



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

August 1, 2014

Ms. Elisabeth Barr
SEMCO Energy Gas Company
1411 3rd Street, Suite A
Port Huron, MI 48060-5480

SRN: N5989, Saint Clair County

Dear Ms. Barr:

VIOLATION NOTICE

On May 9, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of SEMCO Energy Gas Company - Morton Wells Facility (SEMCO) located at 1100 Gratiot Avenue, Marysville, Michigan. The purpose of this inspection was to determine SEMCO'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 administrative rules and the conditions of Permit to Install (PTI) number 126-07A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGENGINES	Permit to Install (PTI) 126-07A, special condition VI.2	Permittee failed to record the natural gas usage for each engine in FGENGINES on a continuous basis.

Per a follow-up telephone conversation with you on July 31, 2014, you informed the AQD that SEMCO failed to record the natural gas usage for each engine included in FGENGINES on a continuous basis. On a "continuous basis" is defined as an instantaneous data point recorded at least once every 15 minutes for at least 90% of the operating time during an operating calendar day.

This is a violation of the recordkeeping requirement specified in Special Condition number VI.2 of PTI number 126-07A. The monitoring and recordkeeping conditions of PTI number 126-07A require the maintenance of records for a period of five years, which shall be made available for review upon request by the AQD staff.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 29, 2014. The written response should include: 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.

If SEMCO 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 violation cited above and for the cooperation that was extended to me during my inspection of May 9, 2014. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Robert Elmouchi
Environmental Quality Analyst
Air Quality Division
586-753-3736

RE/DC

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