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May 9, 2017

Ms. Katie Koster
Senior Environmental Engineer
Air Quality Division
State of Michigan Department of Environmental Quality
Cadillac Place
3058 West Grand Boulevard, Suite 2-300
Detroit, Michigan 48202-6058

RE: Response to Notice of Violation for AT&T's Facility at 1365 Cass Avenue, Detroit Permit to Install No. 103-08

Dear Ms. Koster:

AT&T Communications of Michigan, Inc. (referred to herein as "AT&T") owns and operates two (2) 1,250 kW emergency generators at their facility located at 1365 Cass Avenue, Detroit, Michigan. The emergency generators are currently permitted under Permit to Install (PTI) No. 103-08.

On March 28, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the results of the diesel fuel oil sampling conducted at the site. The purpose of this sampling was to determine compliance with PTI 103-08, Special Conditions 7.3 and 8.3, which limits the sulfur content of the diesel fuel burned to no greater than 0.05 percent (%) by weight. Following the DEQ's review of the sampling results, AT&T received a Notice of Violation (NOV) dated April 20, 2017.

The NOV issued by the DEQ cites that the fuel samples for six (6) of the diesel fuel storage tanks on site indicate sulfur contents ranging between 0.06% and 0.13% by weight, which is an alleged violation of PTI 103-08, Special Conditions 7.3 and 8.3 for which sulfur content for EU-DTRTMIBH07 and EU-DTRTMIBH08 is limited to 0.05% by weight.

The NOV specifies that AT&T must submit, within 21 calendar days from the date of the NOV (i.e. May 11, 2017), a written response which includes: 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 will take place; and what steps are being taken to prevent a reoccurrence. AT&T is hereby submitting this letter to satisfy this request.

Dates the violation Occurred

Sample results received by AT&T on March 3, 2017 indicate sulfur contents ranging between 0.06% and 0.13% by weight. These results indicate that the sulfur content is higher than special conditions 7.3 and 8.3.

Explanation Of The Causes And Duration Of The Violation

AT&T does not have records for any recent fuel deliveries. Based on tank inventory obtained dating back to 2009, no fuel has been purchased for this location.

Whether The Violation Is Ongoing

Currently, the tanks on site still contain the fuel in referenced in the notice of violation for the sulfur content limit specified in PTI 103-08, Special Conditions 7.3 and 8.3. AT&T has not operated EU-DTRTMIBH07 and EU-DTRTMIBH08 since February 15, 2017. AT&T is in the process of putting corrective actions in place to remove the fuel from the tanks on site in violation of the 0.05% by weight sulfur content limit. Details of these corrective actions are provided below.

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 Will Be Taken

AT&T plans to reuse and/or dispose of the current fuel. Any fuel that is reused will be sent to other AT&T sites where the fuel meets the sites' fuel requirements. After emptying the tanks at the 1365 Cass Avenue site, AT&T will clean the tanks. The clean tanks will then be refilled with ultra low sulfur diesel fuel that meets the 0.05% by weight sulfur limit. During this time, AT&T will also be reconfiguring piping on the fueling system. These proposed corrective actions will be completed no later than August 18, 2017. During this time, engine operation will be limited to only testing and maintenance, and power failures. Should any issues arise, AT&T will notify DEQ as soon as is practical.

What Steps Are Being Taken To Prevent A Reoccurrence

The corrective actions detailed above will ensure AT&T is in compliance with the sulfur content limit specified in PTI 103-08, Special Conditions 7.3 and 8.3. Moving forward, AT&T will only refill the tanks on site with ultra low sulfur diesel fuel that meets the 0.05% by weight sulfur limit.

AT&T believes that the information outlined above satisfactorily addresses the deviation in the NOV.

If you have any questions, or need further information, please do not hesitate to contact me at (214) 741-0270 or via email at G43913@att.com.

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Sincerely,

A handwritten signature in blue ink that reads "Julianne Barnum". The signature is written in a cursive style with a long horizontal flourish at the end.

AT&T SERVICES, INC.

Julianne Barnum

Area Manager - EH&S Environmental Services