

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

**Consumers Energy, J.H. Campbell Generating Complex**

State Registration Number (SRN): B2835

Located at

17000 Croswell, West Olive, Ottawa County, Michigan 49460

Permit Number: MI-ROP-B2835-2020b

Staff Report Date: June 17, 2019

Amended Dates: July 14, 2020  
May 12, 2021

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) requires that the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

## TABLE OF CONTENTS

<b>June 17, 2019 - STAFF REPORT</b>	<b>3</b>
<b>December 20, 2019 - STAFF REPORT ADDENDUM</b>	<b>13</b>
<b>July 14, 2020 - STAFF REPORT FOR RULE 216(2) MINOR MODIFICATION</b>	<b>19</b>
<b>May 12, 2021 - STAFF REPORT FOR RULE 216(1)(a)(i)-(iv) ADMINISTRATIVE AMENDMENT</b>	<b>21</b>
<b>May 12, 2021 - STAFF REPORT FOR RULE 216(2) MINOR MODIFICATION</b>	<b>22</b>

State Registration  
Number  
B2835

**RENEWABLE OPERATING PERMIT**

ROP Number

June 17, 2019 - STAFF REPORT

MI-ROP-B2835-2020

**Purpose**

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with an ROP pursuant to Title V of the federal Clean Air Act of 1990 and Michigan's Administrative Rules for Air Pollution Control pursuant to Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This Staff Report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft ROP terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft ROP pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

**General Information**

Stationary Source Mailing Address:	Consumers Energy, J.H. Campbell Generating Complex 17000 Croswell West Olive, Michigan 49460
Source Registration Number (SRN):	B2835
North American Industry Classification System (NAICS) Code:	221112
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201800028
Responsible Official:	Norman J. Kapala, Executive Director of Coal Generation 616-738-3200
AQD Contact:	Kaitlyn DeVries, Environmental Quality Analyst 616-558-0552
Date Application Received:	February 27, 2018
Date Application Was Administratively Complete:	February 27, 2018
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	June 17, 2019
Deadline for Public Comment:	July 17, 2019

## Source Description

Consumers Energy, J.H. Campbell Generating Complex is a coal fired electric generating station. Presently, there are three (3) units in use, which use primarily pulverized coal, producing approximately 1,450 megawatts (net) per hour. The facility itself is located along the northern shore of Pigeon Lake, adjacent to Lake Michigan in Port Sheldon Township, Ottawa County. Although most of the land in the vicinity of the facility is lightly populated, dense developments of both seasonal and year-round homes are located immediately west of the facility, between the plant and Lake Michigan, and south of the facility on the southern shore of Pigeon Lake.

This used to be a two (2) section Title V permit however, the turbine that was associated with section 2, was dismantled. Therefore, the emission unit was removed from the permit and this is now a one (1) section permit.

The primary equipment located at the facility includes three (3) coal fired boilers (Units) that were installed in 1958, 1963, and 1974, respectively. Emissions from the boilers are controlled via use of low NOx burners, pulse jet fabric filter baghouses, activated carbon injection, dry sorbent injection (Units 1 and 2), spray dry absorption (Unit 3), and selective catalytic reduction systems (Units 2 and 3). Electrostatic Precipitators (ESP's) were formerly used at the facility but have been removed and replaced with the pulse jet fabric filter baghouses, and other control equipment. Western coal is primarily used, but Unit 2 has the capability of burning Eastern coal. Continuous Emission Monitoring Systems (CEMS) are installed for gas flow, sulfur dioxide, nitrogen oxides, mercury, and opacity. EUBOILER3 also has CEMS for particulate matter. Other emission sources include ash handling systems, fuel handling equipment, back-up auxiliary boilers, diesel generators, and cold parts cleaners.

Control of fugitive dust from the source has historically been of concern for the surrounding community. As such, the facility has implemented and maintains a site-wide fugitive dust control plan.

Consumers Energy, J.H. Campbell Generating Complex is currently under a USEPA Consent Decree. Requirements of the Consent Decree were incorporated into the Title V permit via a minor modification, completed in December 2017.

Permit to Install (PTI) Number 18-15A was issued to the facility in June 2018 and was to make changes to the byproduct material handling system for Boilers 1 and 2 fly ash removal system.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2018**.

### **TOTAL STATIONARY SOURCE EMISSIONS**

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide (CO)	1,147.62
Lead (Pb)	1.32 Pounds
Nitrogen Oxides (NO <sub>x</sub> )	2,840.90
Particulate Matter (PM)	49.9
Sulfur Dioxide (SO <sub>2</sub> )	5,012.22
Volatile Organic Compounds (VOCs)	137.59

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2018 by Consumers Energy in accordance with the Toxics Release Inventory Reporting Software developed by EPRI and USEPA and reported to MAERS for 2018:

<b>Individual Hazardous Air Pollutants (HAPs) **</b>	<b>Pounds per Year</b>
Acrolein	282
Arsenic Compounds	16
Hydrochloric Acid	7,114
Hydrogen Fluoride	22,174
Chromium Compounds	61
Lead Compounds	34.6
Manganese Compounds	82
Mercury Compounds	32.8
Nickel Compounds	80
Dioxin and Dioxin-like Compounds	0.0013 grams
Selenium Compounds	15
<b>Total Hazardous Air Pollutants (HAPs)</b>	<b>14.93 tons</b>

\*\*As listed pursuant to Section 112(b) of the federal Clean Air Act.

See Parts C and D in the ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

### **Regulatory Analysis**

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

The stationary source is in Ottawa County, which is currently designated by the United States Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because the potential to emit of several criteria pollutants, including Carbon Monoxide, Particulate Matter, Sulfur Dioxide, Nitrogen Oxides, and Volatile Organic Compounds exceed 100 tons per year and the potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112, is equal to or more than 10 tons per year and the potential to emit of all HAPs combined is equal to or more than 25 tons per year.

