

Michigan Department of Natural Resources & Environment  
Air Quality Division

EFFECTIVE DATE: January 1, 2011

REVISION DATE(S):

ISSUED TO

ANR PIPELINE COMPANY- CAPAC COMPRESSOR STATION

State Registration Number (SRN): B6481

LOCATED AT

4876 Kettlehut Road, Capac, Michigan 48014

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-B6481-2011

Expiration Date: December 31, 2015

Administratively Complete ROP Renewal Application Due Between July 1, 2014, and  
July 1, 2015

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

**SOURCE-WIDE PERMIT TO INSTALL**

Permit Number: MI-PTI-B6481-2011

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Natural Resources and Environment

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Christopher Ethridge, Acting Southeast Michigan District Supervisor

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## AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Natural Resources and Environment (MDNRE) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a source-wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements will be identified for each ROP term or condition. All terms and conditions that are included in a PTI, are streamlined or subsumed, or is state only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

## A. GENERAL CONDITIONS

### Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
- Those conditions that are hereby incorporated in a state only enforceable Source-wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R336.1214a(5))**
- Those conditions that are hereby incorporated in federally enforceable Source-wide PTI No. MI-PTI-B6481-2011 pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

### General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**
2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities: **(R 336.1213(1)(d))**
  - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
  - c. Inspect, at reasonable times, any of the following:
    - i. Any stationary source.
    - ii. Any emission unit.
    - iii. Any equipment, including monitoring and air pollution control equipment.
    - iv. Any work practices or operations regulated or required under the ROP.
  - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

### **Equipment & Design**

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

### **Emission Limits**

11. Except as provided in Subrules 2, 3, and 4 of Rule 301, states in part; “a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of Rule 301(1)(a) or (b) unless otherwise specified in this ROP.” The grading of visible emissions shall be determined in accordance with Rule 303. **(R 336.1301(1) in pertinent part):**
  - a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
  - b. A limit specified by an applicable federal new source performance standard.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
  - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.<sup>1</sup> **(R 336.1901(a))**
  - b. Unreasonable interference with the comfortable enjoyment of life and property.<sup>1</sup> **(R 336.1901(b))**

### **Testing/Sampling**

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner’s or operator’s expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1). **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(4))**

## Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate: **(R 336.1213(3)(b))**
- The date, location, time, and method of sampling or measurements.
  - The dates the analyses of the samples were performed.
  - The company or entity that performed the analyses of the samples.
  - The analytical techniques or methods used.
  - The results of the analyses.
  - The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

## Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a responsible official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A responsible official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
- For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
  - For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
  - For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **(R 336.1213(3)(c))**
- Submitting a certification by a responsible official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
  - Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a responsible official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a responsible official in a manner consistent with the CAA. **(R 336.1912)**

### Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
- The applicable requirements are included and are specifically identified in the ROP.
  - The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.
- Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.
27. Nothing in this ROP shall alter or affect any of the following:
- The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
  - The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
  - The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
  - The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
- a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
  - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
  - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
  - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
  - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

### Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(9))**
33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

### Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
- a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
  - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
  - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
  - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

## Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP.  
**(R 336.1210(7))**

## Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaiming, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.
37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

## Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
- June 21, 1999,
  - Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
  - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR, Part 68)**

## Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216.  
**(R 336.1213(12))**

## Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.<sup>2</sup> **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.<sup>2</sup> **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDNRE.<sup>2</sup> **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months, or has been interrupted for 18 months, the applicable terms and conditions from that PTI shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDNRE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.<sup>2</sup> **(R 336.1201(4))**

### Footnotes:

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## **B. SOURCE-WIDE CONDITIONS**

