

State Registration Number

B6637

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number

MI-ROP-B6637-2021

**Consumers Energy Company - St. Clair Compressor Station**

State Registration Number (SRN): B6637

Located at

10021 Marine City Highway, Ira Township, St. Clair County, Michigan 48023

Permit Number: MI-ROP-B6637-2021

Staff Report Date: December 14, 2020

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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**RENEWABLE OPERATING PERMIT**

ROP Number  
MI-ROP-B6637-2021

**DECEMBER 14, 2020 - STAFF REPORT**

**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:	Consumers Energy Company – St. Clair Compressor Station 10021 Marine City Highway Ira Township, Michigan 48023
Source Registration Number (SRN):	B6637
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:	201900211
Responsible Official:	Avelock Robinson, Director Gas Compression Operations 586-716-3326
AQD Contact:	Kerry Kelly, Senior Environmental Quality Analyst 586-506-9817
Date Application Received:	December 19, 2019
Date Application Was Administratively Complete:	December 19, 2019
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	December 14, 2020
Deadline for Public Comment:	January 13, 2021

## Source Description

Consumers Energy Company – Ray Compressor Station is a natural gas storage and transmission facility located in northern Montcalm County Michigan. The ROP contains requirements for two glycol dehydration units (EUDEHY1 and EUDEHY2), four compressor engines (EUENGINE3-1, EUENGINE3-2, EUENGINE3-3, and EUENGINE3-4), two turbines (EUTURBINEC-1 and EUTURBINEC-2), one boiler (EUBOILER3-1), four pipe heaters (EUPIPEHEATER1-1, EUPIPEHEATER1-2, EUPIPEHEATER3-1, EUPIPEHEATER3-2), three process heaters (EUDEHYBLR1, EUDEHYBLR2, EUDEHY3REBLR), one fuel gas heater (EUGASHEATER3-1) and two emergency generator engines (EUAUXGEN1, EUEMERGGEN3-1). Other processes at the facility that are not subject to any process-specific emission limits or standards in any applicable requirement are listed in the “Processes in Application Not Identified in Draft ROP” section of this Staff Report. The area immediately surrounding St. Clair Compressor Station is commercial/industrial. Anchor Bay High School is located approximately 0.5 miles southwest of St. Clair Compressor Station and the nearest residence is located approximately 0.6 miles southwest of the station.

The compressor engines and turbines are natural gas-fired and range in size from 3,100 HP to 6,000 HP and are used to drive compressors to pump natural gas into and out of underground rock formations. Normally natural gas is injected into the storage field using the compressors between April and November and is ready for withdraw and distribution to customers between November and March. Natural gas will free flow early in the withdrawal season when the storage field pressure is greater than the pipeline pressure. The gas needs to be pumped out, using compressors powered by two natural gas-fired internal combustion engines, later in the season as the pressure decreases within the storage field.

During the storage period, the natural gas absorbs hydrocarbons and moisture while in the formation. The facility has installed three glycol dehydration systems to remove moisture and hydrocarbons from the gas before sending it to the pipeline system for customers. When natural gas is taken out of storage at a higher pressure than the pipeline pressure the water in the gas can freeze in the pipeline. The six natural gas-fired pipe heaters are used to prevent the water in the gas from freezing. The gas from the field goes through scrubbers where some of the liquids fall out of the gas. Next the gas goes through glycol dehydration process.

In the glycol dehydration process, natural gas is pumped into one of the contact towers where it crosses a series of glycol trays. The glycol in these trays absorbs moisture and hydrocarbons in the natural gas and the dry gas is then sent to a pipeline. The rich glycol, containing moisture and hydrocarbons, accumulates at the bottom of each tower and is sent to a 3-Phase separator, also referred to as the flash tank, to remove entrained gas and hydrocarbon liquid. From the 3-Phase separator, the resulting glycol is sent through filters before being sent to the reboiler unit. The reboiler heats the glycol to drives off moisture. The resulting lean glycol is recirculated back to a surge tank and then to the glycol contact towers.

Each glycol dehydration unit contains two process vents, the flash tank vent and the vent from the reboiler still. The ROP contains conditions allowing for the emissions from the flash tank to be directed to the reboiler burner for fuel or to a thermal oxidizer. Consumers has indicated that they stopped burning emissions from the flash tank in the reboiler and currently send all flash tank emissions to the thermal oxidizer. Emissions from the reboiler go through the reboiler still and then are sent to the thermal oxidizer for volatile organic compound (VOC) destruction.

