

State Registration Number
N5574

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-N5574-2024

ANR Pipeline Company - Hamilton Compressor Station

State Registration Number (SRN): N5574

Located at

4193 134th Avenue, Hamilton, Allegan County, Michigan 49419

Permit Number: MI-ROP-N5574-2024

Staff Report Date: December 4, 2023

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) of the administrative rules promulgated under Act 451, requires that the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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DECEMBER 4, 2023 - STAFF REPORT

ROP Number

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Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with an ROP pursuant to Title V of the federal Clean Air Act; and Michigan’s Administrative Rules for Air Pollution Control promulgated under Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source’s applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This Staff Report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft ROP terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft ROP pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

General Information

Stationary Source Mailing Address:	ANR Pipeline Company 700 Louisiana Street Houston, TX 77002
Source Registration Number (SRN):	N5574
North American Industry Classification System (NAICS) Code:	486210
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	202200129
Responsible Official:	Dustin Enright, Director US Pipeline Operations Heartland Region 309-507-1400
AQD Contact – District Inspector:	Cody Yazzie, Environmental Engineer 269-312-2754
AQD Contact – ROP Writer:	Shamim Ahammod, Senior Environmental Engineer 586-212-0508
Date Application Received:	June 20, 2022
Date Application Was Administratively Complete:	June 20, 2022
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	December 4, 2023
Deadline for Public Comment:	January 3, 2024

Source Description

ANR Pipeline Company - Hamilton Compressor Station is a natural gas transmission and compression station. The Hamilton Station transports natural gas along the pipeline by receiving low-pressure inlet natural gas and compressing the stream to increase the pressure and move the natural gas along the pipeline.

ANR Pipeline Company - Hamilton Compressor Station is located at 4193 134th Avenue, Hamilton, Allegan County, Michigan 49010. The facility is approximately 20 acres and is immediately surrounded by residential properties to the east, west, north, and south.

The following changes to the facility since the last ROP renewal include:

- On February 4, 2021, Permit to Install (PTI) No. 98-20 was issued to install and operate two (2) natural gas-fired turbines (EUHMTURBINE11, EUHMTURBINE12), one (1) emergency generator (EUHMAPU3), one (1) natural gas-fired heater (EUFUELGASHEATER), one (1) utility gas heater (EUUTILITYHEATER), natural gas-fired warehouse heaters (EUWAREHOUSEHEAT), space heaters (EUSPACEHEATER), and two (2) miscellaneous fluids tanks (EUPIPELINELIQUIDSTANK, EUWASTEWATERTANK). All the new equipment is installed and was commissioned in May of 2022.
- The following equipment was removed from service on May 24, 2022 and has been removed from the ROP: five (5) natural gas-fired internal combustion compressor engines (EUHM001, EUHM002, EUHM003, EUHM004, EUHM005), five (5) natural gas-fired turbines (EUHM006, EUHM007, EUHM008, EUHM009, EUHM010), two (2) natural gas-fired generators (EUHM011, EUHM012), and one (1) natural gas-fired process boiler (EUHM013).

With the installation of new equipment and the decommissioning of existing equipment, potential emissions of carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter (PM), volatile organic compounds (VOCs), and hazardous air pollutant (HAP) emissions all decreased.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2022**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	14.2
Lead (Pb)	0.000005
Nitrogen Oxides (NO _x)	40.6
PM10*	2.0
Sulfur Dioxide (SO ₂)	5.7
Volatile Organic Compounds (VOCs)	0.8

* Particulate matter (PM) that has an aerodynamic diameter less than or equal to a nominal 10 micrometers.

This source is an area source of hazardous air pollutant (HAP) emissions pursuant to Section 112(b) of the federal Clean Air Act. No HAP emissions data is reported.

See Parts C and D in the ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

Regulatory Analysis

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

The stationary source is in Allegan County, which is currently designated by the United States Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants with the exception of non-attainment of the 8-hour ozone standard.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70 because the potential to emit of CO exceeds 100 tons per year.

The stationary source is a "synthetic minor" source regarding HAP emissions because the stationary source accepted a legally enforceable permit (PTI No. 98-20) limiting the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act to less than 10 tons per year and the potential to emit of all HAPs combined to less than 25 tons per year.

The owner/operator of ANR Pipeline Company - Hamilton Compressor Station has requested removal of the provisions of the National Emission Standard for Hazardous Air Pollutants for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters promulgated in 40 CFR Part 63, Subpart DDDDD with this ROP renewal. The stationary source has accepted a legally enforceable permit limiting the potential to emit of HAPs to below major source thresholds.

No emission units at the stationary source were subject to the Prevention of Significant Deterioration regulations of the Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air Quality of Act 451 or 40 CFR 52.21 because at the time of New Source Review permitting the potential to emit of each criteria pollutant was less than 250 tons per year.

The natural gas-fueled emergency engine designated EUHMAPU3 at the stationary source is subject to the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines promulgated in 40 CFR Part 60, Subparts A and JJJJ.

