

October 3, 2019

Mr. Robert Elmouchi, Environmental Quality Analyst
Michigan Department of Environment, Great Lakes, and Energy – Air Quality Division
Warren District Office
27700 Donald Court
Warren, MI 48092-2793

**Re: Consumers Energy Company's Ray Compressor Station (B6636)
Response to Violation Notice, Dated September 19, 2019**

Dear Mr. Elmouchi:

Consumers Energy Company (CE) is providing this written response to the Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Violation Notice, dated September 19, 2019, in reference to the Plant 1 glycol dehydration system (Dehy) located at CE's Ray Compressor Station in Armada, Michigan. Within the Ray Compressor Station Renewable Operating Permit (ROP), the Dehy is identified as EUGLYCDEHYD01 and is included in FGDEHYHHH.

Cited Violation:

Process Description – EUGLYCDEHYD01

Alleged Rule/Permit Condition Violated – MI-ROP-B6636-2015a, FGDEHYHHH, SC III.4.b, III.5, VI.9.

Comments – Permittee failed to maintain compliance with the daily average of the temperature monitoring parameter for eleven (11) days from 1/12/2019 [sic] through 1/31/2019.

CE Response:

The "Comments" above and the Violation Notice incorrectly identifies the start date of this issue as 1/12/19. The correct date is 1/21/19. An alarm triggered at Plant 1 on Monday, 1/21/2019, indicating that the temperature of the thermal oxidizer combustion chamber was below the operational set point. The Operator on duty acknowledged (silenced) the alarm, intending to investigate and respond; however, the Operator was addressing other alarms and did not complete the investigation into the temperature alarm at that time. Since the alarm had been acknowledged (silenced), it did not continue to audibly alarm. During periodic rounds on 1/30/2019, the Field Leader questioned the silenced alarm and started investigating. Corrective actions included the immediate replacement of the temperature controller on the thermal oxidizer. In addition, the Field Leader met with all site personnel to review the operating parameter requirements and to reinforce the importance of addressing each alarm as expeditiously as possible. GRI-GLYCalc was utilized to verify that the benzene, toluene, ethylbenzene and xylene (BTEX) emission limit was not exceeded.

Cited Violation:

Process Description – EUGLYCDEHYD01

Alleged Rule/Permit Condition Violated – MI-ROP-B6636-2015a, FGDEHYHHH, SC III.4.b, III.5, VI.9.

Comments – Permittee failed to maintain compliance with the daily average of the temperature monitoring parameter for three (3) days from 2/16/2019 through 2/18/2019.

CE Response:

Temperature swings in the thermal oxidizer combustion chamber triggered an alarm at Plant 1 on Saturday, 2/16/2019. After arriving on-site to address the alarm, the on-call Operator contacted on-call leadership for support. The on-call Field Leader was from a different area and was not aware of the unit-specific operating temperature for the thermal oxidizers at the Ray Station. Since the temperature was above 1400°F, which is the minimum temperature required at the on-call Field Leader's area, the alarm was erroneously cleared and no further action was taken. The temperatures continued to swing until Monday morning 2/18/2019, when a review of the alarm log from the weekend identified an issue. Corrective actions included increasing the set point on the temperature controller for the thermal oxidizer combustion chamber and changing the alarm to trigger sooner to allow more time to respond. Additional training was provided to on-call personnel regarding unit-specific operating parameters, notably the thermal oxidizer minimum operating temperature. Also, the minimum operating temperatures for each glycol dehydration unit are now posted in the control room to alleviate any confusion. GRI-GLYCalc was utilized to verify that the BTEX emission limit was not exceeded.

CE notes that both of these items were isolated in nature and no emission limits were exceeded. Additionally, the root cause of each of these two incidents has been properly addressed to prevent reoccurrence as evidenced by there have been no repeat incidents since February. If you have any questions, or would like additional information, please contact Amy Kapuga at 517-788-2201.

Sincerely,



Gregory Baustian
Consumers Energy Company
Ex. Director of Gas Compression and Generation

cc: Ms. Jenine Camilleri, Enforcement Unit Supervisor, EGLE, PO Box 30260, Lansing, MI 48909-7760
Mr. Scott Sinkwitts, Corporate Counsel, CE
Mr. Dominic Tomasino, Sr. Field Leader, CE
Mr. Charles Kelly, Field Leader, CE Ray Compressor Station
Ms. Amy Kapuga, Senior Engineer – CE Air Quality
Mr. James Walker, Senior Engineer Lead – CE Air Quality