EUBOILER3 at the stationary source was subject to review under the Prevention of Significant Deterioration (PSD) regulations of 40 CFR 52.21, because at the time of New Source Review permitting the potential to emit of several criteria pollutants was greater than 100 tons per year. Emission limitations for EUBOILER3 were established pursuant to Best Available Control Technology (BACT). Other emission units at the stationary source were not subject to PSD regulations because the process equipment was constructed/installed prior to the promulgation of the PSD regulations.

As part of previous pollution control and energy enhancement projects for Unit 3, the stationary source accepted legally enforceable permit conditions limiting the potential to emit of particulate matter, sulfur dioxide and oxides of nitrogen to below "major modification" levels. The stationary source had reporting requirements to demonstrate that no significant increase in net emissions has occurred as a result of these projects. The monitoring period for the reporting ended in May of 2012.

Permitting of air pollution control equipment for each of the boilers (Permit to Install No. 179-10) involved a hybrid test under PSD per Rule 1802(4)(e) to demonstrate that the project will not cause a significant emissions increase, and therefore, PSD was not triggered by this project. Consumers Energy pursued state permitting for the material handling equipment and to memorialize the non-PSD determination for the boilers.

Permit to Install (PTI) Nos. 18-15, 39-15, and 142-12 were incorporated into the ROP during the most recent ROP modification in December 2017. PTI No. 18-15, which was issued in 2015, was to incorporate the ROP existing at the time of issuance with PTI No. 39-15, which incorporated conditions associated with USEPA Consent Decree 14-13580. The Consent Decree stated “The following must be included in the permit: a schedule for all unit-specific, plant-specific, and system-specific performance, operational, maintenance, and control technology requirements established by this Consent Decree including, but not limited to, any (a) 30-Day, 90-Day and 365-Day Rolling Average Emission Rates, (b) System-Wide Annual NOx and SO2 Tonnage Limitations, (c) the requirements pertaining to the Surrender of NOx and SO2 Allowances, (d) PM Emission Rate and annual stack test requirements, and (e) PM CEMS monitoring requirements.” Therefore, Consumers Energy submitted a PTI application to include these provisions in a PTI. There are no proposed modifications or additions to the equipment at the facility, and there is no New Source Review (NSR) associated with the application review. The Emission Units and Flexible Groups that contain Consent Decree conditions are: EUBOILER1, EUBOILER2, EUBOILER3, FGBOILER12, and Appendices 1, 3, 5, 7, and 10 of the ROP. PTI No. 142-12 incorporated EUCATDIESEL12.

It should be noted that during the modification to incorporate the PTI that contained the Consent Decree conditions, USEPA and Consumers Energy had discussions regarding the Force Majeure language in the Consent Decree. USEPA believes that the Force Majeure references were incorporated incorrectly, and therefore required them to be removed during the modification.

During the Modification to incorporate PTI Nos. 18-15 and 39-15, temporary emission limits were removed, since the time had passed, and the temporary limits were now obsolete. The obsolete emission limit conditions were removed from the Flexible Group FGBOILER12. The removal of these obsolete emission limits were done in consultation with USEPA. Additionally, as part of the permitting process for PTI No. 18-15, upon completion of the installation of the equipment associated with EUBYPRODUCT, the prior requirements of EUASHNEW became obsolete. All construction for EUBYPRODUCT was complete as of June 14, 2018, therefore EUASHNEW was removed from the ROP.

FGBOILER12 was modified during this renewal process. FGBOILER12 formerly contained the common applicable requirements for Boilers 1 and 2. The applicable requirements were moved to EUBOILER1 and EUBOILER2 with just the common Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 left in this flexible group.

PTI No. 18-15A is being incorporated into the ROP during this renewal. The changes involved the material handling system; specifically, an alternate exhaust point for the equipment serving Boiler Unit 1 and Unit 2 dry fly ash removal system.

EUCOALHAND at the stationary source is subject to the Standards of Performance for Coal Preparation and Processing Plants promulgated in 40 CFR Part 60, Subparts A and Y. This standard applies to two (2) “granulator” coal crushers that were installed in the Breaker House in 2006. These pieces of equipment crush and re-size the coal for use further down in the coal handling equipment line. All required notifications and initial performance testing (opacity testing for dust collectors 4, 5, 6, 7, and 9) have been conducted.

EUCATDIESEL12 and FGNEWCIRICE (EUWPDIESEL and EUTRNCNTRDIESEL) at the stationary source are subject to the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, promulgated in 40 CFR Part 60, Subparts A and IIII. All of these engines maintain their USEPA Certification. Additionally, these engines are subject to the National Emissions Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ. Compliance with Subpart ZZZZ is demonstrated via compliance with Subpart IIII.

EUGUARDSHK\_ENG at the stationary source is subject to the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, promulgated in 40 CFR Part 60, Subparts A and JJJJ. This engine maintains USEPA Certification. EUGUARDSHK\_ENG is a new engine added during this renewal cycle. This engine is also subject to the National Emission Standard for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines, promulgated in 40 CFR Part 63, Subparts A and ZZZZ. Compliance with Subpart ZZZZ is demonstrated via compliance with Subpart JJJJ.

EUCAT3DIESEL and FGEXISITNGRICE (EUCATFIREPUMP3, EUHPHSWP15001, EUHPHSWP15002, and EUHPHSWP3000) at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines, promulgated in 40 CFR Part 63, Subparts A and ZZZZ.

EUBOILER1, EUBOILER2, and EUBOILER3 at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Coal-and oil-fired Electric Generating Utility Steam Generating Units promulgated in 40 CFR Part 63, Subparts A and UUUUU. These emission units were also subject to Michigan's Part 15 rules; however, the Part 15 rules have been rescinded upon promulgation of Subpart UUUUU. Two (2) additional flexible groups (FGMATS\_U12 and FGMATS\_U3) were added to the ROP to incorporate the conditions of the federal regulation. Some common applicable requirements when using emissions averaging were placed into the newly created Appendix 12. EUBOILER1 and EUBOILER2 comply with the PM and Hydrogen Chloride (HCl) emission limitations via stack testing and comply with the Mercury (Hg) emission limitation via a continuous emission monitoring system. EUBOILER3 complies with the PM, HCl and Hg emission limitations via continuous emissions monitoring systems (CEMS); SO<sub>2</sub> is used as a surrogate for the HCl, via an SO<sub>2</sub> CEMS.

