



GRETCHEN WHITMER  
 GOVERNOR

LIESL EICHLER CLARK  
 DIRECTOR

March 15, 2019

Mr. Chris D. Conley  
 Manager - Transmission and Storage Operations  
 DTE Gas Company - Milford Compressor Station  
 3515 Childs Lake Road  
 Milford, MI 48381

SRN: B7221, Oakland County

Dear Mr. Conley:

**VIOLATION NOTICE**

On February 15, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the Emissions test report for Oxides of Nitrogen (NOx), Carbon Monoxide (CO) and Particulate Matter (PM<sub>10/2.5</sub>) for the three new turbines at the DTE Gas Company - Milford Compressor Station located at 3515 Childs Lake Road, Milford, Michigan. The purpose of this emission test report was to determine DTE Gas Company - Milford Compressor Station'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 Permit to Install (PTI) number 185-15A. This testing was conducted December 4-18, 2018.

During the review of this emissions test report, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Natural gas-fired Compressor Turbines EUTURBINE 1 and EUTURBINE 2	PTI No. 185-15A, Special Conditions SC I.3 and SC I.4.	Stack test was performed between December 4-18, 2018 for EUTURBINE 1, EUTURBINE 2 and EUTURBINE 3. The stack test report for EUTURBINE 1 and EUTURBINE 2 indicates that PM <sub>10</sub> and PM <sub>2.5</sub> emissions exceeded the PM <sub>10</sub> and PM <sub>2.5</sub> limits specified in the SC I.3 and I.4 of PTI number 185-15A.

The allowed maximum emission rate of PM<sub>10</sub> is 0.015 lb/MMBTU and PM<sub>2.5</sub> is 0.015 lb/MMBTU for both turbines. However, based on the submitted test report, the actual emissions for EUTURBINE1 were 0.085 lb/MMBTU for PM<sub>10</sub> and 0.085 lb/MMBTU for PM<sub>2.5</sub>. The actual emissions for EUTURBINE2 were 0.188 lb/MMBTU for PM<sub>10</sub> and 0.188 lb/MMBTU for PM<sub>2.5</sub>.

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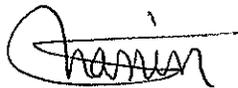
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 5, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes 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.

Please submit the written response to the DEQ, AQD, Southeast Michigan District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If DTE Gas Company - Milford Compressor Station 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 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,



Shamim Ahammod  
Environmental Engineer  
Air Quality Division  
586-212-0508

cc: Ms. Mary Ann Dolehanty, DEQ  
Dr. Eduardo Olaguer, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Joyce Zhu, DEQ