



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

September 19, 2022

VIA E-MAIL AND U.S. MAIL

Richard Martin, Network Operations Manager
Michigan Bell Telephone Company dba AT&T
54 North Mill Street
Pontiac, MI 48342

SRN: N8013, Oakland County

Dear Richard Martin:

VIOLATION NOTICE

On August 18, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Michigan Bell Telephone Company dba AT&T located at 54 North Mill Street, Pontiac, Michigan. The purpose of this inspection was to determine Michigan Bell Telephone Company dba AT&T'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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 171-19.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|--------------------------|---|--|
| Monitoring/Recordkeeping | PTI 171-19, Section VI.2 | The facility did not maintain satisfactory monthly operating hours, and 12-month rolling operating totals. |
| Monitoring/Recordkeeping | PTI 171-19, Section VI.3 40 CFR 60.48c | The facility did not maintain fuel supplier certification records for each delivery of diesel fuel oil in a satisfactory manner. |
| Reporting | PTI 171-19, Section VII.1 | The facility did not notify the AQD in writing upon completion of the relocation of EU-PNTCMIMN03. |

RECORDKEEPING/REPORTING

During this inspection, Michigan Bell Telephone Company dba AT&T was unable to produce satisfactory monthly and 12-month operating totals for EU-PNTCMIMN03. In addition, the facility did not maintain fuel supplier certification records for each delivery of diesel fuel oil. Also, the facility did not provide written notification to the AQD within 30-days

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upon the completion of the relocation of EU-PNTCMIMN03. This is a violation (of the recordkeeping and reporting requirements) specified in Special Condition VI.2, VI.3, and VII.1 of PTI number 171-19.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 10, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Michigan Bell Telephone Company dba AT&T 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 violations cited above and for the cooperation that was extended to me during my inspection of Michigan Bell Telephone Company dba AT&T. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,



Robert Joseph
Environmental Engineer
Air Quality Division

586-506-9564; josephr4@michigan.gov

cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE