM / MAP rather than within the body of the PM / MAP.

Engines

2. Engine Identification: For each engine at the facility, list the engine manufacturer, model and type of engine (rich burn or lean burn) and the type of add-on control equipment used (oxidation catalyst, three-way catalyst), if any. Also, identify each engine with an air to fuel ratio controller (AFRC).
3. Engine operating variables to be monitored: Provide the normal engine maintenance log.
4. Corrective procedures in the event of an engine malfunction: Provide a brief summary of the procedures that will take place in the event of an engine malfunction. A malfunction is defined in Rule 113(d) of the State of Michigan Air Pollution Control Rules which states, in part, 'any sudden, infrequent and not reasonable preventable failure of the equipment to operate in a normal or usual manner. Failures caused in part by poor maintenance or careless operations are not malfunctions.'
5. Major parts replacement inventory: Provide a list of major replacement parts that shall be maintained in inventory for quick replacement. If no replacement parts are kept on site provide a statement that no parts shall be kept.

Add-On Controls

6. Catalytic converter operating variables to be monitored: Provide the following:
 - a. A list of variables that will be monitored to measure catalytic converter performance including the catalytic converter inlet and outlet temperature, pressure differential across the catalytic converter, and any other relevant catalytic converter variables that are monitored.
 - b. The normal operating range that has been developed for each variable; acceptable ranges shall include documentation as to how the range was determined (i.e. manufacturer's recommendations or determined in the field with documentation or testing).
 - c. The method of monitoring the variables, and
 - d. The frequency of monitoring the variables.
7. Corrective procedures in the event of a malfunction of the catalytic converter: Malfunction is defined in number four above. Provide information on what steps shall be taken when a variable is out of range. This could include monitoring of emissions or cleaning and/or replacement of the catalytic converter.
8. AFRC O₂ sensor replacement schedule or operating variables to be monitored: Chose either (a) or (b).
 - a. O₂ sensor replacement interval or sensor life detector
 - b. If monitoring, provide:
 - i. A list of variables monitored to measure AFRC performance (i.e. millivolt output, O₂, and/or any other relevant AFRC variables that are monitored).
 - ii. The normal operating range that has been developed for each variable; acceptable ranges shall include documentation as to how the range was determined (i.e. manufacturer's recommendations or determined in the field with documentation or testing).
 - iii. The method of monitoring the variables.
 - iv. The frequency of monitoring the variables.

9. Corrective procedures in the event of a malfunction of the AFRC: Malfunction is defined in number 4 above. If choosing monitoring in paragraph 8.b above, provide information on what steps shall be taken when a variable is out of range.
10. Emission checks: Describe when a portable analyzer would be used and how it will be used.
 - a. Calibration of the analyzer will be conducted as required by manufacturer's specifications. Records shall be kept on file and made available to the Air Quality Division upon request.
 - b. Checks for both CO and NO_x.
 - c. Checks to be used to:
 - i. Check performance if monitored parameter is out of normal range, e.g. low inlet temperature (an engine specific minimum inlet temperature could then be established).
 - ii. When vendor cleaned catalyst is installed. This check will normally occur in the 12-18 month window as specified for routine cleaning.
 - d. Companies may choose to perform any of following the three valid methods:
 - i. Inlet and outlet checks and estimate destruction efficiency.
 - ii. Outlet testing and check for g/hp-hr compared to levels used for permitting.
 - iii. Outlet testing and use the uncontrolled vendor data to establish destruction efficiency.
11. Scheduled maintenance: Describe the scheduled cleaning and/or replacement of the catalytic converter.
 - a. Frequency of catalytic converter inspection and field catalyst media cleaning (vacuum catalyst face): Follow vendor recommendations, typically 12-18 months unless parameters (pressure drop, temperature deviations, etc) indicate otherwise.
 - b. Catalyst media removal and wash in chemical solution by manufacturer (if catalyst media does not respond to field cleaning). A replacement catalyst media will be used during the cleaning process.
 - c. Catalytic converter gasket replacement: Follow vendor recommendations, typically 12-18 months when catalyst is serviced.
 - d. Replace catalyst media if not functioning properly after vendor cleaning, or in lieu of vendor cleaning.
12. Major parts replacement inventory: Provide a list of major replacement parts that shall be maintained in inventory for quick replacement. If no replacement parts are kept on site provide a statement that no parts shall be kept.
13. Supervisory personnel responsible for maintenance of the control equipment: Include the contact information. This person or position can be a company employee or contractor and may or may not be the same person / position listed in number one above.
14. Retention of records: Records shall be kept on file and retained as described in the permit.
15. Updates of PM / MAP: Any updates to the plan shall be submitted to the AQD District Supervisor for written approval as required in the permit (the Department recommends the PM / MAP be reviewed annually).