



August 20, 2024
RECEIVED MR

AUG 26 2024

AIR QUALITY DIVISION
WARREN DO KU

Ms. Marie Reid
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division
27700 Donald Court
Warren, MI 48092-2793

RE: DTE Gas Company Response to the EGLE-AQD Violation Notice of July 30, 2024 Issued to Columbus Compressor Station

This letter is in response to the Violation Notice (VN) issued by EGLE-AQD on July 30, 2024 to Columbus Compressor Station related to not using the most recent gas analysis data to calculate VOC emissions. The VN cited the following:

Process Description	Rule/Permit Condition Violated	Comments
FGDEHY	MI-ROP-B6480-2024, FGDEHY SC VI.5	The facility did not use the most [recent] gas analysis data to calculate VOC emission rates from each dehydrator in GRI-GLYCalc (Version 3.0 or higher).

As required by the Renewable Operating Permit (ROP) for Columbus Compressor Station, GRI-GLYCalc is used to calculate VOC emission rates from each dehydrator. Data from gas analysis at the station is used to populate GLYCalc in order to calculate emissions. The permit condition cited above requires that these calculations include the most recent gas analysis data. EGLE performed an inspection at the site on June 12, 2024 and made subsequent records request. The documentation provided in response to that records request showed that emissions had been calculated using an older version of the gas analysis data.

Following the records request and confirmation that the older gas analysis data had been used, the calculations were updated using the most recent gas analysis. After investigation it was found that the most recent gas analysis had not been provided to the "Station Analyst" who coordinates the GLYCalc emissions calculations. The DTE Gas Company lab coordinates annual gas samples for use in emissions calculations. The lab analysis was provided to the site but was not shared with the Station Analyst.

After discovering this situation, changes were made to the onsite process for sharing the gas analysis data. A work order will now be generated through the station's work management

system for the gas analysis data to be updated appropriately by March 1st of each year. The work management system includes notifications to proper personnel via email and periodic reminders leading up to the due date of the work order. Work order completion is tracked at the station. Additionally, the gas analyses will be managed by the Station Analyst rather than being routed through the site environmental representative. This eliminates the need for a hand off within the process.

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
Manager – Environmental Strategy
DTE Energy
(810) 343-6391
Barry.Marietta@dteenergy.com

Cc (electronic): Michael Waters, DTE
 Joe Neruda, DTE
 Annette Switzer, EGLE
 Jenine Camilleri, EGLE
 Christopher Ethridge, EGLE
 Brad Myott, EGLE
 Joyce Zhu, EGLE
 Kerry Kelly, EGLE