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

### C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

#### EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCP003	Glycol Dehydration system used to remove moisture from natural gas withdrawn from the storage field. The system equipment consists of a flash vessel, heat exchangers and filters, distillation column, and a reboiler/surge tank. The emissions to the atmosphere from the system are destroyed initially by a thermal oxidizer A condenser used as a back up to the thermal oxidizer.	1/1/1982	NA
EUCP001	Delaval HVA 16C Compressor Engine, 4830 HP, natural gas fired, 4-stroke, Lean burn, reciprocating compressor engine; used to compress natural gas for injection into or withdrawal from a natural gas storage field.	9/1/1978	FGCPREC
EUCP004	Delaval HVA 16C Compressor Engine, 4830 HP, natural gas fired, 4-stroke, Lean burn, reciprocating compressor engine; used to compress natural gas for injection into or withdrawal from a natural gas storage field.	10/1/1978	FGCPREC
EUCPGENERATOR	Caterpillar, diesel fuel-fired, compressor ignition, standby emergency electricity generator (300 bhp, 4 stroke), Stationary Reciprocating Internal Combustion engine (RICE), existing, less than 500 HP, located at a major HAP source	9/1/1978	NA
EURULE285(mm)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 285(mm).	N/A	FGRULE285(mm)

**EUCP003**  
**EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Glycol Dehydration system used for removing moisture from natural gas withdrawn from the storage field. The system equipment consists of a flash vessel, heat exchangers and filters, distillation column, and a reboiler/surge tank. The emissions to the atmosphere from the system are destroyed initially by a thermal oxidizer A condenser used as a back up to the thermal oxidizer.

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

Thermal Oxidizer and Condenser

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Volatile Organic Compounds (VOC)	a. 45.5 pounds <sup>2</sup>	a. Per day	Glycol dehydration unit and associated equipment	Section V	R336.1205(1) R336.1901 R336.1702(a) R336.1201(3)
	b. 8.3 tons <sup>2</sup>	b. Per year based on a 12-month rolling time period as determined at the end of each calendar month			
2. Benzene	1 ton <sup>2</sup> (0.9 mega gram)	Per 12-month rolling time period as determined at the end of each calendar month	Glycol dehydration unit and associated equipment	Section V	40 CFR 63.1274(d)(2) R336.1205(1) R336.1201(3) R336.1901

**II. MATERIAL LIMITS**

- The permittee shall not use stripping gas in EUCP003<sup>2</sup>.  
**(R336.1201(3), R336.1205, R336.1225, R336.1702(a), R336.1901)**

**III. PROCESS/OPERATIONAL RESTRICTIONS**

- Permittee shall not operate the glycol dehydration unit unless the thermal oxidizer operating temperature is at least 760°C (1400°F), a minimum residence time of at least 0.5 second is maintained, and the VOC destruction efficiency is at least 95% per cent by weight, except during a thermal oxidizer malfunction as specified in condition (IV-3).<sup>2</sup>  
**(R336.1201(3)), (R336.1205(1)), (R336.1702(a)), (R336.1901)**
- Permittee shall not operate the glycol dehydration unit during thermal oxidizer malfunction unless the condenser exhaust temperature is 140°F or less.<sup>2</sup>  
**(R336.1201(3)), (R336.1205(1)), (R336.1702(a)), (R336.1901)**

#### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. Permittee shall not operate the glycol dehydration unit unless a properly operating flash tank, that would volatilize organic compounds out of the rich glycol stream and route them to the glycol dehydration unit reboiler unit, is installed and operating properly.<sup>2</sup>  
(R336.1201(3)), (R336.1205(1)), (R336.1702(a)), (R336.1901)
2. Permittee shall not operate the glycol dehydration unit unless the glycol regenerator still is equipped with a thermal oxidizer installed and operating properly, except as specified in the condition (IV-3) below.<sup>2</sup>  
(R336.1201(3)), (R336.1205(1)), (R336.1702(a)), (R336.1901)
3. Permittee may operate the glycol dehydration unit, in the event of a thermal oxidizer malfunction, if the glycol regenerator still is equipped with a condenser installed and operating properly.<sup>2</sup>  
(R336.1201(3)), (R336.1205(1)), (R336.1702(a)), (R336.1901)

