



April 29, 2022

Mark Dziadosz
Air Quality Division – Michigan Department of EGLE
27700 Donald Court
Warren, MI 48092

RE: DTE Gas Company Response to the EGLE-AQD Violation Notice Issued March 22, 2022 – DTE Gas Company - Belle River Mills Compressor Station (SRN: 6478)

Dear Mr. Dziadosz:

This letter is in response to the Violation Notice (VN) issued by EGLE-AQD on March 22, 2022 to DTE Gas Company - Belle River Mills Compressor Station related to the EUDEHY Annual “no detectable emissions” testing for 2021. The VN cited the following:

Process Description	Rule/Permit Condition Violated	Comments
Large, existing, glycol dehydration unit	EUDEHY S.C.V.4	DTE submitted records on February 7, 2022, indicating the required annual “no detectable emissions” annual testing had not been completed in 2021.

This response provides the Company’s review of the situation and identifies actions taken and proposed to be taken to prevent recurrence. Further information on this determination is outlined below.

It was discovered on January 10, 2022, during a records review, that the required annual ‘no detectable emissions’ testing required by EUDEHY S.C. V.4 was not conducted in 2021. The most recent testing was conducted on July 14, 2020. This testing has been completed annually since 2015 as required and at no time were detectable emissions found.

Upon discovery of the missed annual ‘no detectable emissions’ testing a test was scheduled and testing was completed on January 27, 2022. This testing showed ‘no detectable emissions’ from the closed vent system. This test is intended to satisfy the requirement to test in 2021 and an additional test will be conducted in 2022 to satisfy the requirement for 2022. DTE also conducted an internal after-action review (AAR) to determine the root cause(s) of

the missed test in 2021. It was determined through the AAR that personnel who had previously conducted the annual testing had transferred positions and/or left the Company. During the employee transitions it was erroneously communicated that the 'no detectable emissions' test was completed in 2021.

DTE notified EGLE on February 7, 2022, during their annual recertification, of the missed testing and followed up with an email on March 4, 2022 which outlined corrective actions that DTE took with regards to the cited violation.

The following action items have been implemented to prevent a missed annual test.

1. The annual 'no detectable emissions' testing will be scheduled in conjunction with other required annual leak detection testing conducted at Belle River Mills Compressor Station.
2. The annual 'no detectable emissions' test requirement has been added to the Environmental Management and Safety (EM&S) Stack Testing and Ambient Monitoring (STAM) group's master emissions testing schedule. The STAM emissions testing schedule is reviewed on a weekly basis to ensure all testing requirements are completed per required completion dates.

DTE believe that the measures implemented to date will eliminate the potential for recurrence of this situation in the future. If you have any questions on the information in this letter or would like further information, please contact me at Barry.Marietta@dteenergy.com or (810) 343-6391.

Sincerely,

Barry Marietta

Barry Marietta
Manager – Environmental Strategy
DTE Energy
(313) 235-5611
Barry.Marietta@dteenergy.com

Cc (electronic): Ms. Jenine Camilleri, Enforcement Unit Supervisor, EGLE
Tom Durham, DTE
Michael Waters, DTE
Joseph Neruda, DTE