

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

N786834460

FACILITY: JORDAN DEVELOPMENT COMPANY, L.L.C. - SLAM DUNCAN		SRN / ID: N7868
LOCATION: NE NE NW SEC 13, SPRATT		DISTRICT: Gaylord
CITY: SPRATT		COUNTY: ALPENA
CONTACT:		ACTIVITY DATE: 04/28/2016
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2016 Scheduled Inspection.		
RESOLVED COMPLAINTS:		

SRN: N7868 Name: Jordan Development Company, Slam Duncan

Directions: The facility is located in Alpena County, Green Township. From M-32 turn south onto M-65 and travel about 4 miles, then turn west on Moore's Landing Road. Travel 1.5 miles, the facility is on the south side of the road.

Application/Permit: This is an Antrim gas facility. The application included one 930 hp CAT G399 rich burn engine with a 3-way catalyst, one glycol dehydrator, and tanks. On December 3, 2007 the AQD issued opt-out permit 312-07 which includes one natural gas reciprocating engine and a glycol dehydrator. Condition 2.8 allows the engine to be replaced. The Eval Form includes, "The existing facility would be major for NOx if the engine did not have control."

Malfunction Abatement Plan (MAP): On February 28, 2008 the AQD approved the MAP. The MAP includes one Cat 399 HCTA 930 hp rich burn engine with 3-way catalytic control and an AFRC.

MAERS: The 2015 MAERS included one engine and one dehydrator. The permittee reported from EUENGINE1 three tons NOx (12 tpy permitted), and less than one ton SO2 (19.4 tpy permitted).

Records: The permittee provided records including:

- Monthly natural gas fuel usage
- Monthly and 12-month rolling NOx and CO emissions .

The permittee provided monthly records of catalyst inlet and outlet temperatures. After reviewing their records, the permittee could not find the daily records catalyst inlet and outlet temperatures as required by the MAP.

MACTS: The facility is a true minor for HAPs making the facility an area source for these MACTs:

- 40 CFR, Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines for Area Sources.
- 40 CFR Part 63 Subpart HH, National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities.

The EPA has not delegated these Subparts to MI AQD and the Subparts were not reviewed.

MACES: Facility Information and Regulatory Info were reviewed and no change was made.

Brochure: The inspection brochure will be forwarded to the permittee via email with the site inspection notes.

Compliance: A review of AQD files and MACES report generator show no outstanding violation.

Inspection: The engine operated during the site visit. No visible emissions were observed from the engine stack. Per a visual assessment, the engine stack met the limits of a maximum diameter of 10 inches and a minimum height of 33 feet. The engine skid has this identification: GCS776. The engine has a catalytic converter. The clip board near the engine had paper records including the catalyst inlet and outlet temperatures. The catalyst inlet and outlet temperatures were not recorded each day in April 2016. The April 2016 record included:

	Catalyst Inlet F	Catalyst Outlet F
April 6, 2016	925	964
April 15, 2016	931	965
April 18, 2016	928	964

There are two tanks in a retaining area. The site is very tidy.

Permit Conditions:

EUDEHY

1.1, 1.2, 1.3, 1.4, 1.5 The EPA has not delegated 40 CFR Part 63, Subpart HH to MI AQD and the Subpart was not reviewed

EUENGINE1

	Pollutant	Limit	Equipment	January 2016 12-Month Rolling Records from Permittee, in tons
2.1a, 2.11	NO _x	12 tpy	EUENGINE1	2.99
2.1b, 2.11	CO	19.4 tpy	EUENGINE1	4.66

2.2 On February 28, 2008 the AQD approved the MAP. The MAP includes one Cat 399 HCTA 930 hp rich burn engine with 3-way catalytic control and an AFRC.

The MAP Table 1 Catalytic Converter Preventative Maintenance Schedule includes Catalyst, Check inlet and outlet temperatures across the catalyst: Monthly. The MAP Table 2 Catalyst Operating Variables and Remedial Actions includes Inlet and Outlet Temperatures Monitoring, Daily. The permittee keeps the monthly record of the

catalyst inlet and outlet temperatures. After reviewing their records, the permittee could not find the daily records catalyst inlet and outlet temperatures as required by the MAP.

On May 11, 2016 Torello, AQD, spoke on the phone with Kim Weber at Jordan Development. In sum, Torello communicated AQD would send a letter to the permittee outlining the requirement of daily recordkeeping of catalyst inlet and outlet temperatures. Torello will request follow-up records. Torello suggested the permittee review records at their other facilities and make sure they are in compliance with recordkeeping requirements.

- 2.3, 2.4, 2.9 The permittee's records include monthly and 12-month rolling time when engine ran with and without the catalyst. Records show no catalyst downtime.
- 2.5 The AQD has not requested verification of NO_x and CO emission factors by testing.
- 2.6, 2.10 The permittee keeps records of natural gas usage for EUENGINE1. The permit does not limit natural gas usage. Natural gas usage is used to calculate emissions.
- 2.7 The permittee provided records in a timely manner.
- 2.8 The permittee provided records of maintenance activities including maintenance for the MAP such as quarterly portable emissions analyzer "test" of NO_x, CO, and O₂. There is no record the engine was replaced.
- 2.12 Per a visual assessment, the engine stack met the limits of a maximum diameter of 10 inches and a minimum height of 33 feet.

Conclusions:

After reviewing their records, the permittee could not find the daily records catalyst inlet and outlet temperatures as required by the MAP. On May 11, 2016 Torello, AQD, spoke on the phone with Kim Weber at Jordan Development. In sum, Torello communicated AQD would send a letter to the permittee outlining the requirement of daily recordkeeping of catalyst inlet and outlet temperatures. Torello will request follow up records. Torello suggested the permittee review records at their other facilities and make sure they are in compliance with recordkeeping requirements.

With the above resolved, via onsite inspection, review of records, and discussion with permittee staff, the permittee demonstrates compliance with the conditions of permit 312-07.

NAME



DATE

5-11-16

SUPERVISOR



