



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 15, 2022

VIA EMAIL AND CERTIFIED MAIL-RETURN RECEIPT

Janna Spitz
Consumers Energy Company
2219 Chapin Street
Jackson, Michigan 49203
Dear Janna Spitz:

SRN: N6626, Jackson County

VIOLATION NOTICE

On December 1, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), met with Consumers Energy Co. - Jackson Generating Station (JGS) located at 2219 Chapin St., Jackson, Michigan. The purpose of this meeting was to discuss the findings of a self-audit JGS conducted as part of their quarterly Electronic Data Report (EDR) review to ensure 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-N6626-2019a.

Staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGLMDB1-6 - Six (6) combined-cycle natural gas-fired CTGs each equipped with a HRSG.	R 336.1205(1)(a) & (b)/ SC I.10	After recent data revisions done by Consumers Energy, the 12 month rolling total CO mass emissions for May 2021 was 360.3 tons, exceeding the limit of 360.0 tons.

During a routine quarterly EDR review for JGS, it was determined that the duct burner hourly average fuel flow rate was not being calculated correctly for certain hours. They determined the hourly average duct burner fuel flow to always be based upon 60 minutes, regardless of the actual duct burner operating time in the hour. They worked with their DAHS vendor and determined that the duct burner fuel flow hourly average calculation channel was pointing to the incorrect operating time, namely the combined cycle operating time instead of the duct burner operating time. JGS recalculated the emissions and notified

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EPA to update the emissions previously reported under 40 CFR Part 75 (Acid Rain and CSAPR) and Part 98 (Mandatory Greenhouse Gas Reporting Rule).

JGS determined during this time that they had exceeded the 12 month rolling total CO mass emissions for May 2021, with 360.3 tons of CO, exceeding the limit of 360.0 tons. JGS then contacted AQD to update their 2022 MAERS submittal and submit revised deviation reports for 2021, showing this deviation.

JGS has since updated their DAHS, so the emissions will be correctly calculated. They also have set an internal operational limit for the 12-month rolling total limits to a minimum of 1.0% of the emission limit. The actions taken to correct the cited violation appear appropriate to bring this facility back into compliance.

If JGS 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 violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Brian Carley
Environmental Quality Specialist
Air Quality Division
517-416-4631

cc: Jason Prentice, Consumers Energy
Doug Mallory, Consumers Energy
James Walker, Consumers Energy
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Scott Miller, EGLE