



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING DISTRICT OFFICE

EGLE
LIESL EICHLER CLARK
DIRECTOR

January 31, 2020

Mr. Bruce Bendes, Environmental Specialist CS & E
TC Energy
Great Lakes Gas Transmission
5250 Corporate Drive
Troy, Michigan 48098

SRN: N3818, Genesee County

Dear Mr. Bendes:

VIOLATION NOTICE

On December 12, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), was on site to observe stack testing at Great Lakes Gas Transmission located at 7500 East Dodge St., Otisville, Michigan. The purpose of this stack test was to determine Great Lakes Gas Transmission’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:

Process Description	Rule/Permit Condition Violated	Comments
EU-UNIT1303	MI-ROP-N3818-2016 Condition 1.2	Prior to testing, preliminary NOx lb/hr emissions were exceeding the permit limit.

The emissions observed prior to the start of the testing indicated that emissions of NOx from the EU-UNIT1303 process equipment were reading 99.1 lbs/hr. The conditions of MI-ROP-N3818-2016 limit the emissions of EU-UNIT1303 to 89 lbs/hour. The actual emissions from EU-UNIT1303 exceeded the allowable emission limit of NOx, and therefore, is considered a violation of MI-ROP-N3818-2016.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 21, 2020 (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

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will take place; and what steps are being taken to prevent a reoccurrence. Please submit the written response to EGLE, AQD, Lansing District, at 525 West Allegan Street P.O Box 30242, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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

Sincerely,



Samantha Davis
Environmental Quality Analyst
Air Quality Division
517-282-1373

cc: Mr. Chris Waltman, TC Energy
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Brad Myott, EGLE