

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N558646360

FACILITY: ANR Pipeline Company Lincoln Compressor Station		SRN / ID: N5586
LOCATION: 3991 S. Hickory, LAKE GEORGE		DISTRICT: Saginaw Bay
CITY: LAKE GEORGE		COUNTY: CLARE
CONTACT: Chris Waltman , Senior Environmental Specialist		ACTIVITY DATE: 07/25/2018
STAFF: Matthew Karl	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection and records review.		
RESOLVED COMPLAINTS:		

On Wednesday (7/25/18) Ben Witkopp and I (Matt Karl) arrived on site to conduct a scheduled compliance inspection of the ANR Pipeline Company – Lincoln Compressor Station located at 3991 South Hickory, Lake George, Michigan. The purpose of this inspection was to check the source's compliance with the Federal Clean Air Act, Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality – Air Quality Division (MDEQ-AQD) Administrative Rules and Renewable Operating Permit (ROP) Permit No. MI-ROP-N5586-2012. Mr. Gene Bass assisted during the inspection and Mr. Chris Waltman, Senior Environmental Specialist provided requested records.

Source Description:

The ANR Pipeline Company – Lincoln Compressor Station is a natural gas compression and transmission station that operates three compressor engines, an emergency generator, a boiler and a dehydration furnace. The compressor engines are used to raise the pressure of gas and move it to and from storage reservoirs. The following table summarizes the emission units:

Emission Unit ID	Emission Unit Description	Manufacturer	Model/Type	Rated Capacity (hp)	Heat Input (MMBtu/hr)	Install/Mod Date
EU-LI001	Compressor Engine 1	Clark	TLAD8	3,200	22.4	1/1/71
EU-LI002	Compressor Engine 2	Clark	TLAD8	3,200	22.4	1/1/71
EU-LI003	Compressor Engine 3	Cooper-Bessemer	16W330	8,000	55.2	1/1/74
EU-LI004	Emergency Generator	GE Caterpillar	G379	330	3.2	1974
EU-LI006	Natural Gas Fired Boiler	Kewanee	-	-	3.2	1970
EU-LI007	Dehydration Furnace	-	-	-	1.1	1970
EU-LI008	Regen Gas Heater	-	-	-	6.63	2018

Facility Inspection:

First, we checked the RICE MACT Emergency Engine Log for Lincoln- Entity # 6061167 APU (EU-LI004). The unit had run 8 times from 2/14/18 to 7/11/18. The hour meter recorder indicated the unit ran for a total of 17.8 hours. 3 hours of this running time was for maintenance "MOI test". The unit ran for 2 emergency outages, on 5/28/18 for 8.6 hours and on 6/17/18 for 6.2 hours.

We then inspected the permitted emission units in the following order. First, we looked at EU-LI001, a Clark TLAD8 Compressor Engine, it is an 8 cylinder, 2-stroke natural gas engine. We were informed it was scheduled for a rebuild in the next few months. We confirmed EU-LI002 was onsite and in good order at the time of our inspection. The Cooper-Bessemer Compressor Engine (EU-LI003) had its compressor valves out for rebuild at the time of our inspection. The Kewanee Boiler (EU-LI006) was onsite and in good condition. It had last been inspected/serviced on 7/21/17.

The dehydration furnace (EU-LI007) was decommissioned at the time of our inspection. We were informed that the facility would be reinstalling within a few months.

Records Review:

Ben Witkopp requested the following information from Chris Waltman on 8/10/18 and received it via email on 9/5/18. The following records are in the District office files.

- RICE MACT Emergency Engine Log records for 2017, 2018
- Compressor Engine 01, 02, 03 operating hours for 2017, 2018 January-April
- Compressor Engine 01, 02, 03 fuel use for 2017, 2018 January-April
- ANR Pipeline Company- Lincoln Compressor Station Minor Amendment Application

We were also informed the dehydration furnace/regeneration heater project had not yet been completed so notifications had not yet been submitted. The initial notification would follow start-up. The work was expected to be completed within the next few weeks from the time of the records request submission.

Minor Air Permit Amendment Application: 4/5/18

The minor air permit amendment application was to replace the existing dehydration furnace (EU-LI007) with a new natural gas-fired broach regeneration gas heater (EU-LI008) rated at 6.63 MMBtu/hr. The heater would be subject to 40 CFR Part 63, Subpart DDDD: Industrial, Commercial and Institutional Boilers and Process Heaters (Boiler MACT). The heater is exempt from the requirement to obtain a Permit to Install (PTI) under R 336.1282 (2)(b)(i). This exemption applies to fuel-burning equipment used in oil and gas processing, which uses sweet natural gas and has a rated heat input capacity of not more than 50 MMBtu/hr. This exemption appears to apply.

