



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

April 25, 2019

Mr. Norman Kapala  
Consumers Energy Company, J.H. Campbell Plant  
17000 Croswell  
West Olive, Michigan 49460

SRN: B2835, Ottawa County

Dear Mr. Kapala:

**VIOLATION NOTICE**

On February 11, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received an Excess Emissions Report from Consumers Energy Company, J.H. Campbell Plant located at 17000 Croswell, West Olive, Michigan. The report was reviewed in order to determine Consumers Energy Company, J.H. Campbell Plant'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 Renewable Operating Permit (ROP) number MI-ROP-B2835-2013b.

During the review, staff verified the following:

Process Description	Rule/Permit Condition Violated	Comments
FGBOILER12	ROP No. MI-ROP-B2835-2013b, FGBOILER12, Special Condition (SC) I.2  R 336.1301	Exceedance of 20 percent opacity limit
EUBOILER2 FGBOILER12	ROP No. MI-ROP-B2835-2013b, EUBOILER2, SC III.2, IV.1, and IV.2  FGBOILER, SC IV.1  R 336.1910	Failure to continuously operate the Particulate Matter (PM) control device (PJFF) for EUBOILER2 in accordance with good air pollution control practices
EUBOILER2	ROP No. MI-ROP-B2835-2013b, EUBOILER2, SC I.1  R 336.1331(1)(c)	Exceedance of the hourly PM emission limit

<b>Process Description</b>	<b>Rule/Permit Condition Violated</b>	<b>Comments</b>
EUBOILER2	ROP No. MI-ROP-B2835-2013b, EUBOILER2, SC I.5	Exceedance of the hourly PM emission limit on a heat input basis

On January 31, 2019, Consumers Energy Company, J.H. Campbell Plant, Unit 2 (EUBOILER2) experienced a drive motor failure forcing the Pulse Jet Fabric Filter (PJFF) into emergency bypass mode, thus being put offline. This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451 and the requirements of ROP No. MI-ROP-B2835-2013b, EUBOILER2, Special Conditions (SC) III.2, IV.1, and IV.2 and FGBOILER12, SC IV.1, which require that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

The bypass of the PJFF resulted in 100 percent opacity readings from the Continuous Opacity Monitoring System (COMS). The entire event lasted for a duration of 2.5 hours, resulting in an average opacity of 97 percent, which is in excess of the 20 percent allowed under ROP No. MI-ROP-B2835-2013b. This constitutes a violation of the emissions allowed by Rule 301 of the administrative rules promulgated under Act 451, and the requirements of ROP No. MI-ROP-B2835-2013b, EUBOILER2, SC I.1 and I.5.

Consumers Energy Company, J.H. Campbell Plant relies on opacity monitoring as an indicator of compliance with the Particulate Matter (PM) emission limits of 0.16 pounds of PM per 1,000 pounds of exhaust gas and 0.015 pounds of PM per MMBtu Heat Input. The documented 100 percent opacity is indicative of PM emissions greater than allowed in Rule 331 of the administrative rules promulgated under Act 451, Table 31 and EUBOILER2, SC I.1 and I.5 of ROP No. MI-ROP-B2835-2013b. This constitutes a violation of Rule 331, which prohibits emissions of particulate matter from any process or process equipment in excess of the maximum allowable emission rate.

It should be noted that the majority of the cited conditions are also enforceable under U.S. V CONSUMERS ENERGY COMPANY, CIVIL ACTION 14-13580, E.D. MICH., 2014.

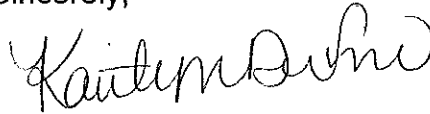
Since the Excess Emissions Report detailed the dates the violations occurred, an explanation of the causes and duration of the violations, and summary of the actions taken to correct the violations, no additional follow up is required. However, please make any necessary updates to the Malfunction Abatement Plan as specified in EUBOILER, SC III.1, as defined in ROP No. MI-ROP-B2835-2013b.

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If Consumers Energy Company, J.H Campbell Plant 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 violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Kaitlyn DeVries  
Environmental Quality Analyst  
Air Quality Division  
616-558-0552

cc: Mr. Joseph Firlit, Consumers Energy Company  
Ms. Sarah Marshall, EPA  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Heidi Hollenbach, EGLE