

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> Washington 10 Storage Corporation	<b>SRN :</b> N3391
<b>Location :</b> 12700 30 MILE ROAD	<b>District :</b> Warren
	<b>County :</b> MACOMB
<b>City :</b> WASHINGTON <b>State:</b> MI <b>Zip Code :</b> 48095	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Kerry Kelly
<b>FCE Begin Date :</b> 1/1/2022	<b>FCE Completion Date :</b> 5/2/2023
<b>Comments :</b> FY 2023 Full Compliance Evaluation	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
05/02/2023	MAERS	Compliance	MAERS Report Submission. Certification received. Certification received. Audit complete. Audit passed. CO emissions reported to MAERS for calendar year 2022 for each engine in FGENGINES1 and FGENGINES2 are between 3.7 and 5.1 tons lower per engine than the CO emissions in records received for the FY 2023 inspection. NOx emissions reported to MAERS for calendar year 2022 for each engine in FGENGINES1 and FGENGINES2 are between 1.2 and 2.3 tons lower per engine than the NOx emissions in records received for the FY 2023 inspection. MAERS emission factors for the engines are in lb/MMBtu while the emission factors in the reports received for this inspection are in lb/hour. DT Midstream uses MAERS emission factors for the boilers, heaters, and emergency generator.
05/02/2023	MACT (Part 63)	Compliance	MACT DDDDD annual report required in 40 CFR 63.7550(c)(1). Report also submitted to CEDRI. The report includes the information required in 40 CFR 63.7550(c). Required tune-ups completed on time based on records provided during FY 2023 inspection.

Activity Date	Activity Type	Compliance Status	Comments
05/02/2023	ROP Annual Cert	Compliance	Annual report. Report includes deviations/violations noted in the VN dated 3/15/22. The violations/deviations include not keeping accurate 4-hour rolling temperature records for FGENGINES2 catalysts and pre-catalyst sampling port for EUENGINE4 being open while engine was running & testing was not being conducted. Corrective actions were identified in the report. DTM corrected the sampling port violation/deviation on January 19, 2022.
05/02/2023	ROP SEMI 2 CERT	Compliance	Semi-annual report. No deviations reported. Based on information and belief formed after reasonable inquiry during the FY 2023 inspection, the statements and information in the notification accurate and complete.
05/02/2023	MACT (Part 63)	Compliance	MACT ZZZZ compliance report required in 40 CFR 63.6650. Report includes a statement that there were no instances during the reporting period that the CPMS was out of control. According to 40 CFR 63.8(c)(7), the CMS is out of control if the CMS fails a performance test audit (e.g., cylinder gas audit), relative accuracy audit, relative accuracy test audit, or linearity test audit. Records provided for the FY 2023 inspection indicate DT Midstream is performing scheduled relative accuracy audits on the CPMS and the values are within the tolerances stated in 40 CFR 63 Subpart ZZZZ.
03/30/2023	On-site Inspection	Compliance	FY 2023 inspection
03/15/2023	ROP Tech Review Notes		
12/07/2022	MACT (Part 63)	Compliance	MACT ZZZZ compliance report required in 40 CFR 63.6650. Report includes a statement that there were no instances during the reporting period that the CPMS was out of control. Based on my knowledge of the source, the information in the report appears to be accurate.

Activity Date	Activity Type	Compliance Status	Comments
12/07/2022	ROP Semi 1 Cert	Compliance	Revised Semi-Annual Report required in R 336.1213(3)(c)(i). Updated report includes deviations/violations noted in the VN dated 3/15/22. Revised Annual Report required in R 336.1213(3)(c)(i). Updated report includes deviations/violations noted in the VN dated 3/15/22. The violations/deviations include not keeping accurate 4-hour rolling temperature records for FGENGINES2 catalysts and pre-catalyst sampling port for EUENGINE4 being open while engine was running & testing was not being conducted. Corrective actions were identified in the report. DTM corrected the sampling port violation/deviation on January 19, 2022.
12/07/2022	ROP SEMI 2 CERT	Compliance	Revised Semi-Annual Report required in R 336.1213(3)(c)(i). Updated report includes deviations/violations noted in the VN dated 3/15/22. The violations/deviations include not keeping accurate 4-hour rolling temperature records for FGENGINES2 catalysts and pre-catalyst sampling port for EUENGINE4 being open while engine was running & testing was not being conducted. Corrective actions were identified in the report. DTM corrected the sampling port violation/deviation on January 19, 2022.
12/07/2022	ROP Annual Cert	Compliance	Revised Annual Report required in R 336.1213(3)(c)(i). Updated report includes deviations/violations noted in the VN dated 3/15/22. The violations/deviations include not keeping accurate 4-hour rolling temperature records for FGENGINES2 catalysts and pre-catalyst sampling port for EUENGINE4 being open while engine was running & testing was not being conducted. Corrective actions were identified in the report. DTM corrected the sampling port violation/deviation on January 19, 2022.