EUBOILER3 at the stationary source is subject to the Standards of Performance for Fossil-Fuel-Fired Steam Generators which commenced construction after August 17, 1971, promulgated in 40 CFR Part 60, Subparts A and D. Monitoring requirements for Sulfur Dioxide from this emission unit, pursuant to 40 CFR Part 60, Subpart D are addressed through compliance with the certification of the Continuous Emissions Monitoring System (CEMS) per Title IV (Acid Rain), 40 CFR Part 75 regulations.

After consultation with USEPA, the Particulate Matter emission limit of 0.03 pounds per MMBTU heat input for EUBOILER3 originating in the Consent Decree Paragraph 143 has been removed. This limit was removed because the limit was applicable prior to the commencement and continuous operation of the pulse jet fabric filter baghouse. Since the pulse jet fabric filter baghouse is now in continuous operation, this emission limit is no longer applicable. Similarly, the Spray Dry Absorber system (SDA) has been installed. This makes the SO<sub>2</sub> emission limit of 1.00 pounds per MMBTU heat input, based upon a 30-day rolling average emission rate applicable pursuant to the Consent Decree paragraph 111, no longer applicable, therefore the limit was removed.

In Appendix 3-E PM CEMS, the March 31, 2017 requirement to have a PM CEMS installed was removed. All other requirements, including the requirement to correlate, maintain, and continuously operate the PM CEMS were kept, pursuant to the Consent Decree paragraph 163.

In Appendix 5, PM Emissions Testing and Monitoring Requirements, the requirement to demonstrate compliance with the PM emissions equal to or less than 0.015 lb./MMBTU if the applicable rate is 0.03 lb./MMBTU was removed, since the limit of 0.03 lb./MMBTU was removed from EUBOILER3, as mentioned above. The current limit for the Pulse Jet Fabric Filter Baghouse is 0.010 lb./MMBTU since the rate is 0.015 lb./MMBTU, which is outlined in Appendix 5, was removed.

EUAUXBLR12 and FGAUXBLRS3 (EUAUXBLR3B, and EUAUXBLR3C) at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters promulgated by 40 CFR Part 63, Subparts A and DDDDD.

EUBOILER1, EUBOILER2, and EUBOILER3 at the stationary source are subject to the federal Acid Rain program promulgated in 40 CFR Part 72.

EUBOILER1, EUBOILER2, and EUBOILER3 at the stationary source are subject to the Cross-State Air Pollution Rule NO<sub>x</sub> Annual Trading Program pursuant to 40 CFR Part 97, Subpart AAAAA.

EUBOILER1, EUBOILER2, and EUBOILER3 at the stationary source are subject to the Cross-State Air Pollution Rule NO<sub>x</sub> Ozone Season Group 2 Trading Program pursuant to 40 CFR Part 97, Subpart EEEEE.

EUBOILER1, EUBOILER2, and EUBOILER3 at the stationary source are subject to the Cross-State Air Pollution Rule SO<sub>2</sub> Group 1 Trading Program pursuant to 40 CFR Part 97, Subpart CCCCC.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the "Procedure for Evaluating Periodic Monitoring Submittals."

EUAUXBLR12, EUCAT3DIESEL, EUCATDIESEL12, EUGUARDSHK\_ENG, FGEXISTINGRICE (EUCATFIREPUMP3, EUHPHSWP15001, EUHPHSWP15002, and EUHPHSWP3000), FGAUXBLRS3 (EUAUXBLR3B and EUAUXBLR3C), FGNEWCIRICE (EUWPDIESEL and EUTRNCNTRDIESEL), FGPARTSCLEANERS do not have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64, because these emission units at the stationary source do not have a control device.

EUDSI\_U12, EUACI\_U123, and the remaining components of EUCOALHAND, EUSDA\_U3, and EUBYPRODUCT do not have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64, because the units do not have potential pre-control emissions over the major source thresholds. The PM emissions from these emission units are controlled by vent filters, or dust collectors.

The emission limitations or standards for Nitrogen Oxides and Sulfur Dioxides at the stationary source with the underlying applicable requirements of 40 CFR Part 75, Acid Rain Program, from EUBOILER1, EUBOILER2, and EUBOILER3 are exempt from the federal Compliance Assurance Monitoring (CAM) regulation pursuant to 40 CFR 64.2(b)(1)(iii), because the continuous monitoring of Nitrogen Oxides and Sulfur Dioxides meet the CAM exemption for Acid Rain monitoring requirements.

The pound per million BTU (MMBTU), pounds per hour, and tons per year emission limitations for particulate matter from EUBOILER3 at the stationary source are exempt from the federal Compliance Assurance Monitoring (CAM) regulation pursuant to 40 CFR 64.2(b)(1)(vi), because all of the emission limitations are monitored on a continuous basis, meeting the CAM exemption for a continuous compliance determination method. Particulate Matter (PM) emissions are continuously monitored via a continuous emissions monitoring system (CEMS). The stationary source was required to install a PM CEMS for this emission unit pursuant to the Consent Decree with USEPA. A gas flow monitor has been installed for EUBOILER3 and mass emissions are directly calculated using the data from the continuous emissions monitoring system.

