

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number  
B3721

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-B3721-2014a

**ANR Pipeline Company - Reed City Compressor Station**

SRN: B3721

Located at

7677 230<sup>th</sup> Avenue, Reed City, Osceola, Michigan 49677

Permit Number: MI-ROP-B3721-2014a

Staff Report Date: October 7, 2013

Reopening Date: August 24, 2015

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) requires that the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number  
B3721

**RENEWABLE OPERATING PERMIT**  
**OCTOBER 7, 2013 - DRAFT STAFF REPORT**

ROP Number  
MI-ROP-B3721-2014

**Purpose**

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with a ROP pursuant to Title V of the federal Clean Air Act of 1990 and Michigan's Administrative Rules for air pollution control pursuant to Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft permit terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft permit pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

**General Information**

Stationary Source Mailing Address:	ANR Pipeline Company Reed City Compressor Station 7677 230 <sup>th</sup> Avenue Reed City, Michigan 49677
Source Registration Number (SRN):	B3721
North American Industry Classification System (NAICS) Code:	486210
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201200061
Responsible Official:	Vern Meier, Vice President, U.S. Pipeline Operations 832-320-5505
AQD Contact:	Kurt Childs, Environmental Quality Analyst 231-876-4411
Date Permit Application Received:	May 7, 2012
Date Application Was Administratively Complete:	May 17, 2012
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	October 7, 2013
Deadline for Public Comment:	November 6, 2013

## Source Description

The Reed City Compressor Station is a natural gas transmission and compression station which operates two natural gas storage fields, the Loreed and the Reed City Stray Storage Fields. The Reed City Compressor Station operates under varying conditions. The pipeline transports natural gas to and from the storage reservoirs and typically operates between 400 and 2000 psig. During injection, natural gas free flows into the reservoir until the field pressure approaches pipeline pressure. At this point one or more internal combustion engines will be used to compress the natural gas into the reservoir. Compression injection usually continues until the field reaches its maximum rated pressure. Two of the engines are equipped with catalytic converters for the control of NOx emissions. The station utilizes nine natural gas-fired engines in total for transmission and processing. Depending on storage and delivery contract, gas availability, and demand by end-users, the engines may operate simultaneously, independently or not at all.

Gas withdrawn from the Reed City Stray Storage Field is conditioned through the Reed City Stray glycol dehydration system to remove liquids that are transported out of the reservoir with the gas. During spring and summer field pressures reach 780 psig. After conditioning the natural gas is fed into a separator to further remove liquids that remain in the stream before it is compressed and transported into the pipeline downstream. The emissions from the glycol dehydrator are controlled by a condenser and thermal oxidizer.

Because natural gas processed at Loreed contains more hydrocarbon liquids, the withdrawal process is more complicated than the process used at the Reed City Stray Storage Field. At each well site a small gas-liquid separator is used to separate the hydrocarbons from the gas at the well head. Gas is routed to a compressor station, while liquids are routed to one of the three condensate tank battery areas. Prior to entering the pipeline from the Loreed Storage Field the natural gas is conditioned through the Loreed glycol dehydration system to remove liquids that are transported out of the reservoir with the gas before it is compressed or transported into the pipeline downstream. The emissions from the glycol dehydrator are controlled by a condenser and thermal oxidizer.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System in the **2012** submittal.

### TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	35
Lead (Pb)	0
Nitrogen Oxides (NO <sub>x</sub> )	139
Particulate Matter (PM)	2
Sulfur Dioxide (SO <sub>2</sub> )	0
Volatile Organic Compounds (VOCs)	7
<b>Individual Hazardous Air Pollutants (HAPs) **</b>	
<b>Total Hazardous Air Pollutants (HAPs)</b>	

\*\*As listed pursuant to Section 112(b) of the federal Clean Air Act.

In addition to the pollutants listed above that have been reported in MAERS, the potential to emit of Greenhouse Gases in tons per year of CO<sub>2</sub>e is less than 100,000. CO<sub>2</sub>e is a calculation of the combined global warming potentials of six Greenhouse Gases (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride).

