

**Steamboat Butte C1/C3 Tank Battery
Wind River Energy Commission
Wind River Reservation, Fremont County**

**Full Compliance Evaluation (FCE)
Clean Air Act**

Inspection Date: July 24, 2024

Inspection Report Date: December 4, 2024

EPA Representative: Robert (Bob) Gallagher, US EPA – Region 8

Tribal Representatives: Dean Goggles (Northern Arapaho), (307) 438-2163

Company Representatives: Wind River Energy Commission and their
Subcontractor MI3 Petroleum Engineering

- Ed Pearson, Director of Operations (via Zoom)
- Justin Lajeunesse, Production Superintendent
- John Kennah, Team Lead

Inspection Report Prepared By: Robert Gallagher

Inspection Report Reviewed By: Scott Patefield

Last CAA Inspection: August 7, 2019

Applicable Rules: Tribal Minor NSR Permit Application
NSPS Subpart OOOO

SCOTT PATEFIELD Digitally signed by SCOTT
PATEFIELD
Date: 2024.12.04 14:04:51 -07'00'

CAA Permit History:

Part 49 Permit Number: SMNSR-WR-000004-2017.001 Issue Date: March 18, 2019
Part 49 Permit Number: SMNSR-WR-000004-2020.002 Issue Date: January 27, 2020

ICIS Facility ID: AIR08000005601300071

SIC Code: 1311 – Crude Petroleum and Natural Gas

Reservation: Wind River Reservation

Tribes: Northern Arapaho and Eastern Shoshone

General Source Information

Parent Company Name: Wind River Energy Commission (WREC)

Plant Name: Steamboat Butte C1/C3 Tank Battery

Plant Mailing Address: PO Box 538
Ft. Washakie, Wyoming 82514

On-site Office: 14567 Highway 287
Ft. Washakie, Wyoming 82514

Plant Location: Latitude 43° 16' 32.9" N (43.28590)
Longitude 108° 54' 29.6" W (-108.9087)

County, State: Fremont, Wyoming

Responsible Official: Ed Pearson

Overall Inspection Findings

The WREC facility was operational during the inspection. There were numerous areas of concern noted during the inspection. Also, no compliance assistance was provided during the inspection; however, this inspection report will be provided to WREC upon finalization.

The following areas of concern were noted during the inspection, including;

- annual oil production exceedances of the 401,500 bbls limit for three months in 2024, May (443,213 bbls), June (489,245 bbls), July (514,457 bbls) (Condition I.C.1(a))
- annual emissions and annual fees that were due in 2023 and 2024 were not submitted (Condition I.H.1)
- since January of 2023, no monthly inspections were conducted on the flares, on the tank covers, or closed vent systems (Condition I.E.2(a))
- the flares were not equipped with monitoring systems (Condition I.D.4)
- permit application for new ownership had not been submitted to EPA

Enforcement History

No previous enforcement actions were found in the ICIS database.

Description of Process

The Steamboat Butte C1/C3 tank battery operates continuously 8,760 hours per year. It handles 1,100 barrels per day of crude oil, 83,000 barrels of produced water, and 0.10 MMscfd of gas which may contain up to 5.75% of H₂S. The facility is comprised of two sections: C1 and C3. C3 has a separate produced water storage and disposal system while the oil and gas from C3 are routed into the C1 system.

Production from a portion of the wells enters C3 through two inlet free water knockouts (FWKO). From the FWKOs, oil is sent to the bulk treater (C1HT) located at the C1 facility for secondary separation of the gas, oil, and produced water. Produced water from the FWKOs is sent to two 300-barrel storage tanks (C3WTK 8020 & C3WTK 8021) and then is either routed to water injection wells or trucked to offsite surface water discharge ponds. Vapors from the two produced water tanks are vented to atmosphere.

Production from the remaining portion of the wells enters C1 through two additional inlet FWKOs. From the FWKOs, oil is sent to the same bulk treater (C1HT) for secondary separation. Produced water from the FWKOs is sent to two 300-barrel storage tanks (C1WTK 8006 & C1WTK 8007) and then is either routed to water injection wells or trucked to offsite surface water discharge ponds.

