DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: On-site Inspection

N557573486	-		
FACILITY: ANR Pipeline Company - Bridgman Compressor Station		SRN / ID: N5575	
LOCATION: 3372 Browntown Rd, BRIDGMAN		DISTRICT: Kalamazoo	
CITY: BRIDGMAN		COUNTY: BERRIEN	
CONTACT:		ACTIVITY DATE: 08/22/2024	
STAFF: Chance Collins	SOURCE CLASS: MAJOR		
SUBJECT: Scheduled inspection for FCE.			
RESOLVED COMPLAINTS:			

On August 22, 2024, AQD staff traveled to Berrien County to perform an inspection of ANR Pipeline Company – Bridgman Compressor Station. The purpose of the inspection was to determine the facility's compliance with MI-ROP-N5575-2018, Permit to Install No. 92-20A, and applicable state and federal air pollution control regulations.

The facility recently went through a major change that decommissioned and removed the majority of equipment from MI-ROP-N5575-2018 and replaced it with the equipment listed on Permit to Install No. 92-20A. This PTI is currently being rolled into the ROP renewal. The facility is a compressor station whose main function is to maintain certain pressures in pipelines that transport sweet natural as from ANRs southwest mainline to storage facilities or local distribution companies.

AQD staff arrived on site at 09:35 a.m. to sunny conditions with a temperature of 67° F, and a SE wind of 5 mph. There were no noticeable odors upon arrival.

AQD staff met with Joshua Stilwell (Electrical, Instrumentation & Controls Technician) on-site, and Chris McFarlane (PG, Manager, Air emissions and Reporting) via phone conference who answered all questions and escorted staff around the site. The following discusses the results of the on-site inspection and review of records:

MI-ROP-N5575-2018:

EUBG009: Removed from facility.

EUBG011: Removed from facility.

EUBG012: Removed from facility.

FGEQUIMENT: Removed from facility.

Permit to Install No. 92-20A:

EUBG015:

Description: Emergency engine: Natural gas-fired 4-stroke, lean burn Waukesha L36GL emergency engine rated at 880 hp, powering an electric generator.

Emission Limits:

Pollutant	Limit	Equipment
1	1	

		Time Period/Operating Scenario	
NOx	2.0 g/hp-hr OR 160 ppmvd	Hourly	EUBG015
со	4.0 g/hp-hr OR 540 ppmvd	Hourly	EUBG015
voc	1.0 g/hp-hr OR 86 ppmvd	Hourly	EUBG015

(For purposes of NSPS Subpart JJJJ, when calculating emission of VOC, emissions of formaldehyde should not be included.)

Facility appears to be in compliance.

Material Limits:

The permittee shall burn only pipeline quality natural gas in EUBG015. Facility appears to be in compliance.

Process/Operational Restrictions:

1. The permittee shall not operate EUBG015 for more than 500 hours per year based on a 12-month rolling time period as determined at the end of each calendar month. The 500 hours includes the hours for the purpose of necessary maintenance checks and readiness testing as described in SC III.(R 336.1205(1)(a), R 336.1225, R 336.1702 (a), 40 CFR 52.21(c) & (d))

2. The permittee may operate EUBG015 for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per calendar year. (40 CFR 60.4243(d)(2))

3. The permittee may operate EUBG015 up to 50 hours per calendar year in nonemergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing as provided in SC III.2. Except as provided in 40 CFR 60.4243(d)(3)(i), the 50 hours per calendar year for nonemergency situations cannot be used for peak shaving or demand response, or to generate income for the permittee to supply non-emergency power as part of a financial arrangement with another entity. (40 CFR 60.4243(d)(3)) 4. The permittee shall operate and maintain EUBG015 according to the manufacturer's emission-related written instructions such that it meets the emission limits in SC I.1, I.2, and I.3 over the entire life of the engine. (40 CFR 60.4234, 40 CFR 60.4243(b))

5. If EUBG015 is a non-certified engine or a certified engine operating in a noncertified manner, per 40 CFR Part 60 Subpart JJJJ, the permittee shall keep a maintenance plan for EUBG015 and shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 60.4243(b)(2))

Facility appears to be in compliance.

DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain EUBG015 with a non-resettable hour meter to track the operating hours. (R 336.1205(1)(a) & (3), R 336.1225, 40 CFR 60.4237)

2. The nameplate capacity of EUBG015 shall not exceed 880 HP, as certified by the equipment manufacturer. (R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d), 40 CFR 60.4230)

Facility appears to be in compliance.