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. Permittee shall determine the composition of the natural gas, including VOC and benzene content, processed in the glycol dehydration unit.<sup>2</sup>  
(R336.1201(3)), (R336.1205(1)), (R336.1901), (R336.1702(a))
2. Permittee shall determine the natural gas composition, including VOC and benzene content, by a method or methods which are standard in the natural gas industry, subject to approval by the Air Quality Division.<sup>2</sup>  
(R336.1201(3)), (R336.1205(1)), (R336.1901), (R336.1702(a))
3. Permittee shall determine the composition, including VOC and benzene content, of the natural gas processed in the glycol dehydration unit at least once per every five years.<sup>2</sup>  
(R336.1201(3)), (R336.1205(1)), (R336.1901), (R336.1702(a))
4. Permittee shall recalculate the emission factor specified in Condition VI-10 each time the natural gas is analyzed to determine composition including VOC and benzene content.<sup>2</sup>  
(R336.1201(3)), (R336.1205(1)), (R336.1901), (R336.1702(a))

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. Permittee shall equip and maintain an operating temperature monitor for the thermal oxidizer.<sup>2</sup>  
(R336.1201(3)), (R336.1205(1)), (R336.1901), (R336.1702(a))
2. Permittee shall equip and maintain an exhaust gas temperature monitor for the condenser.<sup>2</sup>  
(R336.1201(3)), (R336.1205(1)), (R336.1901), (R336.1702(a))
3. Permittee shall monitor and record the thermal oxidizer operating temperature on a daily basis when the glycol dehydration unit is operating, except in the event of a thermal oxidizer malfunction.<sup>2</sup>  
(R336.1201(3)), (R336.1205(1)), (R336.1901), (R336.1702(a))
4. Permittee shall monitor and record the condenser exhaust gas temperature on daily basis when the glycol dehydration unit is operating, as specified in the condition (IV-3) above.<sup>2</sup>  
(R336.1201(3)), (R336.1205(1)), (R336.1901), (R336.1702(a))
5. Permittee shall monitor and record total hours of operation of the glycol dehydration unit for each day.<sup>2</sup>  
(R336.1201(3)), (R336.1205(1)), (R336.1901), (R336.1702(a))
6. Permittee shall monitor and record total hours of operation of the thermal oxidizer for each day.<sup>2</sup>  
(R336.1213(3)(a)), (R336.1205(1)), (R336.1901), (R336.1702(a))

7. Permittee shall monitor and record the amount of natural gas processed through the glycol dehydration unit for each day.<sup>2</sup>  
**(R336.1201(3)), (R336.1205(1)), (R336.1901), (R336.1702(a))**
8. Permittee shall calculate and record the amount of VOC emissions, in pounds, from the glycol dehydration unit for each calendar day. The calculated VOC emissions for each day of a calendar month shall be available to the AQD upon request no later than 15<sup>th</sup> of the next calendar month.<sup>2</sup>  
**(R336.1201(3)), (R336.1205(1)), (R336.1901), (R336.1702(a))**
9. Permittee shall separately calculate and record VOC and benzene emissions from the glycol dehydration unit, on a monthly basis, in tons, and on a 12-month rolling time period basis, in tons per year. Permittee shall make these monthly and 12-month rolling time period records available to the AQD upon request no later than 15<sup>th</sup> of the next calendar month.<sup>2</sup>  
**(R336.1201(3)), (R336.1205(1)), (R336.1901), (R336.1702(a))**
10. Permittee shall determine the actual average VOC and benzene emissions from the glycol dehydration unit process using an **emission factor** calculated with the GRI-GLYCalc™ computer model, version 3.0 or higher and the procedures presented in the associated GRI-GLYCalc™ Technical Reference manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled “Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions”. The VOC composition and benzene content, of the natural gas, which is input to the model shall be as determined in the most recent analysis of the natural gas processed in each glycol dehydration unit.<sup>2</sup>  
**(R336.1201(3)), (40 CFR 63.1282(a)(2)(i)), (R336.1205(1)), (R336.1901), (R336.1702(a))**

