

P0608  
MONITOR

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

P060854907

FACILITY: J P MORGAN CHASE COMPANY		SRN / ID: P0608
LOCATION: 9000 HAGGERTY ROAD, BELLEVILLE		DISTRICT: Detroit
CITY: BELLEVILLE		COUNTY: WAYNE
CONTACT: Steve Shaw , Chief Engineer, Critical Sites		ACTIVITY DATE: 08/12/2020
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : August 12, 2020  
 FACILITY EMAIL ADDRESS : Steven.b.shaw@jpmchase.com  
 CONTACT PERSON : Steve Shaw, Chief Engineer, Critical Sites ABM Facility Services

**FACILITY BACKGROUND**

J. P. Morgan Chase operates a tech center and data center located in Belleville Michigan. The facility installed four emergency generators at this facility in 2015 and additional generators in 2019. The facility is considered a synthetic minor source.

**COMPLAINT/COMPLIANCE HISTORY**

No complaints have been received regarding this facility. No violations have been issued for this facility.

**PROCESS EQUIPMENT AND CONTROLS**

The facility has installed six 2,500-kilowatt diesel-fueled emergency engines. These engines are subject to the New Source Performance Standard (NSPS) for Reciprocating Internal Combustion Engines. The engines are tested monthly. The engines will be used if the data center should lose power so that the banks electronic systems, such as online banking, will be maintained. These six generators are permitted under PTI No. 20-19.

During the past year, it seems that the facility has installed an additional six emergency engines. These additional engines appear to be operating without a permit. In July 2020 the facility applied for a permit modification to include these engines. However, on September 3, 2020, the facility determined that these engines were exempt from permitting. A copy of this email is attached to this report.

**INSPECTION NARRATIVE**

I arrived in the area on August 12, 2020. I drove to the back of the facility to observe the emergency generators. I did not observe any opacity coming from any of the engines. I did not smell fuel or other chemicals during my surveillance.

**On September 10, 2020 and again on September 16, 2020 I sent an email to Thomas Tucker, Sal Patrico, Steven Shaw, and Don Kliebert requesting records a potential to emit. The response from the company is attached to this report.**

## **APPLICABLE RULES/PERMIT CONDITIONS**

**These engines operate under permit 20-19. The special conditions are as follows:**

**FGENGINES: Six 2,500 kilowatt (kW) diesel-fueled emergency engines with a model year of 2006 or later, and a displacement of less than 30 liters / cylinder. The engines are subject to New Source Performance Standards for Stationary Reciprocating Internal Combustion Engines (RICE), combustion ignition, emergency RICE greater than 3,000 hp.**

- I. Emission Limits – Compliance. The facility has manufacturer's certification to verify the emission rates so the facility is not required to test the engines.
- II. Material Limits
  1. Compliance – The only fuel burned in these engines is ultra low sulfur diesel fuel. According to the company, the diesel fuel contains less than 15 ppm sulfur.
- III. Process / Operational Restrictions
  1. Compliance – The facility has stated that over the course of the year, the engines typically will average 30-35 hours. In general, the engines average 2-3 hour run time per month.
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  4. Compliance – The facility operates all engines based on manufacturer's recommendations.
  5. Compliance – The facility has stated the original six engines are Tier I certified, and the six newer engines are Tier II certified under 40 CFR 60 subpart IIII.
  6. Compliance – When the company was asked how many engines operated at one time, they responded this way: The engines are typically tested under various scenarios over the course of a year. On a monthly basis, there are maintenance tests performed where one, two, or three engines will operate at the same time. On an annual basis, each engine is tested separately, and all six engines in each group (existing and newer) are tested at the same time at reduced operating loads for up to 4 hours of operation. The 6 existing engines are tested separately from the 6 newer engines, such that no more than 6 engines would be operating at the same time, under reduced load.
- IV. Design / Equipment Parameters
  1. Compliance – Hour meters were located on each of the original engines. It is undetermined whether there are hour meters on the newly installed engines.
  2. Compliance – Nameplates were located on each of the original engines. It is undetermined whether there are hour meters on the newly installed engines.
- V. Testing / Sampling.

1. NA. The facility has certification from the manufacturer that can be used to verify the emissions.

VI. Monitoring / Recordkeeping – Undetermined. When records were requested from the company, the following was received:

- a. Hours that the engines operated monthly - 2-3 hours per month on average.
- b. Hours for emergency operation - No recorded emergency run hours to date.
- c. Hours for non-emergency operation - 2-3 hours per month on average, with 30-35 hours average run time for maintenance activities per year.
- d. Maintenance – All maintenance under contract with OEMs, typically on a quarterly basis.
- e. Amount of diesel fuel used monthly – Varies by engine and scheduled maintenance. Records are kept detailing fuel burn by engine.

Copies of engine records are available upon request.

I. Reporting

1. NA – The engines are not contractually obligated to operate for more than 15 hours per calendar year. Therefore, this requirement is not applicable.

II. Stack / Vent Restrictions – All stacks were installed to the required specifications.

III. Other Requirements

- 1. Compliance – The facility has certification from the manufacturer for the emissions from all engines.
- 2. **Compliance – The facility has certification from the manufacturer for the emissions from all engines.**

**MAERS REPORT REVIEW**

**The facility is not currently reporting into MAERS. The facility has been flagged to begin reporting to MAERS in the future.**

**FINAL COMPLIANCE DETERMINATION**

**JP Morgan Chase appears to be operating in compliance with all permit conditions. Further determination may be needed to determine if permits are needed for the six additional engines. In part, this will be based on the PTE calculation submitted from the company.**

NAME 

DATE 2/17/23

SUPERVISOR JK