

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

N790628892

FACILITY: JORDAN DEVELOPMENT COMPANY, L.L.C. - SPRINGDALE 15		SRN / ID: N7906
LOCATION: SE SW SW SEC15, SPRINGDALE TWP		DISTRICT: Cadillac
CITY: SPRINGDALE TWP		COUNTY: MANISTEE
CONTACT:		ACTIVITY DATE: 03/18/2015
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2015 FCE including site inspection and records review.		
RESOLVED COMPLAINTS:		

2015 FCE

N7906 Jordan Development Company (JDC) Springdale 15.

I conducted a targeted compliance inspection and records review of the JDC Springdale 15 CPF. The Springdale 15 is an opt-out facility with PTI 360-07A. The facility consists of the following equipment:

- A tank battery consisting of 17 tanks which are no longer connected to a VRU which has been removed. The tanks are for produced water, condensate and sweet crude oil. The tanks are not addressed in the permit and appear to meet the requirements of the permit exemption under R 336.1284(e).
- There are 18 heaters in groups of two, a large heater treater and a small line heater. Only four of the large heaters were operating.
- There was one small dehydrator which was operating at the time of the inspection, no odors were detected within the plant site. This dehy was equipped with a condenser that vented through a drip tank and 55 gallon drum with a lid and a vent to atmosphere. Vapors were observed exiting the vent.
- There are two compressor buildings. PTI application 360-07A indicates there is one Caterpillar G3408TA-130F engine (EUENGINE1) with no catalytic converter and one Caterpillar G3406TA-130F engine (EUENGINE2) with catalytic control. At the time of the inspection only EUENGINE 1 was in place and operating. EUENGINE 2 had been removed. EUENGINE1 was a V-8 engine that appeared to be new. I spoke to Mark Williams of JDC later that day at the Springfield 16 and he stated that production is down so one engine (the G3406 engine) had been removed and the other had been replaced. EUENGINE1 was running at 1373 RPM and oil pressure was 68 psi. There were no visible emissions from the stack which appeared to meet the permit specs of a max diameter of 6" and min. height of 36'.
- There was no NGL separation equipment, it does not appear this facility would be subject to Subpart KKK. Also, this facility is not equipped with a flare.

A Malfunction abatement plan was submitted on 3/08/08 and approved on 11/18/08. The MAP was updated on 6/01/2011 to reflect corrections to FGENGINES. A MAERS report for 2014 has been received and reviewed. Reported NOx emissions for the facility were 23 TPY including 18.5 tons from EUENGINE1 and 4 tons from EUENGINE2 prior to it's removal.

Prior to the inspection I had requested that the company provide records for the period from September 2013 through August 2014 including:

Applicable monthly and 12-mos rolling NOx and CO emissions calculations for the engines.

Log of maintenance activities for each engine.

Hours of engine operation without catalytic converter.

Monthly engine fuel use.

Records provided by JDC indicated both engines operated during this period and that there were no periods of operation without the catalyst for EUENGINE 2. Extensive maintenance records were included in the electronic submittal and were reviewed but not printed out.

The controlled rolling 12-mos.NOx emissions calculations for EUENGINE2 were 4.45 tons NOx which is below the permit limit of 5 tons per year. Emissions emission testing performed by Exterran also indicate Nox emissions are less than 5 TPY. NOx emissions from EUENGINE2 were 25 tons per 12-mos rolling time period which is less than the 68 TPY limit in the permit.

The facility NOx limit of 89 tons per year has does not appear to have been exceeded based on compressor engine emissions and the information contained in the 2014 MAERS submittal. The PTI does not contain engine specific or facility wide CO emission limits.

Following the inspection I contacted JDC to find out when the engine changes at the Springdale 15 occurred. EUENGINE 1 was replaced with an identical engine on 1/06/2015 and EUENGINE 2 was removed on 11/17/2014.

As a result it appears that this source is in compliance with PTI 360-07A and Air Pollution Control Rules.

NAME  DATE 3-20-15 SUPERVISOR 