

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY  
AIR QUALITY DIVISION**

EFFECTIVE DATE: February 28, 2024

ISSUED TO

**ANR Pipeline Company - Hamilton Compressor Station**

State Registration Number (SRN): N5574

LOCATED AT

4193 134<sup>th</sup> Avenue, Hamilton, Allegan County, Michigan 49410

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-N5574-2024

Expiration Date: February 28, 2029

Administratively Complete ROP Renewal Application  
Due Between August 28, 2027 and August 28, 2028

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Rule 210(1) of the administrative rules promulgated under Act 451, this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

**SOURCE-WIDE PERMIT TO INSTALL**

Permit Number: MI-PTI-N5574-2024

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(1) of Act 451. Pursuant to Rule 214a of the administrative rules promulgated under Act 451, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environment, Great Lakes, and Energy

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Julie Brunner, ROP Central Unit Supervisor

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## AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environment, Great Lakes, and Energy (EGLE) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements are identified for each ROP term or condition. All terms and conditions that are included in a PTI are streamlined, subsumed and/or is state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

## A. GENERAL CONDITIONS

### Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**
- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

### General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**
2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities: **(R 336.1213(1)(d))**
  - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
  - c. Inspect, at reasonable times, any of the following:
    - i. Any stationary source.
    - ii. Any emission unit.
    - iii. Any equipment, including monitoring and air pollution control equipment.
    - iv. Any work practices or operations regulated or required under the ROP.
  - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

## Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2).<sup>2</sup> **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

## Emission Limits

11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in Subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:"<sup>2</sup> **(R 336.1301(1))**
  - a. A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity.
  - b. A limit specified by an applicable federal new source performance standard.

The grading of visible emissions shall be determined in accordance with Rule 303.

12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
  - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.<sup>1</sup> **(R 336.1901(a))**
  - b. Unreasonable interference with the comfortable enjoyment of life and property.<sup>1</sup> **(R 336.1901(b))**

## Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).<sup>2</sup> **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

## Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. **(R 336.1213(3)(b))**
  - a. The date, location, time, and method of sampling or measurements.
  - b. The dates the analyses of the samples were performed.
  - c. The company or entity that performed the analyses of the samples.
  - d. The analytical techniques or methods used.
  - e. The results of the analyses.
  - f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

## Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
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))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
  - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
  - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
  - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **(R 336.1213(3)(c))**
  - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
  - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that; “based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete.” The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.<sup>2</sup> **(R 336.1912)**

## Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
  - a. The applicable requirements are included and are specifically identified in the ROP.
  - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

27. Nothing in this ROP shall alter or affect any of the following:
  - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
  - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
  - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
- a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
  - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
  - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
  - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
  - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

## Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(10))**
33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

## Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
- a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
  - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
  - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
  - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

## Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(9))**

## Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.
37. If the permittee is subject to 40 CFR Part 82 and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

## Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
- June 21, 1999,
  - Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
  - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c). **(40 CFR Part 68)**

## Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **(R 336.1213(12))**

### Permit to Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.<sup>2</sup> **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.<sup>2</sup> **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, EGLE.<sup>2</sup> **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.<sup>2</sup> **(R 336.1201(4))**

#### **Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## **B. SOURCE-WIDE CONDITIONS**

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

## SOURCE-WIDE CONDITIONS

### DESCRIPTION

All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, and exempt equipment.

### POLLUTION CONTROL EQUIPMENT

NA

### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Each Individual HAP	8.9 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	SOURCE-WIDE	SC VI.2, SC VI.3	<b>R 336.1205(3)</b>
2. Aggregate HAPs	22.4 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	SOURCE-WIDE	SC VI.2, SC VI.3	<b>R 336.1205(3)</b>

### II. MATERIAL LIMIT(S)

NA

### III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

### IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

### V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

### VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

- The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> **(R 336.1205(3))**

2. Beginning during the first month that either EUFUELGASHEATER, EUHMTURBINE11, EUHMTURBINE12, or EUHMAPU3 starts up, the permittee shall monitor and record, in a satisfactory manner, emission calculations determining the cumulative emission rate of individual and aggregate HAPs during the first 12-months, and the annual emission rate of each thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month.<sup>2</sup> **(R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))**
3. The permittee shall keep the following information on a monthly basis:
  - a. Gallons or pounds of each HAP containing or emitting material used.
  - b. HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used or HAP emission factors used as approved by the AQD District Supervisor.
  - c. Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
  - d. Individual and aggregate HAP emission calculations determining the cumulative emission rate of each during the first 12-months and the annual emission rate of each thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1213(3))**

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

## **VIII. STACK/VENT RESTRICTION(S)**

NA

## **IX. OTHER REQUIREMENT(S)**

NA

### **Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

### C. EMISSION UNIT SPECIAL CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

#### EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUHMTURBINE11	A 22,546 hp (181.21 MMBTU/hr at 32°F) natural gas-fueled Solar Titan 130 turbine with dry-low-NOx (SoLoNOx) control	05-12-2022	FGTURBINES
EUHMTURBINE12	A 22,546 hp (181.21 MMBTU/hr at 32°F) natural gas-fueled Solar Titan 130 Turbine with dry-low-NOx (SoLoNOx) control	05-12-2022	FGTURBINES
EUHMAPU3	A 872 kilowatts (kW) natural gas-fueled emergency engine manufactured after 2009.	05-18-2022	NA
EUFUELGASHEATER	A 1.3 MMBTU/hr natural gas-fueled fuel heater	05-12-2022	FGHEATERS
EUUTILITYHEATER	A 0.09 MMBTU/hr natural gas-fueled utility heater	05-12-2022	FGHEATERS
EUWAREHOUSEHEAT	Natural gas-fueled warehouse heating units with a combined heat input rate of 0.26 MMBTU/hr.	05-12-2022	FGHEATERS
EUSPACEHEATER	Natural gas-fueled space heating units (two heaters are rated for 0.036 MMBTU/hr and eight heaters are rated for 0.06 MMBTU/hr) with a maximum combined heat input rating of 0.55 MMBTU/hr.	05-12-2022	FGHEATERS
EUIPELINELIQUIDSTANK	A 4,100 Gallon Pipeline Fluids Tank	05-12-2022	FGTANKS
EUWASTEWATERTANK	A 1,500 Gallon Wastewater Tank	05-12-2022	FGTANKS
EUIPECOMPONENTS	Piping and components in natural gas transmission and distribution systems.	01-01-1951, 05-12-2022	FGNSPS0000a, FGRULE285(2)(mm)

