

N6291
MANILA

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

N629155380

FACILITY: Kinder Morgan Utopia LLC		SRN / ID: N6291
LOCATION: 7501 W JEFFERSON, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Howdy McCracken ,		ACTIVITY DATE: 09/23/2020
STAFF: C. Nazaret Sandoval	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY2020 Scheduled Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION: September 23, 2020

SOURCE: Kinder Morgan Utopia LLC, Detroit River Valve Site

SRN: N6291

ADDRESS: 7501 West Jefferson, Detroit, Michigan 48209

SUBJECT Scheduled Inspection

FACILITY CONTACT: Howdy McCracken, Kinder Morgan Utopia, Senior EHS Engineer

FACILITY BACKGROUND AND REGULATORY

The Detroit River Valve Site with address at 7501 West Jefferson is located adjacent to the Lafarge Midwest facility at 1301 Springwells Court. The site houses a series of interconnected above-ground pipes for the launching and receiving of "traps" into the pipelines. Traps are solid cylindrical devices with diameters slightly less than that of the pipeline. When introduced into the trap launcher, the trap is propelled down the pipeline by the natural flow of the liquid until it reaches a trap receiver. Traps are used to clean debris from the inner surface of the pipe and to inspect the interior. Whenever residual material needs to be removed from the pipe system, it is "blown down" into a 500-gallon tank, flashing the liquid to a gas, and then incinerated in a flare. The stationary flare is manually operated and so any activity requiring the use of the flare only occurs with facility personnel present on-site.

I conducted an inspection of the Detroit River Valve Site last year on 6/12/2019. The inspection report explains with detail the facility background, from the construction of the original pipelines and its ancillary equipment to the most recent projects. It also discusses the changes in ownership, the changes in fluids transported, as well as the AQD permit history. The most recent construction impacting the Detroit River Valve Site is the Utopia Pipeline Detroit River Crossing Project. The pipe section across the Detroit River is the final phase of the Utopia Pipeline System which renovates the entire stretch that originates in Harrison County, Ohio. Please refer to last year's inspection report for the history and projects details.

During the inspection conducted last year I observed that the Detroit River Crossing Project was in progress. There were construction activities at the time of the site visit which included Horizontal Directional Drilling (HDD) boring. The HDD entry was on the US side at the Detroit River Valve Site and extends approximately 3,727 feet to the exit location in Windsor. The new pipeline ties into the existing 12" block valve at the Detroit River Valve Site. The old 10" Detroit River pipeline built in 1957 and buried four meters under the riverbed was going to be replaced with a new 10" pipeline to be installed 12 meters deep and buried in bedrock. The old pipeline would be capped, filled, and decommissioned in place. The end of the Utopia pipeline is in Sarnia where it interacts with NOVA Chemicals which converts ethane into a product essential for plastics.

AQD Permit to Install (PTI) No. 114-96C covers the stationary flare at the site; the flare has

been unused since the last event in March-April 2014. The pipeline was idled for several years and a determination was made in 2017 that the Detroit River stationary flare, previously used for propane/propane-blend, was not suitable for the planned ethane/ethane-blend to be transported in the Utopia pipeline. During last year's inspection I observed that the stationary flare was still on-site, but it was disconnected from the Utopia pipeline. I was told that the flare was going to be dismantled.

Kinder Morgan applied for a permit in 2018 to use portable flares on the Michigan portion of the Utopia pipeline for maintenance and emergency events. PTI 120-18 issued on 12/21/2018 for SRN N5916 allowed the usage of a total of four portable flares, which would cover the events at the Detroit Valve Site.

PTI 122-19 was issued on 11/15/2019 for a portable flare that would serve the EDS pipeline system, owned by Plains Pipeline, LP which is also located at the Detroit Valve Site.

INSPECTION NARRATIVE

On September 23, 2020 I arrived at the facility and conducted observations. I took some pictures from the perimeter of the facility, which is fenced and cannot be accessed without authorization. The Utopia Pipeline Detroit River Crossing Project (on the Detroit side) appears to be completed. There were not construction crews or signs of land/soil movement as I witnessed in June of last year. I do not have current information about the status of construction/completion for the river crossing; however, that is not within the scope of this report.

With respect to the stationary flare regulated under PTI 114-96C, I verified that the stationary flare had been removed from the site, but a portable flare was at the site.