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year.  
**(R 336.1213(4)(c))**

See Appendix 8

**VIII. STACK/VENT RESTRICTIONS**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCP007 (oxidizer)	NA	16 <sup>1</sup>	<b>R336.1901 R336.1201(3)</b>
2. SVCP003 (condenser)	2 <sup>1</sup>	16 <sup>1</sup>	<b>R336.1901 R336.1201(3)</b>

**IX. OTHER REQUIREMENTS**

1. Permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart HHH-National Emission Standards for Hazardous Air Pollutants From National Gas Transmission and Storage Facilities.<sup>2</sup>  
**(R336.1201(3)), (40 CFR Part 63, Subpart HHH), (40 CFR 63.1274(d)(2))**

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUCPGENERATOR  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Caterpillar, diesel fuel-fired, compressor ignition, standby emergency electricity generator (300 bhp, 4 stroke), Stationary Reciprocating Internal Combustion engine (RICE), existing, less than 500 HP, located at a major HAP source

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT:** NA

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	NA	NA	NA

**II. MATERIAL LIMITS**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	NA	NA	NA

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. Permittee shall perform following work practice standards, except during periods of startup, for emergency CI RICE less than or equal to 500 HP located at major sources:
  - A. Change oil and filter every 500 hours of operation or annually, which ever comes first
  - B. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first
  - C. Inspect all hoses and belts every 500 hours of operation or annually which ever comes first, and replace as necessary. **(40 CFR 63.6640, Table 2c)**
2. Permittee must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. **(40 CFR 63.6640, Table 2c)**
3. Permittee shall not operate EUCPGENERATOR for any purpose other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year. **(40 CFR 63.6640(f)(1))**
4. Permittee shall limit the maintenance checks and readiness testing, which are recommended by Federal, State, or Local government, the manufacturer, the vendor, or the insurance company associated with EUCPGENERATOR, to 100 hours per year including the maximum 50 hours per year non-emergency operations. **(40 CFR 63.6640)(f)(3) & (4)**

**IV. DESIGN/EQUIPMENT PARAMETERS**

1. Permittee must install a non-resettable hour meter, if one is not already installed, on EUCPGENERATOR to record the hours of operation. **(40 CFR 63.6625(f))**

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. Permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that EUCPGENERATOR and after-treatment control device (if any) was operated and maintained according to the Permittee's own maintenance plan. **(40 CFR 63.6655(e))**
2. Permittee shall keep records of hour of operation of the EUCPGENERATOR, including how many hours are spent for emergency operation and how many hours are spent for non-emergency operation. **(40 CFR 63.6655(f))**
3. If EUCPGENERATOR was used for demand response, the permittee must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. **(40 CFR 63.6655(f))**
4. Permittee shall maintain a record of the size (BHP), installation date, and type of operation (lean burn/rich burn, 2 stroke/4 stroke) of EUCPGENERATOR.

**(R336.1213(3)(b)), (40 CFR 63, Subpart ZZZZ)**

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

**VIII. STACK/VENT RESTRICTIONS**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. NA	NA	NA	NA

**IX. OTHER REQUIREMENTS**

1. Permittee shall comply with all applicable requirements of 40 CFR 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants from Reciprocating Internal Combustion Engines (RICE).  
**(R336.1213 (3)(b)), (40 CFR 63, Subpart ZZZZ)**
  
2. Permittee shall comply with the operating limitations, specified in 40 CFR 63, subpart ZZZZ, for existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, by no later than May 3, 2013.  
**(40 CFR 63.6595(a)(1))**
  
3. Permittee must operate and maintain the stationary RICE, including air pollution control and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions at all times, including during startup, shutdown, and malfunction.  
**(40 CFR 63.6605)(b))**
  
4. Permittee shall operate and maintain EUCPGENERATOR according to the manufacturer's emission-related operation and maintenance related written instructions; or develop and follow permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.  
**(40 CFR 63.6625(e))**

**Footnotes:**

- <sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
- <sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## D. FLEXIBLE GROUP CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

### FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
FGCPREC	Two natural gas-fired reciprocating internal compressor engines	EUCP001, EUCP004
FGRULE285(mm)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 285(mm).	EURULE285(mm)

**FGCPREC**  
**FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION:**

Two natural gas-fired, lean burn, reciprocating internal compressor engines.