**EUHMAPU3  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

A 872 kilowatts (kW) natural gas-fueled emergency engine manufactured after 2009. This engine is subject to 40 CFR Part 60, Subpart JJJJ.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	2.0 g/hp-hr Or 160 ppmvd at 15% O <sub>2</sub> <sup>2</sup>	Hourly	EUHMAPU3	SC V.1	<b>R 336.1205(1)(a), 40 CFR 60.4233(e), 40 CFR 52.21(c) &amp; (d)</b>
2. CO	4.0 g/hp-hr Or 540 ppmvd at 15% O <sub>2</sub> <sup>2</sup>	Hourly	EUHMAPU3	SC V.1	<b>R 336.1205(1)(a), 40 CFR 60.4233(e), 40 CFR 52.21(d)</b>
3. VOC <sup>A</sup>	1.0 g/hp-hr Or 86 ppmvd at 15% O <sub>2</sub> <sup>2</sup>	Hourly	EUHMAPU3	SC V.1	<b>R 336.1205(1)(a), R 336.1702(a), 40 CFR 52.21(c) &amp; (d), 40 CFR 60.4233(e)</b>

<sup>A</sup> For purposes of showing compliance with this emission limit and 40 CFR Part 60, Subpart JJJJ, when calculating emissions of volatile organic compounds, emissions of formaldehyde should not be included.

**II. MATERIAL LIMIT(S)**

1. The permittee shall burn only pipeline quality natural gas in EUHMAPU3.<sup>2</sup> **(R 336.1205(1)(a), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d), 40 CFR 60.4230)**

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not operate EUHMAPU3 for more than 500 hours per year on a 12-month rolling time period basis as determined at the end of each calendar month. The 500 hours includes the 100 hours as described in SC III.2.<sup>2</sup> **(R 336.1205(1)(a), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))**
2. The permittee may operate EUHMAPU3 for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per calendar year.<sup>2</sup> **(40 CFR 60.4243(d)(2))**

3. EUHMAPU3 may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing as provided in SC III.2. Except as provided in 40 CFR 60.4243(d)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or demand response, or to generate income for the permittee to supply non-emergency power as part of a financial arrangement with another entity.<sup>2</sup> **(40 CFR 60.4243(d)(3))**
4. The permittee shall operate and maintain EUHMAPU3 according to the manufacturer's emission-related written instructions such that it meets the emission limits in SC I.1, I.2, and I.3 over the entire life of the engine.<sup>2</sup> **(40 CFR 60.4234, 40 CFR 60.4243(b))**
5. If EUHMAPU3 is a non-certified engine or a certified engine operating in a non-certified manner, per 40 CFR Part 60, Subpart JJJJ, the permittee shall keep a maintenance plan for EUHMAPU3 and shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.<sup>2</sup> **(40 CFR 60.4243(b)(2))**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall equip and maintain EUHMAPU3 with a non-resettable hour meter to track the operating hours.<sup>2</sup> **(R 336.1205(1)(a) & (3), R 336.1225, 40 CFR 60.4237)**
2. The nameplate capacity of EUHMAPU3 shall not exceed 1,175 HP (2,664 kW), as certified by the equipment manufacturer.<sup>2</sup> **(R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d), 40 CFR 60.4230)**

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. If EUHMAPU3 is a non-certified engine or a certified engine operating in a non-certified manner, per 40 CFR Part 60, Subpart JJJJ, the permittee must demonstrate compliance as follows:
  - a. Conduct an initial performance test to demonstrate compliance with the applicable emission limits in SC I.1 – I.3 within 1 year after EUHMAPU3 begins operating in a noncertified manner.
  - b. The performance tests shall be conducted according to 40 CFR 60.4244.
  - c. Subsequent performance testing shall be completed every 8,760 hours of engine operation or every 3 years, whichever comes first, to demonstrate compliance with the applicable emission limits.

No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> **(R 336.1205(1)(a), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21 (c) & (d), 40 CFR 60.8, 40 CFR 60.4243, 40 CFR 60.4244, 40 CFR 60.4245, 40 CFR Part 60, Subpart JJJJ)**

2. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. **(R 336.1213(3))**

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep, in a satisfactory manner, the following records for EUHMAPU3:
  - a. If operated in a certified manner: The permittee shall keep records of the documentation from the manufacturer that the EUHMAPU3 is certified to meet the emission standards and information as required in 40 CFR Parts 90, 1048, 1054, and 1060, as applicable.
  - b. If operated in a non-certified manner: The permittee shall keep records of testing required in SC V.1.

The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> **(R 336.1205(1)(a), 40 CFR 52.21(c) & (d), 40 CFR 60.4233(e), 40 CFR 60.4243, 40 CFR 60.4245(a))**

2. The permittee shall keep, in a satisfactory manner, the following records of maintenance activity for EUHMAPU3:
  - a. If operated in a certified manner: The permittee shall keep the manufacturer's emission-related written instructions and records demonstrating that EUHMAPU3 has been maintained according to them, as specified in SC III.4.
  - b. If operated in a non-certified manner: The permittee shall keep records of a maintenance plan, as required by SC III.5 and maintenance activities.

