

State Registration Number
N6838

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-N6838-2024

Vector Pipeline L.P., Highland Compressor Station

State Registration Number (SRN): N6838

Located at

2282 South Duck Lake Road, Highland, Oakland County, Michigan 48356

Permit Number: MI-ROP-N6838-2024

Staff Report Date: January 29, 2024

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

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JANUARY 29, 2024 - STAFF REPORT

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Purpose

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

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

General Information

Stationary Source Mailing Address:	Vector Pipeline L.P., Highland Compressor Station 2282 South Duck Lake Road Highland, Michigan 48356
Source Registration Number (SRN):	N6838
North American Industry Classification System (NAICS) Code:	486210
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	202300077
Responsible Official:	Amy Back, General Counsel 734-462-7619
AQD Contact:	Owen Pierce, Environmental Engineer 586-854-3244
Date Application Received:	April 23, 2023
Date Application Was Administratively Complete:	May 1, 2023
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	January 29, 2024
Deadline for Public Comment:	February 28, 2024

Source Description

The Vector Pipeline L.P., Highland Compressor Station is a compressor station used to maintain pressure of pipeline quality sweet natural gas in order to move it along the transmission pipeline system. The Highland Compressor Station consists of two (2).

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2023**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	6.42
Lead (Pb)	N/A
Nitrogen Oxides (NO _x)	20.80
PM10*	2.87
Sulfur Dioxide (SO ₂)	0.35
Volatile Organic Compounds (VOCs)	0.77

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

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

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

Regulatory Analysis

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

The stationary source is in Oakland County, which is currently designated by the United States Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70 because the potential to emit of carbon monoxide and oxides of nitrogen exceed 100 tons per year and the potential to emit of Greenhouse Gases is 100,000 tons per year or more per year or more calculated as carbon dioxide equivalents (CO₂e) and 100 tons per year or more on a mass basis.

The stationary source is an area source of HAP emissions because the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act is less than 10 tons per year and the potential to emit of all HAPs combined are less than 25 tons per year.

The stationary source is considered a "synthetic minor" source in regards to the Prevention of Significant Deterioration regulations of 40 CFR 52.21 because the stationary source accepted legally enforceable permit conditions limiting the potential to emit of carbon monoxide to less than 250 tons per year.

FGTURBINES (EUTURBINE1 and EUTURBINE2) at the stationary source is subject to the Standards of Performance for Stationary Gas Turbines promulgated in 40 CFR Part 60, Subparts A and GG.

EUSPU3 at the stationary source is subject to the National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ.

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

No emission units have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64, because all emission units at the stationary source either do not have a control device or those with a control device do not have potential pre-control emissions over the major source thresholds.

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

Source-Wide Permit to Install (PTI)

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

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. MI-ROP-N6838-2019 are identified in Appendix 6 of the ROP.

PTI Number			
221-04			

Streamlined/Subsumed Requirements

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

Non-applicable Requirements

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

Processes Not in the Draft ROP

The following table lists PTI exempt processes that were not included in the Draft ROP pursuant to Rule 212(4). These processes are not subject to any process-specific emission limits or standards.

Emission Unit ID	Description of Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EU-PORTABLE ENGINES	Portable gasoline engine. Used at various sites along the pipeline – including a portable generator engine (10 HP Tecumseh engine), portable generator (9 HP Honda), power washer (6.5 HP Honda engine), portable air compressor, snow blower and weed trimmer.	R336.1212(4)(e)	R336.1285(2)(g)
EU-PORTABLE TOOLS	Portable power tools (4.5 HP angle grinder, bench grinder, drill press, electric hand tools, sawzall, and circular saw).	R336.1212(4)(e)	336.1285(2)(l)(vi)(B)

Draft ROP Terms/Conditions Not Agreed to by Applicant

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

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

Action taken by EGLE, AQD

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

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RENEWABLE OPERATING PERMIT
MARCH 7, 2024 - STAFF REPORT ADDENDUM

ROP Number
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Purpose

A Staff Report dated January 29, 2024, was developed to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by Rule 214(1) of the administrative rules promulgated under Act 451. The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in Rule 214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

Responsible Official:	Amy Back, General Counsel 734-462-7619
AQD Contact:	Owen Pierce, Environmental Engineer 586-854-3244

Summary of Pertinent Comments

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

Changes to the January 29, 2024 Draft ROP

No changes were made to the draft ROP.