EUAUXBLR2-7 and EUBOILER3 are used for space heating and EUAUXGEN2-7 and EUEMERGGEN3 is used for power generation in the event of a power outage.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2019**.

## TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	11.5
Lead (Pb)	<0.0100
Nitrogen Oxides (NO <sub>x</sub> )	22.8
Particulate Matter (PM)	0.762
Sulfur Dioxide (SO <sub>2</sub> )	0.307
Volatile Organic Compounds (VOCs)	5.07

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2018 by Consumers Energy Company:

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
Formaldehyde	<b>3.75</b>
<b>Total Hazardous Air Pollutants (HAPs)</b>	<b>6.32</b>

\*\*As listed pursuant to Section 112(b) of the federal Clean Air Act.

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.

St. Clair County is currently designated by the United States Environmental Protection Agency (USEPA) as a non-attainment area with respect to the eight-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 carbon monoxide and nitrogen oxides 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 condition 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 stationary source is an existing major stationary source pursuant to Prevention of Significant Deterioration (PSD) regulations. Existing major stationary sources can trigger permitting requirements under PSD if there is a significant emissions increase from the project of a regulated new source review pollutant and a significant net emissions increase of that same pollutant. In 2015, Consumers Energy proposed a project to install four natural gas-fired, 4735 HP, four stroke lean burn RICE, one 2,000 HP emergency RICE, two glycol dehydration units, four natural gas-fired pipeline heaters, one gas heater, one boiler, and seven above-ground storage tanks at St. Clair Compressor Station. This project would result in a significant emissions increase for both NO<sub>x</sub> and VOCs but did not result in a significant net emissions increase for either pollutant. Therefore, the project was a minor modification to an existing PSD source and was not subject to the PSD regulations in Part 18 of the Michigan Air Pollution Control Rules and the federal PSD regulations.

No emission units at the stationary source are currently subject to the Prevention of Significant Deterioration regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451.

EUENGINE2-2, EUENGINE2-3, EUENGINE2-4, and EUAUXGEN2 were removed in the ROP because the equipment was decommissioned in 2019.

EUEMERGEN3-1, EUENGINE3-1, EUENGINE3-2, EUENGINE3-3, and EUENGINE3-4 at the stationary source are subject to the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines promulgated in 40 CFR Part 60, Subparts A and JJJJ.

EUTURBINEC1-1 and EUTURBINEC1-2 at the stationary source are subject to the Standards of Performance for Stationary Gas Turbines promulgated in 40 CFR Part 60, Subparts A and GG.

EUBOILER3-1, EUPIPEHEATER3-1, and EUPIPEHEATER3-2 at the stationary source are subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units promulgated in 40 CFR Part 60, Subparts A and Dc.

EUEMERGEN3-1, EUENGINE3-1, EUENGINE3-2, EUENGINE3-3, and EUENGINE3-4 at the stationary source are subject to the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ (RICE Area Source MACT). EUEMERGEN3-1, EUENGINE3-1, EUENGINE3-2, EUENGINE3-3, and EUENGINE3-4 must meet the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR part 60 subpart JJJJ, for spark ignition engines, per 40 CFR 63.6590(c)(1).

On July 23, 2015, AQD issued a notice of violation to Consumers Energy Company – St. Clair Compressor Station for a violation of the gram per horsepower hour (g/hp-hr) NOx emission limits in MI-ROP-B6637-2010 FGTURBINES SC I.1c and 40 CFR 60.332(a)(2). Consumers stated in their response to the violation notice that they did not believe the items identified in the violation notice constitute violations of the applicable legal requirements cited because the turbines did not meet the operating requirements in MI-ROP-B6637-2010 FGTURBINES SC I.1c during testing and therefore could not be used for compliance with the emission limits in MI-ROP-B6637-2010 FGTURBINES SC I.1c and the limit in 40 CFR 60.332(a)(2) is 150 ppm NOx, stated in MI-ROP-B6637-2010 FGTURBINES SC I.1d, which was not exceeded. The cited violations were resolved December 10, 2015 following repair and re-testing of the turbines that indicated emissions in compliance with the ROP limits. Enforcement section decided that the violation is not a High Priority Violation (HPV) because actual emissions would be less than PSD significance limit. Consumers Energy Company (CEC) applied for a PTI (178-17) to increase the short term NOx limit and remove the g/hp-hr limit for the turbines. PTI 178-17 was approved April 2, 2018 and revised and approved January 3, 2019. The conditions from PTI 178-17 were rolled into the ROP on June 11, 2019.