The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> **(40 CFR 60.4243, 40 CFR 60.4245(a), 40 CFR Part 60, Subpart JJJJ)**

3. The permittee shall keep records of notifications submitted for the completion of construction and start-up of EUHMAPU3.<sup>2</sup> **(40 CFR 60.4245(a))**
4. The permittee shall monitor and record the hours of operation of EUHMAPU3 during emergencies and non-emergencies, on a monthly, 12-month rolling, and calendar year basis, in a manner acceptable to the District Supervisor, Air Quality Division. The permittee shall record the time of operation of EUHMAPU3 and the reason it was in operation during that time.<sup>2</sup> **(R 336.1205(1)(a), R 336.1225, R 336.1702(a), 40 CFR 52.21(c)&(d), 40 CFR 60.4243, 40 CFR 60.4245(b))**

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
5. The permittee shall submit a notification specifying whether EUHMAPU3 will be operated in a certified or a non-certified manner to the AQD District Supervisor, in writing, within 30 days following the initial startup of the engine and within 30 days of switching the manner of operation.<sup>2</sup> **(40 CFR Part 60, Subpart JJJJ)**

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter / Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SVHM017	12 <sup>2</sup>	20.6 <sup>2</sup>	<b>R 336.1225, 40 CFR 52.21(c)&amp;(d)</b>

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subpart A and Subpart JJJJ, as they apply to EUHMAPU3.<sup>2</sup> **(40 CFR Part 60, Subparts A and JJJJ)**
2. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, as they apply to EUHMAPU3.<sup>2</sup> **(40 CFR 63.6590(c), 40 CFR Part 63, Subparts A and ZZZZ)**

**Footnotes:**

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## D. FLEXIBLE GROUP SPECIAL CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

### FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGTURBINES	Two (2) natural gas turbines with a combined heat input of 362.42 MMBTU/hr.	EUHMTURBINE11, EUHMTURBINE12
FGHEATERS	Various natural gas-fueled heating units with a maximum combined heat input rating not to exceed 3.6 MMBTU/hr.	EUFUELGASHEATER, EUUTILITYHEATER, EUWAREHOUSEHEAT, EUSPACEHEATER
FGTANKS	Two (2) tanks, one (1) for pipeline liquids and one (1) for wastewater.	EUIPELINELIQUIDSTANK, EUWASTEWATERTANK
FGNSPSOOOa	The collection of fugitive emissions components at a compressor station subject to requirements in 40 CFR Part 60, Subpart OOOOa.	EUIPECOMPONENTS
FGRULE285(2)(mm)	Routine and emergency venting of natural gas from transmission and distribution systems, exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 285(2)(mm)	EUIPECOMPONENTS

**FGTURBINES  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Two (2) natural gas turbines with a combined heat input of 362.42 MMBTU/hr at 32°F.

**Emission Units:** EUHMTURBINE11, EUHMTURBINE12

**POLLUTION CONTROL EQUIPMENT**

Dry-low-NOx (SoLoNOx) Control

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	25 ppmvd or 150 ng/J of useful output (1.2 lb/MWh) <sup>C, a</sup>	Hourly	EUHMTURBINE11, EUHMTURBINE12 (each unit)	SC V.1, SC V.2, SC V.3, SC VI.5	<b>40 CFR 60.4320(a), Table 1 of 40 CFR Part 60, Subpart KKKK</b>
2. NOx	9.8 pph <sup>A, B, D, E, 2</sup>	Hourly, except during startup and shutdown, low load operations, and cold weather operations	EUHMTURBINE11, EUHMTURBINE12 (each unit)	SC V.1, SC VI.5	<b>R 336.1205(1)(a) &amp; (3), 40 CFR 52.21(c) &amp; (d)</b>
3. NOx	113.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	FGTURBINES	SC VI.4, SC VI.5	<b>R 336.1205(1)(a) &amp; (3), 40 CFR 52.21(c) &amp; (d)</b>
4. CO	10.0 pph <sup>A, B, D, E, 2</sup>	Hourly, except during startup and shutdown, low load operations, and cold weather operations	EUHMTURBINE11, EUHMTURBINE12 (each unit)	SC V.1, SC VI.5	<b>R 336.1205(1)(a) &amp; (3), 40 CFR 52.21(d)</b>
5. CO	127.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	FGTURBINES	SC VI.4, SC VI.5	<b>R 336.1205(1)(a) &amp; (3), 40 CFR 52.21(d)</b>
6. SO <sub>2</sub>	0.060 lb/MMBTU <sup>2</sup>	Hourly	EUHMTURBINE11, EUHMTURBINE12 (each unit)	SC VI.5,	<b>40 CFR 60.4330</b>

ppmvd = parts per million by volume at 15 percent O<sub>2</sub> and on a dry gas basis

lb/MWh = pound per megawatt hour

<sup>A</sup> Does not include startup and shutdown.

<sup>B</sup> Startup is defined as the period of time from initiation of the combustion process (flame-on) from shutdown status and continues until steady state operation (loads greater than a demonstrated percent of design capacity) is achieved. Shutdown is defined as that period of time from the lowering of the turbine output below the demonstrated steady state level, with the intent to shut down, until the combustion process ends at flame-off. The demonstrated percent of design capacity, or demonstrated steady state level, shall be described in the plan required in SC III.2.

<sup>C</sup> Table 1 of 40 CFR Part 60, Subpart KKKK allows 150 ppmvd NO<sub>x</sub> at 15 percent O<sub>2</sub> when the turbines are operating

at less than 75 percent of peak load, or at temperatures less than 0°F.

- D Cold weather operation shall be defined as anytime when the ambient outdoor temperature is less than 0°F
- E Low load operation shall be defined as anytime when the turbine is operating at 50% or less of full load.
- a In accordance with R 336.1213(2) and R 336.1213(6), compliance with this streamlined NOx limit shall be considered compliance with the NOx limit established by 40 CFR 60.4320(a); and also compliance with the NOx limit in R 336.1201(3) an additional applicable requirement that has been subsumed within this condition.

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Sulfur content in natural gas	0.25 gr/100 scf <sup>A, 2</sup>	At all times	FGTURBINES	SC VI.5	<b>R 336.1205(1)(a) &amp; (3), 40 CFR 52.21(c) &amp; (d)</b>

<sup>A</sup> The sulfur content limit in 40 CFR 60.4365 is 20 gr/100 scf. SC II.1 subsumes the NSPS requirement.