All oil exiting the bulk treater is routed to 500-barrel Run Tanks (C1 Run Tanks 8014, 8015, 8016) and then released for custody transfer via a LACT unit. During abnormal operating conditions, reject or overflow oil is directed to either Reject Tank (C1 8015) or Overflow Tank (C1 8016).

Vapors from all C1 oil storage tanks and the bulk treater, including all produced gas are routed and controlled by the process flare (FL-2). Vapors from the produced water tanks are routed and controlled by the water tank flare (FL-1).

Additionally, pop & rupture tanks are used to store liquids from the FWKOs during upset conditions. These tanks vent to atmosphere.

Equipment List

Summary of Equipment			
Equipment ID	Equipment Description	Capacity / Design Rate	Control ID
FL-1	Water Tank Flare (2008)		
FL-2	Process Flare (1996)		
C1HT-1	C1 Bulk Treater	466 bbl	FL-2
C1 Run Tank	C1 Crude Oil Run Tank 8014	500 bbl	FL-2
C1 Overflow Tank	C1 Overflow Tank 8016	500 bbl	FL-2
C1 Reject Tank	C1 Reject Tank 8015	500 bbl	FL-2
C1WTK-1	C1 Produced Water Tank #1	3,000 bbl	FL-1
C1WTK-2	C1 Produced Water Tank #2	3,000 bbl	FL-1
C1PR-1	C1 Horizontal Pop & Rupture Tank #1	606 bbl	None
C1PR-2	C1 Horizontal Pop & Rupture Tank #2	606 bbl	None

C1PR-3	C1 Pop & Rupture Tank #3	2,000 bbl	None
C3WTK-3	C3 Produced Water Tanks #3	300 bbl	None
C3WTK-4	C3 Produced Water Tanks #4	300 bbl	None
C3PR-4	C3 Pop & Rupture Tank #4	1,000 bbl	None
C1B-1	(2) C1 Bulk Treater Burners	1 MMBTU/hr	None
FUG-1	Process Fugitives		None
MSS-DEGAS	Tank Degassing		None

General Inspection Observations and Commentary

Dean Goggles and I arrived at the WREC Office at 9:10 a.m. Upon arrival at the facility, we met with representatives of the subcontractor MI3 Petroleum Engineering, Ed Pearson, Director of Operations (via Zoom), Justin Lajeunesse, the Production Superintendent, and John Kennah, the Team Lead at the C1/C3 Tank Batteries. Departure time was approximately 11:10 a.m.

Opening Meeting

The EPA and Tribal staff were given a short safety meeting to ensure proper PPE was worn and exit procedures in the event of an emergency. We observed some of the records that were available at the site, including production numbers at C1/C3.

Walk Through Inspection Observations

We initially traveled to the Steamboat Butte C1/C3 Tank Batteries where we observed the two flares (production and tank) operating with no visible emissions. We observed various emitting units such as the water tanks and the oil tanks with faceplates. The C1 and C3 Tank Batteries are separated by approximately 2/3 mile. Observations were made of all the following emission sources listed.

Records Review/Closing Meeting

WREC provided some of the requested records for our review, but could not provide monthly flare observations, annual emissions calculations, and fee calculations since taking ownership in January 2023.

Uncontrolled Potential to Emit (PTE)

