

March 10, 2021

Ms. Caryn Owens
Environmental Engineer
Michigan Department of Environment, Great Lakes and Energy
Air Quality Division, Cadillac District Office
120 West Chapin Street
Cadillac, MI 49601-2158

RE: J. H. Campbell Generating Complex (SRN B2835) ROP Administrative Amendment

The J. H. Campbell Generating Complex (JH Campbell) is located at 17000 Croswell Street, West Olive, Michigan, and is currently operating pursuant to the terms and conditions of MI-ROP-B2835-2020a. Last week, Consumers Energy discovered an error in the ROP for Zeeland Generating Station regarding certain maintenance requirements for existing compression ignition (CI) engines subject to 40 CFR Part 63, Subpart ZZZZ. When discussing this matter with EGLE, it was noted that the EGLE ROP template for such engines was in a state of flux in 2020. As a result, Consumers Energy has reviewed other ROPs issued in 2020 for this same error, and we have found another example of the error in the ROP for JH Campbell.

Specifically, EUCAT3DIESEL Condition III.1 is as follows:

1. The permittee shall:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2;
 - b. Inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If the emergency engine is being operated during an emergency and it is not possible to shut down the engine to perform the work practice standards on the schedule required, the work practice standard can be delayed until the emergency is over. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. **(40 CFR 63.6602, 40 CFR Part 63, Subpart ZZZZ, Table 2c, Item 6)**

CI engines such as EUCAT3DIESEL don't have spark plugs. Based upon a closer review of Subpart ZZZZ, Table 2c, it would appear as though Item 6 (pertaining to spark ignition engines) of Table 2c was inadvertently referenced instead of Item 1. As such, spark plugs are referenced rather than the air cleaner, as would be applicable to compression ignition engines.

This matter was discussed on March 4, 2021 with yourself and Ms. Kaitlyn DeVries of the EGLE Grand Rapids District Office in relation to a compression ignition engine at the Zeeland Generating Station. As part of that discussion, EGLE acknowledged the error in this same condition language and stated that simply changing "spark plugs" to "air cleaner" within said condition could be accomplished via a Rule 216(1)(a)(i)-(iv) Administrative Amendment. EGLE further confirmed that submittal of this Administrative Amendment prior to March 15, 2021 would obviate any need to report a related deviation in the 2nd 2020 semi-annual ROP monitoring and deviation report with regard to the erroneous condition language (note that the required air cleaner inspection was conducted in 2020).

Please find the attached ROP Administrative Amendment. Consumers Energy respectfully requests that the word "spark plugs" in EUCAT3DIESEL, Condition III.1.b be changed to "air cleaner", and that the underlying applicable requirement for this condition be revised from Subpart ZZZZ, Table 2c, Item 6 to Subpart ZZZZ, Table 2c, Item 1.

If any further information is required for the attached ROP Administrative Amendment, please feel free to contact me at 517-788-1467 or jason.prentice@cmsenergy.com or Mr. Kevin Starcken at 616-738-3241 or kevin.starcken@cmsenergy.com.

Sincerely,



Jason M. Prentice
Environmental Planner
Consumers Energy Company

cc: Ms. Kaitlyn DeVries, EGLE Grand Rapids District Office
NJHoffman, JH Campbell (Electronic Only)
KDStarcken, JH Campbell (Electronic Only)
MEGruber, Karn Weadock Admin. Bldg. (Electronic Only)



Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division

RENEWABLE OPERATING PERMIT APPLICATION C-001: CERTIFICATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to provide this information may result in civil and/or criminal penalties. Please type or print clearly.


This form is completed and included as part of Renewable Operating Permit (ROP) initial and renewal applications, notifications of change, amendments, modifications, and additional information.

Form Type C-001	SRN B2835
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Stationary Source Name J H Campbell Generating Complex	
City West Olive	County Ottawa

SUBMITTAL CERTIFICATION INFORMATION	
1 Type of Submittal <i>Check only one box</i>	
<input type="checkbox"/> Initial Application (Rule 210)	<input checked="" type="checkbox"/> Notification / Administrative Amendment / Modification (Rules 215/216)
<input type="checkbox"/> Renewal (Rule 210)	<input type="checkbox"/> Other, describe on AI-001
2 If this ROP has more than one Section, list the Section(s) that this Certification applies to _____	
3 Submittal Media <input checked="" type="checkbox"/> E-mail <input type="checkbox"/> FTP <input type="checkbox"/> Disk <input type="checkbox"/> Paper	
4 Operator's Additional Information ID - Create an Additional Information (AI) ID that is used to provide supplemental information on AI-001 regarding a submittal	
AI	