TESTING/SAMPLING

 If EUBG015 is a non-certified engine or a certified engine operating in a non-certified manner, per 40 CFR Part 60 Subpart JJJJ, the permittee must demonstrate compliance as follows:

a) Conduct an initial performance test to demonstrate compliance with the emission limits in SC I.1 – I.3 within 1 year after EUBG015 begins operating in a noncertified manner. b) The performance tests shall be conducted according to 40 CFR 60.4244. c) Subsequent performance testing shall be completed every 8,760 hours of engine operation or every 3 years, whichever comes first, to demonstrate compliance with the applicable emission limits. No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1205(1)(a), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21 (c)&(d), 40 CFR 60.8, 40 CFR 60.4243, 40 CFR 60.4244, 40 CFR 60.4245, 40 CFR Part 60 Subpart JJJJ

Facility appears to be in compliance.

MONITORING/RECORDKEEPING:

1. The permittee shall keep, in a satisfactory manner, the following records for EUBG015: a) For a certified engine: The permittee shall keep records from the manufacturer that the EUBG015 is certified to meet the emission standards and information as required in 40 CFR Parts 90, 1048, 1054, and 1060, as applicable. b) For an uncertified engine: The permittee shall keep records of testing required in SC V.1. The permittee shall keep all records on file and make them available to the Department upon request. (40 CFR 60.4211)

2. The permittee shall keep, in a satisfactory manner, the following records of maintenance activity for EUBG015: a) For a certified engine: The permittee shall keep

records of the manufacturer's emission-related written instructions, and records demonstrating that the engine has been maintained according to those instructions, as specified in SC III.4. b) For an uncertified engine: The permittee shall keep records of a maintenance plan, as required by SC III.5, and maintenance activities.

3. The permittee shall keep records of notifications submitted for the completion of construction and start-up of EUBG015. (40 CFR 60.4245(a))

4. The permittee shall monitor and record, the total hours of operation for EUBG015 on a monthly and 12-month rolling time period basis, and the hours of operation during emergency and non-emergency service that are recorded through the non-resettable hour meter for EUBG015, on a calendar year basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation of EUBG015, including what classified the operation as emergency and how many hours are spent for non-emergency operation. (R 336.1205(1)(a), R 336.1225, R 336.1702(a), 40 CFR 52.21(c)&(d), 40 CFR 60.4243, 40 CFR 60.4245(b)

Facility appears to be in compliance.

REPORTING:

1. The permittee shall submit a notification specifying whether EUBG015 will be operated in a certified or a non[1]certified manner to the AQD District Supervisor, in writing, within 30 days following the initial startup of the engine and within 30 days of switching the manner of operation. (40 CFR Part 60, Subpart JJJJ)

2. If EUBG015 has not been certified by an engine manufacturer to meet the emission standards in 40 CFR 60.4231, the permittee shall submit an initial notification as required in 40 CFR 60.7(a)(1). The notification must include the following information: a) The date construction of EUBG015 commenced; b) Name and address of the owner or operator; c) The address of the affected source; d) EUBG015 information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement; e) EUBG015 emission control equipment; and f) Fuel used in EUBG015. The notification must be postmarked no later than 30 days after construction commenced for EUHM017. (40 CFR 60.7(a)(1), 40 CFR 60.4245(c))

3. The permittee shall submit an initial notification as required in 40 CFR 63.6645(f) for EUBG015. The notification must include the information in 40 CFR 63.9(b)(2)(i)-(v): a) The name and address of the owner or operator; b) The address (i.e., physical location) of the affected source; c) An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date; d) A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and e) A statement of whether the affected source is a major source or an area source. The notification must also include a statement that EUBG015 has no additional requirements and explain the basis of the exclusion (for example, that it operates exclusively as an emergency stationary RICE if it has a site rating of more than 500 brake HP located at a major source of HAP emissions). (40 CFR 63.9(b)(2)(i)-(v), 40 CFR 63.6590(b)(1), 40 CFR 63.6645(f)

Facility appears to be in compliance.

Stack/Vent Restrictions:

SVBG015 stack appears to be in compliance with permit requirements.

