

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

N790728897

|   |                               |                           |
|---|-------------------------------|---------------------------|
| FACILITY: JORDAN DEVELOPMENT COMPANY, L.L.C. - SPRINGDALE 16          |                               | SRN / ID: N7907           |
| LOCATION: NW SW SE SEC 16, HUMPHREY                                   |                               | DISTRICT: Cadillac        |
| CITY: HUMPHREY  |                               | COUNTY: MANISTEE          |
| CONTACT:  |                               | ACTIVITY DATE: 03/18/2015 |
| STAFF: Kurt Childs  | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT  |
| SUBJECT: 2015 FCE including compliance inspection and records review. |                               |                           |
| RESOLVED COMPLAINTS:  |                               |                           |

**2015 Full Compliance Evaluation**

N7907 JDC Springdale 16

I conducted a targeted compliance inspection and records review of the JDC Springdale 16 CPF. The Springdale 16 is an opt-out facility with PTI 361-07. The facility consists of the following equipment:

- A tank battery consisting of 14 tanks, no VRU the contents of the tanks were not identified but each had a name on it apparently correlated to an individual well.
- There are 7 heater treaters, three of which 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 is one compressor building. PTI application 361-07 indicates there is one Caterpillar G398TA (EUENGINE1) engine equipped with a catalytic converter. At the time of the inspection the engine was as described and was operating. Engine RPMs were 658 and oil pressure was 45 psi. The catalyst inlet temperature was 820 degrees F and the outlet temperature was 797 degrees F. Also the AFRC controller was indicating "Rich Limit" on the right bank. Maintenance records supplied by JDC indicate that the catalyst had been tested in February, May and August of 2014 and the catalyst had been cleaned the week of 11/24/2014. Following the inspection I contacted the company and informed them of these air pollution control device readings. JDC provided the following information: Exterran serviced the compressor (see attached Engine Emission Analysis) on 3/24/2015 and resolved the Rich Limit warning, inverted temperatures on the catalyst are due to the engine running at low rpms. The emission analysis indicates catalyst temps were inverted at the time of the testing when results indicated the emissions were compliant with the 10 TPY limit.

The stack appeared to meet the permit parameters of a max. diameter of 6" and min. height of 31.5'.

- There was no NGL separation equipment on site, it does not appear this facility would be subject to Subpart KKK. This facility is not equipped with a flare.

A Malfunction abatement plan was submitted on 3/08/08 and approved on 11/18/08.

A MAERS report for 2014 has been received and reviewed. Reported NOx emissions for the facility were 4 tons.

Prior to the inspection I had requested that the company provide the following records:

- Monthly NOx emissions calculations.
- Monthly fuel use.
- Maintenance logs.
- Monthly and 12 month rolling time period records of the hours the compressor engine was operated without the control device.


Records provided by JDC indicated the engine operated during this period and that there were no periods of operation without the catalyst. The records provided indicate emissions are in compliance with permit.

The controlled rolling 12-mos.NOx emissions calculations for EUENGINE1 were 3.54 tons NOx which is below the permit limit of 10 tons per year. Emissions emission testing performed by Exterran also indicate NOx emissions are less than 10 TPY.

The facility NOx limit of 10.1 tons per year has does not appear to have been exceeded based on compressor engine emissions and the 2014 MAERS submittal. JDC was also operating 3 heaters at the facility at the time of the inspection. The PTI does not contain engine specific or facility wide CO emission limits.

Extensive maintenance records were provided with the electronic submittal and were reviewed but not printed out.

As a result of the FCE it appears this source is in compliance with PTI 361-07 and the Air Pollution Control Rules.

NAME  DATE 3-26-15 SUPERVISOR 