



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

November 9, 2021

Mr. Keith Mossman  
TC Energy - ANR Woolfolk Compressor Station  
5250 Corporate Drive, Suite 100  
Troy, Michigan 48098

SRN: B7220, Mecosta County

Dear Mr. Mossman:

**VIOLATION NOTICE**

On September 22, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the 2021 Ozone Season Emissions Monitoring & Catalyst Replacement Report for ANR Pipeline Company – Woolfolk Compressor Station (Woolfolk) located at 11039 150<sup>th</sup> Avenue, Big Rapids, Michigan. The report and test data were required to determine Woolfolk’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 Renewable Operating Permit (ROP) number MI-ROP-B7220-2017a.

During the review of the testing results, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-RICE-818-WLENGINES	ROP No. MI-ROP-B7220-2017a, Special Condition (SC) VI.6.a  Rule 818(4)(ii)(A)	Failure to conduct 2021 NOx performance testing for Engine 6.

ROP No. MI-ROP-B7220-2017a, FG-RICE-818-WLENGINES, SC VI.6.a, and Michigan Air Pollution Control Rule 818(4)(ii)(A) require annual NOx performance testing for these engines if they operate during the Ozone Season (May 1 – September 30). The test report confirmed that the 2021 NOx performance test for Engine 6 had not been conducted and follow up calls with TC Energy staff confirmed that Unit 6 had operated at the beginning of the Ozone Season.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 30, 2021 (which coincides with 21 calendar days from the date of this letter). 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.

Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue, NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Woolfolk 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. 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,

A handwritten signature in blue ink, appearing to read "Chris Robinson".

Chris Robinson  
Environmental Quality Analyst  
Air Quality Division  
616-286-0083

cc: Mr. Chris McFarlane, TC Energy  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Heidi Hollenbach, EGLE