OTHER REQUIREMENT(S):

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subpart A and Subpart JJJJ, as they apply to EUBG015. (40 CFR Part 60 Subparts A & JJJJ)

2. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, as they apply to EUBG015. (40 CFR Part 63 Subparts A and ZZZZ, 40 CFR 63.6595

Facility appears to be complying with the previously mentioned regulations.

FGTURBINES

DESCRIPTION: Two (2) natural gas turbines with a combined heat input of 224.1 MMBtu/hr.

Emission Unit: EUBG013, EUBG014

POLLUTION CONTROL EQUIPMENT: Each turbine is equipped with SoLoNOx drylow-NOx combustion control.

Pollutant	Limit	Time Period/Operating Scenario	Equipment
NOx	25 ppmvd or 150 ng/J of useful output (1.2 lb/MWh) _{A,B,C}	Hourly	EUBG013, EUBG014 (each unit)
NOx	7.6 pph ^{A,B,D,E}	Hourly, except during startup and shutdown, low load operations, and cold weather operations	EUBG013
NOx	4.9 pph ^{A,B,D,E}	Hourly, except during startup and shutdown, low load operations, and cold weather operations	EUBG014

NOx	65.7 tpy	12-month rolling time period as determined at the end of each calendar month	FGTURBINES
со	7.7 pph ^{A,B,D,E}	Hourly, except during startup and shutdown, low load operations, and cold weather operations	EUBG013
со	5.0 pph ^{A,B,D,E}	Hourly, except during startup and shutdown, low load operations, and cold weather operations	EUBG014
со	213 tpy	12-month rolling time period as determined at the end of each calendar month	FGTURBINES
SO2	0.060 lb/MMBtu ^{A,B,D,E}	Hourly	EUBG013, EUBG014 (each unit)

ppmvd = parts per million by volume at 15 percent O2 and on a dry gas basis lb/MWh = pound per megawatt hour

^A Does not include startup and shutdown.

^B Startup is defined as the period of time from initiation of the combustion process (flame-on) from shutdown status and continues until steady state operation (loads greater than a demonstrated percent of design capacity) is achieved. Shutdown is defined as that period of time from the lowering of the turbine output below the demonstrated steady state level, with the intent to shut down, until the combustion process ends at flame-off. The demonstrated percent of design capacity, or demonstrated steady state level, shall be described in the plan required in SC III.2.

^c Table 1 of 40 CFR Part 60 Subpart KKKK allows 150 ppmvd NOx at 15 percent O2 when the turbines are operating at less than 75 percent of peak load, or at temperatures less than 0°F.

^D Cold weather operation shall be defined as anytime when the ambient outdoor temperature is less than 0°F E Low load operation shall be defined as anytime when the turbine is operating at 50% or less of full load

Facility appears to be in compliance. NOx emissions ranged from 4.23 tpy to 13.71 tpy, which is well within limits. CO emissions ranged from 3.83 tpy to 14.41 tpy, which is well within limits.

Material Limits:

Material	Limit	Time Period/Operating Scenario	Equipment
Sulfur content in natural gas	0.25 gr/100 scf	At all times	FGTURBINES

Facility appears to be in compliance.

PROCESS/OPERATIONAL RESTRICTION(S):

1. Within 180 days of initial startup, the permittee shall submit, implement, and maintain a malfunction abatement plan (MAP) as described in Rule 911(2) for FGTURBINES. The MAP shall, at a minimum, specify the following:

a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.

b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.

c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

d) Operating variables and ranges under various load conditions shall be monitored and recorded. The normal operating range of these variables and a description of the method of monitoring shall be maintained.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1205(1)(a) & (3), R 336.1224, R 336.1702(a), R 336.1910, R 336.1911)

2. Within 180 days of initial startup, the permittee shall submit, implement, and maintain a plan that describes how emissions will be minimized during startup and shutdown. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporate standard industry practices, and shall describe the demonstrated percent of design capacity, or demonstrated steady state level. Unless notified by the District Supervisor within 30 business days after plan submittal, the plan shall be deemed approved. (R 336.1911, R 336.1912, 40 CFR 60.4333(a))

3. The total events for startup and shutdown for each turbine in FGTURBINES shall not exceed 200 startup and shutdown events per 12-month rolling time period as determined at the end of each calendar month. (R 336.1205(1)(a) & (3), 40 CFR 52.21 (c) & (d))

4. The total hours for low load operation for each turbine in FGTURBINES shall not exceed 200 hours per 12-month rolling time period as determined at the end of each calendar month. Low load operation shall be defined as anytime when the turbine is operating at 50% or less of full load. Low load operation does not include startups and shutdowns. (R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))

5. The permittee shall operate and maintain FGTURBINES, including associated equipment and monitors, in a manner consistent with safety and good air pollution control practice. (40 CFR 60.4333(a)

Facility appears to be in compliance.

