

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Other

N781763665

<b>FACILITY:</b> JORDAN DEVELOPMENT COMPANY, L.L.C.- MILTON BRADLEY		<b>SRN / ID:</b> N7817
<b>LOCATION:</b> 4600 CAIRN HWY, KEWADIN		<b>DISTRICT:</b> Cadillac
<b>CITY:</b> KEWADIN		<b>COUNTY:</b> ANTRIM
<b>CONTACT:</b> Kimberly Weber , Authorized Agent/MAERS		<b>ACTIVITY DATE:</b> 07/15/2022
<b>STAFF:</b> Jodi Lindgren	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Records Review		
<b>RESOLVED COMPLAINTS:</b>		

### FACILITY DESCRIPTION

Jodi Lindgren of the Department of Environmental, Great Lakes, and Energy (EGLE) – Air Quality Division (AQD) conducted a review of records of Jordan Development Company (Jordan) – Milton Bradley CPF (N7817) located at 4600 Cairn Highway in section 26, T30N-R9W, Milton Township, Antrim County, Kewadin, Michigan, 49648.

The Milton Bradley CPF is an opt-out facility with PTI 193-07 issued on June 25, 2007. The facility may be subject to 40 CFR Part 63 Subpart ZZZZ (MACT ZZZZ) and 40 CFR Part 63 Subpart HH (MACT HH). EGLE-AQD is not delegated authority to enforce MACT HH. EGLE-AQD has been delegated authority to implement and enforce MACT ZZZZ, but compliance assessments for area sources have not been completed. The facility consists of two 400 bbl brine tanks, two natural gas compressors, two natural gas fired reciprocating compressor engines, a glycol dehydration system (dehy), and an iron sponge systems for hydrogen sulfide treatment. The dehy is exempt from R 336.1201(1) permitting requirement as it meets the conditions of exemption R 336.1288 (2)(b)(ii) because it processes only Antrim natural gas. In addition, the dehy has been reported to meet an exemption (40 CFR 63.764(e)(1)(i)) from MACT HH with documentation of an actual annual average flow rate of natural gas less than 85,000 cubic meters per day or 3 MMCF/day. Jordan reported the actual annual average flow rate as 2.97 MMCF/day. One of the natural gas fired reciprocating compressor engines is a 1340 hp CAT 3516 lean burn engine that has been reported as exempt from R 336.1201(1) permitting requirement as it meets the conditions of exemption R 336.1285(2)(g) because it has a maximum heat input less than 10 MMBtu. Jordan reported the heat input to be 9.92 MMBtu and provided the manufacturer's engine data sheet to justify their heat input calculations.

### SCHEDULED INSPECTION

A. EUEGINE1 – a 830 hp CAT 399 TA engine equipped with a three-way catalyst and air/fuel ratio controller (AFRC) for emission control.

1. Emission Limits – PTI 193-07 established a NOx limit of 19 tons per year (tpy) and a CO limit of 13 tpy calculated at the end of each month using a 12-month rolling time period. Records provided by Jordan indicate EUENGINE1 emitted 4.72 tpy of NOx and 3.98 tpy of CO calculated for a 12-month rolling time period of June 2021 to May 2022. These records indicate compliance with the emission limits established in PTI 193-07.

2. Material Limits – There are no material limits associated with this emission unit; therefore, this section is not applicable.

**3. Process/Operational Restrictions – (1.2) PTI 193-07 requires an AQD approve preventative maintenance/malfunction abatement plan (PM/MAP). An AQD approval letter dated December 11, 2013 was issued for the PM/MAP received on November 20, 2013. (1.3) PTI 193-07 prohibits the operation of any engine equipped with an add-on control device for more than 200 hours per year without that control device consistent with the AQD approved PM/MAP. The records provided by Jordan indicate that the control equipment on EUENGINE1 was run 100% time during the time period of June 2021 to May 2022.**

**4. Equipment Parameters – PTI 193-07 prohibits the operation of any engine equipped with an add-on control unless the device is installed, maintained, and operated in accordance with the manufacturer’s recommendations and the approved PM/MAP. Archrock, Jordan’s contractor, provided monthly records showing regular maintenance and operational tests of the catalyst and AFRC to satisfy PTI-193-07 and the approved PM/MAP.**

**5. Testing – PTI 193-07 dictates that the AQD District Supervisor may request testing NOx and CO emission verification. No testing has been requested by the AQD Supervisor during the time constraints of this compliance evaluation.**

**6. Monitoring – Jordan demonstrated compliance with the monitoring requirement of PTI 193-07 to monitor natural gas usage on a continuous basis by providing AQD staff with a natural gas usage report for the time period June 2021 to May 2022. The total natural gas usage by EUENGINE1 was reported as 37.133 MMCF using the 12-month rolling time period of June 2021 to May 2022**

**7. Recordkeeping/Reporting/notification – Jordan demonstrated compliance with the recordkeeping requirements of PTI 193-07 to document natural gas usage, calculate NOx and CO emissions, and maintain a log of all maintenance activities required by the PM/MAP for EUENGINE1. Riverside provided AQD staff the required documentation upon request.**

**8. Stack/Vent Restrictions – PTI 193-07 requires EUENGINE1 to have a stack with a maximum diameter of 8 inches and a minimum height above ground level of 38 feet. Previous inspections conducted by AQD staff indicated the stacks appeared to meet these requirements.**

**9. Other Requirements – There are no other requirements associated with this flexible unit; therefore, this section is not applicable.**

### **EVALUATION SUMMARY**

**Conclusion – Based upon the review of records, it appears the source was in compliance with PTI 193-07 at the time of the evaluation.**

NAME  \_\_\_\_\_

DATE \_\_\_\_\_

SUPERVISOR \_\_\_\_\_