See Parts C and D in the draft ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

## **Regulatory Analysis**

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

The stationary source is located in Osceola County, which is currently designated by the U.S. Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR), Part 70, because the potential to emit nitrogen oxides exceeds 100 tons per year and the potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112, is equal to or more than 10 tons per year and/or the potential to emit of all HAPs combined are more than 25 tons per year.

No emissions units at the stationary source are currently subject to the Prevention of Significant Deterioration (PSD) regulations of Part 18, Prevention of Significant Deterioration of the Air Pollution Control Rules of Act 451 or 40 CFR, Part 52.21 because the process equipment was constructed/installed prior to June 19, 1978, the promulgation date of the PSD regulations.

EURC002 through EURC007 were installed prior to 1967 and are "grandfathered" with regard to the requirements to obtain an Air Use Permit to Install.

EURC008 was installed in 1973 and was exempt from the requirement to obtain a Permit to Install pursuant to the Air Pollution Control Rules that were in place at that time.

EURC011 and EURC012 (four-stroke rich burn engines greater than 500 hp) and EURC019 and EURC020 (two emergency generator four-stroke rich burn engines less than 500 hp) at the stationary source are subject to the Maximum Achievable Control Technology Standards for Stationary Reciprocating Internal Combustion Engines (RICE) promulgated in 40 CFR, Part 63, Subparts A and ZZZZ. The remaining internal combustion engines are not subject to any requirements under Subpart ZZZZ because they are four-stroke lean burn engines greater than 500 hp or a two-stroke lean burn engine greater than 500 hp.

EURC015 and EURC024 are glycol dehydration systems that are subject to the Maximum Achievable Control Technology Standards for Natural Gas Transmission and Storage promulgated in 40 CFR, Part 63, Subparts A and HHH. However, pursuant to 63.1274(d) the dehydrators are exempt from most of the requirements in Subpart HHH. Requirements regarding start up, shut down and malfunction, control equipment, and testing are included in the emission unit tables.

The natural gas fired boilers and heaters at the Reed City Compressor Station are subject to the Maximum Achievable Control Technology (MACT) standards under the National Emission Standard for Hazardous Air Pollutants for Major Sources for Industrial, Commercial, and Institutional Boilers and Process Heaters promulgated in 40 CFR, Part 63, Subparts A and DDDDD. EURC001, EURC025, are each less than 5 MMBtu/hr and Gas withdrawal heaters EURC016, EURC017, and EURC018, are each greater than 10 MMBtu/hr but less than 50 MMBtu/hr. The Subpart DDDDD requirements applicable to these emission units are included in FGMACTDDDD in the ROP.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the "Procedure for Evaluating Periodic Monitoring Submittals."

No emission units are subject to the federal Compliance Assurance Monitoring rule under 40 CFR, Part 64, because only two of the compressor engines (EURC011 and EURC012) have control devices and there are no emission limits that apply. EURC015 and EURC024 are not subject to CAM because they do not have potential pre-controlled emissions of VOC above the major source threshold.

The permit changes requested in Minor Modification 200900066 for removal of EU00048 (7500 gallon methanol storage tank) and FGRULE290 have been made to the ROP. ANR has asserted the tank is exempt from the requirement to obtain a Permit to Install pursuant to Rule 336.1284(n) based on the size of the tank. This was the only emission unit covered by FGRULE290 so the flexible group is no longer necessary.

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

**Source-wide Permit to Install (PTI)**

Rule 214a requires the issuance of a Source-wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. MI-ROP-B3721-2007a is identified in Appendix 6 of the ROP.

PTI Number			
420-97A			

**Streamlined/Subsumed Requirements**

This permit does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

**Non-applicable Requirements**

Part E of the draft ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the draft ROP pursuant to Rule 213(6)(a)(ii).

