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November 8, 2016

Michigan Department of Environmental Quality
Air Quality Division - Lansing District Office
Attn: Nathan Hude
525 Allegan St., 1 South
Lansing, MI 48909-7760

RE: Great Lakes Gas Transmission (GLGT) Company
Otisville #13 Compressor Station
SRN: N3818, Genesee County

Dear Ms. Radulski

The Great Lakes Gas Transmission (GLGT) Company is submitting this response to the MI DEQ Violation Notice dated November 10, 2016. The letter cited the following violations after an agency inspection at the GLGT Otisville #13 Compressor Station on October 18, 2016:

Process Description	Rule/Permit Condition Violated	Comments
EU-OVAPU	ROP paragraph III.6.a.i. and 40 CFR 63.6625(j)	Base sample oil analysis sample inadequate.
EU-OVAPU	ROP paragraph III.6.a.i. and 40 CFR 63.6625(j)	2015 oil sample not provided.
EU-OVAPU	ROP paragraph VII.1. and 40 CFR VII.2	Deviation not reported.
EU-OVAPU	ROP paragraph III.6.b. and III.6.c., and 40 CFR 63.6655(e)(2)	Maintenance records inadequate.

In the violation notice, a written response is required which should include the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. Attachment 1 contains a copy of the Violation Notice. Attachment 2 contains GLGT's written response due by December 8th for each violation cited above.

Thanks for your cooperation in this matter. Please let me know if you have further questions.

Sincerely,


Tiffany Grady
Air Quality Specialist

Bcc: Houston Air Files
Otisville CS facility files

Attachment 2

GLGT's Violation Notice Response

Violation Number 1

Process Description	Rule/Permit Condition Violated	Comments
EU-OVAPU	ROP paragraph III.6.a.i. and 40 CFR 63.6625(j)	Base sample oil analysis sample inadequate

Date(s) Violation Occurred: Not applicable – See explanation below

Explanation of Causes: The base line sample for the listed oil type (Mobile PEGASUS 805 SUPER 15W40) did not include the total acid number (TAN) as required by RICE MACT. Therefore, the March 2016 sample's TAN results could not be compared to the 2010 baseline TAN results.

Duration of the Violation: Not applicable – See explanation below

Corrective Actions: A new baseline sample was sent on November 9, 2016. We discovered a discrepancy between what the Technician listed as the oil type for this unit and the oil type listed in the Fluid Life Database. After some investigation, it appears a Technician entered the wrong oil type on the sample label in the past or Fluid Life made a mistake in identifying the oil for this unit in their database. The correct oil type (Mobil Pegasus 805, 40 wt) has an existing baseline analyzed on October 4, 2014 which includes the required RICE MACT results such as viscosity, percent water, and total acid number. The last sample on March 3, 2016 is within the RICE MACT specifications after comparison to this baseline sample. In reality, this issue no longer exists because Fluid Life contains a sufficient baseline for the correct oil type that should have been assigned to this unit (see attached baseline results for the corrected oil type). The issue is now corrected. GLGT believes it does not constitute a violation of the rule and permit conditions cited above considering this new discovery.

Violation Number 2

Process Description	Rule/Permit Condition Violated	Comments
EU-OVAPU	ROP paragraph III.6.a.i. and 40 CFR 63.6625(j)	2015 oil sample not provided.

Date(s) Violation Occurred: 3/4/2015

Explanation of Causes: On November 8, 2016, GLGT discovered evidence could not be located that an oil sample was conducted or analyzed in 2015. The RICE MACT maintenance record sheet, dated March 4, 2015, included an "N/A-taken at a regular interval" notation under the oil change and oil analysis requirements.

Duration of the Violation: 3/4/2015 – 3/3/2016 (1 year)

Corrective Actions: The most recent sample was taken on March 3, 2016 and within the acceptable RICE MACT specifications. To prevent reoccurrence, the Technicians were trained on the importance of ensuring an annual sample is collected and tracked prior to the required due date. The violation is resolved.

Violation Number 3

Process Description	Rule/Permit Condition Violated	Comments
EU-OVAPU	ROP paragraph VII.1. and 40 CFR VII.2	Deviation not reported.

Date(s) Violation Occurred: 3/5/2015

Explanation of Causes: We were unaware of the deviation when it occurred on March 4, 2015. We reported this violation immediately upon discovery.

Duration of the Violation: 3/4/2015 – 11/8/2016 (1 year, 8 months, 4 days)

Corrective Actions: Upon discovery, the violation was reported on November 8, 2016. We have provided additional training to the Technicians and put practices in place to prevent reoccurrence. This includes more checks to ensure timely samples, and notification of sample submission and results from Fluid Life. The violation is resolved.

Violation Number 4

Process Description	Rule/Permit Condition Violated	Comments
EU-OVAPU	ROP paragraph III.6.b. and III.6.c., and 40 CFR 63.6655(e)(2)	Maintenance records inadequate.

Date(s) Violation Occurred: 3/3/2016

Explanation of Causes: The work order was completed for this maintenance but the specific maintenance actions were not documented properly.

Duration of the Violation: 3/3/2016 - 3/4/2016 (1 day)

Corrective Actions: To prevent reoccurrence, the Technicians were trained on the importance of this documentation and will be required to attach it to the completed work order in the future. The violation is resolved.