Emission Source	EPN	VOC		NO _x		CO		PM ₁₀		PM _{2.5}		SO ₂		H ₂ S		Benzene		HAP	
		lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
Produced Gas	C1HT-1	110.78	485.20	--	--	--	--	--	--	--	--	--	--	21.52	94.24	0.06	0.27	7.86	34.42
C1 Crude Oil Run Tank 8014	C1Run Tank 8014	30.87	14.38	--	--	--	--	--	--	--	--	--	--	4.51	3.99	0.02	0.01	2.27	0.71
C1 Crude Oil Overflow Tank 8016	C1Reject Tank 8016	0.25	1.10	--	--	--	--	--	--	--	--	--	--	0.02	0.08	1.01E-04	4.43E-04	0.02	0.07
C1 Crude Oil Reject Tank 8015	C1Reject Tank 8015	0.22	0.98	--	--	--	--	--	--	--	--	--	--	0.05	0.20	7.11E-05	3.12E-04	0.01	0.05
C1 Produced Water Tank 8006	C1WTK 8006	9.07	24.55	--	--	--	--	--	--	--	--	--	--	12.87	14.12	0.03	0.02	0.33	0.87
C1 Produced Water Tank 8007	C1WTK 8007	9.07	24.55	--	--	--	--	--	--	--	--	--	--	12.87	14.12	0.03	0.02	0.33	0.87
C1 Horizontal Pop & Rupture Tank #1	C1PR-1	0.68	2.96	--	--	--	--	--	--	--	--	--	--	0.02	0.07	4.20E-04	1.84E-03	0.07	0.31
C1 Horizontal Pop & Rupture Tank #2	C1PR-2	0.68	2.96	--	--	--	--	--	--	--	--	--	--	0.02	0.07	4.20E-04	1.84E-03	0.07	0.31
C1 Pop & Rupture Tank 8013	C1PR 8013	1.07	4.69	--	--	--	--	--	--	--	--	--	--	0.02	0.09	8.21E-04	3.60E-03	0.14	0.61
C3 Produced Water Tank 8020	C3WTK 8020	5.82	15.75	--	--	--	--	--	--	--	--	--	--	8.24	9.01	0.02	0.01	0.21	0.56
C3 Produced Water Tank 8021	C3WTK 8021	5.82	15.75	--	--	--	--	--	--	--	--	--	--	8.24	9.01	0.02	0.01	0.21	0.56
C3 Pop & Rupture Tank 8022	C3PR 8022	0.75	3.28	--	--	--	--	--	--	--	--	--	--	0.02	0.09	4.80E-04	2.10E-03	0.08	0.36
C1 Bulk Treater Burner	C1B-1	0.01	0.05	0.20	0.89	0.17	0.74	0.02	0.07	0.02	0.07	1.28E-03	0.01	1.37E-05	5.98E-05	4.25E-06	1.86E-05	3.82E-03	0.02
TOTAL EMISSIONS		174.89	596.20	0.20	0.89	0.17	0.74	0.02	0.07	0.02	0.07	1.28E-03	0.01	68.38	145.10	0.18	0.35	11.62	39.71
MAXIMUM OPERATING SCHEDULE		Hours/Day		24		Days/Week		7		Weeks/Year		52		Hours/Year		8760			

Proposed Allowable Emission Rates

Emission Source	Equipment ID	VOC		NO _x		CO		PM ₁₀		PM _{2.5}		SO ₂		H ₂ S		Benzene		HAP	
		lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
Process Fugitives	FUG-1	1.81	7.93	--	--	--	--	--	--	--	--	--	--	0.27	1.19	0.00	0.00	0.08	0.39
Water Tank Flare	FL-1	0.37	1.01	0.09	0.23	0.76	1.95	0.01	0.03	0.01	0.03	48.37	53.08	0.51	0.56	1.20E-03	7.82E-04	0.01	0.03
Process Flare	FL-2	2.84	10.06	0.37	3.09	3.20	6.17	0.04	0.17	0.04	0.17	49.04	185.17	0.52	1.87	1.59E-03	0.01	0.20	0.71
C1 Horizontal Pop & Rupture Tank #1	C1PR-1	0.68	2.96	--	--	--	--	--	--	--	--	--	--	0.02	0.07	4.20E-04	1.84E-03	0.07	0.31
C1 Horizontal Pop & Rupture Tank #2	C1PR-2	0.68	2.96	--	--	--	--	--	--	--	--	--	--	0.02	0.07	4.20E-04	1.84E-03	0.07	0.31
C1 Pop & Rupture Tank 8013	C1PR 8013	1.07	4.69	--	--	--	--	--	--	--	--	--	--	0.02	0.09	8.21E-04	3.60E-03	0.14	0.61
C3 Produced Water Tank 8020	C3WTK 8020	5.82	15.75	--	--	--	--	--	--	--	--	--	--	8.24	9.01	0.02	0.01	0.21	0.56
C3 Produced Water Tank 8021	C3WTK 8021	5.82	15.75	--	--	--	--	--	--	--	--	--	--	8.24	9.01	0.02	0.01	0.21	0.56
C3 Pop & Rupture Tank 8022	C3PR 8022	0.75	3.28	--	--	--	--	--	--	--	--	--	--	0.02	0.09	4.80E-04	2.10E-03	0.08	0.36
C1 Bulk Treater Burner	C1B-1	0.01	0.05	0.20	0.89	0.17	0.74	0.02	0.07	0.02	0.07	1.28E-03	0.01	1.37E-05	5.98E-05	4.25E-06	1.86E-05	3.82E-03	0.02
Tank Degassing	MSS-DEGAS	1.91	9.54E-04	--	--	--	--	--	--	--	--	--	--	0.30	1.49E-04	6.84E-04	3.42E-07	0.11	5.72E-05
TOTAL EMISSIONS		19.94	66.90	0.66	4.20	4.13	8.87	0.07	0.26	0.07	0.26	97.41	238.25	17.89	20.89	0.04	0.04	1.13	3.46
MAXIMUM OPERATING SCHEDULE		Hours/Day		24		Days/Week		7		Weeks/Year		52		Hours/Year		8760			