### **Processes in Application Not Identified in Draft ROP**

The following table lists processes that were included in the ROP application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

<b>Exempt Emission Unit ID</b>	<b>Description of Exempt Emission Unit</b>	<b>Rule 212(4) Exemption</b>	<b>Rule 201 Exemption</b>
EURC031, EURC032, EURC044	Crude oil and condensate storage tanks less than 40,000 gallons each	R 336.1212(3)(e)	R 336.1284(e)
EURC030, EURC035, EURC036, EURC037, EURC038, EURC040, EURC041, EURC042, EURC045	Methanol, glycol, gasoline and diesel fuel storage	R 336.1212(4)(c)	R 336.1284(d), (i), and (n)

### **Draft ROP Terms/Conditions Not Agreed to by Applicant**

This permit does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

### **Compliance Status**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

### **Action taken by the DEQ**

The AQD proposes to approve this permit. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the U.S. Environmental Protection Agency (USEPA) is allowed up to 45 days to review the draft permit and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Janis Denman, Cadillac District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

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ROP Number

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**NOVEMBER 27, 2013 - STAFF REPORT  
ADDENDUM**

MI-ROP-B3721-2014

### Purpose

A Staff Report dated October 7, 2013, was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in R 336.1214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

### General Information

Responsible Official:	Vern Meier, Vice President, U.S. Pipeline Operations 832-320-5505
AQD Contact:	Kurt Childs, Environmental Quality Analyst 231-876-4411

### Summary of Pertinent Comments

No comments were received from the public or from the US EPA. The company provided additional comments during a telephone conversation on October 17, 2013 as follows:

The Draft Staff Report contained an outdated regulatory citation in the eighth paragraph of the Regulatory Analysis. The Staff report reads "However, pursuant to 63.1274(d) the dehydrators are exempt from most of the requirements in Subpart HHH." This was correct at the time the Staff Report was originally written but changes to 40 CFR, Part 63, Subpart HHH in the interim have made this language obsolete. The paragraph should now read, in its entirety: "EURC015 and EURC024 are glycol dehydration systems that are subject to the National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities promulgated in 40 CFR, Part 63, Subparts A and HHH. The applicable requirements are included in the ROP in FGMACTHHH."

Additional information was provided regarding the size of the EURC018 gas withdrawal heater.

#### FGMACTZZZZ

A typographical error was noted in VII.5, "6 days" should be "60 days".  
V.2, 76% formaldehyde reduction requirement from I.1 should be added.

#### FGMACTHHH

I.1, Should include V.5 as a Monitoring/Testing Method.

III.2, 5, and VI.9.a, the company plans on using a condenser to demonstrate compliance with 40 CFR Part 63, Subpart HHH and requested deleting the references to the thermal oxidizer. EURC015 and EURC024 are also equipped with thermal oxidizers which are required elsewhere in the ROP. The AQD believes it will be more accurate and cause less confusion if the same control equipment is referenced consistently throughout the ROP. No changes were made.



III.6, Comments indicated that this requirement applies to the use of any control device not just the thermal oxidizer.

V.4.c, The company identified a typographical error in this condition regarding the citation of a testing method. "ASTM D64200-99" should read "ASTM D6420-99".

V.5, The company was concerned this requirement was confusing.

VI.2.a, The company felt that this condition may be duplicative of III.6 and may be deleted. Condition III.6 requires the control equipment be operated at a specific minimum operating parameter. Condition VI.2.a required that the permittee establish what the correct minimum operating parameters are. No change was made.

VI.2.b, The company requested that the control devices be identified in this condition.

VI.3, The company noted that the references to condition VI.10 in this condition should be changed to VI.8 in the current version of the ROP.

VI.4, 5 and 6, These conditions included language referring to a "cover" which is not applicable to this facility. The company requested the word "cover" be deleted.

VI.5 and 6, The company noted that the references to condition VI.5 should be VI.4 in the current ROP.

VI.8, The company suggested the following alternate language for this condition to clarify its intent: "For the control devices used to comply with 40 CFR Part 63 Subpart HHH, the permittee shall establish a minimum operating parameter value or a maximum operating parameter value, as appropriate for the control device, to define the conditions at which the control device must be operated to continuously achieve the emission limits in Section I of FGMACTHHH. Each minimum or maximum operating parameter value shall be established as follows:"