The emission limitations for particulate matter (PM) from EUBOILER1, EUBOILER2, EUCOALHAND (DC10, DC11, and DC1), PM10 and PM2.5 from EUBYPRODUCT (Transfer Tank A and Transfer Tank B, Landfill Silo's A, B, and C) and EUSDA\_U3 (two recycle silos – SVRS-BV3A and SVRS-BV-B) at the stationary source are subject to the federal Compliance Assurance Monitoring (CAM) rule under 40 CFR Part 64. These emission units have a control device and the potential pre-control emissions of PM are greater than the major source threshold level. The table below outlines the emission units that are subject to CAM, including their emission limitation and the associated control device and monitoring methods.



Emission Unit/Flexible group ID	Pollutant/Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM*?
EUBOILER1	0.16 pounds of Particulate Matter (PM) per 1,000 pounds of exhaust gas	R336.1331(1)(c)	Pulse Jet Fabric Filter (PJFF) Baghouse	Continuous Opacity Monitoring System (COMS) any two (2) consecutive 1-hour block average of opacity greater than 20% and broken bag detection systems	EUBOILER1	No
EUBOILER1	0.015 pounds of Particulate Matter (PM) per MMBtu Heat Input	"U.S. V CONSUMER S ENERGY COMPANY, CIVIL ACTION 14-13580, E.D. MICH., 2014" paragraph 144, Act 451, Section 324.5503(b)	Pulse Jet Fabric Filter (PJFF) Baghouse	Continuous Opacity Monitoring System (COMS) any two (2) consecutive 1-hour block average of opacity greater than 20% and broken bag detection systems	EUBOILER1	No
EUBOILER2	0.16 pounds of Particulate Matter (PM) per 1,000 pounds of exhaust gas	R336.1331(1)(c)	PJFF Baghouse	Continuous Opacity Monitoring System (COMS) any two (2) consecutive 1-hour block average of opacity greater than 20% and broken bag detection systems	EUBOILER2	No
EUBOILER2	0.015 pounds of Particulate Matter (PM) per MMBtu Heat Input	"U.S. V CONSUMER S ENERGY COMPANY, CIVIL ACTION 14-13580, E.D. MICH., 2014" paragraph 144, Act 451,	PJFF Baghouse	Continuous Opacity Monitoring System (COMS) any two (2) consecutive 1-hour block average of opacity greater than 20% and broken bag	EUBOILER2	No

Emission Unit/Flexible group ID	Pollutant/Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM*?
		Section 324.5503(b)		detection systems		
EUCOALHAND (DC10, DC11, and DC1)	0.10 pounds per 1,000 pounds exhaust gas, on a dry basis for PM	R336.1331(1)(a), Table 31(j)	Baghouses	No Visible Emissions	EUCOALHAND	No
EUBYPRODUCT (Transfer Tank A and Transfer Tank B)	0.05 pph for PM10	R 336.2803 R 336.2804	Bin vent filter	No Visible Emissions	EUBYPRODUCT	No
EUBYPRODUCT (Transfer Tank A and Transfer Tank B)	0.05 pph for PM2.5	R 336.2803 R 336.2804	Bin vent filter	No Visible Emissions	EUBYPRODUCT	No
EUBYPRODUCT (Landfill Silo's A, B, and C)	0.55 pph for PM10	R 336.2803 R 336.2804	Bin vent filter	No Visible Emissions	EUBYPRODUCT	No
EUBYPRODUCT (Landfill Silo's A, B, and C)	0.55 pph for PM2.5	R 336.2803 R 336.2804	Bin vent filter	No Visible Emissions	EUBYPRODUCT	No
EUSDA_U3 (two recycle silos – SVRS-BV3A and SVRS-BV3B)	0.02 pph for PM10	R 336.2803 R 336.2804	Bin vent filter	No Visible Emissions	EUSDA_U3	No
EUSDA_U3 (two recycle silos – SVRS-BV3A and SVRS-BV3B)	0.02 pph for PM2.5	R 336.2803 R 336.2804	Bin vent filter	No Visible Emissions	EUSDA_U3	No

\*Presumptively Acceptable Monitoring (PAM)

The transfer tanks and silos for EUBYPRODUCT, the recycle silos for EUSDA\_U3, and the three (3) dust collectors for EUCOALHAND use visible emissions as the primary indicator and differential pressure as a secondary indicator for proper operation. The observation of visible emissions has been chosen as the primary indicator for compliance regarding excursions. There should be no visible emissions when the dust collector is operating properly, thus any presence of visible emissions will require corrective action. Additionally, all of the vessels have continuous monitoring of differential pressure across the bin vent filters. Monitoring differential pressure provides a means of detecting a change in the operation that could lead to an increase in emissions. An increase or decrease in differential pressure could be indicative of an issue

with the system. The differential pressure also serves to indicate that there is airflow through the control device. Since the dust collector may still be operating even while outside of the specified operational range of 0 – 7” WC for EUBYPRODUCT and EUSDA\_U3 and 1-7” WC for EUCOALHAND, the presence of visible emissions is also used as an indicator.

EUBOILER1 and EUBOILER 2 utilizes a continuous opacity monitoring system (COMS) for particulate matter (PM) monitoring. Opacity is used as the performance indicator because it is indicative of good operation and maintenance of the dust collection system. Stack testing conducted at opacity readings of less than 20% indicate the PM emissions are well below the particulate limits. EUBOILER1 and EUBOILER2 have the indicator ranges of any two (2) or more consecutive 1-hour block averages of opacity readings greater than 20% for an excursion indicator. This range in conjunction with the performance testing, demonstrate compliance with the PM emission limits. A secondary indicator, used by Consumers Energy, J. H. Campbell Generating Complex, is the use of a broken bag detection system. Alarms on the system provide indication of performance status of the fabric filters.

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

**Source-wide Permit to Install (PTI)**

Rule 214a requires the issuance of a Source-Wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. MI-ROP-B2835-2011 are identified in Appendix 6 of the ROP.

PTI Number			
148-95	113-87	60-74	60-74A
263-75	287-76	155-77	349-94
401-87	338-83	287-76A	158-98
220-76	233-81	141-12	179-10

**Streamlined/Subsumed Requirements**

This ROP does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

**Non-applicable Requirements**

Part E of the ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the ROP Application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the ROP pursuant to Rule 213(6)(a)(ii).

