

TCEnergy
N4956 Oakcrest Dr
Bonduel, WI 54107
Phone: 715-758-3341 Fax: 715-758-2132
Chris.Waltman@transcanada.com



April 24, 2020

Ms. Samantha Davis
Michigan Department of Environment, Great Lakes and Energy
Lansing District Air Quality Division
Constitution Hall
525 W. Allegan St., 1 South
Lansing, MI 48909-7760

RE: Amended Response to Violation Notice - Great Lakes Gas Transmission Compressor Station 13
SRN: N3818, Renewable Operating Permit No. MI-ROP-N3818-2016

Dear Ms. Davis,

On January 31, 2020, Michigan Department of Environment, Great Lakes and Energy (EGLE) issued a Violation Notice to Great Lakes Gas Transmission (GLGT) regarding emission testing issues at the GLGT Otisville Compressor Station which occurred on December 12, 2019. GLGT submitted a response to the Violation Notice on February 18, 2020.

Following review of the Violation Notice response, EGLE staff requested a conference call with GLGT representatives to discuss concerns regarding emission testing at GLGT Station 13 and at other TCEnergy-owned facilities in Michigan. During the call, EGLE staff noted several instances where emission tests were cancelled or not started due to pre-test emissions indicating engine problems. EGLE requested an amended response to the Otisville Violation Notice that addresses EGLE's concern about TCEnergy's maintenance and repair practices. Additionally, EGLE requested that TCEnergy provide information regarding what the company is doing to ensure that combustion units are operating below permitted emission limits at all times.

The following list outlines recent changes in TCEnergy procedures and best practices for maintenance and reliability. These practices ensure that reciprocating engines and turbines are maintained for safe, reliable and compliant operation:

- Improved communication protocols between the Environmental, Operations and Reliability departments were put in place in 2018 to ensure engines are ready to test and will be available to operate on the day of the test.
- A comprehensive oil sampling and monitoring program for both reciprocating and centrifugal drivers. The program provides monitoring of the results with direct actions to field operations via TCEnergy's Work Management System.

- Detailed notifications of issues discovered during equipment analysis are created in the Work Management System to ensure identified problems are prioritized and corrected.
- Additional portable emission analyzers were purchased in December 2019 to ensure all equipment analysts were equipped to provide emission maintenance checks during analysis.
- Improved inspection protocols, documentation and communication requirements for most turbines were implemented in 2019. Ongoing work for the remaining turbines is under current review.
- Work is currently underway to consolidate and update turbine maintenance plans. This is an effort to harmonize maintenance plans and best practices across the entire TCEnergy fleet.
- Improvements were implemented to the Equipment Analysis Program for reciprocating units in late 2018. Current work is focused on updating and implementing improvements to the Reciprocating Engine Power Cylinder Balance; Reciprocating Engine Spark Plug Inspection and Replacement; and Reciprocating Engine Fuel Control Inspection Procedures.
- Engines will be taken out of service if problems discovered during engine analysis impact emissions. The engine will remain out of service until the problem can be repaired.

TCEnergy is committed to improving emission testing performance. The items outlined above show that we are aware of the emission testing issues in the past and have been taking positive steps to avoid future problems. If you have any questions regarding this submittal or require any additional information, please feel free to contact Chris Waltman at (715) 701-3659 or at Chris.Waltman@TCEnergy.com

Sincerely,



W. Craig Rundle
Director – Great Lakes Region

Cc: Ms. Jenine Camilleri
Enforcement Unit Supervisor
Michigan Department of Environment, Great Lakes and Energy
Air Quality Division
Constitution Hall
525 West Allegan Street
Lansing, MI 48909

Houston Air Files