

A CMS Energy Company

August 12, 2015



Mr. Sebastian Kallumkal, Senior Environmental Engineer Michigan Department of Environmental Quality – Air Quality Division Southeast Michigan District Office 27700 Donald Court Warren, MI 48092-2793

Re: Consumers Energy Company's St. Clair Compressor Station (B6637) Response to Violation Notice, Dated July 23, 2015

Dear Mr. Kallumkal:

Consumers Energy Company (CE) is providing this written response to the Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Violation Notice, dated July 23, 2015, in reference to the two (2) stationary combustion turbines located at CE's St. Clair Compressor Station in Ira Township, Michigan. The turbines are identified as EUTURBINEC1-1 and EUTURBINEC1-2 (collectively identified as FGTURBINES).

Cited Violation:

Process Description – FGTURBINES

Rule/Permit Condition Violated – MI-ROP-B6637-2010, SC I.1c 40 CFR 60.332(a)(2)

Comments - Emission tests conducted on May 19, 2015 showed that each turbine in FGTURBINES exceeded the g/bhp-hr limit for NO_x (Oxides of Nitrogen) at 100% NGP or maximum NGP (emphasis added).

CE Response:

<u>MI-ROP-B6637-2010, SC I.1c</u>

Special Condition I.1c specifies a NO_x emission limit of 0.47 grams per horsepower-hour (g/hphr), corrected to 15% oxygen (O₂), on a dry gas basis, at 100% speed and 100% torque, for each turbine. Special Condition I.1c does not specify a NOx emission limit at "maximum natural gas producer (NGP)" as the Violation Notice indicates. During emission testing of FGTURBINES on May 19, 2015, the average g/hp-hr NO_x emission rate, at the upper end of the operating range tested (but below 100% speed and 100% torque), was 0.73 g/hp-hr (EUTURBINEC1-1) and 1.01 g/hp-hr (EUTURBINEC1-2). A complete test report was submitted to MDEQ-AQD on July 14, 2015 which summarized the results of testing conducted on May 19, 2015. While the measured values for NO_x did exceed the specified g/hp-hr emission limit, the actual speed and torque of each of the units was not at the Special Condition I.1c specification of 100% speed and 100% torque during the test event. The average NGP speed was actually, at the upper end of the operating range tested, 98.9% for EUTURBINEC1-1 and 98.8% for EUTURBINEC1-2. Therefore, necessary parameters of Special Condition I.1c were not met and the g/hp-hr limit for NO_x did not apply. Consumers Energy respectfully requests that the cited violation be rescinded in writing at MDEQ-AQD's earliest opportunity.

Once the abnormal condition was identified, upon receipt and review of the final emission test calculations on June 29, 2015, the units were tagged as "not available". EUTURBINEC1-2 did not operate between May 19, 2015 and July 21, 2015 (the date of the successful test to re-establish operation limits). EUTURBINEC1-1 did operate for a total of nine (9) days between May 19, 2015 and identification of the abnormal condition on June 29, 2015. Based on the concentration (ppm) of the NO_x emissions during the testing event, along with subsequent operational data during the 9 days of post-test operation, the resulting emissions from EUTURBINEC1-1 were below the applicable NO_x and CO emission limitations in the Renewable Operating Permit.

40 CFR §60.332(a)(2)

The turbines are subject to 40 CFR Part 60 Subpart GG-Standards of Performance for Stationary Gas Turbines, which is not the underlying applicable requirement (UAR) for the cited Special Condition I.1.c, but is the UAR for Special Condition I.1d. Special Condition I.1d specifies a NO_x emission limit of 150 part per million (ppm) at 15% O_2 on a dry gas basis. During emission testing of FGTURBINES on May 19, 2015, the maximum ppm NO_x emission rate was 55.7. Therefore, the ppm limit for NO_x was not exceeded during emission tests conducted on May 19, 2015 and Consumers Energy respectfully requests that the cited violation be rescinded in writing at MDEQ-AQD's earliest opportunity.

In conclusion, Consumers Energy believes that the items identified in the violation notice do not constitute violations of the applicable legal requirements cited. If you have any questions, or would like additional information, please contact Amy Kapuga at 517-788-2201. Please note that Mr. Gregory has taken a new role at CE and we are in the process of transferring the responsible official duties for the St. Clair Compressor Station to Gregory Baustian. Please address any future correspondence to Mr. Baustian.

Sincerely,

Gregory Baustian Consumers Energy Company Ex. Manager of Gas Compression and Storage

Attachments

cc: Ms. Amy Kapuga, Senior Engineer – CE Air Quality
Mr. James Walker, Senior Engineer Lead – CE Air Quality
Mr. Scott Sinkwitts, Corporate Counsel, CE
Mr. Michael Vigrass, Manager Gas Compression, CE
Mr. Dominic Tomasino, Sr. Field Leader, CE
Mr. Brian Mauzy, Field Leader, CE St. Clair Compressor Station