**Processes in Application Not Identified in Draft ROP**

The following table lists processes that were included in the ROP Application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

<b>PTI Exempt Emission Unit ID</b>	<b>Description of PTI Exempt Emission Unit</b>	<b>Rule 212(4) Citation</b>	<b>PTI Exemption Rule Citation</b>
EUSPACEHEATERS	34 Small natural gas or propane space heating or package water heating boiler units all rated at less than 1.0 MMBtu/hr	R 336.1212(4)(c)	R 336.1282(2)(b)(ii)
EUPROPANETANKS	Various propane tanks, each with a capacity of 1,000 gallons or less. (the exact number fluctuates)	R 336.1212(4)(d)	R 336.1284(2)(b)
EUSANDBLASTER3	Unit 3 sand blaster	R 336.1285(2)(l)(vi)(C)	R 336.1212(4)(e)
EUSANDBLASTER12	Units 1 and 2 sand blaster	R 336.1285(2)(l)(vi)(C)	R 336.1212(4)(e)

**Draft ROP Terms/Conditions Not Agreed to by Applicant**

This draft ROP does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

**Compliance Status**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

**Action taken by EGLE, AQD**

The AQD proposes to approve this ROP. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the USEPA is allowed up to 45 days to review the draft ROP and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Heidi Hollenbach, Grand Rapids District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the ROP Application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

State Registration Number

B2835

## RENEWABLE OPERATING PERMIT

ROP Number

MI-ROP-B2835-2020

December 20, 2019 - STAFF REPORT ADDENDUM

### Purpose

A Staff Report dated June 17, 2019, was developed to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by Rule 214(1) of the administrative rules promulgated under Act 451. The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in Rule 214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

### General Information

Responsible Official:	Norman J. Kapala, Executive Director of Coal Generation 616-738-3200
AQD Contact:	Kaitlyn DeVries, Environmental Quality Analyst 616-558-0552

### Summary of Pertinent Comments

Comments were received from USEPA during the 30-day public comment period. The comments were received on July 17, 2019 and are outlined below.

#### USEPA Comment 1:

EUBOILER1, EUBOILER2, EUSDA\_U3, and EUBYPRODUCT Compliance Assurance Monitoring (CAM) applicability. Although the Staff Report indicates that the particulate matter (PM, PM10, PM2.5) limits in EUBOILER1, EUBOILER2, EUSDA\_U3, and EUBYPRODUCT are subject to the 40 CFR Part 64 CAM requirements, these respective Emission Unit sections of the permit do not associate any emissions limits with the CAM requirements. Please revise the permit as necessary to identify which pollutant specific emission units (i.e., which emission limits in EUBOILER1, EUBOILER2, EUSDA\_U3, and EUBYPRODUCT) are subject to CAM, in accordance with 40 CFR 64.2(b). For example, the Monitoring/Testing Method column in the EU emissions tables could reference the applicable CAM requirements.

#### AQD Response:

The Particulate Matter (PM) emission limits for EUBOILER1 and EUBOILER2 are subject to Compliance Assurance Monitoring, as noted in the Staff Report. While the CAM Monitoring and Recordkeeping requirements are located in FGBOILER12, the Emission Limit tables in EUBOILER1 and EUBOILER2 have been updated to reference the CAM applicability for the associated emission limit that is subject to CAM. For both, the Monitoring/Testing Method column of the Emission Limit table has been updated to include a reference to FGBOILER12, Special Condition (SC) VI.1, and the requirement for a Continuous Opacity Monitoring System (COMS) that is used as the indicator for compliance with the CAM requirements.

The Emission Limit tables for EUBYPRODUCT and EUSDA\_U3 have also been updated to include a reference to the CAM requirements in the Monitoring/Testing Method column for the appropriate PM limit. The Monitoring/Testing Method column now references SC VI.1, the requirement to conduct Visible Emissions monitoring, which is the primary indicator for compliance with the emission limit.

USEPA Comment 2:

EUBOILER3 CAM exemption. The Staff Report indicates that the particulate matter limits for EUBOILER3 are exempt from CAM because the permit includes a continuous compliance determination method. However, the permit does not include particulate matter CEMs in the respective Monitoring/Testing Method column of the emissions table. Please revise the permit as necessary to address the continuous compliance determination method exemption requirements, in accordance with 40 CFR 64.2(b)(1)(vi).

AQD Answer:

As indicated in the Staff Report, the particulate matter emission limits for EUBOILER3 are exempt from CAM because the permit includes a continuous compliance determination method. EUBOILER3 is equipped with a Particulate Matter CEMS as identified in EUBOILER3 SC VI.4. The Emission Limit table, specifically EUBOILER3, SC I.3, I.4, and I.5 have been updated to include the reference to SC VI.4 in the Monitoring/Testing Method column.

USEPA Comment 3:

Staff Report, CAM nitrogen oxides and sulfur dioxides exemptions for EUBOILER1, EUBOILER2, and EUBOILER3. The Staff Report describes several exemptions from CAM for nitrogen oxides and sulfur dioxides on the basis that the units are subject to the Title IV Acid Rain Program monitoring requirements. In accordance with 40 CFR 64.2(b), please address the CAM non-applicability analysis for the nitrogen oxides and sulfur dioxides emission limits in EUBOILER1, EUBOILER2, and EUBOILER3 (i.e., those limits not required by Title IV). For example, it appears that the relevant exemption may be 40 CFR 64.2(b)(1)(vi)- emission limitations for which the Title V permit specifies a continuous compliance determination method.