**Emission Units:** EUCP001, EUCP004

**POLLUTION CONTROL EQUIPMENT:** NONE

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	NA	NA	NA

**II. MATERIAL LIMITS**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	NA	NA	NA

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. Permittee shall only burn pipeline natural gas in the reciprocating engines at the facility.<sup>2</sup>  
**(R336.1301)(1)**

**IV. DESIGN/EQUIPMENT PARAMETERS**

1. NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. Permittee shall monitor and record the natural gas consumption rate for each emission unit listed in FGCPREC for each calendar month.  
**(R336.1213(3)(b))**
2. Permittee shall maintain a record of the size (BHP), installation date, hours of operation, and type of operation (lean burn/rich burn, 2 stroke/4 stroke) of these units to demonstrate compliance with 40 CFR 63.6590(b)(3).  
**(R336.1213(3)(b)), (40 CFR 63.6590(b)(3)), (40 CFR 63, Subpart ZZZZ)**

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

**VIII. STACK/VENT RESTRICTIONS**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. NA	NA	NA	NA

**IX. OTHER REQUIREMENTS**

1. Permittee shall comply with all applicable requirements of 40 CFR 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants from Reciprocating Internal Combustion Engines (RICE). **(R336.1213(3)(b)), (40 CFR 63.6590(b)(3)), (40 CFR 63, Subpart ZZZZ)**

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGRULE285 (mm)**  
**FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 285(mm).

**Emission Unit:**

**POLLUTION CONTROL EQUIPMENT**

1. NA

**I. EMISSION LIMIT(S)**

1. NA

**II. MATERIAL LIMIT(S)**

1. NA

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. For venting of natural gas for routine maintenance or relocation of transmission and distribution systems in amounts greater than 1,000,000 standard cubic feet, the permittee shall, at a minimum, implement measures to assure safety of employees and the public and minimize impacts to the environment.<sup>1</sup> **(R 336.1285 (mm)(ii)(B))**

**IV. DESIGN/EQUIPMENT PARAMETERS**

1. NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. NA

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year.  
**(R 336.1213(4)(c))**
- 4. For venting of natural gas for routine maintenance or relocation of transmission and distribution systems in amounts greater than 1,000,000 standard cubic feet, the permittee shall notify the AQD Southeast Michigan District Supervisor prior to a scheduled pipeline venting.<sup>1</sup>  
**(R 336.1285 (mm)(ii)(A))**
- 5. For venting of natural gas for routine maintenance or relocation of transmission and distribution systems in amounts greater than 1,000,000 standard cubic feet, the permittee shall provide necessary notification in accordance with the Michigan gas safety standards, the federal pipeline and hazardous materials safety administration standards, and the federal energy regulatory commission standards, as applicable.<sup>1</sup>  
**(R 336.1285(mm)(ii)(B))**
- 6. For emergency venting of natural gas in amounts greater than 1,000,000 standard cubic feet per event, the permittee shall notify the pollution emergency alert system (PEAS) within 24 hours of an emergency pipeline venting. For purposes of this requirement, an emergency is considered an unforeseen event that disrupts normal operating conditions and poses a threat to human life, health, property, or the environment if not controlled immediately.<sup>1</sup>  
**(R 336.1285 (mm)(iv))**

See Appendix 8

**VIII. STACK/VENT RESTRICTIONS**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. NA	NA	NA	NA

**IX. OTHER REQUIREMENTS**

- 1. NA

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).  
<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that the requirements identified in the table below are not applicable to the specified emission unit(s) and/or flexible group(s). This determination is incorporated into the permit shield provisions set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii). If the permittee makes a change that affects the basis of the non-applicability determination, the permit shield established as a result of that non-applicability decision is no longer valid for that emission unit or flexible group.

