

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

N613037301

FACILITY: JORDAN DEVELOPMENT COMPANY, L.L.C. - NADV 4		SRN / ID: N6130
LOCATION: NW SEC 23 T30N R5W, STAR TWP		DISTRICT: Gaylord
CITY: STAR TWP		COUNTY: ANTRIM
CONTACT: Troy Molby		ACTIVITY DATE: 10/25/2016
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: scheduled inspection and records review		
RESOLVED COMPLAINTS:		

AQD Staff (Becky Radulski and Gloria Torello) traveled to N6130 Jordan Development NADV 4 CPF located in Star Township, Antrim County for a Full Compliance Evaluation (FCE) scheduled inspection to determine compliance with PTI 688-96A. This is an opt out source.

DEQ Inspection brochures have been previously mailed to Jordan Development.

The NADV 4 CPF compresses natural gas produced at production wells in the area. Following compression, the produced gas is dehydrated and sent to the sales point via pipeline.

LOCATION

The facility is located on the south side of Alba Rd. It is visible from the road.

REGULATORY DISCUSSION

PTI 688-96A was issued on January 22, 2008, PTI 688-96 became void upon issuance. PTI 688-96A is for 2 engines, a Caterpillar 399 with catalyst and a Caterpillar 3406 with no control. It is unclear from the eval notes which engine is EUENGINE1 which has lower NOx limits.

The source is not major for HAPs.

EUENGINE1 and EUENGINE2 are subject to 40 CFR Part 63, Subpart ZZZZ, which has not been delegated to MDEQ from EPA.

EUDEHY is subject to 40 CFR Part 63, Subpart HH, which has not been delegated to MDEQ from EPA.

INSPECTION NOTES

The facility is permitted for 2 engines however there is only 1 engine at the facility. The main building contains a Caterpillar 399 with a catalytic converter. There is an additional section attached to the east side of the building that has an empty concrete pad where an engine previously sat. There is no requirement for a facility to get a new PTI to address the removal of an engine; however it should be noted that an engine can not be put back into place without a permit modification. SC 2.8 allows for engine switch out, however this engine has been removed since the 2012 inspection, therefore is a removal and not a switch out.

There is another building adjacent to the Jordan Development NADV 4 CPF. The second building is owned by NuEnergy Operating. A permit could not be found in MACES for the NuEnergy CPF - they will be contacted separately to determine if they have a PTI or are exempt.

Based on previous inspection reports, the remaining engine in the large building is EUENGINE1.

During the inspection the engine was operating. Steam was noted on the engine exhaust, no 'tail', no odor. The exhaust has a muffler and a catalytic converter. Based on visual estimates, the stack meets the height and diameter requirements (27 feet minimum height; 10 inch max diameter).

2 lines enter on the west side of the building. Several tanks are located inside the building for used oil, hydraulic oil. A glycol tank with containment is located outside the building.

The Caterpillar 399 (EUENGINE1) was operating as follows:

RPM	884
Cat In Temp, F	846
Cat out Temp, F	858

The MAP requires the outlet temperature to be higher than the inlet temperature on the catalyst to demonstrate proper operation. The temperatures also must within the range of 750-1350 degrees F. Based on these parameters the catalyst appears to be operating properly.

MAERS

The 2017 MAERS submittal will be reviewed separately once it is received.

MACES

MACES Facility information screen was populated, including noting there is only 1 engine. The dehy area MACT HH was added to the Regulatory Summary screen; CO was added as a permitted pollutant on the Regulatory Detail section.

RECORDS REVIEW

Records were provided upon request by Mr. Troy Molby, Jordan Development, troym@jordanex.com.

SC 2.1a, 2.1b, 2.11, 2.12 - EUENGINE 1 (Caterpillar 399) NOx, CO Limits

Parameter	Permitted Limit	Reported Emissions
NOx, tpy, 12 month rolling	13.7	3.21
CO, tpy, 12 month rolling	16.7	5.00

Based on the reported emissions, the facility is compliance with 2.1a and 2.1b.

SC 2.2 and 2.8 require the use of a MAP. The facility has an approved MAP on file. provided records as requested to demonstrate maintenance on the engine. The parameters for the catalytic converter are discussed above. The O2 sensor was replaced on 8/16/16. A request for an updated MAP to change inconsistencies with the frequency of readings of the cat inlet and outlet temperatures, as well as updating to reflect 1 engine, was requested.

SC 2.3 and 2.9 require the facility to record the number of hours the engine operates without control; hours are limited to 200 hours per engine per year. Records were provided - there were zero hours of operation for the engine without the control operating over the past 12 months, thus meeting this condition.

SC 2.5 requires testing upon request. No testing was requested by AQD at this time.

SC 2.6, 2.10 require the monitoring and monthly recording keeping of natural gas used by each engine. Fuel use records were provided. The engine used around 2,000 Mcfd per month. There is no limit for fuel use.

SC 2.13a SVENGINE1 (max diameter 10", min height 27') - As mentioned above, the facility appears to meet these conditions based on visual estimates.

SC 3.1 requires the facility to not burn sour natural gas in FGFACILITY. Troy Molby confirmed the facility does not burn sour natural gas.

Based on the inspection and records review, the facility appears to be in compliance with PTI 688-96A.

NAME Becky Radulski

DATE 10/28/16

SUPERVISOR 

