



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GRETHER  
DIRECTOR

April 2, 2018

Mr. Gregory Baustian  
Consumers Energy - Zeeland Generating Station  
425 North Fairview Road  
Zeeland, MI 49464

SRN: B6637, Saint Clair County

Dear Mr. Baustian:

**VIOLATION NOTICE**

On February 27, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Consumers Energy - Saint Clair Compressor Station located at 10021 Marine City Highway, Ira Township, Michigan. The purpose of this inspection was to determine Consumers Energy - Saint Clair Compressor Station'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; the conditions of Permit to Install (PTI) number 106-14; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B6637-2015;

During the inspection of February 27, 2018, and per the ROP report certification received by the AQD on March 12, 2018, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUENGINE2-4	MI-ROP-B6637-2015, FGENGINES-P2, VI.3, VI.4.d VI.5.b and c, and 40 CFR 63.10(b)(2)(vii).	Permittee failed to collect catalyst inlet temperature data between July 18, 2017, and August 24, 2017.

During this inspection, Consumers Energy - Saint Clair Compressor Station was unable to produce catalyst inlet temperature data records for EUENGINE2-4 for the date range of July 18, 2017, through August 24, 2017, as required per ROP table FGENGINES-P2, special condition VI.2. FGENGINES-P2, special condition VI.2 states, *"For each stationary RICE with oxidation catalyst, the permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record, on a continuous basis and according to the requirements in 40 CFR 63.6625(b) and 40 CFR 63.6635, the temperature at the inlet of the catalyst for each stationary RICE."*

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During this inspection, Consumers Energy - Saint Clair Compressor Station was unable to produce records of the 4-hour rolling average for the catalyst inlet temperature for EUENGINE2-4 for the date range of July 18, 2017, through August 24, 2017, as required per FGENGINES-P2, special condition VI.3. FGENGINES-P2, special condition VI.3. states, *"For each stationary RICE with oxidation catalyst, the permittee shall keep, in a satisfactory manner, records of the 4-hour rolling average for each catalyst inlet temperature as required by SC VI.2. All records shall be kept on file for a period of at least five years (at least two years at the site) and made available to the Department upon request."*

During this inspection, Consumers Energy - Saint Clair Compressor Station was unable to produce CPMS records for the date range of July 18, 2017, through August 24, 2017, as required per FGENGINES-P2, special condition VI.4.d, which states in part, *"The permittee shall keep the following records: For each CEMS or CPMS, records described in 40 CFR 63.10(b)(2)(vi) through (xi)."* 40 CFR 63.10(b)(2)(vii) states in part, *"The owner or operator of an affected source subject to the provisions of this part shall maintain relevant records for such source of all required measurements needed to demonstrate compliance with a relevant standard."*

During this inspection, Consumers Energy - Saint Clair Compressor Station was unable to produce records for EUENGINE2-4 for the date range of July 18, 2017, through August 24, 2017, as required per FGENGINES-P2, special condition VI.5.b and c. FGENGINES-P2. Special condition VI.5 states in part, *"For each engine in FGENGINES-P2, the permittee shall demonstrate continuous compliance with each applicable emission and operating limitation as specified in Table 6 to 40 CFR, Part 63, Subpart ZZZZ, by:*

- b. Collecting the catalyst inlet temperature data according to 40 CFR 63.6625(b); and*
- c. Reducing these data to 4-hour rolling averages."*

The deficiencies cited above are violations of the recordkeeping requirements specified in Special Condition numbers FGENGINES P-2, VI.3, VI.4.d VI.5.b and c of ROP number MI-ROP-B6637-2015, and 40 CFR 63.10(b)(2)(vii).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 27, 2018. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Consumers Energy 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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of February 27, 2018. 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,

A handwritten signature in cursive script, appearing to read "Robert Elmouchi".

Robert Elmouchi  
Environmental Quality Analyst  
Air Quality Division  
586-753-3736

cc/via e-mail: Mr. Brian Mauzy, Consumers Energy  
Ms. Amy Kapuga, Consumers Energy  
Mr. Gerald F. Rand, Jr., Consumers Energy  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Chris Ethridge, DEQ  
Ms. Joyce Zhu, DEQ