Permit History

Ownership Change

Marathon Oil Company sold the facility to Merit Energy effective December 1, 2016. WREC took ownership of the facility starting on January 1, 2023.

Tribal Minor Source Permit Applications

WREC (newest owner) had not submitted a Tribal New Source Review Permit application for the Steamboat Butte operations to update the ownership. The previous application submitted by Merit Energy in November of 2018 requested:

- Issuance of synthetic minor permit
- C1/C3 facilities are registered in tribal permit rule
- Separation of C1 and C3 facilities back to separately permitted sources
- Federally enforceable limits on 2 flares
- Sampling shows 2 of 3 oil tanks are not subject to NSPS – OOOO
 - C1 Run Tank – yes
 - C1 Overflow Tank – no
 - C1 Reject Tank – no

With the flares included as enforceable control devices under NSPS – OOOO and based on physical properties of the produced oil and facility production limitations, the emissions are as follows:

	VOC	SO2	H2S
Uncontrolled PTE, tpy	596	0	145
Controlled PTE, tpy	57	238	21

*See the following NSPS – OOOO conditions

Synthetic Minor Source Permit #SMNSR-WR-000004 Issued – March 18, 2019 and January 27, 2020

Review of Minor New Source Review (MNSR) Permit Provisions

I.C.1 Facility-Wide Emissions Limitations

- (a) Annual facility crude oil throughput shall not exceed 401,500 barrels (bbls) of oil per year.
- (b) Annual facility produced water throughput shall not exceed 30,295,000 bbls of produced water per year from C1 produced water tanks.
- (c) Annual facility produced water throughput shall not exceed 19,427,125 bbls per year from the C3 produced water tanks.
- (d) The volume of gas combusted by the process flare shall not exceed 37.39 million standard cubic feet per year.
- (e) The volume of gas combusted by the water tank flare shall not exceed 6.8 million standard cubic feet per year.

(f) Produced gas H₂S content shall not exceed 57,500 ppm H₂S.

OBSERVATION: Records were observed on-site and monthly numbers had been recorded that showed annual crude throughput **greater** than the limits.

