

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

N591549099

FACILITY: Kinder Morgan Utopia LLC		SRN / ID: N5915
LOCATION: 3340 Will Carlton Drive, FLAT ROCK		DISTRICT: Jackson
CITY: FLAT ROCK		COUNTY: MONROE
CONTACT: Danny Cochran , Area Manager		ACTIVITY DATE: 06/11/2019
STAFF: Diane Kavanaugh Vetort	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Complete scheduled inspection. Synthetic Minor Opt Out Facility. Propane product pipeline meter station with Flare. Station has been idle and now has been disconnected. Company proposing to submit VOID requests for this location and the Valve station in Detroit, Wayne County.		
RESOLVED COMPLAINTS:		

Date of Investigation: June 11, 2019

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Source: Kinder Morgan Cochran 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

Contacts:

Danny Cochran, Operations Manager, Danny_Cochran@kindermorgan.com

Kevin Maloney, EHHS, Specialist – Permitting Compliance SR 1, Office: 918-588-5061, Cell: 405-446-4007, Email: Kevin_Maloney@kindermorgan.com

On June 11, 2019, I conducted a complete scheduled inspection of the Kinder Morgan Utopia LLC, Flat Rock Meter Station facility located at 3340 Will Carlton Drive, Flat Rock, Monroe County. The previous inspection was conducted on April 9, 2015. The inspection was announced a short time prior because it is an unmanned facility, with periodic maintenance technician stop-by and on-call checks. The contacts live out of state approximately 4 hours away minimum. I was previously given the contact information for Kevin Alfrey, Operations Supervisor. Upon contacting him, I was told that Dan and Kevin M. were in the Detroit area with plans to meet with Nazarete Sandoval, AQD Detroit Office to conduct an inspection of the Detroit Valve station. Both Detroit and Flat Rock Permits to Install (PTI) are proposed to be voided (not yet submitted). KM will no longer be operating the Flat Rock Meter Station pipeline containing the propane product and permitted flaring capacity.

Dan and Kevin met me at the Flat Rock site at approximately 12 PM. The gate near the road is somewhat hidden and was locked. A long narrow dirt driveway leads back to the station which is also fenced and locked. I introduced myself, provided identification and stated the purpose of the inspection. There is a small building on site containing site controls, various records and safety equipment.

The purpose of the inspection was to determine the compliance status of the Kinder Morgan Utopia 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 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 previously 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 had previously been told it was dormant, then during the 2015 inspection I was told it had been put back into

service, and KM's pipeline was currently dormant at that time. Both pipelines were connected to the one existing stationary flare on site used for maintenance flaring.

Today I observed three pipelines, the first eastern most is the KM EUMETERSTATION and per Dan it is now disconnected from the Flare. This was shown to me by means of various pipe connections coming out of the ground next to the larger pipeline but not connected above ground to the metering station pipeline. The second middle pipeline I observed comes out of the ground runs a straight length and goes back underground. This is the active product line per Dan but is not hooked to the flare. He and Kevin indicated if necessary a proposed permit exempt portable flare could be brought in for short duration flaring of specific sections. The third western most line is the Plains All American owned metering station that was previously also hooked to the same KM Flare. Dan said the gauge read 10 psi so there is nitrogen in the line, meaning it is idle or not operating. During my prior inspection I was also told the lines were filled with Nitrogen, cathodic protection.

I observed the Flare is still installed on site however it has been disconnected per Dan and Kevin. There was nothing visually obvious to indicate the disconnection at the flare however. I asked about plans to dismantle/remove it and they indicated that would likely be the case. It seems this may be necessary in order to definitively demonstrate the permit can be voided.

The EUMETERSTATION PTI 115-96C contains:

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. KM records 2018-2019 show 0 gallons flared in the last 12 month period. COMPLIANT

SC IV. 1. requires the EUMETERSTATION is not to operate unless the Flare is installed, maintained and operated in a satisfactory manner. Line is dormant and no flaring has occurred. 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. KM submitted spreadsheet records to AQD by email on 6/13/19. COMPLIANT

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

I requested the material flared record summary for the 12 month rolling period ending May 2019. Kevin agreed to email the records to me within a week. As stated records were received and KM, Flat Rock reported that zero gallons of fuel was sent to the Flare. (Attached to this Report)

I requested and obtained from Dan while on-site, copies of their "Facility Monthly Safety Inspection Checklist" for January 4, 2019 through June 6, 2019. Every inspection sheet indicates the following statement: "Meter run disconnected from mainline piping, flare is out of service". (Attached to this Report)

I requested a site diagram/lay out drawing to better identify the separate lines and ownership. Kevin agreed to also send me this electronically.

COMPLIANCE INSPECTION

During my walk through of the site with Dan and 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 there were 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. Per Dan the "Densitometer" attached to their

line and all meter valves observed during last inspection have been removed. In a prior inspection Dan had explained its use as a pipeline gas analyzer to me, he said it is similar to a Gas Chromatograph. The gas flow process came 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.

I asked Dan about the on-call technicians that service the station. He said they still have 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.

I observed the Flare and it appeared to be in compliance with the stack conditions in the permit. I did hear a sporadic electrical buzz/clicking sound while standing near the flare. During the prior inspection the sound was more consistent and I was informed that it indicates the flare is working. I observed the Flare control box and it has to be manually operated. KM knows when and if an alarm goes off at the site. Any shut-down and flaring is planned ahead. If they need to Flare someone will come to the site. I expect the flare operating status to be clearly demonstrated once the permit void request is submitted.

COMPLIANCE SUMMARY

It appears that the Kinder Morgan Utopia 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: The modification permit application shows 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.

AQD will await any request to VOID permit and make determination at that time, although it appears the station has been disconnected from the pipeline and flare.

NAME *Deborah V. Trout* DATE *6/17/19* SUPERVISOR *[Signature]*