

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Other

N610363663

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: Kim Weber ,		ACTIVITY DATE: 07/15/2022
STAFF: Jodi Lindgren	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Records Review. Facility inspection completed separately.		
RESOLVED COMPLAINTS:		

FACILITY DESCRIPTION

Jodi Lindgren of the Department of Environmental, Great Lakes, and Energy (EGLE) – Air Quality Division (AQD) conducted a review of records for Jordan Development Company (Jordan) – Vienna 2 CPF located off County Road 622 in Section 19, T31N-R1E of Vienna Township, Montmorency County, Michigan, 49751.

The Custer CPF is an opt-out facility with PTI 661-96B issued on September 19, 2013. The facility may be subject to 40 CFR Part 63 Subpart ZZZZ (MACT ZZZZ) and 40 CFR Part 63 Subpart HH (MACT HH). EGLE-AQD is not delegated authority to enforce MACT HH. EGLE-AQD has been delegated authority to implement and enforce MACT ZZZZ, but compliance assessments for area sources have not been completed. The facility consists of a fixed roof 400-barrel storage tank, two natural gas compressors, two natural gas fired reciprocating compressor engines, process heaters, and a glycol dehydrator. The glycol dehydrator, process heaters, and fixed roof tank are reported as exempt from Rule 201, the requirement to obtain a permit to install.

SCHEDULED INSPECTION

A. FGENGINES – FGENGINES includes two natural gas fired reciprocating engines (RICE), EUENGINE1 and EUENGINE2. EUENGINE1 is a 930 hp CAT 399 HCTA RICE with a catalytic converter for emission control. EUENGINE1 skid unit number is 779. EUENGINE2 is a 215 hp CAT 3406 NA RICE with no emission control.

1. Emission Limits – For EUENGINE1, PTI 661-96B established a NOx limit of 13.7 tons per year (tpy) and a CO limit of 16.7 tpy calculated at the end of each month using a 12-month rolling time period. For EUENGINE2, PTI 661-96B established a NOx limit of 44.5 tons per year (tpy) and a CO limit of 3 tpy calculated at the end of each month using a 12-month rolling time period. Records provided by Jordan indicate EUENGINE1 emitted 4.75 tpy of NOx and 7.4 tpy of CO calculated for a 12-month rolling time period of June 2021 to May 2022. EUENGINE2 has not been operated since July 2021. It was reported that EUENGINE2 emitted 9.04 tpy of NOx and 0.63 tpy of CO calculated for the time period of January 2021 to July 2021. These records indicate compliance with the emission limits established in PTI 661-96B.

2. Material Limits – There are no material limits associated with this flexible group; therefore, this section is not applicable.

3. Process/Operational Restrictions – PTI 661-96B requires an AQD approved preventative maintenance/malfunction abatement plan (PM/MAP). Jordan submitted a PM/MAP that was approved by AQD on February 29, 2008 and updated to reflect the changes to EUENGINE2 in

2012. Monitoring records for EUENGINE1 and EUENGINE2 was provided by Jordan's contractor. The provided maintenance logs demonstrate ample performance of routine maintenance including engine oil and filter changes, spark plug replacement, sensor cleaning and calibration, valve replacement, and electrical system testing. These records indicate compliance with the AQD approved PM/MAP and PTI 661-96B.

4. Design/Equipment Parameters – PTI 661-96B dictates proper installation, maintenance, and operation of an engine add-on control device. There were no reported malfunctions with the EUENGINE2 catalyst. PTI 661-96B requires the installation, calibration, maintenance, and operate a device to monitor and record the natural gas usage for FGENGINES be monitored on a continuous basis. Jordan provided records showing the maintenance, testing, and calibration records for the devices recording fuel usage of EUENGINE1 and EUENGINE2.

5. Testing/Sampling – PTI 661-96B dictates that the AQD District Supervisor may request testing to verify NOx and CO emission factor. No testing has been requested by the AQD District Supervisor and no testing was completed by Jordan during the time constraints of this compliance evaluation.

6. Monitoring/Recordkeeping – PTI 661-96B mandates natural gas usage for FGENGINES be monitored on a continuous basis. Jordan provided AQD staff with fuel usage logs for EUENGINE1 and EUENGINE2. The greatest monthly fuel usage for EUENGINE1 was 3.511 MMCF in October 2021 and the total usage for EUENGINE1 was 34.869 MMCF for a 12-month rolling time period of June 2021 to May 2022 indicating compliance with for the time period of June 2021 to May 2022. The greatest monthly fuel usage for EUENGINE2 was 0.614 MMCF in May 2021 and the total usage for EUENGINE2 was 3.462 MMCF for the time period of January 2021 to July 2021. PTI 661-96B establishes FGENGINES recordkeeping for all emissions calculations, natural gas usage, and monitoring and maintenance activities logs. Jordan provided all of the requested records in a timely manner.

7. Reporting – PTI 661-96B requires Jordan to report if either of the engines in FGENGINES is replaced for an equivalent-emitting or lower-emitting engine. The engines in FGENGINES have not been replaced.

8. Stack/Vent Restrictions – There are no records associated with the stacks of this flexible group; therefore, this section is not applicable.

9. Other Requirements – There are no other requirements associated with the continued compliance of FGENGINES; therefore, this section is not applicable.

B. FGFACILITY – All process equipment source-wide including equipment covered by other permits, grandfathered equipment, and exempt equipment.

1. Emission Limits – There are no emission limits associated with FGFACILITY; therefore, this section is not applicable.

2. Material Limits – PTI 661-96B dictates only sweet natural gas may be processed at the facility. Jordan only burns sweet natural gas at the facility.

3. Process/Operational Restrictions – Jordan has reported to be in compliance with 40 CFR Part 63 Subpart (MACT ZZZZ). EGLE-AQD has been delegated authority to implement and enforce MACT ZZZZ, but compliance assessments for area sources have not been completed

4. Design/Equipment Parameters – There are no equipment parameters associated with FGFACILITY; therefore, this section is not applicable.

5. Testing – PTI 661-96B dictates that the AQD District Supervisor may request testing to verify H₂S and/or sulfur content of the natural gas burned. No testing has been requested by the AQD District Supervisor.

6. Monitoring/Recordkeeping – There are no monitoring or recordkeeping requirements associated with FGFACILITY; therefore, this section is not applicable.

7. Reporting – There are no reporting requirements associated with FGFACILITY; therefore, this section is not applicable.

8. Stack/Vent Restrictions – There are no stack nor vent restrictions associated with FGFACILITY; therefore, this section is not applicable.

9. Other Requirements – There are no other requirements associated with the continued compliance of EUENGINE; therefore, this section is not applicable.

EVALUATION SUMMARY

Conclusion – Based upon the review of records, it appears the source was compliant with PTI 661-96B at the time of the evaluation.

NAME 

DATE _____

SUPERVISOR _____