Month	C1 Oil Production Rolling 12-month total (bbls)	C1 Water Production Rolling 12-month total (bbls)	C3 Water Production Rolling 12-month total (bbls)	C1 Process Flare Volume Rolling 12-month total (mscf)
Jul-24	514,457	Not available	Not available	13,059
Jun-24	489,245	2.3M	12.7M	12,805
May-24	443,213	2.2M	13.3M	12,240
Apr-24	398,457	2.4M	13.0M	12,531
Mar-24	353,149	2.4M	13.2M	12,549
Feb-24	305,839	2.0M	10.3M	11,033
Jan-24	261,229	2.3M	11.4M	9,430
Dec-23	217,065	2.9M	11.7M	8,434
Nov-23	177,541	2.9M	11.4M	6,768*
Oct-23	131,408	2.9M	11.4M	8,088*
Sep-23	121,969	5.3M	11.3M	8,520*
Aug-23	123,388	5.3M	11.3M	8,652*
Jul-23	122,637	5.3M	11.3M	8,208*
Jun-23	120,694	5.3M	11.3M	9,012*
May-23	118,852	5.4M	11.4M	10,656*
Apr-23	116,845	4.9M	11.3M	12,948*
Mar-23	113,531	5.2M	11.3M	2,592*
Feb-23	107,162	5.1M	11.3M	2,592*
Jan-23	121,392	5.3M	11.3M	9,688*

*total is based on 12 times the monthly production since records were unavailable for months prior to the facility being acquired by WREC

I.D.1 Requirements for the Separator

- (a) The Permittee shall install and operate no more than one 466 bbl bulk heater treater separator (separator) equipped with no more than two heaters limited to a maximum heat input capacity of 1.0 million British thermal units per hour (MMBtu/hr).

OBSERVATION: The number of heater treater separators on-site were verified to correspond with the number and size allowed in the permit.

I.D.2. Requirements for the Crude Oil and Produced Water Storage Tanks

- (a) The Permittee shall install, operate and maintain at the C1 Tank Battery no more than one 500 bbl Run Tank used to store crude oil; one 500 bbl reject oil storage tank; one 500 bbl oil overflow storage tank; and two storage tanks used to store produced water, each limited to a maximum storage capacity of 3,000 bbl.
- (b) The Permittee shall install, operate and maintain at the C3 Tank Battery no more than two storage tanks used to store produced water, each limited to a maximum storage capacity of 300 bbls.

OBSERVATION: The three tanks on-site at C1 and two tanks on-site at C3 were verified to correspond with the number allowed in the permit.

I.D.3 Requirements for Closed-Vent Systems: The Permittee shall design, install, continuously operate, and maintain closed-vent systems.

OBSERVATION: The closed-vent system was verified to correspond with what is allowed in the permit and no emissions were observed.

I.D.4 Requirements for the Flares

- (a) The Permittee shall design, install, continuously operate and maintain the process flare and water tank flare such that the mass content of the uncontrolled VOC emissions from the C1 Tank Battery bulk treater separator, crude oil storage tanks, and produced water storage tanks are reduced by at least 95.0% by weight.
- (b) The Permittee shall ensure that the flare is designed and operated in accordance with the requirements of 40 CFR 60.18(b) for flares, unless otherwise specified in this permit.
- (c) The Permittee shall ensure that each flare is:
 - (i) Operated properly per the manufacturer, vendor or Permittee's written instructions at all times that produced natural gas or gases, vapors and fumes are routed to it;
 - (ii) Designed for and operated with no visible smoke emissions, as determined by the methods specified in Condition E.2.(b) of this permit;
 - (iii) Equipped with one of the following:
 - (A) A continuous burning pilot flame, a thermocouple and a malfunction alarm and notification system if the pilot flame fails; or
 - (B) An operational electronically controlled automatic ignition device that sparks on a continuous cycle; and
 - (iv) Equipped with a monitoring system for continuous measuring and recording of the parameters that indicate proper operation of the flare and the continuous burning pilot flame or electronically controlled automatic ignition device (such as a chart recorder, data logger or similar device). Where sufficient to meet the monitoring requirements in this permit, the Permittee may use a Supervisory Control and Data Acquisition (SCADA) system to monitor and record the required data.

OBSERVATION: Flares were observed to be burning with no visible emissions during the on-site inspection. The flares were **not** equipped with monitoring systems.

I.E.1 Testing and Monitoring for Facility Wide Emission Limitations

OBSERVATION: The facility had the flow monitoring devices to measure production numbers to stay within the limits at the site.