- 2. The permittee shall only burn pipeline quality natural gas in FGTURBINES.<sup>2</sup> **(R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), 40 CFR 60.4330)**

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

- 1. The permittee shall submit, implement, and maintain a malfunction abatement plan (MAP) as described in Rule 911(2) for FGTURBINES. The MAP shall, at a minimum, specify the following:
  - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
  - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.
  - d. Operating variables and ranges under various load conditions shall be monitored and recorded. The normal operating range of these variables and a description of the method of monitoring shall be maintained.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.<sup>2</sup> **(R 336.1205(1)(a) & (3), R 336.1224, R 336.1702(a), R 336.1910, R 336.1911)**

- 2. The permittee shall submit, implement, and maintain a plan that describes how emissions will be minimized during startup and shutdown. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporate standard industry practices, and shall describe the demonstrated percent of design capacity, or demonstrated steady state level. Unless notified by the District Supervisor within 30 business days after plan submittal, the plan shall be deemed approved.<sup>2</sup> **(R 336.1911, R 336.1912, 40 CFR 60.4333(a))**
- 3. The total events for startup and shutdown for each turbine in FGTURBINES shall not exceed 200 startup and shutdown events per 12-month rolling time period as determined at the end of each calendar month.<sup>2</sup> **(R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))**

4. The total hours for low load operation for each turbine in FGTURBINES shall not exceed 14 hours per 12-month rolling time period as determined at the end of each calendar month. Low load operation shall be defined as anytime when the turbine is operating at 50% or less of full load. Low load operation does not include startups and shutdowns.<sup>2</sup> **(R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))**
5. The permittee shall operate and maintain FGTURBINES, including associated equipment and monitors, in a manner consistent with safety and good air pollution control practice.<sup>2</sup> **(40 CFR 60.4333(a))**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The maximum design heat input capacity for each turbine in FGTURBINES shall not exceed, on a fuel heat input basis, 181.2 MMBTU per hour (HHV), as described in the manufacturer's product documentation.<sup>2</sup> **(R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))**
2. The permittee shall not operate FGTURBINES unless the dry-low-NO<sub>x</sub> (SoLoNO<sub>x</sub>) control is installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each turbine in accordance with an approved MAP for FGTURBINES as required in SC III.1.<sup>2</sup> **(R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1910)**
3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the natural gas usage rate for each turbine within FGTURBINES on a continuous basis.<sup>2</sup> **(R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))**

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall verify CO and NO<sub>x</sub> emission rates from each turbine in FGTURBINES at maximum routine operating conditions, by testing at owner's expense, in accordance with Department requirements. The permittee must complete the required testing once every five years of operation, thereafter. Testing shall be based on an average of three 1-hour or longer test runs performed using an approved EPA Method listed in:

<b>Pollutant</b>	<b>Test Method Reference</b>
NO <sub>x</sub>	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> **(R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1331(1)(c), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)**

2. The permittee must conduct an initial performance test of NO<sub>x</sub> emission rates from each turbine in FGTURBINES, as required in 40 CFR 60.8. Subsequent NO<sub>x</sub> performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test) in accordance with 40 CFR 60.4400 to demonstration continuous compliance. If the NO<sub>x</sub> emission result from the performance test is less than or equal to 75 percent of the NO<sub>x</sub> emission limit specified in SC I.1, the permittee may reduce the frequency of subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75 percent of the NO<sub>x</sub> emission limit for the turbine, the permittee must resume annual performance tests.<sup>2</sup> **(40 CFR 60.4340(a), 40 CFR 60.4400(a))**
3. The performance test required under SC V.2 must be done at any load conditions within plus or minus 25 percent of 100 percent peak load. The permittee may perform testing at the highest achievable load point, if at least 75 percent of peak load cannot be achieved in practice. The permittee must conduct three separate test runs for each performance test. The minimum time per run is 20 minutes. No less than 30 days prior to testing, the

permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> **(R 336.2001, R 336.2003, R 336.2004, 40 CFR 60.4375(b), 40 CFR 60.4400(b))**

4. The permittee shall verify the CO and NO<sub>x</sub> emission rates from FGTURBINES, at a minimum, every five years from the date of the last test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**
5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. **(R 336.1213(3))**

## **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> **(R 336.1205(1)(a) & (3), 40 CFR 60.4345)**
2. The permittee shall monitor and record, in a satisfactory manner, the natural gas usage for each turbine in FGTURBINES on an hourly and monthly basis. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> **(R 336.1205(1)(a) & (3))**
3. The permittee shall keep, in a satisfactory manner, a record of the monthly and 12-month rolling total hours of startup and shutdown, cold weather operation, and low-load for each turbine in FGTURBINES. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> **(R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))**
4. The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling NO<sub>x</sub> and CO mass emissions for FGTURBINES. The permittee shall keep records of the basis of the calculations, including any product documentation from the turbine manufacturer used to determine emissions during startup and shutdown, cold weather operation, and low-load.<sup>2</sup> **(R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))**
5. The permittee shall maintain records of all information necessary for all notifications and reports as specified in these special conditions as well as that information necessary to demonstrate compliance with the emission limits of this permit for each turbine within FGTURBINES. This information shall include, but shall not be limited to the following:
  - a. Compliance tests and any testing required under the special conditions of this permit;
  - b. Total sulfur content and potential sulfur emissions, as applicable, of the natural gas as required by 40 CFR 60.4365(a) or (b);
  - c. Verification of heat input capacity as required by SC IV.1;
  - d. Identification, type, and amount of fuel combusted on a calendar month basis;
  - e. All records required by 40 CFR 60.7;
  - f. Records of the duration of all dates and times of startup and shutdown events;
  - g. Records of the duration of all dates and times of low load operations;
  - h. Records of the duration of all dates and times of cold weather operations;
  - i. All calculations necessary to show compliance with the limits contained in this permit;
  - j. All records related to, or as required by, the MAP and the startup and shutdown plan.