The company stated in the Minor Air Permit Amendment Application that:

"None of the provisions in R 336.1216(2)(a)(i)-(v) apply to this project as both EU-LI007 and EU-LI008 are both subject only to the Boiler MACT requirements which only establishes work practice standards, monitoring, and reporting requirements. The change to remove EU-LI007 and add EU-LI008 to the ROP would not significantly affect these requirements. Therefore, the change qualifies as a minor modification under R 336.1216(2)."

This appears to apply.

The company stated in the Minor Air Permit Amendment Application that:

"The proposed change will increase total emissions at the facility, as outlined in the attached emission calculations. The largest increases are for NOx (2.38 TPY) and CO (2.00 TPY). The source is a major existing source in regard to federal PSD regulations; however, these emissions increases are below the major modification threshold for PSD review."

This appears to be true.

FG-LIREC: Compliant

This flexible group consists of the 3 compressor engines: EU-LI001, EU-LI002; EU-LI003.

SC VI.1. Requires the permittee to record the monthly natural gas consumption.

The following information is from the 2017 monthly fuel usage report:

Compressor Engine 1 (EU-LI001) had a maximum monthly fuel usage of 7.3285 MMCF in January 2017. This unit did not run in May through July, November or December of 2017. Compressor Engine 2 (EU-LI002) had a maximum monthly fuel usage of 7.7775 MMCF in October 2017. This unit did not run in May or June of 2017. Compressor Engine 3 (EU-LI003) had a maximum monthly fuel usage of 6.3433 MMCF in September 2017. This unit did not run in January-March, May-July, October or November of 2017.

2017 Fuel Usage

Emission Unit ID	Fuel Usage (MMCF) Yearly Sum
EU-LI001	32.6859
EU-LI002	26.8841
EU-LI003	6.8265
Total (EU-LI001+ EU-LI002 EU-LI003)	66.3965

The following information is from the 2018 monthly fuel usage report: January-April

Compressor Engine 1 (EU-LI001) had a maximum monthly fuel usage of 5.0059 MMCF in January 2018. This unit did not run in February or March of 2018. Compressor Engine 2 (EU-LI002) had a maximum monthly fuel usage of 3.8191 MMCF in February 2018. Compressor Engine 3 (EU-LI003) had a maximum monthly fuel usage of 18.6945 MMCF in February 2018. This unit did not run in March of 2018.

2018 Fuel Usage

Emission Unit ID	Fuel Usage (MMCF) Yearly Sum (Jan-April)
EU-LI001	5.4554
EU-LI002	6.4071
EU-LI003	43.1813
Total (EU-LI001+ EU-LI002 EU-LI003)	55.0438

FG-RICEMACT: Compliant

This flexible group consists of the emergency generator: EU-LI004.

SC IX.1. Permittee shall comply with applicable requirements of 40 CFR Part 63 Subpart ZZZZ NESHAP for Major Sources: Reciprocating Internal Combustion Engines (RICE).

The RICE MACT Emergency Engine Log 2017 contained the following information:

The unit had run 14 times from 1/5/17 to 12/14/17. The hour meter recorder indicated the unit ran for a total of 13 hours. 9.6 hours of this running time was for maintenance "MO1 test and M01 Test No Load". The unit ran for 2 emergency outages, on 5/22/18 for 1.6 hours and on 9/24/18 for 1.8 hours.

The RICE MACT Emergency Engine Log 2018 contained the following information:

The unit had run 9 times from 1/14/18 to 7/11/18. The hour meter recorder indicated the unit ran for a total of 18.3 hours. 3.5 hours of this running time was for maintenance "MO1 test". The unit ran for 2 emergency outages, on 5/28/18 for 8.6 hours and on 6/17/18 for 6.2 hours.

FG-BOILERMACT: Unknown

This flexible group consists of the Kewanee boiler EU-LI006 and the dehydration furnace EU-LI007.

SC IX.1. Permittee shall comply with applicable requirements of 40 CFR Part 63 Subpart DDDDD NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

Records were not received to determine compliance with this requirement. A request for additional information was sent to Chris Waltman via email on 9/27/18. A compliance evaluation report will follow receipt of those records.

Summary:

At the time of our 7/25/18 scheduled inspection, the ANR Pipeline Company Lincoln Compressor Station appeared to be in compliance with the requirements of ROP No. MI-ROP-N5586-2012.

NAME Matthew R. Karl

DATE 10-9-2018

SUPERVISOR C. Hove