

Michigan Department of  
Environment, Great Lakes, and Energy  
Air Quality Division

State Registration Number  
N6838

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-N6838-2019

**Vector Pipeline L.P., Highland Compressor Station**

State Registration Number (SRN): N6838

Located at

2282 South Duck Lake Road, Highland, Oakland, Michigan 48356

Permit Number: MI-ROP-N6838-2019

Staff Report Date: March 11, 2019

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) of the administrative rules promulgated under Act 451, requires that the Michigan Department of Environment, Great Lakes, and Energy (EGLE), 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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**RENEWABLE OPERATING PERMIT**  
**MARCH 11, 2019 - STAFF REPORT**

ROP Number  
MI-ROP-N6838-2019

**Purpose**

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with an ROP pursuant to Title V of the federal Clean Air Act; and Michigan's Administrative Rules for Air Pollution Control promulgated under 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 Staff Report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft ROP terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft ROP 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:	Vector Pipeline L.P., Highland Compressor Station 2282 South Duck Lake Road Highland, Michigan 48356
Source Registration Number (SRN):	N6838
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:	201800104
Responsible Official:	Belinda Friis, General Counsel 734-462-7621
AQD Contact:	Joseph Forth, Environmental Quality Analyst 586-217-1435
Date Application Received:	August 10, 2018
Date Application Was Administratively Complete:	August 22, 2018
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	March 11, 2019
Deadline for Public Comment:	April 10, 2019

## Source Description

The Vector Pipeline, L.P., Highland Compressor Station is a compressor station used to maintain pressure of pipeline quality sweet natural gas in order to move it along the transmission pipeline system. The Highland Compressor Station consists of two (2) natural gas fired turbine driven compressors and a single natural gas fired internal combustion engine standby power unit.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2017**.

### **TOTAL STATIONARY SOURCE EMISSIONS**

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide (CO)	5.01
Lead (Pb)	N/A
Nitrogen Oxides (NO <sub>x</sub> )	20.9
Particulate Matter (PM)	6.0
Sulfur Dioxide (SO <sub>2</sub> )	0.43
Volatile Organic Compounds (VOCs)	0.98

<b>Individual Hazardous Air Pollutants (HAPs) **</b>	<b>Tons per Year</b>
N/A	N/A
<b>Total Hazardous Air Pollutants (HAPs)</b>	<b>N/A</b>

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

This facility is a true minor source for HAPS. Therefore, HAP emissions are not listed. No Hazardous Air Pollutant (HAP) emissions were included in the Vector Pipeline- Highland Compressor Station 2017 MAERS emission inventory report (and none were required by the Air Quality Division to be reported).

See Parts C and D in the 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.

Oakland County is currently designated by the United States Environmental Protection Agency (USEPA) as a non-attainment area with respect to the 8-hour ozone standard.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because the potential to emit of carbon monoxide and oxides of nitrogen exceed 100 tons per year and the potential to emit of Greenhouse Gases is 100,000 tons per year or more calculated as carbon dioxide equivalents (CO<sub>2</sub>e) and 100 tons per year or more on a mass basis.

The stationary source is a minor source of HAP emissions because the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act, is less than 10 tons per year and the potential to emit of all HAPs combined are less than 25 tons per year.

The stationary source is considered a “synthetic minor” source in regards to the Prevention of Significant Deterioration regulations of 40 CFR 52.21 because the stationary source accepted legally enforceable permit conditions limiting the potential to emit of carbon monoxide to less than 250 tons per year.

FGTURBINES (EUTURBINE1 and EUTURBINE2) at the stationary source is subject to the Standards of Performance for Stationary Gas Turbines promulgated in 40 CFR Part 60, Subparts A and GG.

EUSPU3 at the stationary source is subject to the National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ.

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 all emission units at the stationary source either do not have a control device or those with a control device do not have potential pre-control emissions over the major source thresholds.

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-N6838-2014a are identified in Appendix 6 of the ROP.

PTI Number			
221-04			

**Streamlined/Subsumed Requirements**

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

**Non-applicable Requirements**

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

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EUPORTABLEENGINES	Portable gasoline fired internal combustion engines. Used at various sites along the pipeline or on-site. Includes Portable Generator (10 HP Tecumseh Engine and 9 HP Honda Engine), Power Washer (6.5 HP Honda Engine), Portable Air Compressor, Snow Blower, and Weed Trimmer	R 336.1212(4)(d)	R 336.1285(2)(g)
EUPORTABLETOOLS	Portable Power Tools (4.5 HP angle grinder, bench grinder, drill press, electric hand drills, sawzall and circular saw)	R 336.1212(4)(d)	R 336.1285(l)(vi)(B)

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

This draft ROP 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 MDEQ, AQD**

The AQD proposes to approve this ROP. 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 USEPA is allowed up to 45 days to review the draft ROP 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 Joyce Zhu, Southeast Michigan District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the ROP 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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**RENEWABLE OPERATING PERMIT**  
**MAY 1, 2019 - STAFF REPORT ADDENDUM**

ROP Number  
MI-ROP-N6838-2019

**Purpose**

A Staff Report dated March 11, 2019, was developed to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by Rule 214(1) of the administrative rules promulgated under Act 451. 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 Rule 214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

**General Information**

Responsible Official:	Belinda Friis, General Counsel 734-462-7621
AQD Contact:	Joseph Forth, Environmental Quality Analyst 586-217-1435

**Summary of Pertinent Comments**

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

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**JUNE 18, 2019 - STAFF REPORT ADDENDUM**

**Purpose**

A Staff Report dated March 11, 2019, was developed to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by Rule 214(1) of the administrative rules promulgated under Act 451. The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 45-day EPA comment period as described in Rule 214(3). In addition, this addendum describes any changes to the proposed ROP resulting from these pertinent comments.

**General Information**

Responsible Official:	Belinda Friis, General Counsel 734-462-7621
AQD Contact:	Joseph Forth, Environmental Quality Analyst 586-217-1435

**Summary of Pertinent Comments**

No pertinent comments were received during the 45-day EPA comment period.