All of the above information shall be stored in a format acceptable to the AQD District Supervisor.<sup>2</sup> (R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1331(1)(c), R 336.1702(a), R 336.1912, 40 CFR 60.7, 40 CFR 60.4365, 40 CFR Part 60, Subpart KKKK)

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. EUHMTURBINE11	108 x 108 <sup>2</sup>	58.5 <sup>2</sup>	R 336.1225, 40 CFR 52.21(c) & (d)
2. EUHMTURBINE12	108 x 108 <sup>2</sup>	58.5 <sup>2</sup>	R 336.1225, 40 CFR 52.21(c) & (d)

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and KKKK, as they apply to FGTURBINES.<sup>2</sup> (40 CFR Part 60, Subparts A and KKKK)

**Footnotes:**

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

<b>FGHEATERS</b> <b>FLEXIBLE GROUP CONDITIONS</b>
--

**DESCRIPTION**

Various natural gas-fueled heating units with a maximum combined heat input rating not to exceed 3.6 MMBTU/hr.

**Emission Units:** EUFUELGASHEATER, EUUTILITYHEATER, EUWAREHOUSEHEAT, EUSPACEHEATER

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

1. The permittee shall only burn pipeline quality natural gas in FGHEATERS.<sup>2</sup> (R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a))

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The maximum heat input of all equipment in FGHEATERS combined shall not exceed 3.6 MMBTU/hr.<sup>2</sup> (R 336.1205(1)(a) & (3), R 336.1225, 40 CFR 52.21(c) & (d))

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall maintain records showing the maximum heat input capacity of all equipment in FGHEATERS. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> (R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1702)

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year.  
**(R 336.1213(4)(c))**

**VIII. STACK/VENT RESTRICTION(S)**

NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

<b>FGTANKS</b> <b>FLEXIBLE GROUP CONDITIONS</b>
--

**DESCRIPTION**

Two (2) tanks, one (1) for pipeline liquids and one (1) for wastewater.

**Emission Units:** EUPIPELINELIQUIDSTANK, EUWASTEWATERTANK

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

NA

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The design capacity of the tanks in FGTANKS shall not exceed the following:<sup>2</sup> **(R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1702(a))**
  - a. EUPIPELINELIQUIDSTANK: 4,100 Gallons
  - b. EUWASTEWATERTANK: 1,500 Gallons

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep, in a satisfactory manner, records of the storage capacity and general contents of each tank in FGTANKS.<sup>2</sup> **(R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1702(a))**

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year.  
**(R 336.1213(4)(c))**

**See Appendix 8**

**VIII. STACK/VENT RESTRICTION(S)**

NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGNSPS0000a**  
**FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

The collection of fugitive emissions components at a compressor station subject to requirements in 40 CFR Part 60, Subpart OOOOa.

**Emission Unit:** EUPIPECOMPONENTS

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

NA

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee must develop an emissions monitoring plan that covers the collection of fugitive emissions components at compressor stations within each company-defined area as follows: **(40 CFR 60.5397a(b), 40 CFR 60.5397a(c))**
  - a. Fugitive emission monitoring plans must include the elements specified in 40 CFR 60.5397a(c)(1) through (8), at a minimum: **(40 CFR 60.5397a(c))**
    - i. A monitoring survey of the collection of fugitive emissions components at a compressor station must be conducted at least semiannually after the initial survey. Consecutive semiannual monitoring surveys must be conducted at least 4 months apart and no more than 7 months apart. **(40 CFR 60.5397a(c)(1), 40 CFR 60.5397a(g)(2))**
    - ii. Fugitive emissions components that cannot be monitored without elevating the monitoring personnel more than 2 meters above the surface may be designated as difficult-to-monitor. Ensure that fugitive emissions components that are designated difficult-to-monitor meet the specifications of 40 CFR 60.5397a(g)(3)(i) through (g)(3)(iv). **(40 CFR 60.5397a(c)(1), 40 CFR 60.5397a(g)(3))**
    - iii. Fugitive emissions components that cannot be monitored because monitoring personnel would be exposed to immediate danger while conducting a monitoring survey may be designated as unsafe-to-

monitor. Ensure that fugitive emissions components that are designated unsafe-to-monitor meet the specifications of 40 CFR 60.5397a(g)(4)(i) through (g)(4)(iv). **(40 CFR 60.5397a(c)(1), 40 CFR 60.5397a(g)(4))**

- b. Technique for determining fugitive emissions (i.e., Method 21 of Appendix A–7 to 40 CFR Part 60, or optical gas imaging). **(40 CFR 60.5397a(c)(2))**
  - c. Manufacturer and model number of fugitive emissions detection equipment to be used. **(40 CFR 60.5397a(c)(3))**
  - d. Procedures and timeframes for identifying and repairing fugitive emissions components from which fugitive emissions are detected, including timeframes for fugitive emission components that are unsafe to repair. The repair schedule must meet the requirements in SC VI.3 at a minimum. **(40 CFR 60.5397a(c)(4))**
  - e. Procedures and timeframes for verifying fugitive emission component repairs. **(40 CFR 60.5397a(c)(5))**
  - f. Records that will be kept and the length of time records will be kept. **(40 CFR 60.5397a(c)(6))**
  - g. If using optical gas imaging, the plan must also include the elements specified in 40 CFR 60.5397a(c)(7)(i) through (vii). **(40 CFR 60.5397a(c)(7))**
  - h. If using Method 21 of Appendix A–7 to 40 CFR Part 60, the plan must also include the elements specified in 40 CFR 60.5397a(c)(8)(i) through (iii). For the purposes of complying with the fugitive emissions monitoring program using Method 21 of Appendix A–7 to 40 CFR Part 60, a fugitive emission is defined as an instrument reading of 500 ppm or greater. **(40 CFR 60.5397a(c)(8))**
2. Each fugitive emissions monitoring plan must include the elements specified in SC VI.2.a through c, at a minimum, as applicable. **(40 CFR 60.5397a(b), 40 CFR 60.5397a(d))**
- a. If using optical gas imaging, the plan must include procedures to ensure that all fugitive emissions components are monitored during each survey. Example procedures include, but are not limited to, a sitemap with an observation path, a written narrative of where the fugitive emissions components are located and how they will be monitored, or an inventory of fugitive emissions components. **(40 CFR 60.5397a(d)(1))**
  - b. If using Method 21 of Appendix A–7 to 40 CFR Part 60, the plan must include a list of fugitive emissions components to be monitored and method for determining the location of fugitive emissions components to be monitored in the field (e.g., tagging, identification on a process and instrumentation diagram, etc.). **(40 CFR 60.5397a(d)(2))**
  - c. The fugitive emissions monitoring plan must include the written plan developed for all of the fugitive emissions components designated as difficult-to-monitor in accordance with 40 CFR 60.5397a(g)(3), and the written plan for fugitive emissions components designated as unsafe-to-monitor in accordance with 40 CFR 60.5397a(g)(4). **(40 CFR 60.5397a(d)(3))**
3. Each monitoring survey shall observe each fugitive emissions component, as defined in 40 CFR 60.5430a, for fugitive emissions. **(40 CFR 60.5397a(e))**
4. Each identified source of fugitive emissions shall be repaired, in accordance with the following: **(40 CFR 60.5397a(h))**
- a. A first attempt at repair shall be made no later than 30 calendar days after detection of the fugitive emissions. **(40 CFR 60.5397a(h)(1))**
  - b. Repair shall be completed as soon as practicable, but no later than 30 calendar days after the first attempt at repair as required in SC VI.3.a. **(40 CFR 60.5397a(h)(2))**
  - c. If the repair is technically infeasible, would require a vent blowdown, a compressor station shutdown, a well shutdown or well shut-in, or would be unsafe to repair during operation of the unit, the repair must be completed during the next scheduled compressor station shutdown for maintenance, scheduled well shutdown, scheduled well shut-in, after a scheduled vent blowdown, or within 2 years, whichever is earliest. **(40 CFR 60.5397a(h)(3))**