I.E.2. Flares and Closed vent systems

- (a) The Permittee shall at a minimum perform monthly visual inspections of the flares and closed-vent systems as follows:
 - (i) Inspect the thermocouple and the malfunction alarm and notification

- system if the pilot flame fails or the electronically controlled automatic ignition device, as applicable, to ensure proper operation;
- (ii) Perform an auditory, visual, olfactory (AVO) inspection of the closed-vent systems to ensure proper condition and functioning;
 - (iii) Inspect the parameter monitoring system and recorded measurements to ensure proper operation of the flare and monitoring system; and
 - (iv) Respond to any malfunction alarm or other indication of improper flare, closed-vent system or monitoring system operation by following the manufacturer's, vendor's or Permittee's instructions to identify the cause of the deficiency and make any necessary repairs within 30 days of identifying the deficient condition to return the flare and monitoring system to compliant operation. All repairs and maintenance activities shall be recorded in a maintenance and repair log and shall be made available for inspection.
- (b) The Permittee shall at a minimum perform monthly visual inspections of each of the flares to ensure they operate with no visible smoke emissions. If any visible smoke emissions are detected during the monthly inspection or any other time, the Permittee shall take the following actions:
- (i) The Permittee shall demonstrate that the flare operates with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours, using the procedures specified in EPA Method 22 at 40 CFR part 60, appendix A. The observation period shall be 2 hours;
 - (ii) If the flare fails the visual emissions test, the Permittee shall follow the manufacturer's, vendor's or Permittee's repair instructions to return the flare to compliant operation. All repairs and maintenance activities shall be recorded in a maintenance and repair log and shall be made available for inspection;
 - (iii) Upon return to operation from any repair and maintenance activity, the flare shall pass a Method 22 test; and
 - (iv) If the flare fails a follow up Method 22 test, the Permittee shall repeat the procedures in paragraphs (i) through (iii) of this section, until the flare passes a follow up test.

OBSERVATION: Facility had **no recent monthly inspections** documented at the site.

I.F. Recordkeeping Requirements

OBSERVATION: The facility had the recordkeeping required by the permit at the site.

I.G. Requirements for Records Retention

OBSERVATION: The facility had been following the requirements for records retention.

I.H.1 Requirements for Reporting - Annual Compliance Reports

OBSERVATION: The facility had **not** submitted the annual compliance reports for 2022 and 2023.

New Source Performance Standards

***Subpart OOOO – Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution**

[40 CFR 60.5360 – 60.5499]

§60.5420 What are my notification, reporting, and recordkeeping requirements?

Per §60.5420(b):

(b) Reporting requirements. You must submit annual reports containing the information specified in paragraphs (b)(1) through (6) of this section to the Administrator and performance test reports as specified in paragraph (b)(7) or (8) of this section. The initial annual report is due no later than 90 days after the end of the initial compliance period as determined according to §60.5410. Subsequent annual reports are due no later than same date each year as the initial annual report. If you own or operate more than one affected facility, you may submit one report for multiple affected facilities provided the report contains all of the information required as specified in paragraphs (b)(1) through (6) of this section. Annual reports may coincide with title V reports as long as all the required elements of the annual report are included. You may arrange with the Administrator a common schedule on which reports required by this part may be submitted as long as the schedule does not extend the reporting period.

Per §60.5420(b)(6):

(6) For each storage vessel affected facility, the information in paragraphs (b)(6)(i) through (vii) of this section.

(i) An identification, including the location, of each storage vessel affected facility for which construction, modification or reconstruction commenced during the reporting period. The location of the storage vessel shall be in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983.

(ii) Documentation of the VOC emission rate determination according to §60.5365(e) for each storage vessel that became an affected facility during the reporting period or is returned to service during the reporting period.

OBSERVATION: The specific VOC emission rate methodology utilized Tanks 4.0.9d. Below is a table of calculated emissions for all three tanks combined. Samples were taken from the flare header.

<u>Pollutant</u>	<u>Actual Emissions</u>	<u>PTE Emission Rate</u>
VOC	4.32 tpy	47.2 tpy
H2S	0.29 tpy	9.5 tpy

(iv) You must submit a notification identifying each Group 1 storage vessel affected facility in your initial annual report. You must include the location of the storage vessel, in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983.

