



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

November 10, 2016

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Bruce Bendes
TC Pipelines, LP
5250 Corporate Drive
Troy, Michigan 48098

SRN: N3818, Genesee County

Dear Mr. Bendes:

VIOLATION NOTICE

On October 18, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of Great Lakes Gas Transmission, Otisville #13 located at 7500 East Dodge Street, Otisville. 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 Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N3818-2016.

During the inspection, staff observed the following:

Violation Number	Process Description	Rule/Permit Condition Violated	Comments
1	EU-OVAPU	ROP paragraph III.6.a.i. and 40CFR63 63.6625(j)	Base sample oil analysis sample inadequate.
2	EU-OVAPU	ROP paragraph III.6.a.i. and 40CFR63 63.6625(j)	2015 oil sample not provided.
3	EU-OVAPU	ROP paragraph VII.1. and VII.2	Deviation not reported.
4	EU-OVAPU	ROP paragraph III.6.b. and III.6.c., and 40CFR63 63.6655(e)(2)	Maintenance records inadequate.

Violation 1 has been cited due to a lack of information in the baseline oil sample. The information provided states that the sample was taken on February 17, 2010. When using the oil analysis program as allowed by the ROP and 40CFR63 ZZZZ, the facility must be able to compare base results with future sampling results in regards to viscosity, percent water, and total acid number at a minimum. The base sample provided does not include results for percent water nor total acid number thus not allowing for comparison with oil samples taken beyond the base sample date. Due to these circumstances, resolution will require the oil to be changed and a new base sample be taken along with the requirements of the response requirements listed below.

Violation 2 has been cited due to the lack of documentation indicating an oil sample analysis was conducted in 2015. A maintenance document provided indicates that the required checks of belts, hoses, and spark plugs was conducted on March 4, 2015, yet the column for "Oil

Changed" has "NA" written and the column for "Oil Sample Taken" is written in as "N/A Taken on a regular interval". Documentation from the lab could not be provided that a sample was sent or analyzed.

Violation 3 has been cited due to the lack of documentation of the deviation for failure to complete an adequate oil analysis during the 2015 maintenance year. The oil analysis program is detailed in 40CFR63 ZZZZ paragraph 63.6625(j).

Violation 4 is cited due to inadequate records indicating the completion of required maintenance of the checks of belts, hoses, and spark plugs as detailed in the ROP paragraph III.6.b. and III.6.c., and 40CFR63 ZZZZ Table 2d and as required to be documented per 40CFR63 ZZZZ paragraph 63.6655(e)(2). The facility submitted a site work order as proof of the completion of the required maintenance, yet the order does not provide clear information as to what was completed nor does the work order provide clear information as to what date maintenance was completed.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 1, 2016. The written response 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.

If Great Lakes Gas Transmission 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 violations cited above and for the cooperation that was extended to me during my inspection of October 18, 2016. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Nathan Hude
Environmental Quality Analyst
Air Quality Division
517-284-6779

NNH:TG

cc: Ms. Tiffany Grady, TransCanada - US Pipelines
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Mr. Brad Myott, DEQ