

State Registration Number  
N8151

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-N8151-2021

**Vector Pipeline L.P. Athens Compressor Station**

State Registration Number (SRN): N8151

Located at

4981 2 Mile Road, Athens, Calhoun County, Michigan 49011

Permit Number: MI-ROP-N8151-2021

Staff Report Date: May 3, 2021

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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**May 3, 2021- 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., Athens Compressor Station 4981 2 Mile Road Athens, Michigan 49011
Source Registration Number (SRN):	N8151
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:	202100019
Responsible Official:	Stanley Sagun, Chief Compliance Officer 734-462-7619
AQD Contact:	Rachel Benaway, Environmental Quality Analyst 269-370-2170
Date Application Received:	September 24, 2020
Date Application Was Administratively Complete:	September 24, 2020
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	May 3, 2021
Deadline for Public Comment:	June 2, 2021

## **Source Description**

Vector Pipeline, L.P. in Athens, Michigan is one of five compressor stations required to maintain pressure along the 350 mile long, 42-inch wide, sweet natural gas pipeline. The entire Vector Pipeline traverses from Joliet, IL to Ontario, Canada. This facility utilizes one natural gas fired combustion turbine (EUTURBINE1) to compress the pipeline gas. A 365 HP natural gas fired spark ignition internal combustion generator (EUSPU) is used for emergency power.

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

### **TOTAL STATIONARY SOURCE EMISSIONS**

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide (CO)	0.04
Lead (Pb)	0.00
Nitrogen Oxides (NO <sub>x</sub> )	0.68
Particulate Matter (PM)	0.05
Sulfur Dioxide (SO <sub>2</sub> )	0.007
Volatile Organic Compounds (VOCs)	0.018

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 Calhoun 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 exceeds 100 tons per year.

The stationary source is a minor 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.

No emission units at the stationary source are currently subject to the Prevention of Significant Deterioration regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451, because at the time of New Source Review permitting the potential to emit of CO and NO<sub>x</sub> was less than 250 tons per year.

EUTURBINE1 at the stationary source is subject to the Standards of Performance for Stationary Combustion Turbines promulgated in 40 CFR Part 60, Subparts A and KKKK.

EUSPU at the stationary source is subject to the National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) promulgated in 40 CFR Part 63, Subparts A and ZZZZ. EUSPU is considered to be a new stationary RICE at an area source of HAPs and is an affected source under 40 CFR Part 63, Subpart ZZZZ, pursuant to 40 CFR 63.6590(a)(2)(iii). Per 40 CFR 63.6590(c)(1), the affected source must meet the requirements of 40 CFR Part 63, Subpart ZZZZ, by meeting the requirements of 40 CFR Part 60, Subpart JJJJ. EUSPU is not currently subject to 40 CFR

Part 60, Subpart JJJJ, for emergency engines constructed or ordered on or after January 1, 2009 (40 CFR 60.4230(a)(4)(iv)) because the engine was ordered in April 2008 and the manufacture date was December 2008. If EUSPU is modified or reconstructed at a future date, it will become subject to 40 CFR Part 60, Subpart JJJJ.

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

No emission units have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring 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-N8151-2016 are identified in Appendix 6 of the ROP.

PTI Number			
288-08	NA	NA	NA

**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 in Application Not Identified in Draft ROP**

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

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EU-PORTABLE ENGINES	Portable gasoline engines used at various sites along the pipeline- including a portable generator engine, portable generator, power	R 336.1212(4)(e)	R 336.1285(2)(g)

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
	washer, portable air compressor, snow blower, and weed trimmer.		
EU-PORTABLE TOOLS	Portable power tools (4.5 hp angle grinder, bench grinder, drill press, electric hand tools, sawz-all, and circular saw.)	R 336.1212(4)(e)	R 336.1285(2)(l)(vi)(B)
EU-HEATER	One fuel gas heater rated at 100,000 Btu/hr used to heat natural gas used as fuel by the turbine.	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-SPHEATERS	Small natural gas heaters are used for comfort heating including 7 @ 60,000 Btu/hr and 4 @ 28,000 Btu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-COND	One 2,500 gallon natural gas condensate tank	R 336.1212(4)(d)	R 336.1284(2)(e)

**Draft ROP Terms/Conditions Not Agreed to by Applicant**

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

**Compliance Status**

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

**Action taken by EGLE, AQD**

The AQD proposes to approve this ROP. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the USEPA is allowed up to 45 days to review the draft ROP and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Mr. Rex Lane, Kalamazoo 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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**June 21, 2021 - STAFF REPORT ADDENDUM**

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**Purpose**

A Staff Report dated May 3, 2021, 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:	Stanley Sagun, Chief Compliance Officer 734-462-7619
AQD Contact:	Rachel Benaway, Environmental Quality Analyst 269-370-2170

**Summary of Pertinent Comments**

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

**Changes to the May 3, 2021 Draft ROP**

No changes were made to the draft ROP.