

DTE Energy®



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September 24, 2015

Mr. Remilando Pinga
Air Quality Division
Michigan Department of Environmental Quality
27700 Donald Court
Warren, MI 48092

Re: DTE Gas Company - Columbus Compressor Station (SRN: B6480) Response to MDEQ-AQD Violation Notice dated September 4, 2015

Dear Mr. Pinga:

The Columbus Compressor Station (the "Station") is operated under Renewable Operating Permit MI-ROP-B6480-2012 (the "ROP"). DTE received a Violation Notice ("VN") issued by MDEQ dated September 4, 2015. The VN stated that the average glycol recirculation rate of 10 gpm, calculated on a calendar month basis, was exceeded during the months of January and February 2015 for the new dehydration unit ("dehy #2") per special condition FGDEHYDRATORS III.1. Dehy #2 operated at an average glycol recirculation rate of 11.25 gpm in January and 12.125 gpm in February, as indicated by the records provided by DTE. This issue was previously noted by DTE in late February or early March of 2015 and brought to the attention of AQD through discussions with Michelle Rogers, the permit engineer for the dehy #2 unit, and Robert Elmouchi, district inspector for the Station.

Although the process equipment limit for glycol recirculation was exceeded, no emission limit for the Station or dehy #2 was exceeded. DTE Gas Company is working toward remedying the situation through a permit modification and remains committed to complying with all permit limits.

Discussion

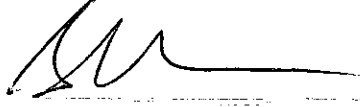
The original pump limit of 10 gpm was based on the manufacturer's pump rating for the equipment. However, this rating was based on pumping water at standard temperature and pressure. In actual operation, pumping a heated and pressurized glycol liquid, the pump was determined to operate at a rate of 12 gpm, not the manufacturer's quoted rate of 10 gpm. The normal glycol recycle rate for dehy #2 is 12 gpm, but this value will vary based on the actual conditions of the process and the glycol being recirculated.

The emissions calculated from the process are based on actual operating conditions as required in special condition FGDEHYDRATORS(VI)(5). Although the average monthly glycol recirculation rate exceeded the limit, the emissions from dehy #2, calculated using the higher actual glycol flow rate, did not exceed any permit limit.

DTE Energy is committed to meeting regulatory compliance and is in the process of obtaining a modification to the Station's ROP to increase the dehy #2 glycol recirculation rate limit. The modification request will be submitted to MDEQ-AQD in October 2015. The dehy units operate during the winter months only, and the permit modification will be complete prior to any increased flow requirement for the coming winter.

If you have any questions or would like further information, please contact Ms. Phillis Rynne by phone at (248) 977-0957 or email at rynnep@dteenergy.com or me at (313) 235-5611.

Sincerely,



Barry Marietta
DTE Energy
Environmental Management & Resources