Emission Unit/Flexible Group ID	Non-Applicable Requirement	Justification
Source-wide	40 CFR Part 60 Subpart K- Standards of Performance for Storage Vessels for Petroleum Liquids	This rule applies to the construction or modification of storage vessels for petroleum liquids which have a capacity greater than 40,000 gallons after June 11, 1973 through May 19, 1978. All petroleum liquid storage tanks currently located at this facility have capacities less than 40,000 gallons and were not constructed or modified during this time period. Therefore, the liquid petroleum tanks at this facility are not subject to this Rule.
Source-wide	40 CFR Part 60 Subpart Ka- Standards of Performance for Storage Vessels for Petroleum Liquids	This rule applies to the construction or modification of storage vessels for petroleum liquids which have a capacity greater than 40,000 gallons after May 18, 1978 through July 23, 1984. All petroleum liquid storage tanks currently located at this facility have capacities less than 40,000 gallons and were not constructed or modified during this time period. Therefore, the liquid petroleum tanks at this facility are not subject to this Rule.
Source-wide	40 CFR 60, Subpart Dc- Standards of Performance for Small Industrial-Commercial- Institutional Steam Generating Units	This standard is applicable to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum heat input capacity of 29 megawatts (MW) (100 Million BTU/hr or less but greater than or equal to 2.9 MW (10 million BTU/hr). This standard is not applicable to the Capac Compressor Station because there are no natural gas-fired boilers with a design heat input capacity of 2.9 MW (10 MMBTU/hr) or greater.
Source-wide	40 CFR 60, Subpart Kb- Standards of Performance for Volatile Organic Liquid Storage Vessels	This regulation applies to volatile organic liquid storage vessels with storage capacity greater than 75 cubic meters (19,812 gallons) and constructed, reconstructed, or modified after July 23, 1984. There are no tanks that were installed at the Capac Station after the effective date, and all tanks have capacity less than 75 cubic meters. Therefore this regulation is not applicable.
Source-wide	40 CFR 60, Subpart KKK- Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants	This regulation is not applicable to Capac Station because the facility is not a natural gas processing plant as defined in the regulation. The facility does not engage in extraction of natural gas liquids from field gas or fractionate mixed natural gas liquids to natural gas products.
Source-wide	40 CFR 60, Subpart LLL- Standards of Performance for Onshore Natural Gas Processing: SO2 Emissions	Standards of Performance for Onshore Natural Gas Processing: SO2 emissions does not apply to Capac Station. The Capac Station will not have any equipment involved in natural gas sweetening or sulfur recovery.

<b>Emission Unit/Flexible Group ID</b>	<b>Non-Applicable Requirement</b>	<b>Justification</b>
Source-wide	40 CFR 60, Subpart JJJJ- Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	On January 18, 2008, US EPA issued final Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. Because Capac Station engines were in September and October of 1987, the engines are not subject to the proposed new source performance standard for spark ignited internal combustion engines.
Source-wide	40 CFR 61, Subpart M- National Emission Standard for Asbestos	The Capac Station may at times engage in demolition and/or renovation activities involving asbestos-containing materials (ACM). Therefore, the facility could be potentially subject to Subpart M, Standards for Demolition and Renovation (40 CFR 61.145). Procedures are in place to ensure the facility complies with these standards.
Source-wide	40 CFR 61, Subpart V- National Emission Standard for Equipment Leak	This regulation is not applicable to the Capac Station because the provisions of this subpart apply to sources that are intended to operate in volatile hazardous air pollutant (VHAP) service. The Capac Station does not have any sources that operate in VHAP service.
Source-wide	40 CFR 63. Subpart HH- NESHAP for Oil and Natural Gas Production Facilities	This regulation is not applicable to the Capac Station because the facility is a transmission and storage facility and is not an oil and gas production facility as defined in this regulation.
Source-wide	40 CFR 63, Subpart HHH- NESHAP for Natural Gas Production and Storage Facilities	The facility is a major source of HAPs and Operates a glycol dehydration unit (affected source). However the General Standard cited under Subpart 63.1274 allows for an exemption from the requirements associated with the rule if actual emissions of benzene do not exceed 0.9 mega grams on an annual basis. The Capac dehydration unit qualifies for the exemption because the benzene emissions do not exceed 0.90 mega grams per year. The Title V permit limits the benzene emissions to less than one ton per year.