On April 2, 2018, AQD issued a notice of violation to Consumers Energy Company – St. Clair Compressor Station for a violation of the catalyst temperature monitoring requirement in ROP-B6637-2015 FGENGINE-P2 SC VI.3, VI.4.d, VI.5.b and c, and 40 CFR 63.10(b)(2)(vii). The violation was resolved June 14, 2018. All engines in FGENGINE-P2 have been decommissioned and have been removed from the ROP.

EUAUXGEN1, a 475 HP, 4-stroke, lean burn, natural gas-fired auxiliary generator subject to the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines at area sources, was removed from the ROP during this renewal. Consumers Energy stated that EUAUXGEN1 was retired and air-gapping of the engine was completed in October 2018. This emission unit was not part of the Source-wide PTI.

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."

EUEMERGEN3-1, EUBOILER3-1, EUGASHEATER3-1, EUTURBINEC1-1, EUTURBINEC1-2, EUAUXGEN1, EUPIPEHEATER3-1, EUPIPEHEATER3-2, EUPIPEHEATER1-1, EUPIPEHEATER1-2, EUPARTSCLEANER, EUCOLDCLEANER, and EURULE285(2)(mm) do not have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64, because these emission units do not have a control device.

EUENGINE3-1, EUENGINE3-2, EUENGINE3-3, and EUENGINE3-4 do not have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64, because the unit(s) do not have potential pre-control emissions over the major source thresholds. CO and VOC emissions from EUENGINE3-1, EUENGINE3-2, EUENGINE3-3, and EUENGINE3-4 are controlled by two-way oxidation catalyst. The pre-control potential CO and VOC emissions were calculated using stack test data from the engine with the highest pre-control CO and VOC rate in 2018 (EUENGINE3-1). The potential pre-control CO and VOC rate per engine 15.87 tons/year and 12.45 tons/year respectively.

EUDEHY1 and EUDEHY2 have an emission limitation or standard that is subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64, because the units have potential pre-control emissions over the major source thresholds. Consumers calculated the potential pre-control VOC emissions to be 354.5 tons/year using EPA's GRI-GLYCalc version 4.0 software with the worst case operating parameters and gas analysis between 2006 and 2014. from EUDEHY1 and EUDEHY2 are combined in the flexible group FGDEHY. VOC emissions from FGDEHY are limited to 7.4 tons per year.

The following Emission Units/Flexible Groups are subject to CAM:

<b>Emission Unit/Flexible group ID</b>	<b>Pollutant/ Emission Limit</b>	<b>UAR(s)</b>	<b>Control Equipment</b>	<b>Monitoring (Include Monitoring Range)</b>	<b>Emission Unit/Flexible Group for CAM</b>	<b>PAM ? *</b>
EUDEHY1, EUDEHY2/ FGDEHY	VOC/7.4 tpy	R 336.1702(a), R 336.1205(1)(a)	Thermal Oxidizer	Daily average combustion zone temperature greater than 1400 degrees Fahrenheit	FGDEHY	No

\*Presumptively Acceptable Monitoring (PAM)

The thermal oxidizer combustion zone temperature was selected because it is indicative of the VOC reduction occurring within the oxidizer and is a widely accepted method of monitoring. If the combustion zone temperature decreases significantly, then VOC oxidization by the catalyst may not occur, reducing the destruction efficiency. Therefore, the requirement to monitor temperature and maintain appropriate records is a justification for assuring VOC destruction efficiency. Temperature monitoring is specifically identified in the monitoring/recordkeeping requirements under the current ROP FGDEHY.

The selected indicator for the RTO is the minimum inlet temperature of 1400°F which is required to meet 98% destruction efficiency. This minimum temperature is specified in the current ROP under process/operational restriction(s) for FGDEHY.

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)**

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. MI-ROP-B6637-2015 are identified in Appendix 6 of the ROP.

PTI Number			
178-17	106-14	60-04	449-97 <sup>a</sup>
532-95 <sup>b</sup>			

<sup>a</sup> All equipment permitted in PTI 449-97 (EUGLYCDEHY) was removed from MI-ROP-B6637-2015 through a minor modification application received 7/25/2018.

<sup>b</sup> All equipment permitted in PTI 532-95 (EUTURBINEC1-1 and EUTURBINEC1-2) is now covered in PTI 178-17.

