



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GRETHER
DIRECTOR

October 20, 2016

Mr. James Skalny
AT&T Communications of Michigan, Inc.
445 State Street
Detroit, MI 48226

SRN: M4785, Wayne County

Dear Mr. Skalny:

VIOLATION NOTICE

On August 12, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of AT&T Communications of Michigan, Inc. (AT&T) located at 445 State Street, 444 Michigan Avenue, and 1365 Cass Avenue, in Detroit, Michigan. The purpose of this inspection was to determine 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 Permits to Install (PTI) numbers 153-10A, 85-12, and 103-08.

During the inspection, the following violations were observed:

Process Description	Rule/Permit Condition Violated	Comments
FG-GENERATORS (445 State Street)	PTI 153-10A, Special Conditions VI.4, VII.1, and VII.2	<p>Facility failed to maintain fuel supplier certification records or fuel sample test data for each delivery of diesel fuel oil.</p> <p>Facility failed to notify the AQD in writing within 30 days of completion of the installation activity for each engine.</p> <p>Facility failed to submit a notification to AQD specifying whether each engine will be operated in a certified or non-certified manner within 30 days of initial startup of each engine.</p>

FG-GENERATORS (444 Michigan Avenue)	PTI 85-12, Special Conditions VI. and VII.1	Facility failed to maintain fuel supplier certification records or fuel same test data for each deliver of diesel fuel oil. Facility failed to notify the AQD in writing within 30 days of completion of the installation activity for each engine.
EU-DTRTMIBH07 EU-DTRTMIBH08 (1365 Cass Avenue)	PTI 103-08, Special Conditions 7.9 and 8.9	Facility failed to maintain a copy of the fuel analysis as supplied by the vendor for each shipment of fuel.

During the inspection, and follow up records request via email on September 20, 2016, AT&T was unable to produce any records of the sulfur content of fuel oil for each shipment of fuel. This is a violation of the monitoring and recordkeeping specified in PTI 153-10A, Special Condition (SC) VI.4; PTI 85-12, SC VI.4; and PTI 103-08, SC 7.9 and SC 8.9.

Also, a review of the facility file indicates that written notifications about the completion of engine installation and the manner in which the engine will be operated were not submitted to the AQD as required. This is a violation of PTI 153-10A, SC VII.1 and VII.2; and PTI 85-12, SC VII.1.

In addition, AQD was unable to determine whether the engines are being maintained according to the manufacturer's emission related written instructions in order to retain the certified engine status. Per SC III.3 of PTI 85-12, and SC III.3 of PTI 153-10A, AT&T is required to maintain the engines according to the manufacturer's written instructions. Information provided by the facility stated that no maintenance has been performed on the engines from January 2015 through September 2016. In your response, please provide the manufacturer's emissions related written instructions or other maintenance plan that AT&T has implemented for each certified engine and records of the maintenance activities for the last 5 years.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 10, 2016 (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.

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If 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 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 listed below.

Sincerely,

A handwritten signature in blue ink that reads "Katherine Koster". The signature is fluid and cursive.

Katherine Koster
Senior Environmental Engineer
Air Quality Division
313-456-4678

cc: Ms. Debra Moran, AT&T
Ms. LaReina Wheeler, City of Detroit BSEED
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