- d. Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in SC VI.4.d.i through iv, to ensure that there are no fugitive emissions. **(40 CFR 60.5397a(h)(4))**
- i. The permittee may resurvey the fugitive emissions components to verify repair using either Method 21 of Appendix A–7 of 40 CFR Part 60 or optical gas imaging. **(40 CFR 60.5397a(h)(4)(i))**
  - ii. For each repair that cannot be made during the monitoring survey when the fugitive emissions are initially found, a digital photograph must be taken of that component or the component must be tagged during the monitoring survey when the fugitives were initially found for identification purposes and subsequent repair. The digital photograph must include the date that the photograph was taken and must clearly identify the component by location within the site (e.g., the latitude and longitude of the component or by other descriptive landmarks visible in the picture). **(40 CFR 60.5397a(h)(4)(ii))**
  - iii. Operators that use Method 21 of Appendix A–7 of 40 CFR Part 60 to resurvey the repaired fugitive emissions components are subject to the resurvey provisions specified as follows: **(40 CFR 60.5397a(h)(4)(iii))**
    - A. A fugitive emissions component is repaired when the Method 21 instrument indicates a concentration of less than 500 ppm above background or when no soap bubbles are observed when the alternative screening procedures specified in section 8.3.3 of Method 21 of Appendix A–7 of 40 CFR Part 60 are used. **(40 CFR 60.5397a(h)(4)(iii)(A))**
    - B. Operators must use the Method 21 monitoring requirements specified in 40 CFR 60.5397a(c)(8)(ii) or the alternative screening procedures specified in section 8.3.3 of Method 21 of Appendix A–7 of 40 CFR Part 60. **(40 CFR 60.5397a(h)(4)(iii)(B))**
  - iv. Operators that use optical gas imaging to resurvey the repaired fugitive emissions components, are subject to the resurvey provisions specified as follows: **(40 CFR 60.5397a(h)(4)(iv))**
    - A. A fugitive emissions component is repaired when the optical gas imaging instrument shows no indication of visible emissions. **(40 CFR 60.5397a(h)(4)(iv)(A))**
    - B. Operators must use the optical gas imaging monitoring requirements specified in 40 CFR 60.5397a(c)(7). **(40 CFR 60.5397a(h)(4)(iv)(B))**
5. For each collection of fugitive emissions components at a compressor station, maintain the following records: **(40 CFR 60.5397a(i))**
- a. The date of startup or the date of modification for each collection of fugitive emissions components at a compressor station. **(40 CFR 60.5420a(c)(15)(i))**
  - b. The fugitive emissions monitoring plan as required in SC VI.1 and 2. **(40 CFR 60.5420a(c)(15)(vi))**
  - c. The records of each monitoring survey as follows: **(40 CFR 60.5420a(c)(15)(vii))**
    - i. Date of the survey. **(40 CFR 60.5420a(c)(15)(vii)(A))**
    - ii. Beginning and end time of the survey. **(40 CFR 60.5420a(c)(15)(vii)(B))**
    - iii. Name of operator(s), training, and experience of the operator(s) performing the survey. **(40 CFR 60.5420a(c)(15)(vii)(C))**
    - iv. Monitoring instrument used. **(40 CFR 60.5420a(c)(15)(vii)(D))**
    - v. Fugitive emissions component identification when Method 21 of Appendix A–7 of 40 CFR Part 60 is used to perform the monitoring survey. **(40 CFR 60.5420a(c)(15)(vii)(E))**
    - vi. Ambient temperature, sky conditions, and maximum wind speed at the time of the survey. For compressor stations, operating mode of each compressor (*i.e.*, operating, standby pressurized, and not operating-depressurized modes) at the station at the time of the survey. **(40 CFR 60.5420a(c)(15)(vii)(F))**
    - vii. Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan. **(40 CFR 60.5420a(c)(15)(vii)(G))**