DESIGN/EQUIPMENT PARAMETER(S):

1. The maximum design heat input capacity for EUBG013 shall not exceed, on a fuel heat input basis, 132.9 MMBTU per hour (HHV) at 32°F, as described in the manufacturer's product documentation. (R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))

2. The maximum design heat input capacity for EUBG014 shall not exceed, on a fuel heat input basis, 91.2 MMBTU per hour (HHV) at 32°F, as described in the manufacturer's product documentation. (R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))

3. The permittee shall not operate FGTURBINES unless the dry-low-NOx (SoLoNOx) control is installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each turbine in accordance with an approved MAP for FGTURBINES as required in SC III.1. (R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1910)

4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the natural gas usage rate for each turbine within FGTURBINES on a continuous basis. (R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d)

Facility appears to be in compliance.

TESTING/SAMPLING:

1. Within 60 days after achieving the maximum production rate on each unit, but no later than 180 days after commencement of initial startup, the permittee shall verify CO and NOX emission rates from each turbine in FGTURBINES at maximum routine operating conditions, by testing at owner's expense, in accordance with Department requirements. The permittee must complete the required testing once every five years of operation, thereafter. Testing shall be based on an average of three 1-hour or longer test runs performed using an approved EPA Method. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1205 (1)(a) & (b), R 336.1224, R 336.1225, R 336.1331(1)(c), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004

2. The permittee must conduct an initial performance test of NOX emission rates from each turbine in FGTURBINES, as required in 40 CFR 60.8. Subsequent NOx performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test) in accordance with 40 CFR 60.4400 to demonstration continuous compliance. If the NOx emission result from the performance test is less than or equal to 75 percent of the NOx emission limit specified in SC I.1, the permittee may reduce the frequency of subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75 percent of the NOx emission limit for the turbine, the permittee must resume annual performance tests. (40 CFR 60.4340(a), 40 CFR 60.4400(a))

3. The performance test required under SC V.2 must be done at any load conditions within plus or minus 25 percent of 100 percent peak load. The permittee may perform testing at the highest achievable load point, if at least 75 percent of peak load cannot be achieved in practice. The permittee must conduct three separate test runs for each performance test. The minimum time per run is 20 minutes. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office Mithin 60 days following the last date of the test. (R 336.2001, R 336.2003, R 336.2004, 40 CFR 60.4375(b), 40 CFR 60.4400(b))

Facility appears to be in compliance.

MONITORING/RECORDKEEPING:

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(1)(a) & (3), 40 CFR 60.4345)

2. The permittee shall monitor and record, in a satisfactory manner, the natural gas usage for each turbine in FGTURBINES on an hourly and monthly basis. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(1)(a) & (3))

3. The permittee shall keep, in a satisfactory manner, a record of the monthly and 12month rolling total hours of startup and shutdown, cold weather operation, and lowload for each turbine in FGTURBINES. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))

4. The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling NOX and CO mass emissions for FGTURBINES. The permittee shall keep records of the basis of the calculations, including any product documentation from the turbine manufacturer used to determine emissions during startup and shutdown, cold weather operation, and low-load (R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))

5. The permittee shall maintain records of all information necessary for all notifications and reports as specified in these special conditions as well as that information necessary to demonstrate compliance with the emission limits of this permit for each turbine within FGTURBINES. This information shall include, but shall not be limited to the following:

a) Compliance tests and any testing required under the special conditions of this permit;

b) Total sulfur content and potential sulfur emissions, as applicable, of the natural gas as required by 40 CFR 60.4365(a) or (b);

c) Verification of heat input capacity as required by SC IV.1 and IV.2;

d) Identification, type, and amount of fuel combusted on a calendar month basis;

e) All records required by 40 CFR 60.7;

f) Records of the duration of all dates and times of startup and shutdown events;

g) Records of the duration of all dates and times of low load operations;

h) Records of the duration of all dates and times of cold weather operations;

i) All calculations necessary to show compliance with the limits contained in this permit;

j) All records related to, or as required by, the MAP and the startup and shutdown plan. All of the above information shall be stored in a format acceptable to the AQD District Supervisor. (R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1331(1)(c), R 336.1702(a), R 336.1912, 40 CFR 60.7, 40 CFR 60.4365, 40 CFR Part 60 Subpart KKKK)

Reporting:

NA

Stack/Vent Restrictions:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)
SVBG013	123 x 116	55
SVBG014	114 x 114	55

Facility appears to be in compliance.