VII.6.a. The company requested that Semiannual Periodic Reports be submitted in accordance with the timelines for Semiannual ROP reporting to simplify report submittal. Subpart HHH does not address this directly but Part 63, Subpart A, the General Provisions, 63.10(a)(5) states "If an owner or operator of an affected source in a State with delegated authority is required to submit periodic reports under this part to the State, and if the State has an established timeline for the submission of periodic reports that is consistent with the reporting frequency(ies) specified for such source under this part, the owner or operator may change the dates by which periodic reports under this part shall be submitted (without changing the frequency of reporting) to be consistent with the State's schedule by mutual agreement between the owner or operator and the State. For each relevant standard established pursuant to section 112 of the Act, the allowance in the previous sentence applies in each State beginning 1 year after the affected source's compliance date for that standard. Procedures governing the implementation of this provision are specified in §63.9(i)." The State of Michigan does have delegation for 40 CFR Part 63 National Emission Standardas for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities. As a result the reporting period for this condition can be changed to match the existing ROP semiannual reporting timeline.

FGMACTDDDDD

Description: Additional information was provided regarding the capacity of the EURC018 gas withdrawal heater.

## **Changes to the October 7, 2013 Draft ROP**

In response to comments received from the company, the following changes were made to the ROP:

### Emission Unit Summary Table

The 13 MMBtu capacity of the EURC018 gas withdrawal heater was added to the table.

### FGMACTZZZZ

V.2, Added 76% formaldehyde emission reduction. This is the primary way ANR will demonstrate compliance with Subpart ZZZZ emission limits. Meeting the formaldehyde emission concentration limit is also an option but not one that ANR intends to utilize.

V.5, Changed language to clarify this is an alternative to performance testing for condenser control devices.

VII.5, changed "6 days" to "60 days".

### FGMACTHHH

I.1, included V.5 as a Monitoring/Testing Method.

III.6, Changed wording to "each control device" and kept temperature limit for thermal oxidizer. Deleted UAR 40 DFR 63.1283(d)(5)(i) which deals with establishing minimum operating limits and is addressed in VI.7.

V.4.c, Changed "ASTM D64200-99" to "ASTM D6420-99".

VI.2.b, Language "condenser or thermal oxidizer" was added to the condition.

VI.3, Changed references to condition VI.10 to VI.8.

VI.4, 5 and 6, Deleted the word "cover" from the condition.

VI.5 and 6, Changed referenced to VI.5 to VI.4.

VI.8, Added the suggested language.

VII.6.a, Changed reporting language to match ROP reporting timeline.

### FGMACTDDDDD

Description, Added 13MMBtu heat input capacity rating to the EURC018 gas withdrawal heater.

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**DECEMBER 17, 2013 - STAFF REPORT  
ADDENDUM**

MI-ROP-B3721-2014

**Purpose**

A Staff Report dated October 7, 2013, was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). The purpose of this Staff Report Addendum is to summarize additional comments received from the applicant on the draft ROP following the 30-day public comment period. In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

**General Information**

Responsible Official:	Vern Meier, Vice President, U.S. Pipeline Operations 832-320-5505
AQD Contact:	Kurt Childs, Environmental Quality Analyst 231-876-4411

**Summary of Pertinent Comments**

Following the start of the USEPA 45 day review period additional comments were submitted by the applicant that would correct errors in the Proposed ROP and Staff Report. As a result, AQD is requesting to re-start the USEPA 45 day review period to address the following comments:

**STAFF REPORT**

An outdated regulatory reference was identified in the Regulatory Analysis regarding 40 CFR Part 63 Subpart DDDDD. Specific heat input or range of heat input ratings in MMBtu/hr are identified for various emission units. These regulatory classifications no longer exist in Subpart DDDDD and new information became available indicating the heat input rating of EURC001 is 8MMBtu/hr not "less than 5 MMBtu/hr".

**FGMACTZZZZ**

V.2, Clarification necessary to accurately reflect the Subpart ZZZZ testing requirements. Semi-annual testing only applies when limiting formaldehyde concentration not when complying with the 76% reduction requirement.

**FGMACTHHH**

Additional comments indicated there was an error in the wording of III.6 since the condenser requires a maximum temperature limit not a minimum.

**FGMACTDDDDD**

Additional comments received from the permittee identified two typographical errors in condition VII.4; "biannually" should be "biennially" and in VII.4.e. "EURC01" should be "EURC001".