- viii. Records of calibrations for the instrument used during the monitoring survey. **(40 CFR 60.5420a(c)(15)(vii)(H))**
- ix. Documentation of each fugitive emission detected during the monitoring survey, including the information specified as follows: **(40 CFR 60.5420a(c)(15)(vii)(I))**
  - A. Location of each fugitive emission identified. **(40 CFR 60.5420a(c)(15)(vii)(I)(1))**
  - B. Type of fugitive emissions component, including designation as difficult-to-monitor or unsafe-to-monitor, if applicable. **(40 CFR 60.5420a(c)(15)(vii)(I)(3))**
  - C. If Method 21 of Appendix A–7 of 40 CFR Part 60 is used for detection, record the component ID and instrument reading. **(40 CFR 60.5420a(c)(15)(vii)(I)(3))**
  - D. For each repair that cannot be made during the monitoring survey when the fugitive emissions are initially found, a digital photograph or video must be taken of that component or the component must be tagged for identification purposes. The digital photograph must include the date that the photograph was taken and must clearly identify the component by location within the site (e.g., the latitude and longitude of the component or by other descriptive landmarks visible in the picture). The digital photograph or identification (e.g., tag) may be removed after the repair is completed, including verification of repair with the resurvey. **(40 CFR 60.5420a(c)(15)(vii)(I)(4))**
  - E. The date of first attempt at repair of the fugitive emissions component(s). **(40 CFR 60.5420a(c)(15)(vii)(I)(5))**
  - F. The date of successful repair of the fugitive emissions component, including the resurvey to verify repair and instrument used for the resurvey. **(40 CFR 60.5420a(c)(15)(vii)(I)(6))**
  - G. Identification of each fugitive emission component placed on delay of repair and explanation for each delay of repair. **(40 CFR 60.5420a(c)(15)(vii)(I)(7))**
  - H. Date of planned shutdowns that occur while there are any components that have been placed on delay of repair. **(40 CFR 60.5420a(c)(15)(vii)(I)(8))**
- 6. The permittee must maintain all records required by 40 CFR Subpart OOOOa either onsite or at the nearest local field office for at least 5 years. Any records required to be maintained by 40 CFR Part 60, Subpart OOOOa that are submitted electronically via the EPA's Central Data Exchange (CDX) may be maintained in electronic format. **(40 CFR 60.5420a(c))**

## **VII. REPORTING**

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
- 4. The permittee must submit annual reports for each collection of fugitive emissions components at a compressor station that includes each fugitive emissions monitoring survey performed during the annual reporting period. Multiple collection of fugitive emissions components at a compressor station may be included in a single annual report. Annual reports may coincide with title V reports (in SC VII.3) as long as all the required elements of the annual report are included. **(40 CFR 60.5397a(j), 40 CFR 60.5420a(b))**
  - a. The general information specified as follows is required for all reports. **(40 CFR 60.5420a(b)(1))**
    - i. The company name, facility site name associated with the affected facility, U.S. Well ID or U.S. Well ID associated with the affected facility, if applicable, and address of the affected facility. If an address is not available for the site, include a description of the site location and provide the latitude and longitude

- coordinates of the site in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983. **(40 CFR 60.5420a(b)(1)(i))**
- ii. An identification of each affected facility being included in the annual report. **(40 CFR 60.5420a(b)(1)(ii))**
  - iii. Beginning and ending dates of the reporting period. **(40 CFR 60.5420a(b)(1)(iii))**
  - iv. A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(40 CFR 60.5420a(b)(1)(iv))**
- b. For each fugitive emissions monitoring survey, report the following information: **(40 CFR 60.5420a(b)(7))**
- i. Date of the survey. **(40 CFR 60.5420a(b)(7)(ii)(A))**
  - ii. Monitoring instrument used. **(40 CFR 60.5420a(b)(7)(ii)(B))**
  - iii. Any deviations from the monitoring plan elements under 40 CFR 60.5397a(c)(1), (2), and (7) and (c)(8)(i) or a statement that there were no deviations from these elements of the monitoring plan. **(40 CFR 60.5420a(b)(7)(ii)(C))**
  - iv. Number and type of components for which fugitive emissions were detected. **(40 CFR 60.5420a(b)(7)(ii)(D))**
  - v. Number and type of fugitive emissions components that were not repaired as required in 40 CFR 60.5397a(h). **(40 CFR 60.5420a(b)(7)(ii)(E))**
  - vi. Number and type of fugitive emission components (including designation as difficult-to-monitor or unsafe-to-monitor, if applicable) on delay of repair and explanation for each delay of repair. **(40 CFR 60.5420a(b)(7)(ii)(F))**
  - vii. Date of planned shutdown(s) that occurred during the reporting period if there are any components that have been placed on delay of repair. **(40 CFR 60.5420a(b)(7)(ii)(G))**
5. The permittee must submit reports to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must use the appropriate electronic report in CEDRI for 40 CFR Part 60, Subpart OOOOa or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/cedri/>). If the reporting form specific to 40 CFR Part 60, Subpart OOOOa is not available in CEDRI at the time that the report is due, submit the report to EPA at the appropriate address listed in 40 CFR 60.4. Once the form has been available in CEDRI for at least 90 calendar days, the permittee must begin submitting all subsequent reports via CEDRI. **(40 CFR 60.5420a(b)(11))**

See Appendix 8

#### **VIII. STACK/VENT RESTRICTION(S)**

NA

#### **IX. OTHER REQUIREMENT(S)**

1. The permittee must comply with all applicable provisions of the federal Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 as specified in 40 CFR Part 60, Subparts A and OOOOa. **(40 CFR Part 60, Subparts A and OOOOa)**

**FGRULE285(2)(mm)**  
**FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Routine and emergency venting of natural gas from transmission and distribution systems exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 285(2)(mm).

