

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N610136676

FACILITY: JORDAN DEVELOPMENT COMPANY, L.L.C. - HAYMEADOW		SRN / ID: N6101
LOCATION: SE NW SEC 11 T30N R2E, BRILEY TWP		DISTRICT: Gaylord
CITY: BRILEY TWP		COUNTY: MONTMORENCY
CONTACT:		ACTIVITY DATE: 09/01/2016
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: scheduled inspection / records review		
RESOLVED COMPLAINTS:		

AQD Staff traveled to N6101 Jordan Development Haymeadow CPF located in Briley Township, Montmorency County for a scheduled inspection.

DEQ Inspection brochures have been previously emailed to Jordan Development.

The Jordan Development Haymeadow CPF is used to compress produced natural gas from production wells in the area. Following compression, the produced gas is dehydrated and sent to sales point via pipeline.

LOCATION

The facility is located 1 mile west of Atlanta. From M-32 go north on Reiman Rd approximately 1/4 mile, turn left on dirt access drive.

REGULATORY DISCUSSION

The facility was issued PTI 659-96 in 1996; the permit was modified as PTI 659-96A in 2008 which voided PTI 659-96. In 2014 the facility requested the permit be void due to:

- 1 - the engine is exempt per Rule 285(g), has maximum heat input less than 10,000,000 BTUs per hour
- 2 - UNCONTROLLED emissions are less than significant levels.

As part of the void request the facility provided calculations demonstrating potential uncontrolled emissions of NOx = 20.94 tpy; CO = 18.88 tpy. Following review, the permit was voided 6/3/14.

The facility is subject to 40 CFR Part 63, Subpart ZZZZ, which has not been delegated to MDEQ from EPA. DEQ has been copied on a test protocol and test results related to ZZZZ which AQD did not review as we have not been delegated this MACT.

INSPECTION NOTES

One engine is located inside a building with a dehy on the west side of the building. Two tanks associated with the dehy were located outside the building on the west side, approximately 250 gallons in size (methyl alcohol and triethylene glycol). A tank around 100 gallons was located outside the building on the east side containing corrosion inhibitor. The exterior tanks were contained. 6 lines come up from the ground to enter the facility. Located inside the facility is a used old tank and oil drum.

The engine was operating during the inspection. No VE or odors from the engine stack or the dehy. The stack has both a muffler and a catalytic convertor. The engine was operating as follows: RPM - 1034; Cat pre temp - 739 degrees F, Cat post temp - 728 degrees F.

Maintenance records were reviewed inside the building. The records show the most recent day that operation parameters were written was 8/22. On 8/22, RPM was 1033; Cat pre temp was 743 F, Cat post temp was 730 F. Parameters are not written daily.

The skid identifies the unit as "GCS 1007".

South of the CPF building is a lined tank farm contained 2 tanks approximately 400 bbl each, each labeled as brine. The liner appeared to be in good condition.

CONCLUSIONS

This permit was voided in 2014 because Jordan indicated the engine was exempt per Rule 285(g), and the UNCONTROLLED emissions are less than significant levels. The engine still has a catalytic converter operating which appears to be related to controlling CO for ZZZZ per the description in the stack test report received in April 2016.

The catalytic converter temperatures during the inspection were less than 750F. The MAP which was part of PTI 659-96A had required temperatures above 750F. The MAP is no longer applicable since the permit is void. In addition, the control is not needed from AQD's perspective. Therefore the temperature of the control is only of interest. Per the April 2016 stack test, ZZZZ requires the catalyst inlet temperature to be maintained between 450 and 1350 F. This was added for information purposes only, AQD did not verify the statements regarding ZZZZ.

Also of note, the temp went down across the catalyst as seen during the inspection; it also decreased across the catalyst during the stack test as noted in the April 2016 report.

This ^{permit} ~~facility~~ is void, however ^{the facility is} still operating. PTI 659-96A was updated to be marked as 'VOID'. MACES 'information' screen was updated to reflect that the PTI was void in 2014, a catalytic converter is still operating, the engine is subject to ZZZZ.

NAME Becky Radulski

DATE 9/20/16

SUPERVISOR 