## **Changes to the October, 07 2013 Draft ROP**

### **FGMACTZZZZ**

V.2, Changed language to accurately reflect Subpart ZZZZ testing requirements under either the formaldehyde concentration limit or the formaldehyde reduction limit scenarios.

### **FGMACTHHH**

III.6, In response to the additional comment received regarding this condition it was determined that previous changes to the language in this condition resulted in inaccurate language and the wording of the condition was revised to correct the error and improve the clarity of the requirement.

### **FGMACTDDDDD**

VII.4, Corrected typographical errors, changed "biannually" to "biennially", changed "EURC01" to "EURC001".

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**RENEWABLE OPERATING PERMIT**

ROP Number

B3721

**AUGUST 24, 2015 - STAFF REPORT FOR RULE  
217(2) REOPENING**

MI-ROP-B3721-2014a

**Purpose**

On February 6, 2014, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B3721-2014 to ANR Pipeline Company pursuant to R 336.1214. Once issued, the AQD is required to reopen the ROP if the criteria described in R 336.1217 are met. Only those conditions to be added or changed in the ROP are to be considered during this public comment period. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1217.

**General Information**

Responsible Official:	Randall, Schmidgall, VP of US Gas Pipelines and Storage Operations 832-320-5511
AQD Contact:	Kurt Childs, Environmental Quality Analyst 231-876-4411
Date Public Comment Begins:	August 24, 2015
Deadline for Public Comment:	September 23, 2015

**Regulatory Analysis**

The AQD has determined that the ROP must be reopened because new process equipment (gas withdrawal heaters) have been installed and have new applicable requirements under 40 CFR Part 63, Subpart DDDDD.

Two new gas withdrawal heaters (EURC016 and EURC017) that are subject to the 40 CFR Part 63, Subpart DDDDD requirements for New Units Designed to Burn Gas 1 fuels have been installed to replace three existing heaters (EURC016, EURC017, and EURC018). The Subpart DDDDD requirements are applicable to the emission units upon startup which has already occurred. Therefore these requirements are now being incorporated into the ROP.

**Description of Changes to the ROP**

A new Flexible Group table (FGMACTDDDDDD-NEWGAS1) containing the applicable requirements has been added to the ROP. Additionally, Changes have been made to the Flexible Group table previously identified as FGMACTDDDDDD, including renaming it FGMACTDDDDDD-EXISTINGGAS1, to reflect the process equipment changes. These changes are also reflected in the Emission Unit Summary Table. Also some typographical errors identified in the ROP have been corrected.

**Action Taken by the Department**

The AQD proposes to approve this change to ROP No. MI-ROP-B3721-2014a, which was reopened by the AQD in order to incorporate applicable requirements from 40 CFR Part 63, Subpart DDDDD. A final decision on the approval of the revised ROP will not be made until the public and any affected states have had an opportunity to comment on the proposed changes to the ROP and the USEPA has been

allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is Janis Ransom, Cadillac District Supervisor. The final determination for approval of the revised ROP will be based on a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by the public, any affected states or the USEPA.

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**OCTOBER 1, 2015 - STAFF REPORT  
ADDENDUM FOR RULE 217(2) REOPENING**

MI-ROP-B3721-2014a

**Purpose**

A Staff Report dated August 24, 2015, was developed in order to set forth the applicable requirements and factual basis for the draft reopening to Renewable Operating Permit's (ROP) terms and conditions as required by R 336.1214(3). The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP reopening during the 30-day public and affected state(s) comment period as described in R 336.1214(3) and (4). In addition, this addendum describes any changes to the proposed ROP reopening resulting from these pertinent comments.

**General Information**

Responsible Official:	Randall, Schmidgall, VP of US Gas Pipelines and Storage Operations 832-320-5511
AQD Contact:	Kurt Childs, Environmental Quality Analyst 231-876-4411

**Summary of Pertinent Comments**

No pertinent comments were received during the 30-day public comment period.

**Changes to the August 24, 2015 Draft ROP Reopening**

No changes were made to the draft ROP reopening.