

Ms. Kerry Kelly
Warren District Office
Michigan Department of Environment,
Great Lakes and Energy (EGLE)
Air Quality Division
27700 Donald Court
Warren, MI 48092-2793

IN RE : Notice of Violation
SRN N3391 – DT Midstream Washington 10 Compressor Station

Dear Ms. Kelly:

On behalf of DT Midstream's Washington 10 Compressor Station, we are hereby providing the following response to the Notice of Violation (NOV) issued on March 15, 2022. The NOV cited non-compliance activities related to Permit # MI-ROP-N3391-2017a for the following:

1. The pre-catalyst sampling port for EUENGINE4 was open while the engine was running and testing was not being conducted. (FGENGINES SC III.6 and V.III)
2. Based on the catalyst temperature provided, it appears DT Midstream is taking one catalyst temperature reading every hour an engine is running, not every 15 minutes as required in SC VI.2 and VI.8. (FGENGINES2 SC VI.2 and VI.8)

Finding 1:

EGLE conducted a Title V inspection of the Washington 10 Compressor Station on January 19, 2022 to determine the facility's compliance with the above referenced ROP and state/federal air regulations. During site reconnaissance activities, it was noted that the plug was missing on the pre-catalyst sampling port of the stack for EUENGINE4 which was allowing untreated exhaust to escape. Further investigation discovered the plug on the ground nearby. Upon discovery of the missing plug, operations were immediately notified, and the plug was re-installed to ensure closure of the sampling port.

To eliminate the potential for this to occur again in the future, operations and environmental will include an inspection of the engine stacks in their monthly inspections. Operations has also inspected all sampling ports on the engine stacks to ensure that they are appropriately tightened to ensure they remain in place.

Finding 2:

As part of the inspection, EGLE had requested various operational records to verify compliance with monitoring/recordkeeping requirements of the station's permit. These records were initially provided to EGLE on January 18th and 19th, 2022. EGLE subsequently requested catalyst readings for Engines 4 through 6 in 2-minute intervals for select date & time ranges, which were provided back on February 28, 2022.

Upon review of the data provided, it has been identified that DT Midstream did inadvertently send EGLE 4-hour rolling averages for catalyst temperatures that were based upon an direct hourly readings and not hourly averages. Unfortunately, it was not identified originally that the data queried was hourly readings (snapshot in time) vs. the hourly averages. However, DT Midstream does have accurate 4-hour rolling averages, as provided via email on March 25, 2022. Per our email correspondence, the station's monitoring system will currently monitor catalyst temperature readings several times per second (to ensure engine compliance), and these are documented routinely in our data historian system (likely every few seconds). The data system framework will then average the temperature every 15 minutes that the engine is running on an absolute time basis (i.e., 12:00, 12:15, 12:30, 12:45, etc.). A different analysis takes the 15-minute averages and computes an hourly average for these. The hourly averages can then be utilized to calculate the 4-hour rolling average, consistent with EPA's guidance as discussed in their "Implementation Question and Answer Document" for RICE NESHAP dated April 2, 2013. Therefore, based upon the presence of the 4-hour rolling average data being in fact available for the station, DT Midstream respectfully requests that this finding in the NOV be rescinded.

DT Midstream takes its responsibility very seriously regarding operating its facilities in a safe and environmentally compliant manner. DT Midstream appreciates the cooperation with EGLE and will continually strive towards environmental compliance during its operations. DT Midstream will continue to conduct due diligence, transparency with State and Federal regulatory agencies, and implement appropriate measures to assure that these types of noncompliances do not reoccur. Should you have any questions or would like further information, please do not hesitate to contact me at (724) 416-3642 or kimberly.walker@dtmidstream.com.

Sincerely,



Kimberly A. Walker

DT Midstream

Cc: Darrell Grassmyer (electronically)
Benjamin Parrotta (electronically)