



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
CADILLAC DISTRICT OFFICE



DAN WYANT  
DIRECTOR

April 30, 2015

Mr. Troy Molby  
Jordan Development Company, L.L.C.  
1503 Garfield Road North  
Traverse City, Michigan 49686

SRN: N6109, Otsego County

Dear Mr. Molby:

**VIOLATION NOTICE**

On April 16, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the Schroeder natural gas production facility located at NW, NW, NE of Section 16, Charlton Twp, Otsego County, Michigan. The purpose of this inspection was to determine Jordan Development Company's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules and the conditions of Permit to Install (PTI) number 667-96A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUENGINE1	PTI 667-96A, SC 2.3, and SC 2.4	Operation of EUENGINE1 without the required control device for more than 200 hours per year.

As a result of the inspection it was determined that the catalyst element was removed from the engine exhaust system as of February 28, 2013 though the engine continued to operate. This is violation of PTI 667-96A Special Conditions 2.3 and 2.4 which state "The permittee shall not operate any engine that contains an add-on control device unless that device is installed, maintained, and operated in a satisfactory manner, except as specified in SC 2.3" (SC 2.3 allows up to 200 hours per year of operation without the control device).

The AQD understands this action was taken due to reduced process rates and engine loads resulting in the potential to foul the catalyst. However no changes were made to Permit to Install (PTI) 667-96A prior to and authorizing such changes.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 20, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: an explanation

of the causes and duration of the violation; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Jordan Development Company believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me regarding my inspection of the Jordan Development Company L.L.C. Schroeder CPF. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kurt Childs', with a large, stylized flourish extending to the right.

Kurt Childs  
Environmental Quality Analyst  
Air Quality Division  
231-876-4411

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Janis Ransom, DEQ