



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SAGINAW BAY DISTRICT OFFICE



DAN WYANT
DIRECTOR

July 17, 2015

Mr. Scott O'Laughlin
City of Midland Utilities
4311 East Ashman Street
Midland, MI 48642

SRN: N6004, Midland County

Dear Mr. O'Laughlin:

VIOLATION NOTICE

On March 17, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received a copy of the 2014 annual and semi-annual NSPS Report for the City of Midland Utilities located at 4311 East Ashman Street, Midland, Michigan.

Based upon the review of the 2014 Annual and Semi-Annual NSPS Reports the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
Gas Collection Control System, gas well MLGW-19	MI-ROP-N6004-2014, EU-ACTIVECOLL, VI.1.; 40 CFR 60.753(b) and 63.1955(a)	Wellhead did not operate with negative pressure. Exceedance of pressure operating parameter was from 10/20/2014-11/18/2014.
Gas Collection Control System, gas well MLGW-19	MI-ROP-N6004-2014, EU-ACTIVECOLL, VI.1.a; 40 CFR 60.755(a)(3) and 40 CFR 63.1955(a)	Corrective action was not initiated within 5 calendar days of exceedance (or 10/25/14) and pressure was not returned to compliance within 15 days of the first monitored exceedance (or 11/4/2014) and the collection system was not expanded within 120 days (or 2/17/2015)

Gas Collection Control System, gas well MLGW-22	MI-ROP-N6004-2014, EU-ACTIVECOLL, VI.3.; 40 CFR 60.753(c) and 63.1955(a)	Oxygen percent in wellhead exceeded 5 percent. Exceedance of oxygen operating parameter was from 9/22/2014-10/20/2014
Gas Collection Control System, gas well MLGW-22	MI-ROP-N6004-2014, EU-ACTIVECOLL, VI.3.a; 40 CFR 60.755(a)(5) and 40 CFR 63.1955(a)	Corrective action was not initiated within 5 calendar days of exceedance (or 9/27/14) and oxygen was not returned to compliance within 15 days of the first monitored exceedance (or 10/7/2014) and the collection system was not expanded within 120 days (or 1/20/2015)
Gas Collection Control System, gas well MLGW-22	MI-ROP-N6004-2014, EU-ACTIVECOLL, VI.1.; 40 CFR 60.753(b) and 63.1955(a)	Wellhead did not operate with negative pressure. Exceedance of pressure operating parameter was from 11/26/2014-12/22/2014.
Gas Collection Control System, gas well MLGW-22	MI-ROP-N6004-2014, EU-ACTIVECOLL, VI.1.a; 40 CFR 60.755(a)(3) and 40 CFR 63.1955(a)	Rechecks were performed with equipment that was not calibrated.
Gas Collection Control System, MLC16A06	MI-ROP-N6004-2014, EU-ACTIVECOLL, VI.1.; 40 CFR 60.753(b) and 63.1955(a)	Wellhead did not operate with negative pressure. Exceedance of pressure operating parameter was from 11/26/2014-12/22/2014.
Gas Collection Control System, MLC16A06	MI-ROP-N6004-2014, EU-ACTIVECOLL, VI.1.a; 40 CFR 60.755(a)(3) and 40 CFR 63.1955(a)	Rechecks were performed with equipment that was not calibrated.
MLGW-83	MI-ROP-N6004-2014, EU-ACTIVECOLL, VI.1.; 40 CFR 60.753(b) and 63.1955(a)	Wellhead did not operate with negative pressure. Exceedance of pressure operating parameter was from 10/20/2014-11/26/2014.

MLGW-83	MI-ROP-N6004-2014, EU-ACTIVECOLL, VI.1.a; 40 CFR 60.755(a)(3) and 40 CFR 63.1955(a)	Corrective action was not initiated within 5 calendar days of exceedance (or 10/25/14) and pressure was not returned to compliance within 15 days of the first monitored exceedance (or 11/4/2014) and the collection system was not expanded within 120 days (or 2/17/2015)
---------	--	--

If monitoring demonstrates that the operational requirements in 60.753(b), (c), or (d) are not met, corrective action shall be taken as specified in 60.755(a)(3) through (5) or 60.755(c). As specified in 60.753(g) if corrective actions are taken as specified in 60.755, the monitored exceedance is not a violation of the operational requirements. However, corrective actions were not taken as specified in 60.755 therefore a violation is warranted.

During the compliance inspection on June 16, 2015 staff asked about the deviations report and the gas wells that had been in non-compliance. CML representatives did not identify corrective actions that were taken to make sure future reoccurrence of the violations would not occur.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 7, 2105 (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.

If City of Midland Utilities 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. 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 black ink that reads "Gina L. McCann". The signature is written in a cursive style with a large, prominent "G" and "M".

Gina L. McCann
Environmental Quality Analyst
Air Quality Division
989-894-6218

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Barb Rosenbaum, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Hare, DEQ