



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GAYLORD FIELD OFFICE



C. HEIDI GREETHER
DIRECTOR

September 19, 2016

Mr. William Johnson
DCP Antrim Gas, LLC
307 17th Street, Suite 2500
Denver, Colorado 80202

SRN: N2940, Otsego County

Dear Mr. Johnson:

VIOLATION NOTICE

Recently, staff from the Department of Environmental Quality (DEQ), Air Quality Division (AQD), reviewed records for and conducted an inspection of DCP Antrim Gas, LLC South Chester Antrim CO Removal Facility (DCP) located at 6250 Old State Road, Johannesburg, Michigan. The purpose of these actions was to determine DCP'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-N2940-2015 and the malfunction abatement plan (MAP).

During the records review and inspection, staff determined the following:

Process Description	Rule/Permit Condition Violated	Comments
1. FGENGINES	ROP Condition III.2	<p>The permittee operated FGENGINES but did not implement the MAP as follows.</p> <p>The MAP includes: ...there is a slight rise in exhaust temperature across the catalyst.</p> <p>The MAP includes: If the outlet catalyst temperature is equal to or less than the inlet catalyst temperature, then EXTERRAN shall be notified...and take corrective actions.</p> <p>The permittee provided records from December 2015, and January, February, March, April, May, and June 2016 showing temperature decreases across the catalysts of EUENGINE1 and/or EUENGINE2.</p> <p>DCP staff stated EXTERRAN (or subsequent contractor) was not notified to make corrective action.</p> <p>The MAP includes: EXTERRAN checks pre and post catalyst emission using a portable analyzer, at a minimum, on an annual basis, or sooner if catalyst</p>

		<p>operating parameters indicate a possible catalyst malfunction.</p> <p>DCP staff stated no checks were made of pre and post catalyst emission using a portable analyzer since EUENGINE1 and EUENGINE2 went back on line in December 2015 after repairs and after new catalysts were installed.</p> <p>The MAP includes: If...delta pressure (dP) across the catalyst changes by greater than +/- 2 inches of water column (WC) as measured during the most recent performance test, then EXTERRAN shall be notified...and take corrective actions...</p> <p>Because no checks were made of pre and post catalyst emission, the permittee was not able to determine if the dP across the catalyst changed by greater than +/- 2 inches of WC.</p>
2. FGENGINES	ROP Condition III.3	The appropriate temperature range identified in the MAP was not achieved.
3. FGENGINES	ROP Condition III.4	The appropriate differential pressure range defining proper operation of the catalyst on EUENGINE2 identified in the MAP could not be determined because EUENGINE2's pressure gauge was broken.
4. FGENGINES	ROP Condition VI.4	EUENGINE2's pressure gauge did not operate and was described as broken.
5. FGENGINES	ROP Conditions VII.1, VII.2, VII.3	The ROP semiannual and annual reports did not include the described deviations.
6. FGGEN6789	ROP Condition VI.2	The permittee does not keep records of the daily hours of operation for each engine in FGGEN6789.
7. FGPLANTRA	ROP Condition V.1	The permittee does not perform VE readings on EUPLANT3AMINE and EUPLANT4AMINE.
8. FGPLANTRA	ROP Conditions VII.1, VII.2, VII.3	The ROP semiannual and annual reports did not include the described deviations.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 10, 2016 (which coincides with 21 calendar days from the date of this letter). 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

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violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If DCP 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.

Additionally, please provide an updated MAP to AQD for review and written approval. Please contact me if you have questions about updating the MAP.

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

Sincerely,



Gloria Torello
Environmental Quality Analyst
Air Quality Division

cc: Ms. Janis Ransom, DEQ

cc/via e-mail: Mr. David M. Bennett, DCP Midstream, LP
Mr. Jay Laughlin, DCP Midstream, LP
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