Activity Date	Activity Type	Compliance Status	Comments
12/07/2022	ROP Semi 1 Cert	Compliance	Semi-annual report. Report includes deviations/violations noted in the VN dated 3/15/22. The violations/deviations include not keeping accurate 4-hour rolling temperature records for FGENGINES2 catalysts and pre-catalyst sampling port for EUENGINE4 being open while engine was running & testing was not being conducted. Corrective actions were identified in the report. DTM corrected the sampling port violation/deviation on January 19, 2022.
12/07/2022	MACT (Part 63)	Compliance	MACT ZZZZ compliance report required in 40 CFR 63.6650. Report includes a statement that there were no instances during the reporting period that the CPMS was out of control.
12/07/2022	MACT (Part 63)	Compliance	
07/20/2022	Stack Test	Compliance	Emissions Test Report for CO for Washington 10 Compressor Station Engines EUENINE4 through EUENGINE6 conducted May 10-11, 2022. Report indicates each catalyst tested has a CO destruction efficiency greater than 93% as required in FGNEHAPZZZZ SC I.1. See "Other" report dated 7/20/22 in MACES for details.
07/20/2022	Other	Compliance	May 10 - 11, 2022 CO stack test results summary
06/08/2022	Other Non ROP		Notification of natural gas flaring as part of line maintenance.
06/01/2022	ROP Annual Cert		No deviations reported, however, during FY 2022 FCE, AQD determined the company was not keeping records of the 15-minute catalyst inlet temperature readings on file & was not calculating the 4-hour rolling average temperature based on the 15-minute readings as required in FG-ENGINES2 SC VI.8. Records of 15-minute readings are also required in FGENGINES2 SC VI.9. An email was sent to the facility contact and authorized representative 6/1/2022 requesting the reports be re-submitted.

Activity Date	Activity Type	Compliance Status	Comments
06/01/2022	ROP SEMI 2 CERT		No deviations reported, however, during FY 2022 FCE, AQD determined the company was not keeping records of the 15-minute catalyst inlet temperature readings on file & was not calculating the 4-hour rolling average temperature based on the 15-minute readings as required in FG-ENGINES2 SC VI.8. Records of 15-minute readings are also required in FG-ENGINES2 SC VI.9. An email was sent to the facility contact and authorized representative 6/1/2022 requesting the reports be re-submitted.
05/26/2022	MACT (Part 63)	Compliance	MACT DDDDD annual report required in 40 CFR 63.7550(b) and (c). Report also submitted to CEDRI. The report includes the information required in 40 CFR 63.7550(c).
05/11/2022	Stack Test Observation	Compliance	CO destruction efficiency test observation for EUENGINE6
05/09/2022	MAERS	Compliance	MAERS Report Submittal. Certification received. MAERS audit complete. Audit passed. Facility reported emissions from all permitted equipment and all exempt equipment/processes that must be reported to MAERS. Stack test was data used to calculate CO, NOx, & VOC emissions from compressor engines. Facility-wide reported NOx, CO, and VOC emissions for RY 2021 were 34.82 tons, 60.45 tons, and 0.33 tons respectively.
01/19/2022	On-site Inspection	Non Compliance	FY 2022 Full Compliance Evaluation
01/11/2022	MACT (Part 63)	Compliance	Notification of Start-up required in 40 CFR 63.7545(c) for one new boiler located in Plant 1 (EUP1_BMBLR1). The boiler is an Aerco Benchmark Model BMK2000 and has a heat input rating of 2 MMBtu/hour. According to the notification, start-up occurred December 3, 2021. Notification received on time (within 15 days of start-up).

Activity Date	Activity Type	Compliance Status	Comments
01/11/2022	MACT (Part 63)	Compliance	Notification of Start-up required in 40 CFR 63.7545(c) for two new boilers located in Plant 2 (EUP2_BMBLR1 and EUP2-BMBLR2). Both boilers are Aerco Benchmark Model BMK2000 and have a heat input rating of 2 MMBtu/hour. According to the notification, start-up occurred December 15, 2021. Notification received on time (within 15 days of start-up).

Name:

K. Kelly

Date:

5/2/2023

Supervisor:

Joyce