

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

N610950749

FACILITY: JORDAN DEVELOPMENT COMPANY, L.L.C. - SCHROEDER		SRN / ID: N6109
LOCATION: NW NE SEC 16 T30N R1W, CHARLTON TWP		DISTRICT: Cadillac
CITY: CHARLTON TWP		COUNTY: OTSEGO
CONTACT: Kim Weber ,		ACTIVITY DATE: 08/19/2019
STAFF: Jodi Lindgren	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled facility inspection as part of a full compliance evaluation.		
RESOLVED COMPLAINTS:		

FACILITY DESCRIPTION

On Friday August 19 2019, Jodi Lindgren of the Department of Environmental, Great Lakes, and Energy (EGLE) – Air Quality Division (AQD) conducted an unannounced field inspection of Jordan Development Company, LLC (Jordan) – Schroeder CPF (N6109) located at Waters Road, Charlton Township, Otsego County, Michigan, 49751. The facility was unmanned and not operating at the time of inspection.

The Schroeder CPF is an opt-out facility with PTI 667-96A issued on January 10, 2008. The facility is subject to 40 CFR Part 63 Subpart ZZZZ and HH which the DEQ is not delegated to enforce. The facility consists of a tank battery with two 400-barrel brine tanks and a compressor building which houses a compressor, compressor engine, engine catalytic converter, glycol dehydrator (dehy), and dehy flash tank.

SCHEDULED INSPECTION

A. EUDEHY – Glycol dehydration system processing natural gas from the Antrim zone. The dehy is exempt from R 336.1201(1) as it meets the requirements of exemption R 336.1288(2)(b)(ii) because it processes only Antrim natural gas. The Dehy is subject to 40 CFR Part 63, Subpart HH (NESHAP HH), which the State of Michigan is not delegated to enforce. At the time of inspection, the dehy was not operating.

1. Emission Limits – There are no emission limits established in PTI 667-96A associated with this emission unit; therefore, this section is not applicable.

2. Material Limits – There are no material limits established in PTI 667-96A. However, the dehy is exempt from NESHAP HH with documentation of an actual annual average flow rate of natural gas less than 85,000 cubic meters per day or 3 MMCF/day. Records provided by Jordan indicate an actual annual average flow rate of 4587 cubic meters per day or 0.162 MMCF/day (reported as 162 MCF/day).

3. Process/Operational Restrictions – There are no process or operational restrictions associated with this emission unit; therefore, this section is not applicable.

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

5. Testing/Sampling – There are no testing or sampling requirements associated with this flexible group; therefore, this section is not applicable.

6. Monitoring/Recordkeeping – monitoring and recordkeeping to document actual annual average flow rate of natural gas to satisfy the NESHAP HH exemption criteria in 40 CFR 63.764(e)(1)(i). A certified gas analysis was also provided upon AQD request. The gas analysis indicated no benzene. Jordan provided documentation to satisfy this exemption (records attached).

7. Reporting – Recordkeeping requirements pursuant PTI 667-96A were provided to AQD staff upon request (see attached).

8. Stack/Vent Restrictions – There are no stack or vent restrictions associated with this flexible group; therefore, this section is not applicable.

9. Other Requirements – There are no other requirements associated with this flexible group; therefore, this section is not applicable.

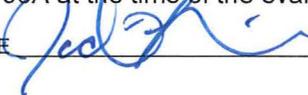
B. EUENGINE1 – One CAT G398 TA engine equipped with a catalytic converter and air/fuel ratio controller. The engine serial number is 4EK00711 with a rebuild date of August 28, 2017. At the time of the inspection the

engine was not running. Records kept on site indicated that on August 16, 2019 the engine was running with an RPM of 877, oil pressure 80 psi, and oil temperature of 183°F. The recorded catalyst inlet temperature reading was 795°F and the outlet temperature was 809°F. Total engine runtime is record as 87,608 hours. (records attached).

1. Emission Limits – PTI 667-96A established a NOx limit of 10 tons per year (tpy) and a CO limit of 15 tpy calculated at the end of each month using a 12-month rolling time period. Records provided by Jordan indicate 1.76 tpy of NOx emissions and 2.79 tpy CO emissions calculated for a 12-month rolling time period of July 2018 to June 2019. These records indicate compliance with the emission limits established in PTI 667-96A (records are attached).
2. Material Limits – There are no material limits associated with this emission unit; therefore, this section is not applicable.
3. Process/Operational Restrictions – PTI 667-96A requires an AQD approve preventative maintenance/malfunction abatement plan (PM/MAP). An AQD approval letter dated March 5, 2008 was issued for the PM/MAP received on February 27, 2008.
4. Design/Equipment Parameters – PTI 667-96A prohibits the operation of EUENGINE1 for more than 200 hours without a control device consistent with the AQD approved PM/MAP. The records provided by Jordan indicate that the approved control was run 100% time during the time period of July 2018 to June 2019 and therefore compliant with equipment restriction.
5. Testing/Sampling – PTI 667-96A dictates that the AQD District Supervisor may request testing NOx and CO emission verification. No testing has been requested by the AQD Supervisor during the time constraints of this compliance evaluation.
6. Monitoring/Recordkeeping – monitoring and recordkeeping to document natural gas usage for EUENGINE1 on a continuous basis is required by PTI 667-96A (records attached). A maintenance log conducted according to the approved PM/MAP is mandated in the PTI 667-96A as well (example record attached). Jordan provided AQD staff the required documentation upon request.
7. Reporting – Recordkeeping requirements pursuant PTI 667-96A were provided to AQD staff upon request (see attached).
8. Stack/Vent Restrictions – PTI 667-69A a stack with a maximum diameter of eight inches and a minimum height above ground level of 20 feet. The engine exhaust stack appeared to meet these requirements during the inspection.
9. Other Requirements – There are no other requirements associated with this emission unit; therefore, this section is not applicable.

EVALUATION SUMMARY

Conclusion – Based upon the Full Compliance Evaluation, it appears the source was in compliance with PTI 667-96A at the time of the evaluation.

NAME 

DATE 9/30/2019 SUPERVISOR 