



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

September 25, 2024

Benjamin Parrotta  
Washington 10 Storage Corporation  
12700 30 Mile Road  
Washington Township, MI 48095

SRN: N3391, Macomb County

Dear Benjamin Parrotta:

**VIOLATION NOTICE**

On September 3, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), reviewed the stack test emissions reports submitted by DT Midstream for testing conducted on engines at Washington 10 Storage Corporation located at 12700 30 Mile Road, Washington Township, Michigan. The purpose of this review was to determine Washington 10 Storage Corporation'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-N3391-2023.

During the review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-ENGINE2	MI-ROP-N3391-2023, FG-ENGINES1, SC V.1	EU-ENGINE2 was operated at 100% torque $\pm$ 10% and ~80% speed for three stack test runs. MI-ROP-N3391-2023, FG-ENGINES1, SC V.1 requires stack tests for NO <sub>x</sub> , CO, and VOC emissions to be conducted at 100% torque $\pm$ 10% and 100% speed $\pm$ 10%.
EU-ENGINE4	MI-ROP-N3391-2023, FG-ENGINES2, SC V.2	EU-ENGINE4 was operated between 83.6% load (Run 3) and 88% load (Runs 1 and 2) during stack testing. MI-ROP-N3391-2023, FG-ENGINES2, SC V.2 requires stack tests for CO destruction efficiency to be conducted at 100% load $\pm$ 10%.

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EU-ENGINE4 is also subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines. These standards are found in 40 CFR Part 63, Subpart ZZZZ.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **October 16, 2024** (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 violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Jillian Cellini at EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092, or cellinij1@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Washington 10 Storage Corporation 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 Washington 10 Storage Corporation. 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,

A handwritten signature in black ink that reads "Jillian Cellini". The signature is fluid and cursive, with the first name "Jillian" written in a larger, more prominent script than the last name "Cellini".

Jillian Cellini  
Environmental Quality Analyst  
Air Quality Division  
586-234-2337

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Joyce Zhu, EGLE  
Kerry Kelly, EGLE