CONTACT INFORMATION	
Contact Name Kevin D Starken	Title Air Quality Lead
Phone number 616-738-3241	E-mail address kevin.starken@cmsenergy.com

This form must be signed and dated by a Responsible Official.				
Responsible Official Name Nathan J Hoffman			Title Plant Business Manager	
Mailing address 17000 Croswell Street				
City West Olive	State MI	ZIP Code 49460	County Ottawa	Country USA
As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate and complete.				
 _____ Signature of Responsible Official			3/10/2021 _____ Date	



RENEWABLE OPERATING PERMIT M-001: RULE 215 CHANGE NOTIFICATION RULE 216 AMENDMENT/MODIFICATION APPLICATION

This information is required by Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment.

1. SRN B2835	2. ROP Number MI-ROP-B2835-2020a	3. County Ottawa
4. Stationary Source Name J.H. Campbell Generating Complex		
5. Location Address 17000 Croswell Street		6. City West Olive
<p>7. Submittal Type - <i>The submittal must meet the criteria for the box checked below. Check only one box. Attach a mark-up of the affected ROP pages for applications for Rule 216 changes.</i></p> <p><input type="checkbox"/> Rule 215(1) Notification of change. Complete Items 8 – 10 and 14</p> <p><input type="checkbox"/> Rule 215(2) Notification of change. Complete Items 8 – 10 and 14</p> <p><input type="checkbox"/> Rule 215(3) Notification of change. Complete Items 8 – 11 and 14</p> <p><input type="checkbox"/> Rule 215(5) Notification of change. Complete Items 8 – 10 and 14</p> <p><input checked="" type="checkbox"/> Rule 216(1)(a)(i)-(iv) Administrative Amendment. Complete Items 8 – 10 and 14</p> <p><input type="checkbox"/> Rule 216(1)(a)(v) Administrative Amendment. Complete Items 8 – 14. Results of testing, monitoring & recordkeeping must be submitted. See detailed instructions.</p> <p><input type="checkbox"/> Rule 216(2) Minor Modification. Complete Items 8 – 12 and 14</p> <p><input type="checkbox"/> Rule 216(3) Significant Modification. Complete Items 8 – 12 and 14, and provide any additional information needed on ROP application forms. See detailed instructions.</p> <p><input type="checkbox"/> Rule 216(4) State-Only Modification. Complete Items 8 – 12 and 14</p>		
8. Effective date of the change. (MM/DD/YYYY) <i>See detailed instructions.</i> 03/10/2021		9. Change in emissions? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>10. Description of Change - <i>Describe any changes or additions to the ROP, including any changes in emissions and/or pollutants that will occur. If additional space is needed, complete an Additional Information form (AI-001).</i></p> <p>Emission unit EUCAT3DIESEL applies to an emergency stationary compression ignition (CI) RICE located at a major source of HAPs that was installed or reconstructed before June 12, 2006 (i.e., existing CI RICE). In the September 3, 2020 revision of the ROP, Condition III.1.b mistakenly references “spark plugs” in lieu of “air cleaner”.</p>		
<p>11. New Source Review Permit(s) to Install (PTI) associated with this application? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If Yes, enter the PTI Number(s) _____ - _____ - _____ - _____ - _____</p>		
<p>12. Compliance Status - <i>A narrative compliance plan, including a schedule for compliance, must be submitted using an AI-001 if any of the following are checked No.</i></p> <p>a. Is the change identified above in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>b. Will the change identified above continue to be in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>c. If the change includes a future applicable requirement(s), will timely compliance be achieved? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>		
13. Operator's Additional Information ID - <i>Create an Additional Information (AI) ID for the associated AI-001 form used to provide supplemental information.</i>		AI
14. Contact Name Kevin D. Starken	Telephone No. 616-738-3241	E-mail Address kevin.starken@cmsenergy.com
<p>15. This submittal also updates the ROP renewal application submitted on ____/____/____ <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A <i>(If yes, a mark-up of the affected pages of the ROP must be attached.)</i></p>		

NOTE: A CERTIFICATION FORM (C-001) SIGNED BY A RESPONSIBLE OFFICIAL MUST ACCOMPANY ALL SUBMITTALS

For Assistance
Contact: 800-662-9278

www.michigan.gov/egle