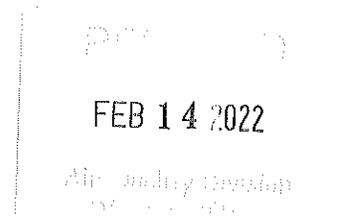


February 11, 2022

Ms. Kerry Kelly
Michigan Department of Environment, Great Lakes and Energy
Air Quality Division – Warren District Office
27700 Donald Court
Warren, MI 48092



Re: Notice of Violation
ANR Pipeline Company – Muttonville Compressor Station
SRN: B8337, ROP No: MI-ROP-B8337-2020

Dear Ms. Kelly,

A Violation Notice dated January 24, 2022 (attached) was received by ANR Pipeline Company (ANR) regarding the Muttonville Compressor Station on January 24, 2022 via email. The Violation Notice stated, "TC Energy did not report the daily minimum condenser temperature exceedance that occurred March 17, 2021, as a deviation in the semi-annual report submitted September 10, 2021."

On November 19, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of ANR Pipeline Company – Muttonville Compressor Station located at 36555 29 Mile Road in Lenox, Michigan. The purpose of this inspection was to determine the station's compliance with the requirements of the Renewable Operating Permit (ROP) number MI-ROP-B8337-2020. As part of the inspection, a records request was made for air compliance documentation for the period of January 2020 through to October 2021. The records request revealed that on March 17, 2021, the daily average temperature of the condenser on the Muttonville glycol dehydration system exceeded the maximum temperature of 140 °F, which is a deviation from EU-GLYCDEHYDE SC III.2 of the ROP.

It is ANR's understanding that although the condenser failed to maintain a temperature of less than 140 °F, the permitted emission limits for the glycol dehydration system were not exceeded. A deviation from the ROP condition (EU-GLYCDEHYDE SC III.2) was not reported in the semi-annual report submitted to EGLE by ANR on September 10, 2021.

ANR strives to meet all permitting and compliance obligations. To that end, an investigation was conducted into the March 17, 2021 temperature excursion, and the following corrective actions were taken:

1. The investigation into the Muttonville glycol dehydration system revealed that the condenser was near the end of its life cycle and was no longer able to reliably maintain the designed temperature of $\leq 140^{\circ}\text{F}$. Prior to the temperature exceedance, the dehydration system was scheduled for a rebuild, which included an entirely new condenser unit. The glycol dehydration system was taken offline in the spring of 2021, and the rebuild was completed in January 2022. It is ANR's understanding that the rebuilt glycol dehydration system is expected to resolve this issue and prevent future temperature exceedances from occurring.

2. ANR is currently evaluating and actively working to improve our processes and procedures to ensure that all permit deviations associated with the glycol dehydration system are elevated to the appropriate ANR personnel, investigated and reported to EGLE as required.
3. ANR will report the March 17, 2021 temperature exceedance as a deviation in the upcoming Annual Compliance Certification Report due on March 15, 2022.

If you have any questions, please feel free to contact Chris McFarlane at chris_mcfarlane@tcenergy.com or (832) 320-5490.

Sincerely,



Keith R. Mossman
Director – Great Lakes Region
TC Energy

Enclosure:

1. January 24, 2022 Violation Notice

Cc: Ms. Jenine Camilleri
Michigan Department of Environment, Great Lakes and Energy
Air Quality Division – Enforcement Unit
P.O. Box 30260
Lansing, Michigan 48909-7760

Houston Air Files, TC Energy

Nick Rudolph, TC Energy, Area Manager, Muttonville Compressor Station via nicholas_rudolph@tcenergy.com

Lisa Fishbeck, Environmental Analyst, Muttonville Compressor Station via lisa_fishbeck@tcenergy.com

Troy Aud, TC Energy, Manager, Environmental Field West via email at troy_aud@tcenergy.com