

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Off-site Inspection

N815156509

FACILITY: VECTOR PIPELINE L.P., Athens Compressor Station		SRN / ID: N8151
LOCATION: 4981 2 Mile Rd, ATHENS		DISTRICT: Kalamazoo
CITY: ATHENS		COUNTY: CALHOUN
CONTACT: Shane Yocum , Environmental Analyst		ACTIVITY DATE: 12/30/2020
STAFF: Amanda Chapel	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

On December 29, 2020, Vector Pipeline L.P. Athens Compressor Station (N8151) submitted records for review to show compliance with MI-ROP-N8151-2016. Vector Pipeline is located at 4981 2 Mile Road, Athens, Calhoun County, Michigan 49011. During the last inspection, the facility was in compliance with all requirements contained in the ROP and all other state and federal air regulations. Due to the COVID-19 pandemic, policy has been changed to allow off-site records reviews, prior to inspection. The following will summarize the records requirements contained in the ROP and submitted records to determine compliance with the recordkeeping portion of the permit.

The facility has one Solar Turbine Incorporated (Solar) Mars 100s natural gas fired turbine with a nominal (ISO) rating at 15,000 hp and a maximum heat input of 120 MMBtu/hr. The turbine is equipped with dry low NOx emission controls (SoLoNOx). There is also one natural gas fired spark ignition internal combustion generator. This is an emergency standby power unit with a 6.0 MMBtu/hr rating. Both were installed in October, 2019.

#### EUTURBINE1

This emission unit contains the natural gas fired turbine with dry low NOx emission controls.

The facility only burns natural gas in the turbine. Vector tariff sheet information is available on the Vector Pipeline webpage ( <http://www.vector-pipeline.com/Informational-Postings/Tariff/Table-of-Contents.aspx> ). The sulfur content limits can be found on sheet no. 110. The tariff states that the natural gas transported by the pipeline shall contain no more than one-quarter (1/4) grain of hydrogen sulfide per 100 cubic feet of gas, nor more than 20 grains of total sulfur per 100 cubic feet of gas. This shows compliance with condition III.2 and VI.2.a.

Stack testing was performed on the Solar Turbine on May 29, 2019. The testing was performed while emissions were controlled using the dry low NOx emission control. Emissions testing showed emissions of 7.03 ppm NOx. Permit limit is 25 ppm NOx at 15% oxygen.

Continuous operation of the turbine in SoLoNOx mode is verified by the turbine computer system which collects operating data whenever the turbine is operating. The data is downloaded and monthly and input into a database which develops a compliance record. The compliance record is retained in accordance with Vector's Environmental Management System and on-line SharePoint file repository. Records are maintained for a minimum of 5-years. Note that if the compressor should operate below the SoLoNOx threshold an audible and visual alarm is generated and the compressor will be shut down.

Hourly records for December 2019 through December 2020 were provided by the facility. The turbine appears to have run 6 days during the last 12 months. Those dates were 1/18, 1/19, 2/13, 2/14, 2/15, and 11/16. Daily gas quality reports are available on the Vector Pipeline website (<http://www.vector-pipeline.com/Informational-Postings/Gas-Quality/Gas-Quality-Report.aspx>). This is not strictly necessary for compliance with the permit as the facility demonstrated that the tariff agreement shows they are meeting the 0.06 lb SO<sub>2</sub>/MMBtu heat input.

The facility appears to be in compliance with all recordkeeping requirements for EUTURBINE1.

#### EUSPU

The emission unit is a natural gas fired spark ignition internal combustion generator for emergency use.

The facility provided a copy of the monthly SPU hour logs for December 2019-November 2020. These logs show the hours of operation for the SPU and the reason any run-time was attributed. The facility appears to do weekly testing for 30 minutes. This is recorded under maintenance checks. Additionally, the facility tracked emergency usage of the engine, which was minimal during this 12-month period.

Records for monthly operating hours for the SPU were provided. The month with the highest operating hours was November with a total of 20.7 hours run using 16.98 MCF of fuel. This total run time includes both readiness testing and emergency usage. Rolling 12-month records show that the highest total month was November 2020 with 55.1 hours. This is well below the 100 hour 12-month rolling limit and includes emergency operation, which does not need to be included in these records.

The facility appears to be in compliance with all recordkeeping requirements associated with EUSPU.

NAME *Quinn Cooper*

DATE 1/22/21

SUPERVISOR *RIL 1/25/21*