Two natural gas turbines designated EUHMTURBINE11 and EUHMTURBINE12 at the stationary source are subject to the Standards of Performance for Stationary Gas Turbines promulgated in 40 CFR Part 60, Subparts A and KKKK.

Piping and components in the natural gas transmission and distribution systems designated EUPIPECOMPONENTS at the stationary source is subject to the Standards of Performance for Crude Oil and Natural Gas Facilities promulgated in 40 CFR Part 60, Subparts A and OOOOa. The replacement project in PTI No. 98-20 resulted in an increase in total horsepower for the stationary source. This is a modification for the purposes of 40 CFR 60.5397a making ANR Pipeline Company - Hamilton Compressor Station subject to requirements in 40 CFR Part 60, Subpart OOOOa.

The natural gas-fueled emergency engine designated EUHMAPU3 at the stationary source is subject to the National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ. For EUHMAPU3, compliance with 40 CFR Part 63, Subpart ZZZZ is demonstrated through compliance with 40 CFR Part 60, Subpart JJJJ.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the "Procedure for Evaluating Periodic Monitoring Submittals."

No emission units have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring (CAM) rule pursuant to 40 CFR Part 64, because all emission units at the stationary source do not have a control device.

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

Source-Wide Permit to Install (PTI)

Rule 214a requires the issuance of a Source-Wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

Streamlined/Subsumed Requirements

The following table lists explanations of any streamlined/subsumed requirements included in the ROP pursuant to Rules 213(2) and 213(6). All subsumed requirements are enforceable under the streamlined requirement that subsumes them.

Emission Unit/Flexible Group ID	Condition Number	Streamlined Limit/ Requirement	Subsumed Limit/ Requirement	Stringency Analysis
EUHMTURBINE11, EUHMTURBINE12 / FGTURBINES	SC I.1	NOx - 25 ppmvd or 150 ng/J of useful output (1.2 lb/MWh) / 40 CFR 60.4320(a), Table 1 of 40 CFR Part 60, Subpart KKKK	NOx - 25 ppmvd or 150 ng/J of useful output (1.2 lb/MWh) ^A / R 336.1201(3) ^A Does not include startup and shutdown.)	The emission limit and averaging time are equivalent but because the NOx limit assessed in the PTI does not include startup and shutdown, it is less stringent than the NSPS limit. The NOx limit coming from the PTI was intended to be equivalent to the NSPS but was subsumed under the more stringent NSPS limit instead.

Non-applicable Requirements

Part E of the ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the ROP Application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the ROP pursuant to Rule 213(6)(a)(ii).

Processes Not in the Draft ROP

There were no PTI exempt processes listed in the ROP Application pursuant to Rule 212(4) that were not included in the Draft ROP.

Draft ROP Terms/Conditions Not Agreed to by Applicant

This draft ROP does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements at the time of issuance of the ROP except for requirements listed in Appendix 2. The table in Appendix 2 contains a Schedule of Compliance developed pursuant to Rule 119(a)(i). The applicant must adhere to this schedule and provide the required certified progress reports at least semiannually or in accordance with the schedule in the table. A Schedule of Compliance for any applicable requirement that the source is not in compliance with at the time of ROP issuance is supplemental to, and shall not sanction non-compliance with, the applicable requirements on which it is based.

Action taken by EGLE, AQD

The AQD proposes to approve this ROP. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the USEPA is allowed up to 45 days to review the draft ROP and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Julie Brunner, ROP Central Unit Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the ROP Application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

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RENEWABLE OPERATING PERMIT

JANUARY 9, 2024 - STAFF REPORT ADDENDUM

ROP Number

MI-ROP-N5574-2024

Purpose

A Staff Report dated December 4, 2023, was developed to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by Rule 214(1) of the administrative rules promulgated under Act 451. The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in Rule 214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

Responsible Official:	Dustin Enright, Director US Pipeline Operations Heartland Region 309-507-1400
AQD Contact – District Inspector:	Cody Yazzie, Environmental Engineer 269-312-2754
AQD Contact – ROP Writer:	Shamim Ahammod, Senior Environmental Engineer 586-212-0508

Summary of Pertinent Comments

No pertinent comments were received during the 30-day public comment period.

Changes to the December 4, 2023 Draft ROP

The USEPA has requested that annual compliance certifications be submitted electronically through the USEPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through CDX (<https://cdx.epa.gov/>), unless it contains confidential business information. If confidential business information is included, continue to mail the submission to USEPA as specified in General Condition 19. General Condition 19 in all Renewable Operating Permits is being updated for electronic submissions to the USEPA as follows:

19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The annual compliance certification (pursuant to Rule 213(4)(c)) shall be submitted to the USEPA through the USEPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through CDX (<https://cdx.epa.gov/>), unless it contains confidential business information then use the following address: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. **(R 336.1213(4)(c))**