UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

SUBJECT:	CLEAN AIR ACT INSPECTION REPORT Infinity Natural Resources (INR) Jenkins Well Pad
FROM:	Victoria Nelson, Environmental Engineer AECAB (MI/WI)
THRU:	Sarah Marshall, Section Supervisor AECAB (MI/WI)
TO:	File

BASIC INFORMATION

Facility Name: Infinity Natural Resources (INR) Jenkins Well Pad

Facility Location: 2070 Kensington Rd Carrollton, Ohio 44615 (40.608147, -81.061941)

Date of Inspection: August 29, 2022

EPA Inspectors:
1. Victoria Nelson, Environmental Engineer
2. Jacob Herbers, Environmental Engineer
3. Sasha Letuchy, Environmental Engineer
4. Manoj Patel, Environmental Engineer
5. Laura Neudorf, Environmental Engineer

Other Attendees:
1. Bill Veigel, Production Manager, INR
2. Larry Barr, Supervisor, INR

Contact Email Address: BVeigel@infinitynr.com

Purpose of Inspection: To assess compliance with the facility's Permit-to-Install and Operate, and the Clean Air Act

Facility Type: Oil and gas well pad

Regulations Central to Inspection: NSPS Subpart OOOO/OOOOa - Standards of Performance for Crude Oil and Natural Gas Facilities

Arrival Time: 15:30 EDT
Departure Time: 15:45 EDT

Inspection Type:
☐ Unannounced Inspection
☒ Announced Inspection

OPENING CONFERENCE

☒ Presented Credentials
☒ Stated authority and purpose of inspection
☒ Small Business Resource Information Sheet not provided. Reason: Not a small business
☒ Provided CBI warning to facility

The following information was obtained verbally from Bill Veigel and Larry Barr, unless otherwise noted.

Process Description:
At the well pad, an oil/gas/water emulsion is extracted from the formation through two sets of three wells each, totaling 6 well heads on-site. Each well flows into a sand trap, a gas processing unit (GPU), and a three-phase separator. From there, the oil/condensate is sent through a heater treater and then into two tanks, and the produced water is sent into one tank. The tanks feed into two vapor recovery units (VRUs), and excess vapors are sent to the combustor, which is the primary emission control device. The gas is sent to pipeline for further processing. There were approximately 12 temporary brine/frack tanks on site.

Staff Interview: Facility staff said that one of the sets of well heads is newer than the other.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:
EPA observed a combustor flaring and emitting on the East end on the site. EPA observed rusty drip marks on the produced water tank's pressure relief device (PRD). With the FLIR camera, EPA inspectors observed emissions from the two conservation vents on the tank battery, and from the produced water tank's thief hatch.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Concerns: EPA had concerns about design and operation of the vapor capture and control systems at the facilities, which we discussed with INR representatives. EPA's concerns stemmed from observed emissions from components atop the tank battery.

DIGITAL SIGNATURES

Report Author: VICTORIA NELSON Digitally signed by VICTORIA NELSON Date: 2022.10.25 16:30:01 -05'00'

Section Supervisor: SARAH MARSHALL Digitally signed by SARAH MARSHALL Date: 2022.10.26 10:03:15 -05'00'

APPENDIX A: DIGITAL IMAGE LOG

1. **Inspector Name:** Jacob Herbers	2. **Archival Record Location:** Region 5 Electronic Records Center

Image #	File Name	Date and Time	Description of Image
1	IMG_0212.JPG	2022:08:29 15:30:50 EDT	Tank battery and GPU/sand trap
2	IMG_0213.JPG	2022:08:29 15:30:57 EDT	GPU/sand trap on the other side of the tank battery
3	IMG_0214.JPG	2022:08:29 15:31:02 EDT	Temporary brine/frack tank batteries
4	IMG_0215.JPG	2022:08:29 15:31:26 EDT	New drilling area
5	IMG_0216.JPG	2022:08:29 15:32:34 EDT	PRD on produced water tank with rusty drip marks
6	IMG_0217.JPG	2022:08:29 15:36:51 EDT	Tank battery nameplate
7	IMG_0218.JPG	2022:08:29 15:39:04 EDT	New drilling area
8	IMG_0219.JPG	2022:08:29 15:42:32 EDT	New drilling area and combustor

APPENDIX B: DIGITAL VIDEO LOG

1. **Inspector Name:** Victoria Nelson, Jacob Herbers, Sasha Letuchy	2. **Archival Record Location:** Region 5 Electronic Records Center

Video #	File Name	Date and Time	Description of Video
1	MOV_2640.mp4	8/29/22 15:29 EDT	FLIR video of combustor
2	MOV_2815.mp4	8/29/22 15:29 EDT	FLIR video of emissions from the conservation vent between the two condensate tanks
3	MOV_2816.mp4	8/29/22 15:30 EDT	FLIR video of emissions from the conservation vent between the produced water tank and a condensate tank
4	MOV_2817.mp4	8/29/22 15:32 EDT	FLIR video of emissions from the thief hatch on the produced water tank
5	MVI_0220.mp4	8/29/22 15:44 EDT	Visible spectrum video of intermittent smoke from the combustor stack