AQD Response:

As indicated in the Staff Report, nitrogen oxide and sulfur dioxide emissions from EUBOILER1, EUBOILER2, and EUBOILER3 are exempt from the requirements of CAM pursuant to 40 CFR 64.2(b)(1)(vi), because all of the emission limitations are monitored on a continuous basis, meeting the CAM exemption for a continuous compliance determination method. All of the units are equipped with a continuous emissions monitoring system (CEMS) for nitrogen oxide and sulfur dioxide emissions. All of the units are also equipped with a gas flow monitor, allowing them to directly calculate nitrogen oxide and sulfur dioxide emissions. No changes have been made to the permit as a result of this comment.

USEPA Comment 4:

EUBOILER1, EUBOILER2, EUBOILER3, EUCOALHAND, EUSDA\_U3, EUDSI\_U12, and EUBYPRODUCT malfunction abatement plans (MAP). Please ensure that any malfunction abatement plans addressed in the permit are readily accessible in the permit record, including online Internet availability if feasible. As addressed by USEPA's March 5, 1996 "White Paper Number 2 for Improved Implementation of The Part 70 Operating Permits Program," information cited or cross-referenced in permits should be current and readily available to the permitting agency and to the public.

AQD Response:

EUBOILER1, EUBOILER2, EUBOILER3, EUCOALHAND, EUSDA\_U3, EUDSI\_U12, and EUBYPRODUCT all have malfunction abatement plans. These plans were erroneously omitted from being readily available via EGLE AQD's website. These plans have since been made available and are posted to EGLE AQD's website. No changes were made to the permit as a result of this comment.

USEPA Comment 5:

EUCOALHAND, Section VI. Please clarify the definition of excursion, pursuant to 40 CFR 64.6(c)(2), and revise the permit or provide additional justification as appropriate. An excursion is defined for purposes of responding to exceedances or excursions. In particular:

1. SC VI.1. does not require visible emission observations for 2 hours;
2. The corrective actions in SC VI.5 may not be required upon observation of any visible emissions, but rather would be required only after observed emissions exceeded 2 continuous hours;
3. The pressure drop ranges in SC VI.2 are not addressed by the definition of excursion or the corrective action provisions.

AQD Response:

Additional clarification of the definition of excursion pursuant to 40 CFR 64.6(c)(2) was provided in Section VI of EUCOALHAND in order to address the defined deficiencies listed in USEPA Comment 5. The previous duration of 2 hours has been updated to a reflect a shorter duration of one (1) hour for which corrective action must be taken. It has also been noted in Section VI of EUCOALHAND that if there is a break in the observations of the visible emissions (VEs), it is assumed that the emissions are continuous up to the point where the emission point is observed again and there are no more visible emissions. A reference to the MAP was also included as a requirement for returning the pollutant specific emission unit to normal operation. SC VI. 1 also now indicates that corrective action is initiated upon detection of any visible emissions for any duration, rather than only when an excursion is detected.

The facility also utilizes a secondary indicator, although not specified in the permit, it is specified in the CAM plan. The secondary indicator of pressure drop and the recording of the pressure drop is part of the CAM plan developed and implemented by the facility.

USEPA Comment 6:

EUSDA\_U3, Section VI. Please clarify the definition of excursion, pursuant to 40 CFR 64.6(c)(2), and revise the permit or provide additional justification as appropriate. An excursion is defined for purposes of responding to exceedances or excursions. In particular:

1. SC VI.1. does not require visible emission observations for 2 hours;
2. The corrective actions may not be required upon observation of any visible emissions, but rather would be required only after observed emissions exceeded 2 continuous hours.

AQD Response:

Additional clarification of the definition of excursion pursuant to 40 CFR 64.6(c)(2) was provided in Section VI of EUSDA\_U3 in order to address the defined deficiencies listed in USEPA Comment 6. The previous duration of 2 hours has been updated to a reflect a shorter duration of one (1) hour for which corrective action must be taken. It has also been noted in Section VI of EUSDA\_U3 that if there is a break in the observations of the visible emissions (VEs), it is assumed that the emissions are continuous up to the point where the emission point is observed again and there are no more visible emissions. A reference to the MAP was also included as a requirement for returning the pollutant specific emission unit to normal operation. An additional condition (now SC VI.2) was added for clarification in regard to the specific pieces

of equipment that have CAM subject emission limits. Additionally, SC VI.2 now indicates that corrective action is initiated upon detection of any visible emissions for any duration, rather than only when an excursion is detected.

The facility also utilizes a secondary indicator, although not specified in the permit, it is specified in the CAM plan. The secondary indicator of pressure drop and the recording of the pressure drop is part of the CAM plan developed and implemented by the facility.

USEPA Comment 7:

EUBYPRODUCT, Section VI. Please clarify the definition of excursion, pursuant to 40 CFR 64.6(c)(2), and revise the permit or provide additional justification as appropriate. An excursion is defined for purposes of responding to exceedances or excursions. In particular:

1. SC VI.1. does not require visible emission observations for 2 hours;
2. The corrective actions provisions may not be required upon observation of any visible emissions, but rather would be required only after observed emissions exceeded 2 continuous hours;
3. The pressure drop ranges in SC VI.2 are not addressed by the definition of excursion or the corrective action provisions.

AQD Response:

Additional clarification of the definition of excursion pursuant to 40 CFR 64.6(c)(2) was provided in Section VI of EUBYPRODUCT in order to address the defined deficiencies listed in USEPA Comment 7. The previous duration of 2 hours has been updated to a reflect a shorter duration of one (1) hour for which corrective action must be taken and defined as an excursion. It has also been noted in Section VI of EUBYPRODUCT that if there is a break in the observations of the visible emissions (VEs), it is assumed that the emissions are continuous up to the point where the emission point is observed again and there are no more visible emissions. A reference to the MAP was also included as a requirement for returning the pollutant specific emission unit to normal operating manner. SC VI. 1 also now indicates that corrective action is initiated upon detection of any visible emissions for any duration, rather than only when an excursion is detected.

The facility also utilizes a secondary indicator, although not specified in the permit, it is specified in the CAM plan. The secondary indicator of pressure drop and the recording of the pressure drop is part of the CAM plan developed and implemented by the facility.

