

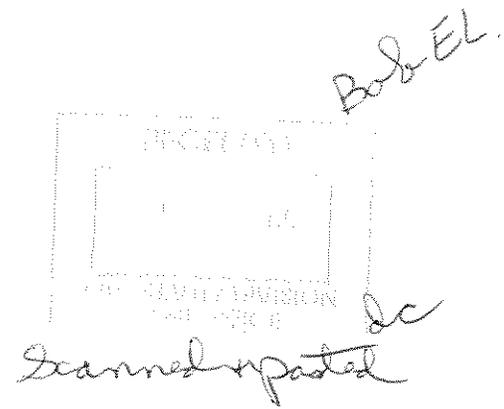
**DTE Energy®**



dteenergy.com

July 27, 2014

Mr. Robert Elmouchi  
Air Quality Division  
Michigan Department of Environmental Quality  
27700 Donald Court  
Warren, MI 48092



Re: DTE Gas Company - Belle River Mills Compressor Station Response to MDEQ-AQD  
Violation Notice dated July 1, 2015

Dear Mr. Elmouchi:

DTE Gas Company submits the following response to MDEQ's Violation Notice (VN) referenced above. It cites that DTE Gas Company installed two natural gas-fired emergency generators (FGEMERGENS) subject to R 336.1201(1) without obtaining an approved permit to install. This issue was discovered during the Renewable Operating Permit ("ROP") renewal application process for Belle River Mills Compressor Station (the "Station") and self-reported to MDEQ-ADQ.

DTE Gas Company is working toward remedying the situation through obtaining a Permit to Install ("PTI") and remains committed to meeting compliance with all permit limits. It is DTE's belief that the permit to install will not contain restrictions on this equipment beyond those which currently exist in the ROP. Nonetheless, the permit will create the proper record for these two pieces of equipment.

**Discussion**

While researching the site's emission units during the ROP renewal process it was discovered that the 13.2 MMBtu/hr heat input rating for these engines was above the threshold of 10 MMBtu/hr for being exempt from requiring a PTI under Rule 285(g). It was determined that the units were installed in 2006 & 2007 and have been in the ROP since 2010. It was further discovered that the engines were added to the ROP as exempt from permitting under Rule 285(g) referenced above.

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Although the engines are rated at 1,818 hp each, they are significantly smaller than other engines at the Station. Due to their smaller size, it appears they were incorrectly assumed to meet the exemption requirement of R 285(g). In the last few years, DTE has instituted a procedure to review all projects that take place at the various compressor stations and designate them as no environmental impact, exempt from permitting, or permitting required. The Station has also become certified to ISO14001, an international standard for environmental management systems which includes a change management process.

DTE Energy is committed to meeting regulatory compliance and agreed with DEQ that obtaining a PTI for the engines would be the proper remedy at this time. A copy of the PTI application for the two engines and associated documentation is included with this VN response. The original PTI application has been sent to Lansing permit section for processing.

If you have any questions or would like further information, please contact Ms. Phillis Rynne by phone at (248) 977-0957 or email at [rynnep@dteenergy.com](mailto:rynnep@dteenergy.com) or me at (313) 235-5611.

Sincerely,



Barry Marietta  
DTE Energy  
Environmental Management & Resources