OBSERVATION: Group 1 tanks were reported in initial annual report.

(v) A statement that you have met the requirements specified in §60.5410(h)(2) and (3).

OBSERVATION: Requirements specified in §60.5410(h)(2)-(h)(3) were met during the reporting period. A flare is the control device used to reduce emissions. Storage vessel has cover and is connected through a closed vent system which routes to the flare.

(vi) You must identify each storage vessel affected facility that is removed from service during the reporting period as specified in §60.5395(f)(1)(ii), including the date the storage vessel affected facility was removed from service.

OBSERVATION: There were no affected storage vessels removed from service.

(vii) You must identify each storage vessel affected facility returned to service during the reporting period as specified in §60.5395(f)(3), including the date the storage vessel affected facility was returned to service.

OBSERVATION: There were no affected storage vessels returned to service.

§60.5416 What are the initial and continuous cover and closed vent system inspection and monitoring requirements for my storage vessel, centrifugal compressor and reciprocating compressor affected facilities?

§60.5417 What are the continuous control device monitoring requirements for my storage vessel or centrifugal compressor affected facility?

Per §60.5416(c)(1) and (2):

(c) *Cover and closed vent system inspections for storage vessel affected facilities.* If you install a control device or route emissions to a process, you must inspect each closed vent system according to the procedures and schedule specified in paragraphs (c)(1) of this section, inspect each cover according to the procedures and schedule specified in paragraph (c)(2) of this section, and inspect each bypass device according to the procedures of paragraph (c)(3) of this section. You must also comply with the requirements of (c)(4) through (7) of this section.

(1) For each closed vent system, you must conduct an inspection at least once every calendar month as specified in paragraphs (c)(1)(i) through (iii) of this section.

(2) For each cover, you must conduct inspections at least once every calendar month as specified in paragraphs (c)(2)(i) through (iii) of this section.

OBSERVATION: Inspections of affected storage vessels **were not conducted** on the cover and closed vent system using Method 21, nor were monthly olfactory, visual, and auditory inspections for defects.

Per §60.5417(h)(1):

(h) For each control device used to comply with the emission reduction standard in §60.5395(d)(1) for your storage vessel affected facility, you must demonstrate continuous compliance according to paragraphs (h)(1) through (h)(3) of this section. You are exempt from the requirements of this paragraph if you install a control device model tested in accordance with §60.5413(d)(2) through (10), which meets the criteria in §60.5413(d)(11), the reporting requirement in §60.5413(d)(12), and meet the continuous compliance requirement in §60.5413(e).

(1) For each combustion device you must conduct inspections at least once every calendar month according to paragraphs (h)(1)(i) through (iv) of this section. Monthly inspections must be separated by at least 14 calendar days.

OBSERVATION: Monthly visual inspections of control devices **were not** conducted after January of 2023.

Attachment

Photo Log

Attachment Photo Log

Date	Time	Location	File ID		Description
7/24/2024	10:33 AM	Steamboat Butte C1/C3 Tank Battery	P1030826	.jpg	Production Flare
7/24/2024	10:34 AM	Steamboat Butte C1/C3 Tank Battery	P1030827	.jpg	Tankage
7/24/2024	10:35 AM	Steamboat Butte C1/C3 Tank Battery	P1030828	.jpg	Two Abandoned Heater Treaters
7/24/2024	10:35 AM	Steamboat Butte C1/C3 Tank Battery	P1030829	.jpg	Current Heater Treater
7/24/2024	10:44 AM	Steamboat Butte C1/C3 Tank Battery	P1030831	.jpg	2 Produced Water Tanks at the C3 Battery
7/24/2024	10:45 AM	Steamboat Butte C1/C3 Tank Battery	P1030832	.jpg	Water Knockouts



Photo of Production Flare



Photo of Tankage



Photo of Two Abandoned Heater Treaters



Photo of Current Heater Treater



Photo of 2 Produced Water Tanks (each 300 barrels) at the C3 Battery



Photo of Water Knockouts