

28 March 2019

Michigan Department of Environmental Quality - Air Quality Division
Mr. Chris Robinson
Grand Rapids District
350 Ottawa Avenue, NW
Unit 10
Grand Rapids, MI 49503



RE: Violation Notice received March 15, 2019 for ANR Woolfolk Compressor Station, SRN B7220

Dear Mr. Robinson,

This letter is in response to the Violation Notice issued by Michigan Department of Environmental Quality (MDEQ) on March 14, 2019 for the ANR Pipeline Company – Woolfolk Compressor Station (Woolfolk). The Violation Notice specified that ANR Pipeline Company (ANR) was not in compliance with Title V Operating Permit number MI-ROP-B7220-2017a, Special Condition VII.8.b.

MDEQ requested a response from ANR to address any deficiencies that led to the violation of Title V operating permit, and to provide further detail on the following items:

1. Dates the violation occurred;
2. Explanation of the causes and duration of the violation;
3. Whether the violation is ongoing;
4. 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;
5. Steps taken to prevent a reoccurrence.

A summary of the issue and ANR's response to these items are detailed below:

Response:

1. Dates the violation occurred;

The emission test reports were due on November 13 and 14, 2018. The emission test report was submitted on December 14, 2018, but were not received by MDEQ until sometime after January 11, 2019.

2. Explanation of the causes and duration of the violation;

Annual Ozone Season emission testing for was completed for the units in Flexible Group FG-RICE-818-WLENGINES (Units EUWL001-EUWL009) on September 12 and 13, 2018. The emission test was completed using in-house personnel, and the results of the emission tests were forwarded to a third-party contractor to write the emission test report. The third-party contractor received the emission test results on October 1, 2018. The contractor had mistakenly entered the

due date for the report in our tracking list to be December 14, 2018 instead of November 14, 2018.

A certification statement from the Responsible Official was signed on December 14, 2018, and was assumed to have been submitted by the third-party contractor on December 14th. On January 11, 2019, Mr. Robinson (MDEQ) contacted Mr. Brad Stermer (ANR) to inquire about the emission test results that had not been received. An electronic copy of the test report was forwarded to Jeremy Howe (MDEQ) and to Mr. Robinson on January 11, 2019, and a paper copy was forwarded to the MDEQ offices in Lansing and Grand Rapids. It is unclear why the report that was sent on December 14, 2018 was not received by MDEQ, as ANR was unable to locate any tracking information from FedEx for this delivery.

Regardless of whether the report was submitted on January 11, 2019 or December 14, 2018, ANR does not dispute MDEQ's assertion that the test report was submitted after the 60-day deadline specified in the Title V operating permit.

3. Whether the violation is ongoing;

The violation is no longer ongoing, as the emission test reports have been submitted.

4. 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;

ANR acknowledges that there have been several issues related to emission testing in Michigan in recent years. Several initiatives have already been put in place to prevent missed deadlines to submit emission test reports and to ensure that emission test deadlines are also not missed.

These initiatives include:

1. Improved communication between field personnel and corporate employees regarding emission test deadlines;
2. Improved emission test requirement tracking;
3. Hiring a full-time corporate employee to manage the emission testing program, and;
4. Including Environmental Department employees in weekly Operations conference calls.

Additionally, an Environmental Management System is currently being implemented, and is expected to contain a module to better track reporting due dates. This system is on-track to roll-out later this year.

5. Steps taken to prevent a reoccurrence.

The items listed above are expected to prevent a reoccurrence of this issue.

As noted in the Violation Notice, the semiannual compliance report for the period of July 1, 2018 through December 31, 2018 and the annual compliance certification for 2018 did not include this permit deviation. It was not understood by ANR that a deviation had occurred at the time those reports were submitted. The semiannual compliance report and annual compliance certification have been updated to reflect this deviation and are included in this submittal.

If you have any further questions or concerns regarding this response, please contact me at Richard_Connor@TransCanada.com or at (231) 527-2122.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Connor". The signature is fluid and cursive, with a long horizontal stroke at the end.

Richard P. Connor
Director, Great Lakes Region

Cc: Michigan Department of Environmental Quality - Air Quality Division
Ms. Jenine Camilleri
Enforcement Unit Supervisor
PO Box 30260
Lansing, MI 48909-7760

Houston Air Files