

P0608
Maw/Ks

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

P060859274

FACILITY: JP Morgan Chase Bank, National Association		SRN / ID: P0608
LOCATION: 9000 HAGGERTY ROAD, BELLEVILLE		DISTRICT: Detroit
CITY: BELLEVILLE		COUNTY: WAYNE
CONTACT: Steve Shaw , Chief Engineer, Critical Sites		ACTIVITY DATE: 07/20/2021
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Onsite Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : July 20, 2021
 FACILITY EMAIL ADDRESS : crystal.callaway@jpmchase.com
 CONTACT PERSON : Crystal Callaway

FACILITY BACKGROUND

J. P. Morgan Chase operates a tech center and data center located in Belleville Michigan. The facility installed six emergency generators at this facility in 2008. Four emergency generators were installed in 2015 and two additional generators were installed in 2019.

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 six 2,500 kilowatt diesel-fueled emergency engines and six 2,050 kW 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 engines are subject to New Source Performance Standards (NSPS). The six 2,050 kW engines initially installed in 2008 are not permitted and the facility feels these engines are exempt from being permitted. These engines were installed on January 1, 2008. The six 2,500 kW engines are permitted under number 20-19.

In July 2020 the facility applied for a permit modification to include all twelve engines. However, on September 3, 2020 the facility determined that these engines were exempt from permitted. During a preinspection meeting at the facility, the facility explained that the potential to emit (PTE) NOx for all twelve emergency engines exceeds 100 TPY. They facility initially withdrew their permit application in 2020 due to the modeling requirement. The facility is concerned about the time and cost to the company to complete modeling on the

unpermitted engines. The facility is considering applying for either a synthetic minor permit or a Title V permit. The facility is leaning more toward a Title V permit so that they will be able to add additional emergency generators or other equipment as needed in the future. As of the writing of this report, no permit applications have been received.

INSPECTION NARRATIVE

I arrived in the area on July 20, 2021. I drove to the back of the facility to observe the emergency generators. I did not observe any opacity coming from any of the engines. I did not smell fuel or other chemicals during my surveillance.

I then entered the facility and met with Ms. Callaway and many other consultants. We discussed the original engines and whether or not these engines require permits. The facility is concerned about the time and cost factors regarding permitting. I explained both opt-out permits and the Title V program.

Next, we walked outside to observe the emergency generators. All twelve generators are located outside in the back of the property in a fenced off area. During the onsite inspection, none of the generators were operating.

APPLICABLE RULES/PERMIT CONDITIONS

The six 2,500 kW engines installed in 2015 and later operate under permit 20-19. The special conditions are as follows:

FGENGINES: Six 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 ultra-low sulfur diesel fuel. According to the company, the diesel fuel contains less than 15 ppm sulfur.
- III. Process / Operational Restrictions**
 - 1. Compliance –** The facility has stated that over the course of the year, the engines typically will average 30-35 hours. In general, the engines average 2-3 hour run time per month.
 - 2. Compliance –** The facility has stated that over the course of the year, the engines typically will average 30-35 hours. In general, the engines average 2-3 hour run time per month.

3. Compliance – The facility has stated that over the course of the year, the engines typically will average 30-35 hours. In general, the engines average 2-3 hour run time per month.
4. Compliance – The facility operates all engines based on manufacturer's recommendations.
5. Compliance – The facility has stated the original six engines are Tier 1 certified and the six newer engines are Tier II certified under 40 CFR 60 subpart IIII.
6. Compliance – When the company was asked how many engines operated at one time, they responded this way: The engines are typically tested under various scenarios over the course of a year. On a monthly basis, there are maintenance tests performed where one, two, or three engines will operate at the same time. On an annual basis, each engine is tested separately, and all six engines in each group (existing and newer) are tested at the same time at reduced operating loads for up to 4 hours of operation. The 6 existing engines are tested separately from the 6 newer engines, such that no more than 6 engines would be operating at the same time, under reduced load.

IV. Design / Equipment Parameters

1. Compliance – Hour meters were located on each of the original engines. It is undetermined whether there are hour meters on the newly installed engines.
2. Compliance – Nameplates were located on each of the original engines. It is undetermined whether there are hour meters on the newly installed engines.

V. Testing / Sampling.

1. NA. The facility has certification from the manufacturer that can be used to verify the emissions.

VI. Monitoring / Recordkeeping – Undetermined. When records were requested from the company, the following was received:

- a. Hours that the engines operated monthly - **2-3 hours per month on average.**
- b. Hours for emergency operation - **No recorded emergency run hours to date.**
- c. Hours for non-emergency operation - **2-3 hours per month on average, with 30-35 hours average run time for maintenance activities per year.**
- d. Maintenance – **All maintenance under contract with OEMs, typically on a quarterly basis.**
- e. Amount of diesel fuel used monthly – **Varies by engine and scheduled maintenance. Records are kept detailing fuel burn by engine.**

Copies of engine records are available upon request.

I. 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.

II. Stack / Vent Restrictions – All stacks were installed to the required specifications.

III. Other Requirements

1. Compliance – The facility has certification from the manufacturer for the emissions from all engines.
2. **Compliance – The facility has certification from the manufacturer for the emissions from all engines.**

MAERS REPORT REVIEW

The facility submitted a MAERS report for FY2020 with reported emissions for all twelve engines. This report was received on time and appeared to have been accurately reported.

FINAL COMPLIANCE DETERMINATION

JP Morgan Chase appears to be operating in compliance with all permit

conditions. Further determination is needed to determine if permits are needed for the six additional engines. It appears as if the facility is in noncompliance for the installation of the six 2,050 kW engines, but we will wait for the further information before deciding if a violation notice will be issued.

NAME JWG

DATE 2/17/23

SUPERVISOR JK