**Streamlined/Subsumed Requirements**

This ROP does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

During NSR permitting, compliance with the streamlined emission limits in FGENGINES-P3 SC I.1 through I.3 (0.6 g/hp-hr NOx, 0.36 g/hp-hr CO, and 0.2 g/hp-hr VOC) was considered to be compliance with the emission limits established by R 336.1205(1)(a) and 40 CFR 52.21(c) & (d); and also compliance with the emission limits in 40 CFR 60.4233(e) (1.0 g/hp-hr NOx, 2.0 g/hp-hr CO, and 0.7 g/hp-hr VOC). 40 CFR 63.4233(e) is listed as an underlying applicable requirement in FGENGINES-P3 SC I.1 through I.3. The testing methods in 40 CFR 60.4244 are used to show compliance with the limit established by R 336.1205(1)(a) and 40 CFR 60.4244 as well.

In the current ROP renewal application (201900211), Consumers Energy did not propose to streamline any requirements. The NOx, CO and VOC limits in 40 CFR 63.4233(e) were added to the Emission Limit Table in FGENGINES-P3 as a result.

**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 in Application Not Identified in Draft ROP**

The following table lists processes that were included in the ROP Application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EUBOILER1	0.3 MMBtu/hr natural gas-fired boiler located in Main office building (1985)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBOILER2	0.3 MMBtu/hr natural gas-fired boiler located in Main office building (1985)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBOILER3	1 MMBtu/hr natural gas-fired boiler located in Garage (1965)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUBOILER4	0.91 MMBtu/hr natural gas-fired boiler located in Garage (1965)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUFGHEATER1	0.75 MMBtu/hr natural gas-fired fuel gas heater #1 (1971)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)

<b>PTI Exempt Emission Unit ID</b>	<b>Description of PTI Exempt Emission Unit</b>	<b>Rule 212(4) Citation</b>	<b>PTI Exemption Rule Citation</b>
EUHOTWTRHTR2	0.2 MMBtu/hr natural gas-fired hot water heater #2 located in Mechanical Room (2001)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EULINEHTR1	4 MMBtu/hr natural gas-fired pipeline heater #1 (1965)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EULINEHTR2	4 MMBtu/hr natural gas-fired pipeline heater #2 (1965)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EULINEHTR3	4.5 MMBtu/hr natural gas-fired pipeline heater #3 (1973)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EULINEHTR4	4.5 MMBtu/hr natural gas-fired pipeline heater #4 (1973)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EULINEHTR5	4 MMBtu/hr natural gas-fired pipeline heater #5 (1965)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EULINEHTR6	4 MMBtu/hr natural gas-fired pipeline heater #6 (1965)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUREBOILERA	3 MMBtu/hr natural gas-fired regenerator boiler	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUREBOILERB	3 MMBtu/hr natural gas-fired regenerator boiler	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUSPACEHTR	0.03 MMBtu/hr natural gas-fired space heater located in gas analysis Bldg. (11/1995)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUSPACEHTR1	0.03 MMBtu/hr natural gas-fired space heater located in Plant 1 Aux Bldg. (1965)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUTANKS35	673 gallon AST containing condensate	R 336.1212(4)(d)	R 336.1284(2)(e)

### **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 as of the effective date of this ROP.

### **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 Joyce Zhu, Warren District 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.

State Registration Number  
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**RENEWABLE OPERATING PERMIT**

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**JANUARY 15, 2021 - STAFF REPORT ADDENDUM**

**Purpose**

A Staff Report dated December 14, 2020, 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:	Avelock Robinson, Director Gas Compression Operations 586-716-3326
AQD Contact:	Kerry Kelly, Senior Environmental Quality Analyst 586-506-9817

**Summary of Pertinent Comments**

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

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## RENEWABLE OPERATING PERMIT

ROP Number  
MI-ROP-B6637-2021

**MARCH 3, 2021 - STAFF REPORT ADDENDUM**

### Purpose

A Staff Report dated December 14, 2020, 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:	Avelock Robinson, Director Gas Compression Operations 586-716-3326
AQD Contact:	Kerry Kelly, Senior Environmental Quality Analyst 586-506-9817

### Summary of Pertinent Comments

On March 3, 2021, the Company notified us of errors (below) in the Description section of the Staff Report.

“The first sentence of the paragraph should read:  
Consumers Energy Company – ~~St. Clair Ray~~ Compressor Station is a natural gas storage and transmission facility located in ~~southern northern~~ ~~St. Clair Macomb~~ County, Michigan.”

AQD Response:

Since the Staff Report has already been finalized, the changes cannot be made to the Staff Report, however, with the Addendum, we are recognizing the correct information.