



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
CADILLAC DISTRICT OFFICE



DAN WYANT  
DIRECTOR

March 23, 2015

Ms. Carolann Knapp  
BreitBurn Operating, LP  
P.O. Box 1256  
Gaylord, Michigan 49734

SRN: N6345, Kalkaska County

Dear Ms. Knapp:

**VIOLATION NOTICE**

On February 25, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of BreitBurn's Garfield 1-8/2-8 facility located at in the SW 1/4, NE 1/4 of Section 8, T25N, R5W in Garfield Township, Kalkaska County, Michigan. The purpose of this inspection was to determine BreitBurn Operating, LP'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 administrative rules and the conditions of Permit to Install (PTI) number 75-12.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
The engine and catalytic converter	SC IV.1 and SC III.1	DEQ observed that the maintenance on the catalytic converter control device for the engine did not appear to be properly maintained in accordance with the MAP of the facility, based on inverted inlet and outlet temperatures of the catalyst intermittently from January 2014 through August 2014. DEQ observed no activities to address the inverted temperatures, and no testing was conducted when the inverted temperatures were present to show that the catalytic converter was meeting the destruction efficiency.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 6, 2015 (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.

If BreitBurn Operating, LP 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,



Caryn Owens  
Environmental Quality Analyst  
Air Quality Division  
231-876-4414

cc/via e-mail: Ms. Janis Ransom, DEQ  
Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