

State Registration Number
B8573

Michigan Department of Environmental Quality
Air Quality Division
**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-B8573-2019

**Great Lakes Gas Transmission Company, LP
Boyne Falls Compressor Station**

State Registration Number (SRN): B8573

Located at

10339 Great Lakes Road, Boyne Falls, Charlevoix County, Michigan 49713

Permit Number: MI-ROP-B8573-2019

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) 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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MARCH 11, 2019 - STAFF REPORT

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 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 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:	Boyne Falls Compressor Station 10339 Great Lakes Road Boyne Falls, Michigan 49713
Source Registration Number (SRN):	B8573
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:	201800011
Responsible Official:	Richard P. Connor, Director US Pipeline Operations -- Great Lakes Region 231-527-2122
AQD Contact:	William Rogers, Environmental Quality Analyst 989-705-3406
Date Application Received:	January 17, 2018
Date Application Was Administratively Complete:	January 17, 2018
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	March 11, 2019
Deadline for Public Comment:	April 10, 2019

Source Description

Great Lakes Gas Transmission Limited Partnership (GLGT) operates a pipeline which carries natural gas across Northern Michigan. The Boyne Falls Compressor Station is also known, in some documents, as Compressor Station 11 because it is the eleventh station along the pipeline. Pipeline compressor stations, including the Boyne Falls Compressor Station, boost the pressure inside the pipeline to push the natural gas through, to and from storage facilities or to local distribution companies.

The facility operates on an as-needed basis. It does not always run. Normally, when the station runs, only one of the two compressor units will operate.

The two compressor engines, EUUNIT1101 and EUUNIT1102, are Rolls Royce Avon Model 76G Stationary Gas Turbines. They are rated at 16,000 horsepower each. They burn natural gas from the pipeline as fuel, at a heat input rate of 158.8 MMBtu/hr each. Both turbines were installed in 1971.

The GLGT Boyne Falls Compressor Station is approximately 10 miles northeast of the city of Boyne Falls.

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

Pollutant	Tons per Year
Carbon Monoxide (CO)	52
Lead (Pb)	0
Nitrogen Oxides (NO _x)	22
Particulate Matter (PM)	1
Sulfur Dioxide (SO ₂)	0
Volatile Organic Compounds (VOCs)	0

This source is a true minor source for Hazardous Air Pollutants (HAPs), thus no HAP emissions data is listed.

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.

The stationary source is in Charlevoix 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 for carbon monoxide and nitrogen oxides 100 tons per year each.

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

EUUNIT1101 and EUUNIT1102 at the stationary source were subject to review under the Prevention of Significant Deterioration regulations of 40 CFR 52.21, because at the time of New Source Review permitting the potential to emit of carbon monoxide and nitrogen oxides was greater than 250 tons per year.

EUAPU at the stationary source is subject to the Maximum Achievable Control Technology Standards under the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines for Area Sources, promulgated in 40 CFR Part 63, Subparts A and ZZZZ.

AQD had previously believed that EUBOILER at the stationary source was subject to the National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, Institutional Boilers and Process Heaters, promulgated in 40 CFR Part 63, Subparts A and JJJJJJ. However, upon review AQD has determined that this was not correct. EUBOILER is not subject to Subpart JJJJJJ because that Subpart exempts boilers which burn only gaseous fuels such as natural gas. Accordingly, Table EUBOILER from the previous ROP for the stationary source, MI-ROP-B8573-2013, has been removed from the draft renewal 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 have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule pursuant to 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-B8573-2013 are identified in Appendix 6 of the ROP.

PTI Number			
438-87B			

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

There were no processes listed in the ROP Application as exempt devices under Rule 212(4). Exempt devices are not subject to any process-specific emission limits or standards in any applicable requirement.

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 Shane Nixon, Cadillac 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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APRIL 11, 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 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:	Richard P. Connor, Director 231-527-2122
AQD Contact:	William Rogers, Environmental Quality Analyst 989-705-3406

Summary of Pertinent Comments

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

Changes to the March 11, 2019 Draft ROP

No changes were made to the draft ROP.