

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : ANR Storage Company - Excelsior Compressor Station	SRN : B7196
Location : 4936 State Rd. NE	District : Cadillac
	County : KALKASKA
City : KALKASKA State: MI Zip Code : 49646	Compliance Status : Compliance
Source Class : MAJOR	Staff : Jodi Lindgren
FCE Begin Date : 7/1/2019	FCE Completion Date : 8/12/2020
Comments : Field inspection and record review report CA B719655109	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/12/2020	Scheduled Inspection	Compliance	2020 FCE field inspection and records review
04/08/2020	MACT (Part 63)	Non Compliance	The 2019 annual Boiler MACT was submitted timely and properly certified. Both 10.00 MMBtu/hr gas withdrawal heaters, EUEXHTR-A and EUEXHTR-B, were reported as having a tune-up on 3/18/2019. The 2019 Annual ROP certification, 2019 2nd Semi-annual ROP certification report, and 2019 2nd semi-annual MACT HHH report were submitted in the same certification report.
04/08/2020	ROP Annual Cert	Compliance	MI-ROP-B7197-2017 2019 Annual Certification submitted timely and properly certified with no deviations for the reporting period (7/1/2019-12/31/2019). The 2019 2nd Semi-annual ROP certification report, the 2nd 2019 semi-annual MACT HHH report, and 2019 annual Boiler MACT report were submitted in the same certification report.

Activity Date	Activity Type	Compliance Status	Comments
04/08/2020	MACT (Part 63)	Compliance	The CVS is current with NDE LDAR testing. It was last performed 12/18/2018 and will be valid until 12/18/2023. The CVS had no reports of leaks nor defects with the AVO inspection, no permanent or semi-permanent seals were broken, and the bypass valves remained closed and lock during the reporting period. The last CMS certification was completed on 12/17/2019. During the reporting period, the glycol dehydrator ran for a total of 46.6 hours, no excursions nor excess emissions events occurred, no malfunctions, downtime, nor repairs were reported for any monitoring equipment or process equipment. The 2019 Annual ROP certification, 2019 2nd Semi-annual ROP certification report, and 2019 annual Boiler MACT report were submitted in the same certification report.
04/08/2020	ROP SEMI 2 CERT	Compliance	MI-ROP-B7197-2017 2nd 2019 Semi-annual Certification submitted timely and properly certified with no deviations for the reporting period (7/1/2019-12/31/2019). The 2019 annual ROP certification report, the 2nd 2019 semi-annual MACT HHH report, and 2019 annual Boiler MACT report were submitted in the same certification report.
03/16/2020	ROP R215 Notification	Compliance	Change in RO From Richard P Connor to Craig Rundle.
03/09/2020	MAERS	Compliance	See MAERS for further info.
10/18/2019	Stack Test	Compliance	The stack test for EUEXCOMP-A was completed on August 19, 2019 by Karl Mast of Environmental Quality Management, Inc with observation from Rob Dickman, EGLE-AQD. The measured NOx limit was reported as an average of 79.13 lb/hr, which is 79.8% of the permitted limit of 99.2 lb/hr. The report demonstrates compliance with the 6-12 PTI conditions.

Activity Date	Activity Type	Compliance Status	Comments
09/26/2019	Other	Compliance	January 20, 2019 deviation information request and summary - ANR response to 9/12/2019 EGLE AQD information request concerning a ROP deviation, which occurred on January 20, 2019, and was reported on the first semiannual ROP report certification received by EGLE AQD on August 30, 2019.
09/12/2019	ROP Semi 1 Cert	Compliance	MI-ROP-B7197-2017 1st 2019 Semi-annual Certification submitted timely and properly certified with one deviation for the reporting period (1/1/2019-6/30/2019). The reported deviation occurred on 1/20/2019 and lasted for six hours. The deviation occurred during a simultaneous malfunction of the primary control, thermal oxidizer (RTO), and secondary control, condenser. More information was requested by the AQD inspector on 9/12/19 via email. A follow up report (CA B719650903) will be submitted with the additional details obtained with the information request. The semi-annual ROP certification report and the semi-annual MACT HHH were submitted in the same certification report.

Activity Date	Activity Type	Compliance Status	Comments
09/12/2019	MACT (Part 63)	Compliance	<p>On 1/20/2019, the primary control, thermal oxidizer (RTO), and secondary control, condenser, simultaneously malfunctioned requiring the condenser bypass valve to be opened for a combined total of 1 hour consisting of two 15 -minute pressure relief events and one 30-minute pressure relief event. The bypass valve venting was deemed necessary due to unsafe pressure levels building in the glycol dehydrator reboiler. The RTO control board failed. Following repairs, the RTO was returned to service on 1/23/2019. The condenser experienced a valve malfunction when the control system automatically routed emissions from the malfunctioning RTO. The valve was repaired, and the condenser returned to full service 6-hours after the initial RTO malfunction. The condenser was solely utilized for control until the RTO was repaired. During the reporting period, the glycol dehydrator ran for a total of 1,506.6 hours. No excursions were reported. The CVS is current with NDE LDAR testing. It was last performed 2/19/2015 and will be valid until 2/19/2020. The next NDE LDAR testing should be reported no later than 1st 2020 semi-annual MACT report. The CVS had no reports of leaks nor defects with the AVO inspection and no permanent or semi-permanent seals were broken. With the exception of the condenser bypass valve opened during the control malfunction, all bypass valves remained closed and lock during the reporting period. The last CMS certification was completed on 12/17/2018. No CMS malfunctions, downtime, nor repairs were reported. The semi-annual ROP certification report and the semi-annual MACT HHH were submitted in the same certification report.</p>
09/04/2019	ROP Other	Compliance	<p>Notification of NOx Performance Test. The testing procedure established in the plan was reviewed in detail by Jeremy Howe, TPU.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/19/2019	Stack Test Observation	Compliance	MI-ROP-B7196-2017 EUEXCOMP-A NOx emission test.

Name: _____ Date: _____ Supervisor: _____