



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GRETHER
DIRECTOR

April 20, 2017

Ms. Julianne Barnum
Area Manager EH&S Air Team
PO Box 5095, Room 4W200M
San Ramon, CA 94583

SRN: M4785, Wayne County

Dear Ms. Barnum:

VIOLATION NOTICE

On March 28, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the results of the diesel fuel oil sampling conducted at 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 sampling 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.

Based on the sample results, the following violation was observed:

Process Description	Rule/Permit Condition Violated	Comments
EU-DTRTMIBH07 EU-DTRTMIBH08 (Two 1250kW emergency generators located at 1365 Cass Avenue)	PTI 103-08, Special Conditions 7.3 and 8.3	Permittee shall not burn diesel fuel with a sulfur content greater than 0.05% by weight. Fuel sampling results indicated that fuel ranging from 0.06% and 0.13% sulfur by weight is in use.

Fuel oil sampling was conducted on the eight diesel fuel storage tanks on site. Two of the samples were below the limit of 0.05% sulfur content by weight. Results of the remaining six samples ranged from 0.06% to 0.13% sulfur content by weight. Based on information provided by AT&T, the generators located at 1365 Cass Avenue utilize fuel from any of these six tanks. This is a violation of Permit to Install No. 103-08, Special Conditions 7.3 and 8.3.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 11, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the

Ms. Julianne Barnum

Page 2

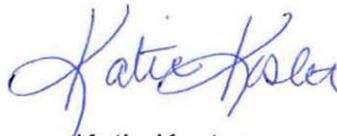
April 20, 2017

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.

If AT&T believes the above observations or statements are inaccurate or do not constitute a violation 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,



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

cc: 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