**Emission Unit:** EUPIPECOMPONENTS

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. For venting of natural gas for routine maintenance or relocation of transmission and distribution systems in amounts greater than 1,000,000 standard cubic feet, the permittee shall, at a minimum, implement measures to assure safety of employees and the public and minimize impacts to the environment. **(R 336.1285(2)(mm)(ii)(B))**

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. For venting of natural gas for routine maintenance or relocation of transmission and distribution systems in amounts greater than 1,000,000 standard cubic feet, the permittee shall notify the AQD District Supervisor prior to a scheduled pipeline venting. **(R 336.1285(2)(mm)(ii)(A))**
5. For venting of natural gas for routine maintenance or relocation of transmission and distribution systems in amounts greater than 1,000,000 standard cubic feet, the permittee shall provide necessary notification in accordance with the Michigan gas safety standards, the federal pipeline and hazardous materials safety administration standards, and the federal energy regulatory commission standards, as applicable. The permittee is not required to copy the AQD on the notifications. **(R 336.1285(2)(mm)(ii)(B))**
6. For emergency venting of natural gas in amounts greater than 1,000,000 standard cubic feet per event, the permittee shall notify the pollution emergency alert system (PEAS) within 24 hours of an emergency pipeline venting. For purposes of this requirement, an emergency is considered an unforeseen event that disrupts normal operating conditions and poses a threat to human life, health, property, or the environment if not controlled immediately. **(R 336.1285(2)(mm)(iv))**

**See Appendix 8**

**VIII. STACK/VENT RESTRICTION(S)**

NA

**IX. OTHER REQUIREMENT(S)**

NA

## **E. NON-APPLICABLE REQUIREMENTS**

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

## APPENDICES

### Appendix 1. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO <sub>2</sub> e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP	Hazardous Air Pollutant
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallons of Applied Coating Solids	HP	Horsepower
GC	General Condition	H <sub>2</sub> S	Hydrogen Sulfide
GHGs	Greenhouse Gases	kW	Kilowatt
HVLP	High Volume Low Pressure*	lb	Pound
ID	Identification	m	Meter
IRSL	Initial Risk Screening Level	mg	Milligram
ITSL	Initial Threshold Screening Level	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	NMOC	Non-methane Organic Compounds
MAP	Malfunction Abatement Plan	NO <sub>x</sub>	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng	Nanogram
NA	Not Applicable	PM	Particulate Matter
NAAQS	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	%	Percent
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO <sub>2</sub>	Sulfur Dioxide
SDS	Safety Data Sheet	TAC	Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature
SRN	State Registration Number	THC	Total Hydrocarbons
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year
USEPA/EPA	United States Environmental Protection Agency	µg	Microgram
VE	Visible Emissions	µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

\*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

**Appendix 2. Schedule of Compliance**

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. But, on August 31, 2023, AQD sent a Violation Notice to the ANR Pipeline Company-Hamilton Compressor Station because the facility had the exhaust stack on EUHMAPU3 discharging horizontally. PTI No. 98-20, SC VIII.1 requires that the stack be discharged unobstructed vertically. As a result, the permittee was required to submit a Schedule of Compliance as defined in Rule 119(a), pursuant to Rule 210(2) and Rule 213(4).

A Schedule of Compliance for any applicable requirements that the permittee is not in compliance with at the time of the ROP issuance is supplemental to, and shall not sanction non-compliance with, the underlying applicable requirements on which it is based.

The permittee shall adhere to this schedule of compliance and submit requested certified progress reports accordingly.

**Schedule of Compliance**

The following schedule of compliance conforms with the provisions of Rule 119(a) and Rule 213(4).

Emission Unit/ Flexible Group ID and Condition No.	Applicable Requirement(s)	Remedial Measure	Required Action	Milestone Date	Progress Reports
EUHMAPU3 - PTI No. 98-20, SC VIII.1	R 336.1225, 40 CFR 52.21(c) & (d)	Obtain a Permit to Install (PTI) to correct the direction of the stack discharge and revise the ROP.	<p>Submit a PTI Application to modify PTI No. 98- 20.</p> <p>Company shall provide all additional information requested by AQD to process the PTI application.</p> <p>Company shall submit in writing an acceptance of all terms and conditions of the draft PTI.</p> <p>Company shall submit an application to modify the ROP in accordance with the requirements of Rule 216.</p>	<p>November 2, 2023</p> <p>Within thirty (30) calendar days of a written request from the AQD.</p> <p>Within thirty (30) calendar days after receipt of the draft PTI.</p> <p>Within seven (7) calendar days of the effective date of the PTI.</p>	<p>Within seven (7) calendar days of a request by the AQD District Supervisor.</p>

**Progress Reports**

The permittee shall submit Certified Progress Reports to the appropriate AQD District Supervisor using EGLE, AQD, Report Certification form (EQP 5736). Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor. **(R 336.1213(4)(b))**

Progress reports shall contain the following information:

The projected dates for achieving scheduled activities, milestones or compliance as required in the schedule of compliance. **(R 336.1213(4)(b)(i))**

The actual dates that the activities, milestones, or compliance are achieved. **(R 336.1213(4)(b)(i))**

An explanation of why any dates in the Schedule of Compliance were not or will not be met. **(R 336.1213(4)(b)(ii))**

A description of any preventative or corrective measures adopted in order to ensure that the schedule of compliance is met. **(R 336.1213(4)(b)(ii))**

**Appendix 3. Monitoring Requirements**

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

**Appendix 4. Recordkeeping**

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

**Appendix 5. Testing Procedures**

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

**Appendix 6. Permits to Install**

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-N5574-2018. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (\*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-N5574-2018 is being reissued as Source-Wide PTI No. MI-PTI-N5574-2024.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
98-20	NA	Installation of two (2) natural gas-fired turbines, one (1) emergency generator, one (1) natural gas-fired heater, one (1) utility gas heater, natural gas-fired warehouse heaters, space heaters, and two (2) miscellaneous fluids tanks.	EUHMAPU3, FGTURBINES (EUHMTURBINE11, EUHMTURBINE12), FGHEATERS (EUFUELGASHEATER, EUUTILITYHEATER, EUWAREHOUSEHEAT, EUSPACEHEATER), FGTANKS (EUPIPELINELIQUIDSTANK, EUWASTEWATERTANK)

## **Appendix 7. Emission Calculations**

There are no specific emission calculations to be used for this ROP. Therefore, this appendix is not applicable.

## **Appendix 8. Reporting**

### **A. Annual, Semiannual, and Deviation Certification Reporting**

The permittee shall use EGLE, AQD, Report Certification form (EQP 5736) and EGLE, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

### **B. Other Reporting**

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.