## APPENDICES

### Appendix 1: Abbreviations and Acronyms

The following is an alphabetical listing of abbreviations/acronyms that may be used in this permit.

AQD	Air Quality Division	MM	Million
acfm	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	MW	Megawatts
BTU	British Thermal Unit	NA	Not Applicable
°C	Degrees Celsius	NAAQS	National Ambient Air Quality Standards
CAA	Federal Clean Air Act	NESHAP	National Emission Standard for Hazardous Air Pollutants
CAM	Compliance Assurance Monitoring	NMOC	Non-methane Organic Compounds
CEM	Continuous Emission Monitoring	NOx	Oxides of Nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
COM	Continuous Opacity Monitoring	PM	Particulate Matter
department	Michigan Department of Natural Resources and Environment	PM-10	Particulate Matter less than 10 microns in diameter
dscf	Dry standard cubic foot	pph	Pound per hour
dscm	Dry standard cubic meter	ppm	Parts per million
EPA	United States Environmental Protection Agency	ppmv	Parts per million by volume
EU	Emission Unit	ppmw	Parts per million by weight
°F	Degrees Fahrenheit	PS	Performance Specification
FG	Flexible Group	PSD	Prevention of Significant Deterioration
GACS	Gallon of Applied Coating Solids	psia	Pounds per square inch absolute
gr	Grains	psig	Pounds per square inch gauge
HAP	Hazardous Air Pollutant	PeTE	Permanent Total Enclosure
Hg	Mercury	PTI	Permit to Install
hr	Hour	RACT	Reasonable Available Control Technology
HP	Horsepower	ROP	Renewable Operating Permit
H <sub>2</sub> S	Hydrogen Sulfide	SC	Special Condition
HVLP	High Volume Low Pressure *	scf	Standard cubic feet
ID	Identification (Number)	sec	Seconds
IRSL	Initial Risk Screening Level	SCR	Selective Catalytic Reduction
ITSL	Initial Threshold Screening Level	SO <sub>2</sub>	Sulfur Dioxide
LAER	Lowest Achievable Emission Rate	SRN	State Registration Number
lb	Pound	TAC	Toxic Air Contaminant
m	Meter	Temp	Temperature
MACT	Maximum Achievable Control Technology	THC	Total Hydrocarbons
MAERS	Michigan Air Emissions Reporting System	tpy	Tons per year
MAP	Malfunction Abatement Plan	µg	Microgram
MDNRE	Michigan Department of Natural Resources and Environment	VE	Visible Emissions
mg	Milligram	VOC	Volatile Organic Compounds
mm	Millimeter	yr	Year

\*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 pounds per square inch gauge (psig).

## Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. **(R 336.1213(4)(a), R 336.1119(a)(ii))**

## Appendix 3. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

## Appendix 4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

## Appendix 5. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

## Appendix 6. Permits to Install

The following table lists any PTIs issued since the effective date of previously issued ROP No. MI-ROP-B6481-2004. **This includes any PTI that were incorporated into the Source-wide PTI No MI-PTI-B6481-2004 through amendments or modifications and any PTI that remained off-permit until this ROP renewal.**

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
307-00A	Glycol dehydration system	EUCP003
MI-PTI-B6481-2004	Source-wide Permit to Install	EUCP003

## Appendix 7. Emission Calculations

There are no specific emission calculations to be used for this ROP. Therefore, this appendix is not applicable.

## Appendix 8. Reporting

### A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDNRE Report Certification form (EQP 5736) and MDNRE Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

### B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.