In an email dated 3/6/2020 Kevin Maloney, EHS specialist from Kinder Morgan, and formerly responsible for air permit compliance for the Michigan assets on the Utopia pipeline notified me that the Kinder Morgan Utopia Pipeline LLC, remains a Kinder Morgan asset, but operation of the pipeline moved to another business unit within the company, in early 2020. He indicated that air permitting, and compliance responsibilities for this site were transferred to Howdy McCracken, Senior EHS Engineer at Kinder Morgan Utopia LLC. In an email dated 8/31/2020 Mr. McCracken confirmed his responsibilities. In his email, Mr. McCracken also indicated that Kinder Morgan wanted to terminate PTI 114-96C; the permit that regulates the operation of the stationary flare located at the Detroit River Valve Site. To provide evidence that the flare regulated under PTI 114-96C had been disconnected, dismantled, and removed, he submitted "before and after" photographs. The pictures showed that by 8/27/2020 (date stamped on the pictures) the flare had been dismantled and removed. He added that the flare has been inactive and unused and there are no intentions of future use of the flare under the referenced permit. He said he will submit a formal request to void the permit. A formal request from Howdy McCracken was received by Sue Thelen, AQD Permit Section on 9/15/2020. The letter was forwarded to me for AQD Detroit District approval.

CONCLUSION

Kinder Morgan Utopia LLC, Detroit River Valve Site appears to be in substantial compliance with the requirements and special conditions of PTI 114-96C.

As indicated in the report, the stationary flare has been unused since the last event in March-April 2014 and the Utopia pipeline has been disconnected ever since. The 2019 MAERS submittal dated 3/13/2020 confirmed zero emissions for year 2019. We did not ask for 2020 emission records because all the evidence confirmed that the stationary flare regulated by PTI 114-96C was disconnected and not in-use.

In this inspection we did not evaluate the conditions of PTI 120-18, which is the permit that regulates the portable flare that is currently at the site (but disconnected). That permit was issued under SRN N5916 and it is not within the scope for this inspection.

Based on the evidence revealed on the photographs provided by Mr. McCracken on 8/31/2020, which I confirmed during my observations at the site inspection conducted on 9/23/2020; rescinding PTI 114-96C is appropriate.

AQD Detroit District will request AQD Permit Section to void PTI 114-96C. Kinder Morgan's permit cancellation request letter will be saved in the AQD Detroit District permit file for our records. A notification of permit void will be sent to Mr. McCracken.



Image 1(Facility Location) : Google Aerial and Pipe and Valve Site Overview

SRN N6291—Kinder Morgan Utopia LLC

Inspection Date: September 23, 2020

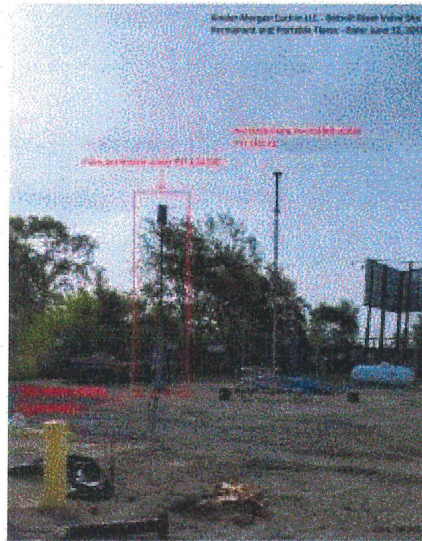
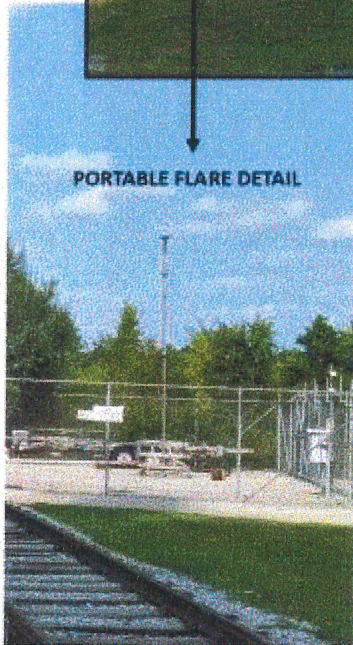


Image 2(Portable Flare) : Stationary flare has been removed. Portable flare was at the site on 9/23/2020

NAME Handoral

DATE 10/28/2020 SUPERVISOR JK