

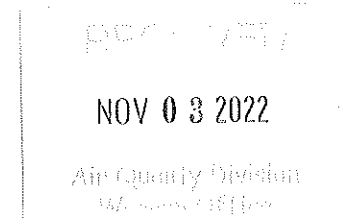


AT&T Services, Inc.  
PO Box 5095  
Rm 4W200M  
San Ramon, CA 94583

T: 972-266-6493  
F: 678.393.6800  
www.att.com

November 1, 2022

Ms. Jenine Camilleri  
Enforcement Unit Supervisor  
Air Quality Division  
State of Michigan Department of Environmental Quality  
P.O. Box 30260  
Lansing, Michigan 48909-7760



**RE: Response to Notice of Violation for AT&T's Facility at 54 N. Mill St,  
Pontiac  
Permit to Install No. 171-19**

Dear Mr. Joseph:

Michigan Bell Telephone Company dba AT&T (referred to herein as "AT&T") owns and operates two (2) 1,250 kW emergency generators at their facility located at 54 N. Mill St, Pontiac, Michigan. The emergency generators are currently permitted under Permit to Install (PTI) No. 171-19.

On August 18, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection at the 54 N. Mill St facility for the purpose of determining AT&T's compliance with the conditions of various air regulations. The inspection showed non-compliance with monitoring, recordkeeping, and reporting. Following the DEQ's inspection, AT&T received a Notice of Violation (NOV) dated September 19, 2022.

The NOV issued by the DEQ cites three violation issues:

1. That the facility did not maintain satisfactory monthly operating hours, and 12-month rolling operating totals, which is a violation of PTI 171-19, Section VI.2.
2. The facility did not maintain fuel supplier certification records for each delivery of diesel fuel oil in a satisfactory manner, which is a violation of PTI 171-19, Section VI.3 and 40 CFR 60.48c.
3. The facility did not notify the AQD in writing upon completion of the relocation of EU-PNTCMIMN03, which is a violation of PTI 171-19, Section VII.1.

The NOV specifies that AT&T must submit 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**

June 2017 to August 18, 2022.

**An Explanation Of The Causes And Duration Of The Violation**

1. The 12-month rolling operating totals and monthly operating hours are kept available at the facility, but the personnel involved in this inspection had not yet been trained in pulling those records. There was also a discrepancy in the monthly operating hours due to the change in personnel.
2. The receipt of purchase, which included the sulfur content, and an MSDS were assumed to satisfy the fuel supplier certification record.
3. The start up notification was presumed to have been the permit application sent on 1/10/2020. Due to EU-PNTCMIMN03 having been in operation for 3 years prior to the permitting, it was assumed that the permit application would satisfy the start up notification requirement.

**Whether The Violation Is Ongoing**

1. No - The personnel currently maintaining the facility have been trained to pull the 12 month rolling operating totals on site. They have also been trained on how to track the monthly operating hours while mitigating any errors or discrepancies.
2. No - The supplier certification record for the latest fuel delivery was acquired and sent to Robert Joseph on 10/19/2022.
3. No - The start up notification was sent to Robert Joseph on 10/19/2022.

**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**

1. The personnel currently maintaining the facility have been trained to pull the 12 month rolling operating totals on site. They have also been trained on how to track the monthly operating hours while mitigating any errors or discrepancies. This training is ongoing and will be required for any personnel in charge of maintaining this equipment.
2. The supplier certification record for the latest fuel delivery was acquired and sent to Robert Joseph on 10/19/2022. The fuel supplier is required to provide this information for every future fuel delivery at this location.
3. The start up notification was sent to Robert Joseph on 10/19/2022.

**What Steps Are Being Taken To Prevent A Reoccurrence**

The corrective actions detailed above will ensure AT&T is in compliance with the monitoring, recordkeeping, and reporting requirements found in PTI171-19. This includes continuous and ongoing training as well as a new documentation requirement for all fuel deliveries.

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 (972) 266-6493 or via email at G43913@att.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Welch". The signature is fluid and cursive, with the first name "Elizabeth" written in a larger, more prominent script than the last name "Welch".

AT&T SERVICES, INC.  
Elizabeth Welch  
Regional Manager - EH&S Environmental Services