USEPA Comment 8:

FGBOILER12, Section VI. Please clarify the definition of excursion, pursuant to 40 CFR 64.6(c)(2), and revise the permit or provide additional justification as appropriate. An excursion is defined for purposes of responding to exceedances or excursions. In particular:

1. The corrective action provisions may not be required when opacity readings reach 20%, but rather would be required only after two or more consecutive 1-hour block average opacity values are greater than 20%;
2. The bag leak detection system monitoring is not addressed by either the definition of excursion or the corrective action provisions.

AQD Response:

FGBOILER12, SC VI.1 has been updated to include additional clarification as to the definition of an excursion pursuant to 40 CFR 64.6(c)(2) by changing the definition of an excursion as any two (2) or more consecutive 1-hour block average opacity values greater than 15%. This will provide more assurance that the PM limits are not exceeded during an excess opacity event. The facility has supplied testing data to correlate opacity levels with particulate emissions, therefore any increase in opacity levels will be indicative



of an increase in the particulate emissions. The facility utilizes a continuous opacity monitor (COMS) for both EUBOILER1 and EUBOILER1 to continuously monitor the opacity of each of the boilers.

FGBOILER12, SC VI.8 was also updated to reference the MAP that the facility maintains and uses when an alarm is triggered per their CAM plan.

USEPA Comment 9:

Please verify whether the following cross reference citations within the permit are correct, and revise the permit as necessary:

1. EUBOILER2, SC I.5. The particulate matter Monitoring/Testing Method refers to SC V.1 instead of SC V.2.
2. EUBOILER3, SC VI.3. refers to SC I.11, I.12, I.13, I.17 and I.18 instead of SC I.10, I.11, I.15, and I.16.
3. EUACI\_U123, SC I.1. The opacity Monitoring/Testing Method refers to SC VI.2 instead of SC VI.1.
4. EUDSI\_U12, SC I.2, 3, and 4. The Monitoring/Testing Method refers to SC V.1. instead of SC VI.1.

AQD Response:

The cross-referenced citations mentioned in USEPA Comment 9 were erroneous in the draft permit. The citations have been updated in the ROP.

**Changes to the June 17, 2019 Draft ROP**

In order to address USEPA Comment 1, the Monitoring/Testing Method column of EUBOILER1 and EUBOILER2 for the Particulate Matter (PM) emission limits subject to CAM now includes a reference to the CAM requirements in FGBOILER12. The Monitoring/Testing Method columns of EUBYPRODUCT and EUSDA\_U3 were also updated to include a reference to the special conditions within those emission units that reference CAM.

In order to address USEPA Comment 2, the Monitoring/Testing Method column of EUBOILER3, SC I.3, I.4, and I.5 have been updated to include a reference to EUBOILER3, SC VI.4.

In order to address USEPA Comment 5, the monitoring/recordkeeping requirements of EUACOALHAND have been updated. Specifically, SC VI.1 was updated to specify how the observations of visible emissions are to occur and address any breaks in the observations. This condition also indicates that corrective action will be initiated in any event of visible emission regardless of the duration. SC VI.2 was updated to reflect the duration of visible emissions that qualifies as an excursion. SC VI.4 was updated to reference the MAP as a requirement for returning the pollutant specific emission unit to normal operating manner.

In order to address USEPA Comment 6, the monitoring/recordkeeping requirements of EUSDA\_U3 have been updated. Specifically, SC VI.2 was updated to specify how the observations of visible emissions are to occur and address any breaks in the observations. This condition also indicates that corrective action will be initiated in any event of visible emission regardless of the duration. SC VI.2 was updated to reflect the duration of visible emissions that qualifies as an excursion. SC VI.4 was updated to reference the MAP as a requirement for returning the pollutant specific emission unit to normal operating manner.

In order to address USEPA Comment 7, the monitoring/recordkeeping requirements of EUBYPRODUCT have been updated. Specifically, SC VI.2 added to specify how the observations visible emissions are to occur and address any breaks in the observations. This condition also indicates that corrective action will be initiated in any event of visible emission regardless of the duration. SC VI.3 includes new duration of visible emissions that qualifies as an excursion. SC VI.4 was updated to reference the MAP as a requirement for returning the pollutant specific emission unit to normal operating manner.

In order to address USEPA Comment 8, the monitoring/recordkeeping requirements of FGBOILER12, SC VI.1, and VI.8 were updated to more clearly define the definition of an excursion for the COMS unit. Additionally, the facility provided data correlating the use of opacity and particulate emissions. This correlation provides additional assurance that with some opacity, the particulate emission limits are not exceeded. Additionally, the definition of an excursion for the boilers was updated to be 15% opacity, a reduction from 20% opacity.

In order to address USEPA Comment 9, all citations mentioned in the comment were cross-checked and updated with the correct reference.

The Delegation status for 40 CFR Part 63, Subpart DDDDD changed during the comment period, and Michigan now has full delegation of this Federal Regulation. Therefore, EUAUXBLR12 and FGAUXBLRS3 were updated. Various conditions throughout EUAUXBLR12 and FGBLRS3 were updated, primarily incorporating existing federal rule language.

After discussion with the permittee, an additional condition was added to EUCOALHAND as Special Condition VI.8 requiring non-certified visible emissions.

Additionally, it was noted during this review that there is an error in the emission limits for CO and PM for EUWPDIESEL. Since these emission limits were incorporated via a Permit to Install (PTI), this error will be fixed via a PTI, and a subsequent modification to the ROP.

State Registration Number

B2835

## RENEWABLE OPERATING PERMIT

ROP Number

MI-ROP-B2835-2020a

### July 14, 2020 - STAFF REPORT FOR RULE 216(2) MINOR MODIFICATION

#### Purpose

On February 4, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B2835-2020 to Consumers Energy, J.H. Campbell Generating Complex pursuant to Rule 214 of the administrative rules promulgated under Act 451. Once issued, a company is required to submit an application for changes to the ROP as described in Rule 216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to Rule 216(2).