OTHER REQUIREMENT(S):

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and KKKK, as they apply to FGTURBINES. (40 CFR Part 60 Subparts A & KKKK)

Facility appears to be complying with the regulations.

FGHEATERS

DESCRIPTION:

Various natural gas-fueled heating units with a maximum combined heat input rating of 3.0 MMBtu/hr.

Emission Unit: EUFUELGASHTR, EUSPACEHEAT

POLLUTION CONTROL EQUIPMENT: NA

EMISSION LIMIT(S): NA

MATERIAL LIMIT(S):

The permittee shall only burn pipeline quality natural gas in FGHEATERS. (R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a))

PROCESS/OPERATIONAL RESTRICTION(S):

The maximum heat input of all equipment in FGHEATERS combined shall not exceed 3.0 MMBtu/hr. (R 336.1205(1)(a) & (3), R 336.1225, 40 CFR 52.21(c) & (d)) IV.

Facility appears to be in compliance.

DESIGN/EQUIPMENT PARAMETER(S): NA

TESTING/SAMPLING: NA

MONITORING/RECORDKEEPING:

1. The permittee shall maintain records showing the maximum heat input capacity of all equipment in FGHEATERS. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1702)

Facility appears to be in compliance.

FGTANKS

DESCRIPTION: Two (2) storage tanks.

Emission Unit: EUFLUIDSTANK, EUWATERTANK

POLLUTION CONTROL EQUIPMENT: NA

EMISSION LIMIT(S): NA

MATERIAL LIMIT(S): NA

PROCESS/OPERATIONAL RESTRICTION(S): NA

DESIGN/EQUIPMENT PARAMETER(S):

1. The design capacity of the tanks in FGTANKS shall not exceed the following: (R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1702(a))

a) EUFLUIDSTANK: 4,100 Gallons

b) EUWATERTANK: 1,200 Gallons

Facility appears to be in compliance.

TESTING/SAMPLING: NA

MONITORING/RECORDKEEPING:

1. The permittee shall keep, in a satisfactory manner, records of the storage capacity and general contents of each tank in FGTANKS. (R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1702(a))

Facility appears to be in compliance.

REPORTING: NA

STACK/VENT RESTRICTION(S): NA

OTHER REQUIREMENT(S): NA

FGFACILITY

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DESCRIPTION: The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment, and exempt equipment.

POLLUTION CONTROL EQUIPMENT: NA

https://intranet.egle.state.mi.us/maces/WebPages/ViewActivityReport.aspx?ActivityID=24... 9/25/2024

Pollutant	Limit	Time Period/ Operating Scenario	Equipment
Each Individual HAP	8.9 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY
Aggregate HAPs	22.4 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY

Facility appears to be in compliance. Aggregate HAPs range from a low of 3.10 tpy to 3.72 tpy. Each individual HAP is well within the emission limit.

MATERIAL LIMIT(S): NA

PROCESS/OPERATIONAL RESTRICTION(S): NA

DESIGN/EQUIPMENT PARAMETER(S): NA

TESTING/SAMPLING: NA

MONITORING/RECORDKEEPING:

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(3))

2. Beginning during the first month that either EUBG013, EUBG014, EUBG015, or EUFUELGASHTR starts up, the permittee shall monitor and record, in a satisfactory manner, emission calculations for FGFACILITY determining the cumulative emission rate of individual and aggregate HAPs during the first 12-months, and the annual emission rate of each thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month. (R 336.1205(1)(a) & (3), 40 CFR 52.21 (c) & (d))

Facility appears to be in compliance.

REPORTING: NA

STACK/VENT RESTRICTION(S): NA

OTHER REQUIREMENT(S): NA

DATE 8/22/2024

SUPERVISOR Monica Brothers