



STATE OF MICHIGAN
 DEPARTMENT OF ENVIRONMENTAL QUALITY
 SOUTHEAST MICHIGAN DISTRICT OFFICE



RICK SNYDER
 GOVERNOR

DAN WYANT
 DIRECTOR

September 4, 2015

Mr. Tom Anderson
 Manager - Transmission and Storage Operations
 DTE Gas Company – Columbus Compressor Station
 5440 Puttygut Road
 East China, MI 48054-2014

SRN: B6480, St. Clair County

Dear Mr. Anderson:

VIOLATION NOTICE

On August 17, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of DTE Gas Company, Columbus Compressor Station located at 1647 Caughill Road, Columbus, Michigan. The purpose of this inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B6480-2012b.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUDEHY2	MI-ROP-B6480-2012b special condition FGDEHYDRATORS(III)(1)	The average glycol recirculation rate of 10 gpm permit limit calculated on a calendar month basis was exceeded in January and February of 2015.

The records provided demonstrate that the actual average glycol recirculation rates of 11.25 gpm for January 2015 and 12.125 gpm for February 2015 from the EUDEHY2 process equipment were above the 10 gpm permit limit calculated on a calendar month basis. These glycol recirculation rates were in violation of MI-ROP-B6480-2012b special condition FGDEHYDRATORS(III)(1).


Be aware that state and federal air pollution regulations prohibit DTE Gas Company, Columbus Compressor Station from obtaining any new permits for major offset sources located in Michigan until the cited violation(s) are corrected or until the company has entered into a legally enforceable order or judgment specifying an acceptable program and schedule for compliance.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 25, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a recurrence.

If the company believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of DTE Gas Company, Columbus Compressor Station. If you have any questions regarding the cited violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Handwritten signature of Remilando Pinga, consisting of a stylized 'R' and 'P' followed by the word 'For'.

Remilando Pinga
Senior Environmental Engineer
Air Quality Division
586-753-3744

RP/DC

cc: Mr. Joe Kotwicki, DTE Energy
Ms. Lynn Fiedler, DEQ
Ms. Barbara Rosenbaum, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Mr. Christopher Ethridge, DEQ