#### General Information

Responsible Official:	Norman J. Kapala, Executive Director of Fossil & Renewable Generation 616-738-3200
AQD Contact:	Caryn E. Owens, Environmental Engineer 231-878-6688
Application Number:	202000099
Date Application for Minor Modification was Submitted:	June 16, 2020

#### Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to Rule 216(2).

#### Description of Changes to the ROP

Minor Modification Number 202000099 was to incorporate PTI No. 50-20 into the ROP, which corrected emission limits for the water pump EUWPDIESEL. The change was due to an incorrect emission limit cited from 40 CFR Part 60, Subpart IIII in the previous permit, but the correct emission limit was used in the permit review. This correction was considered administrative and not subject to New Source Review during permitting.

Additionally, the company identified two other errors in their ROP. The errors were related to the other engine in the flexible group, EUTRNCNTRDIESEL, which was not originally permitted through a PTI but was grouped with the fire pump engine EUWPDIESEL in the ROP. These errors were related to what federal subpart was/was not applicable to that engine. It appears that EUTRNCNTRDIESEL was accidentally included in FGNEWCIRICE Special Condition III.1 at same time that EUTRNCNTRDIESEL was accidentally excluded from FGNEWCIRICE Special Condition III.2. These emission units were corrected in FGNEWCIRICE. PTI No. 50-20 was not required to go through the public participation process.

#### Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

## **Action Taken by EGLE**

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-B2835-2020, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the United States Environmental Protection Agency (USEPA) has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is the District Supervisor. The final determination for approval of the Minor Modification will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by any affected states or the USEPA.

State Registration Number  
B2835

## RENEWABLE OPERATING PERMIT

ROP Number  
MI-ROP-B2835-2020b

### May 12, 2021 - STAFF REPORT FOR RULE 216(1)(a)(i)-(iv) ADMINISTRATIVE AMENDMENT

#### Purpose

On September 3, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B2835-2020a to Consumers Energy, J.H. Campbell Generating Complex pursuant to Rule 214 of the administrative rules promulgated under Act 451. Once issued, a company is required to submit an application for changes to the ROP as described in Rule 216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to Rule 216(1)(a)(i-iv).

#### General Information

Responsible Official:	Nathan J. Hoffman, Plant Business Manager 616-738-5436
AQD Contact:	Caryn Owens, Environmental Engineer 231-878-6688
Application Number:	202100052
Date Application for Administrative Amendment was Submitted:	March 10, 2021

#### Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for an Administrative Amendment pursuant to Rule 216(1)(a)(i).

#### Description of Changes to the ROP

Administrative Amendment Number 202100052 was to correct a typographical error in EUCAT3DIESEL, SC III.1.b, which mistakenly references spark plugs in lieu of air cleaner, and updated the error in the underlying applicable Condition referencing 40 CFR Part 63, Subpart ZZZZ, Table 2c, Item 6 (which is for a spark ignition engine) to reference 40 CFR Part 63, Subpart ZZZZ, Table 2c, Item 1 (which is for a compression ignition engine). The typographical errors have been corrected.

#### Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Administrative Amendment to the ROP.

#### Action Taken by EGLE

The AQD approved an Administrative Amendment to ROP No. MI-ROP-B2835-2020a, as requested by the stationary source. The delegated decision maker for the AQD is the District Supervisor.

State Registration Number  
B2835

**RENEWABLE OPERATING PERMIT**  
**May 12, 2021 - STAFF REPORT FOR RULE 216(2)**  
**MINOR MODIFICATION**

ROP Number  
MI-ROP-B2835-2020b

**Purpose**

On September 3, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B2835-2020a to Consumers Energy, J.H. Campbell Generating Complex pursuant to Rule 214 of the administrative rules promulgated under Act 451. Once issued, a company is required to submit an application for changes to the ROP as described in Rule 216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to Rule 216(2).

**General Information**

Responsible Official:	Nathan J. Hoffman, Plant Business Manager 616-738-5436
AQD Contact:	Caryn Owens, Environmental Engineer 231-878-6688
Application Number:	202100070
Date Application for Minor Modification was Submitted:	April 1, 2021

**Regulatory Analysis**

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to Rule 216(2).

**Description of Changes to the ROP**

Minor Modification No. 202100070 was to incorporate PTI No. 39-15A into the ROP, which was for administrative updates to permitted conditions to reflect the termination of a Consent Decree between the USEPA and Consumers Energy. PTI No. 39-15A previously allowed Boiler #1 and #2 to have individual stacks or meet certain requirements if using a shared stack. The option and associated requirements for having a shared stack were also removed during this minor modification.

It should be noted that PTI No. 39-15A had some errors that were corrected during this Modification. During the last ROP Renewal, the Company requested that the conditions common to boilers 1 and 2 housed in FGBOILER12 be separated and put into their respective boiler emission unit. This was done with the exception of all of the CAM requirements being kept in FGBOILERS12. Additionally, a separate FGMATSU12 table was created to house all of the common MATS requirements for the boilers. All requirements for EDTA and citrosolve have been removed as the units no longer burn any waste. The Conditions related to FGBOILER12 were accidentally added back into PTI No. 39-15A as well in the associated Emission Units, so the Conditions were duplicative. AQD removed the duplicative and obsolete Conditions that were present in PTI No. 39-15A during this minor modification.

During the Company's review, the Company requested to clarify in Appendix 3-E. PM CEMS, PM specification tests will be sent in the future to EGLE. This change would also allow updates to the installation and correlation plans to be submitted to and approved by EGLE.

### **Compliance Status**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

### **Action Taken by EGLE**

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-B2835-2020a, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the United States Environmental Protection Agency (USEPA) has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is the District Supervisor. The final determination for approval of the Minor Modification will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by any affected states or the USEPA.