

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

N787362744

<b>FACILITY:</b> JORDAN DEVELOPMENT COMPANY, L.L.C. - COLFAX 29		<b>SRN / ID:</b> N7873
<b>LOCATION:</b> NE SE SE SEC 30 COLFAX TWP, THOMPSONVILLE		<b>DISTRICT:</b> Cadillac
<b>CITY:</b> THOMPSONVILLE		<b>COUNTY:</b> BENZIE
<b>CONTACT:</b>		<b>ACTIVITY DATE:</b> 04/28/2022
<b>STAFF:</b> Sharon LeBlanc	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Onsite inspection for FY 2022 FCE- records review to be completed and reported independently of this document. sgl		
<b>RESOLVED COMPLAINTS:</b>		

On April 28, 2022, AQD District Staff conducted a site visit of the Jordan Development Company, LLC Colfax 29 CPF (N7893), located on Thurman Road, between County Road 602 (Lindy Road) and Bentley Road in the NE SE SE Section 30, Colfax Township, Benzie County, Thompsonville, Michigan. The purpose of the site visit was to confirm equipment onsite with respect to Permit to Install (PTI) No. 311-07. Records review was/will be conducted and documented in separate reporting.

The referenced site was previously inspected on January 18, 2017. No compliance issues were identified as part of the 2017 compliance evaluation.

#### FACILITY

The referenced facility is a CPF located in Colfax Township, Benzie County on Thurman Road, a seasonal road, E-NE of Thompsonville, Michigan. The Facility is a small facility with a single brine tank, one dehy and one compressor engine with AFC and catalyst. The site is located approximately 0.7-miles north of the intersection of Lindy and Thurman Roads.

A review of readily available aerials indicated that the site was constructed sometime between 1999 and 2005. In 1999 aerials the 200 bbl brine tank was present onsite. In August 2005, one compressor building, and the brine tank was present onsite. An additional compressor was added, and the compressor building extended in aerials for 2006, but had been removed in aerials dated 2015.

A review of previous inspection reports indicated that the EU had been installed in June-July 2008, and was exempt from Rule 201 permitting (February 5, 2009). The engine was not documented as being present in inspection reports dated March 14, 2013 or January 18, 2017.

At the time of the site inspection, sunny skies with isolated clouds, temperatures of 41 degrees F, with winds of less than 5 mph. No visible plumes.

The Facility reports annual emissions as part of the Michigan Air Emissions Reporting Program (MAERS).

#### REGULATORY

Permitting - PTIs issued for the Facility include the following:

PTI	Issued	Voided	Issued to

311-07	January 10, 2008	NA	Jordan Development Company, LLC
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**Note that the above referenced permit was for installation of catalytic controls on EUENGINE1.**

**Federal Regulations - The referenced facility does not process or store petroleum liquids, nor store them onsite and is therefore appears to not be subject to 40 CFR Part 60 (New Source Performance Standards AKA NSPS) Subparts;**

- K, Ka or Kb (Storage vessels for Petroleum Liquids);
- KKK (Equipment Leaks of VOC from onshore NG Processing Plants);
- VV (Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry);

**With regards to the existing engine it appears that based on the manufacture date for EUENGINE1 (prior to January 1, 2008) that the engine would not be subject to NSPS Subparts IIII for Compression Ignition (CI) RICE.**

**Subpart OOOO would apply to onshore affected facilities that are constructed, modified or reconstructed after August 23, 2011. Based on available information it appears that the referenced subpart is not applicable at this time but that future changes may be subject to the referenced subpart.**

**With respect to 40 CFR Part 63 (Maximum Achievable Control Technology Standards A.K.A. MACT) the following Subparts may apply:**

- Subpart HH (HAPS from Oil and NG Production Facilities)
- Subpart ZZZZ (Reciprocating Internal Combustion Engine aka RICE)

**With respect to Subpart HH, the affected unit is believed to be the dehy unit. However, the facility is not subject to the subpart if it's average throughput is less than 85K cubic meters/day (3 MMscf/day) or average benzene emissions are less than 0.9 Mg/yr (approximately 1 ton/yr). A compliance determination has not been made with respect to this subpart, and at the time of report preparation AQD does not have authority to enforce the subpart.**

**With respect to Subpart ZZZZ, the company at the time of report preparation has provided no information indicating that the existing RICE would not be subject to the referenced subpart. A compliance determination has not been made with respect to this subpart, and at the time of report preparation AQD has been delegated authority to implement and enforce the subpart. However, at this time compliance determinations for Federal requirements under Subpart ZZZZ for Area Sources have not been made.**

**EQUIPMENT**

**Equipment associated with the site at the time of April 28, 2022, site inspection included the following:**

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<b>EQUIPMENT</b>	<b>INSTALLATION DATE</b>	<b>311-07</b>	<b>Comment</b>
<b>200 bbl Brine AST</b>	<b>unk</b>	<b>FGFACILITY</b>	<b>With lined secondary containment</b>
<b>CAT 399 TA, 930 Hp, 16 cylinder with Catalyst and AFR</b>	<b>2005</b>	<b>EUENGINE1</b>	<b>Skid CGS 801, at time of 2/5/2009 inspection Sn 85B4796, 1/18/2017 inspection identified unit as C190135</b>
<b>CAT 3408</b>	<b>June-July 2008</b>	<b>NA</b>	<b>Rule 285(g) exemption shown at time of 2/5/2009 inspection - Sn 6NB1706 Not present at time of 1/18/2017 inspection</b>
<b>Dehydrator with reboiler</b>	<b>2005</b>	<b>EUDEHY</b>	

No operations daily log sheet was found onsite for the EUs. Operational parameters noted at the time of the April 28, 2022, site inspection included the following:

<b>EU</b>	<b>RPMs</b>	<b>Engine Oil Pressure</b>	<b>Comp Oil Press</b>
<b>EUENGINE1</b>	<b>821</b>	<b>48 psi</b>	<b>60 psi</b>

Note- pre and post catalyst temps showed a consistent difference of approximately 100 degrees, with the inlet temperature being reported lower than the catalyst outlet temp. This data appears to be consistent with data reported as part of the January 18, 2017, site inspection.

Stack restrictions associated with PTI 311-07 include the following:

<b>STACK</b>	<b>Maximum Diameter (inches)</b>	<b>Minimum Height above ground (feet)</b>

SVENGINE1	8	30
SVDEHY	NA	NA

**\*Compliance with conditions was determined by visual estimations of height based on building heights, and documentation from previous site inspection reports. SVENGINE1 was noted to be approximately 2 times the building height, meeting the above referenced conditions.**

#### **SUMMARY**

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**Equipment identified and operational parameters observed appear to be consistent with records readily available at the time of the site inspection.**

**No compliance issues were identified during the April 28, 2022, site inspection.**

NAME \_\_\_\_\_

DATE \_\_\_\_\_

SUPERVISOR \_\_\_\_\_