

P0608
MWill

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

P060836760

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: 06/29/2016
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Syn Minor Opt Out
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : June 29, 2016
 TIME OF INSPECTION : 10:00 am
 NAICS CODE : 517919
 EPA POLLUTANT CLASS : NOx, CO₂
 INSPECTED BY : Jill Zimmerman
 PERSONNEL PRESENT : Jerry Willcoxson
 FACILITY PHONE NUMBER : (734) 957-0827
 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. The facility is considered a synthetic minor opt-out source.

REQUIRED PPE

During the onsite inspection, I wore steel toed shoes and eye protection.

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 four 2,500 kilowatt diesel-fueled emergency engines. These engines are subject to the New Source Performance Standard 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. The facility believes that the engines are capable of providing more energy than the facility will need, so there is no plan to operate all of the engines at the same time.

INSPECTION NARRATIVE

I arrived at the facility on June 23, 2016 and entered through the south entrance. I spoke with Janice at the security desk. My inspection was unannounced, and she was unsure with whom I should meet. Granger was the contractor for installing the emergency engines; however, no one from Granger was answering the phone. Janice was unable to give me a contact number for any employees. I left the facility at that time. After returning to the office, I contacted Mr. Jerry Willcoxson and we arranged at time to meet for an onsite inspection.

On June 29, 2016 I met with Mr. Willcoxson. He explained that the majority of the work at this facility was operating the tech center and the data center. The engines are located in a secure fenced in section near the northwest corner of the facility. The engines were labeled. During

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the onsite inspection, the engines were not operating. The engines are tested about once a month.

After many attempted phone calls and emails went unanswered, I went to the company to ask some follow-up questions on September 23, 2016. I was told by the security office Janice that Mr. Willcoxson no longer worked for the company. After a phone call to another Janice, I was told that I would need to meet with Mr. Steve Shaw, who was no tavailable at that time. I was told that they could not give me any contact information for Mr. Steve Shaw, but that I should return on Monday September 26, 2016.

On Monday September 26, 2016 at 11:30 am I arrived at the facility to meet with Mr. Shaw and obtain the information needed to complete this report. I entered the facility and spoke with John at the security desk. He called and paged Mr. Shaw, and did not receive an answer. He began calling everyone who worked for the engineering department with Mr. Shaw, and still didn't receive a response. He then contacted Janice Quailen for further direction. She stated that she was unavailable and that I should make an appointment to return. The policy of this facility is that no contact information for any employees can be shared with me. I left my card with my contact information with the security guard. He said that he would personally bring my contact information to Mr. Shaw. I explained that I needed some information on the emergency engines.

On Tuesday September 27, 2016 I received a voicemail message and email from Mr. Steve Shaw. This email is attached to this report. I responded via email to Mr. Shaw requesting additional information about the engines, including the records about the engines. Based on the response to this email, the engines began operating on September 1, 2015.

APPLICABLE RULES/PERMIT CONDITIONS

These engines operate under permit 101-15. The special conditions are as follows:

FGENGINES: Four 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 diesel fuel. According to the most recent fuel report, the diesel fuel contained 5 ppm sulfur.
- III. Process / Operational Restrictions
 1. Compliance – The facility has operated the engines for less than 15 hours during the past year.
 2. Undetermined – The facility has operated the engines for less than 15 hours during the past year.
 3. Compliance – The facility has operated the engines for less than 15 hours during the past twelve months.
 4. Compliance – The facility operates all engines based on manufacturer's recommendations based on the maintenance plan discussed during the onsite inspection on June 29, 2016.
 5. Compliance – The manufacturer has certified the engine emissions. Because the engines have just begun operation, verification of the maintenance plan will be performed during the next onsite inspection.

6. Undetermined – During the onsite inspection, none of the engines were operating.
- IV. Design / Equipment Parameters
 1. Compliance – Hour meters were located on each of the engines.
 2. Compliance – Nameplates were located on each of the engines.
- V. Testing / Sampling.
 1. NA. The facility has certification from the manufacturer that can be used to verify the emissions.
- VI. Monitoring / Recordkeeping
 1. Compliance – The facility maintains operational records for each engine. The engines have been operating for less than a year. These records can be reviewed further during the next onsite inspection.
 2. Compliance – The facility maintains a maintenance plan for all of the engines based on the manufacturer's recommendations.
 3. Compliance – The facility maintains operational records for all of the engines. The engines have not yet been operating for an entire year. These records will be further reviewed during the next onsite inspection. Since being installed, the engines have operated less than 15 hours.
 4. Compliance – The facility maintains engine certifications from the manufacturer for each of the engines.
 5. Compliance – The facility maintains fuel usage records including the sulfur content of the diesel fuel. The sulfur content of the most recent fuel load was 5 ppm.
- VII. 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.
- VIII. Stack / Vent Restrictions – All stacks were installed to the required specifications.
- IX. Other Requirements
 1. Compliance – The facility has certification from the manufacturer for the emissions from all of the engines.
 2. Compliance – The facility has certification from the manufacturer for the emissions from all of the engines.

MAERS REPORT REVIEW

This facility had not been required to report emissions through MAERS because the facility began operating in 2015. Moving forward the facility should be reporting emissions through MAERS.

FINAL COMPLIANCE DETERMINATION

JP Morgan Chase appears to be operating in compliance with all permit conditions. The engines have recently begun operating. To get a better picture of the annual operating procedures of the facility, and additional inspection should be performed after the engines have been operating for more than twelve months.

NAME 

DATE 9/27/16

SUPERVISOR JK

9/27/2016