

P0608
MWWDEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

P060869030

FACILITY: JP Morgan Chase Bank, National Association		SRN / ID: P0608
LOCATION: 9000 HAGGERTY ROAD, BELLEVILLE		DISTRICT: Detroit
CITY: BELLEVILLE		COUNTY: WAYNE
CONTACT: Alyssa Heilman ,		ACTIVITY DATE: 09/13/2023
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : September 13, 2023

CONTACT PERSON : Alyssa Heilman

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 four 2,500 kilowatt (kW) diesel-fueled emergency engines, two 2,740 kW diesel-fuel emergency engines, and six 2,050 kW 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 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 remaining six engines were permitted under Permit to Install (PTI) No. 20-19. The four 2,500 kW engines were installed on June 1, 2015 and the two 2,740 engines were installed on October 1, 2019.

On August 10, 2023 the permit for the six newer engines was modified to PTI No. 20-19C to add facility wide conditions making this an opt-out facility for NOx.

INSPECTION NARRATIVE

I arrived at the facility on September 13, 2023, at 1:30 pm. Initially I was stopped by security since my inspection was unannounced. This was complicated by the fact that I was unsure who I would meet with at the facility. I was scanned for weapons and my vehicle was searched for gun or bomb residue on the door handles and mirrors were used to search the underside of my vehicle before I was allowed to move the secondary security check at the facility. Here I was again checked for weapons and my identification was scanned for security. I was then put in contact with Ms. Alyssa Heilman, who escorted me throughout the facility.

Initially we discussed the new permit and the operations of the twelve engines. Then we walked outside to view the engines. The majority of the facility is used for data storage for the banking industry.

APPLICABLE RULES/PERMIT CONDITIONS

The six newer engines installed in 2015 and 2019 operate under FGENGINES within PTI No. 20-19C which was approved on August 10, 2023. The special conditions are as follows:

FGENGINES: Four 2,500 kW and two 2,740 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.

Emission Limits

Compliance. Compliance with special conditions (SC) 1 through 3 is assumed when the engines are certified. The facility has not yet been requested to test for compliance with SCs 4 through 7.

Material Limits

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.

Process / Operational Restrictions

- 1. Compliance – The facility tests each engine about one hour per month and runs a four hour test twice a year for about 20 hours per year.**
- 2. Compliance – The facility runs a four hour test twice a year. Since the permit was modified, this longer test has not occurred.**
- 3. Compliance – The facility has stated that over the course of the year the engines are tested about an hour a month with a longer test twice a year, which is less than 100 hours per year.**
- 4. Compliance – The facility has stated that over the course of the year the engines are tested about an hour a month with a longer test twice a year, which is less than 100 hours per year.**
- 5. Compliance – The facility maintains the engines properly.**
- 6. Compliance – The facility operates the certified engines according manufacturer's emission-related written instructions.**

7. NA – The facility is using certified engines.

Design / Equipment Parameters

1. Compliance – Hour meters were located on each of the engines.
2. Compliance – The nameplates on EUENGINE1, EUENGINE2, EUENGINE3, and EUENGINE4 do not exceed 2,500 kW.
3. Compliance – The nameplates on EUENGINE5 and EUENGINE6 do not exceed 2,740 kW.

Testing / Sampling.

Compliance – The engines are certified so the testing required in SC V.1 is not applicable.

The facility has not been requested to test for compliance under SC V.2.

Monitoring / Recordkeeping – Compliance is assumed because the reported use of each engine in MAERS for 2022 appears to consist entirely of periodic readiness testing.

Reporting

NA

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

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.

FGFACILITY

- I. Emission Limits – Compliance Based on the MAERS report, the facility emitted less than 5 tons of NOx in 2022, which is less than the permitted limit of 46.6 tpy.
- II. Material Limits – Compliance. The facility only used diesel in the engines.
- III. Process/Operational Restrictions - Compliance. The facility plans to operate the engines for a test about one hour per month a four-hour test performed twice a year. These requirements have not year been tested since this permit with FGFACILITY was issued less than a month before this onsite inspection.
- IV. Design/Equipment Parameters – Compliance. The facility has installed non-resettable hour meters on each engine to track the operating hours.
- V. Testing/Sampling – NA
- VI. Monitoring/Recordkeeping – Undetermined. This permit was issued less than 30 days before the onsite inspection. Therefore, any required records were still being recorded.
- VII. Reporting – NA
- VIII. Stack/Vent Restrictions – NA
- IX. Other Requirements – Na

MAERS REPORT REVIEW

The facility submitted a MAERS report for FY2022 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. An

additional inspection may been needed to verify compliance with the new permit conditions.

NAME 

DATE 7/22/24 SUPERVISOR JK