

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

N591529116

FACILITY: Kinder Morgan Cochin, LLC		SRN / ID: N5915
LOCATION: 3340 Will Carlton Drive, FLAT ROCK		DISTRICT: Jackson
CITY: FLAT ROCK		COUNTY: MONROE
CONTACT: Kevin Alfrey, Operations Supervisor		ACTIVITY DATE: 04/09/2015
STAFF: Diane Kavanaugh-Vetort	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Complete scheduled inspection. Opt-Out permitted facility. Pipeline metering station. Currently dormant.		
RESOLVED COMPLAINTS:		

Date of Investigation: April 9, 2015

Date of Report: April 13, 2015

Source: Kinder Morgan Cochin LLC, Flat Rock Meter Station

SRN: N5915

Address: 3340 Will Carleton Road, Flat Rock, MI 48134

Author: Diane Kavanaugh Vetort, Air Quality Division, Jackson District

Contact: Kevin Alfrey, Operations Supervisor, kevin_alfrey@kindermorgan.com

On April 9, 2015, I conducted a complete scheduled inspection of the Kinder Morgan Cochin, Flat Rock Meter Station facility located at 3340 Will Carlton Drive, Flat Rock, Monroe County. The previous inspection was conducted on July 10, 2012. The inspection was announced a short time prior because it is an unmanned facility with periodic maintenance technician stop-by checks. The prior AQD environmental contact was Kinder Morgan Cochin, Area Manager, Danny Cochran and he is located in Goshen, Indiana (approximately 4 hours away). I was given the contact information for Kevin Alfrey, Operations Supervisor upon emailing Dan to schedule today's inspection. Kevin met me at the site at approximately 9:20 a.m..

The purpose of the inspection was to determine the compliance status of the Kinder Morgan Cochin facility (hereinafter KM) with the applicable federal and state Air Pollution Control regulations, specifically Michigan Air Pollution Control Act 451, Part 55, the administrative rules and the conditions of their Air Use Permit to Install (PTI) No. 115-96C. This is a Synthetic Minor Source. The Flat Rock PTI covers only EUMETERSTATION (will be used herein). The PTI 115-96C was recently modified (issued 4/22/13) along with permits covering their other two locations in Riga and Detroit. Permit modification was to allow increased flaring throughput related to "EDS Pipeline" maintenance events. EDS is now "Plains All American Pipeline LP". It is a co-located, separately owned and operated pipeline. During the prior inspection I had observed this pipeline area, next to but appearing separate from KM's. I was told it was dormant. During today's inspection I was told it has been put back into service, and KM's pipeline is currently dormant per Kevin. Both pipelines are connected to the one existing stationary flare on site used for maintenance flaring.

Upon arrival I met Kevin Alfrey at the site. I introduced myself, provided identification and stated the purpose of the inspection. I provided Mr. Alfrey with the MDEQ Brochure, Inspection Rights and Responsibilities. There is a small building on site containing controls and various records, etc.. I observed an open log book on the table belonging to Plains All American. Kevin explained that they share the office however he has no authority over Plains employees.

Kevin informed me that the KM EUMETERSTATION is not currently operational however the Flare is. The EUMETERSTATION is permitted with:

SC II. 1. (Material Limit of) 1258 gallons flared off per 12 month rolling time period as determined at the end of each calendar month. COMPLIANT

SC IV. 1. requires the EUMETERSTATION is not to operate unless the Flare is installed, maintained and operated in a satisfactory manner. COMPLIANT

KM, Flat Rock is also required under SC. VI. 1. to keep the 12 month rolling records of gallons of liquefied propane or propane blends incinerated in the EUMETERSTATION Flare. COMPLIANT

SC. VIII. 1. requires the Flare stack to be 25 feet minimum height and 4 inches maximum diameter. COMPLIANT

I requested and obtained the KM, Flat Rock material flared record summary for the 12 month rolling period ending March 2015. KM, Flat Rock reported that 5 gallons of fuel was sent to the Flare, specifically during the month of March. Kevin stated this was not from the KM pipeline it was from Plains All American pipeline as a result of maintenance. KM has not flared in 5 yrs or longer. Therefore they are reporting very low emissions. (Attached to this Report)

I requested and obtained a copy of their Facility Monthly Safety Inspection Checklist. (Attached to this Report)

COMPLIANCE INSPECTION

During my walk through of the site with Kevin, it appeared that the pipeline was in good condition. No odors or visible emissions were observed. No obvious leaks or damage was observed. From prior inspection I was told there are two meters on the main line, referred to as Meter A and B. The EUMETERSTATION is a section of above ground pipe coming off the main pipeline that starts at Fort Saskatchewan, California and travels 1992 miles to Plains-Midstream, Windsor, Canada. LPG is then distributed to various customers.

I observed where the line enters and leaves the ground. Of course some of the piping is below ground and there is also a center section of pipe that is prior to the Flare system and is used if need to Flare gas. The "Densitometer" attached to the line was observed during last inspection. The former contact, Dan had explained its use as a pipeline gas analyzer to me, he said it is similar to a Gas Chromatograph. Kevin pointed out the portion of the pipe that could be isolated and evacuated to the Flare. I observed the by-pass line that is available to keep fuel flow going in the pipeline if the main line section is shut off. The gas flow process was briefly explained to me from where it comes in from the main pipeline near the train tracks just south of the property line through the EUMETERSTATION and back to the railway line. He said most of the pipeline travels along near rail lines. The propane gas is coming into Michigan from Canada, and then travels back over to Canada.

Again, Kevin explained to me there is another separate pipeline on this site that is operational now and is not owned by KM. It used to be called the Eastern Delivery System (EDS) but it is now owned/operated by Plains All American. During my prior inspection I was told the lines were filled with Nitrogen, cathodic protection. I observed this pipeline meter station is a similar above ground pipeline configuration on the West side of the site.

Kevin explained that they still have two pipeline Technicians that travel to various stations along the pipeline length and stop at this EUMETERSTATION once per week to do a Station check. He said they are primarily checking for leaks. However they can be called upon to go to the station at other times but at minimum visit once per week.

I observed the Flare and it appeared to be in compliance with the stack conditions in the permit. I heard a buzz/clicking sound coming from the top of the flare while standing near the flare. Per Kevin this is the ignitor and it indicates that it is working. We observed the Flare control box and it has to be manually operated. The Company will know when and if an alarm goes off at the site. Any shut-down and flaring is planned. If they need to Flare someone will come to the site.

COMPLIANCE SUMMARY

It appears that the Kinder Morgan Cochin LLC, Flat Rock facility is in compliance with state applicable requirements and the conditions of its PTI No. 115-96C at this time. There are no known federal air pollution control applicable requirements for this source at this time. All documents received will be placed in plant file.

It is noted here for the first time: I reviewed the most current modification permit application and found that KM identified the co-located Company (Plains All American) and indicated the shared use of the Flare on site and that their permitted limit needs to account for both companies using the flare. Prior site diagrams in AQD files had indicated the co-location of a separate company but stated no ownership or operational connection and in particular informed AQD that the co-located line was dormant for many years.

NAME *Don Robertson* DATE 4/14/15 SUPERVISOR *[Signature]*