

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

N610362770

FACILITY: JORDAN DEVELOPMENT COMPANY, L.L.C. - VIENNA 2		SRN / ID: N6103
LOCATION: NE NE SE SEC 19 T31N R1E, VIENNA TWP		DISTRICT: Cadillac
CITY: VIENNA TWP		COUNTY: MONTMORENCY
CONTACT:		ACTIVITY DATE: 04/27/2022
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY2022 onsite inspection. Note that data review will be conducted and reported independently. sgl		
RESOLVED COMPLAINTS:		

On April 27, 2022, AQD District Staff conducted a site visit for the Jordan Development Company, LLC Vienna 2 Compressor Station (N6103), located at NE NE SE Section 19, T31N, R1E, Montmorency County, Michigan. The purpose of the site visit was to confirm equipment onsite with respect to Permit to Install (PTI) No. 661-96B. Records review was/will be conducted and documented in separate reporting.

The referenced site was previously inspected on February 28, 2017. No compliance issues were identified as part of the 2017 compliance evaluation.

FACILITY

The referenced facility is a compressor station located on County Road 622, just east of Meridian Road, Vienna Township, Montmorency County, Michigan. To get to the site from the Gaylord District Office, travel east on M-32 to Vienna Corners, then make a left and travel north on Meridian Line Road approximately 6 ¼-miles. At that point the road curves to the right and is identified as CR-622. Continue on CR-622 heading east for approximately ¾-mile the Facility is located to the right on the south side of the road, and is visible from the road.

A review of readily available aerials indicated that the site was constructed sometime between 1985 and 1992. In 1992 aerials the 400 bbl brine tank as well as the compressor building (no addition) were present onsite. In 1998, an addition to the compressor building was present onsite.

At the time of the site inspection, the skies were mostly cloudy, temperatures of 23 degrees F, with light snow flurries and little to no winds. No visible plumes.

The Facility reports annual emissions as part of the Michigan Air Emissions Reporting Program (MAERS).

Available records show that the Facility was issued a Violation Notice on May 6, 2013, for replacing EUENGINE2 with a larger engine without a permit. The violation was resolved with the issuance of PTI 661-96B.

REGULATORY

Permitting - PTIs issued for the Facility include the following:

PTI	Issued	Voided	Issued to

661-96	November 13, 1996	January 15, 2008	Terra Energy, Ltd
661-96A	January 15, 2008	September 19, 2013	Jordan Development Company, LLC
661-96B	9/19/2013	NA	Jordan Development Company, LLC

Federal Regulations - The referenced facility does not process or store petroleum liquids, nor store them onsite and is therefore appears to not be subject to 40 CFR Part 60 (New Source Performance Standards AKA NSPS) Subparts;

- K, Ka or Kb (Storage vessels for Petroleum Liquids);
- KKK (Equipment Leaks of VOC from onshore NG Processing Plants);
- VV (Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry);

With regards to the existing engine(s) it appears that based on install date for EUENGINE1 (1999) and the manufacture date for EUENGINE2 (prior to January 1, 2008) that neither engine would not be subject to NSPS Subparts IIII for Compression Ignition (CI) RICE.

Subpart OOOO would apply to onshore affected facilities that are constructed, modified or reconstructed after August 23, 2011. Based on available information it appears that the referenced subpart is not applicable at this time but that future changes may be subject to the referenced subpart.

With respect to 40 CFR Part 63 (Maximum Achievable Control Technology Standards A.K.A. MACT) the following Subparts may apply:

- Subpart HH (HAPS from Oil and NG Production Facilities)
- Subpart ZZZZ (Reciprocating Internal Combustion Engine aka RICE)

With respect to Subpart HH, the affected unit is believed to be the dehy unit. However, the facility is not subject to the subpart if it's average throughput is less than 85K cubic meters/day (3 MMscf/day) or average benzene emissions are less than 0.9 Mg/yr (approximately 1 ton/yr). A compliance determination has not been made with respect to this subpart, and at the time of report preparation AQD does not have authority to enforce the subpart.

With respect to Subpart ZZZZ, the company at the time of report preparation has provided no information indicating that the existing RICE would not be subject to the referenced subpart. A compliance determination has not been made with respect to this subpart, and at the time of report preparation AQD has been delegated authority to implement and enforce the subpart.

However, at this time compliance determinations for Federal requirements under Subpart ZZZZ for Area Sources have not been made.

EQUIPMENT

Equipment associated with the site at the time of April 27, 2022, site inspection included the following:

EQUIPMENT	INSTALLATION DATE	Permit 661-96B	Comment
400 bbl Brine AST	1992	Exempt	With lined secondary containment
CAT 399 HCTA, 930 HP with Catalyst and AFR	1991	Yes	EUENGINE1, Skid CGS 779
CAT 3406 NA 215 HP	1/24/2012	Yes	Replaced EUENGINE2 of PTI 661-96A – Not present onsite
CAT 3304 NA-HC 95 HP	Unk	No	EUENGINE2 Permitted under PTI 661-96A. Replaced in 2012
Dehydrator with reboiler	1992	Exempt	Operating under Rule 288 (2) (b)(ii) Exemption

*Note that the permit eval form for 661-96B indicated that PTI 661-96A included EUDEHY, the permit engineer indicated that the referenced equipment would be exempt from Rule 201 permitting under R288(b)(ii), and was removed from PTI 661-96B.

District Staff noted that operational logs onsite appeared to be limited to those of ArchRock, and indicated regular visits approximately every two weeks. The most recent visit being April 12, 2022. Note that catalyst data recorded on that date indicated an inlet/pre-catalyst temperature of 934 degrees, and a post catalyst temperature of 984 degrees. The data was consistent with data previously recorded for the previous approximately two months.

Operational parameters noted at the time of the April 27, 2022, site inspection included the following:

EU	RPMs	Oil Pressure	Oil Temp
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EUENGINE1	1046	60	Apx 180
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Stack restrictions associated with PTI 661-96B include the following:

STACK	Maximum Diameter (inches)	Minimum Height above ground (feet)
SVENGINE1*	8	30
SVENGINE2	3.5	42.9

*Compliance with conditions was determined by visual estimations of height based on building heights, and documentation from previous site inspection reports. SVENGINE1 at the time of the site visit appeared to be in compliance with the above referenced stack requirements.

SUMMARY

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The Facility reports annual emissions as part of the Michigan Air Emissions Reporting Program (MAERS).

Available records show that the Facility was issued a Violation Notice on May 6, 2013, for replacing EUENGINE2 with a larger engine without a permit. The violation was resolved with the issuance of PTI 661-96B. It is noteworthy that at the time of the April 27, 2022, site visit that EUENGINE2 was not present onsite. MAERS reports for the 2021 calendar year failed to indicate that the RICE had been removed from site.

No compliance issues were identified with respect to the April 27, 2022, site inspection.

NAME _____

DATE _____

SUPERVISOR _____