

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Consumers Energy Co. - Jackson Generating Station	SRN : N6626
Location : 2219 CHAPIN ST	District : Jackson
	County : JACKSON
City : JACKSON State: MI Zip Code : 49203	Compliance Status : Compliance
Source Class : MAJOR	Staff : Brian Carley
FCE Begin Date : 3/1/2020	FCE Completion Date : 3/15/2021
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
03/03/2021	On-site Inspection	Compliance	Scheduled compliance inspection
02/03/2021	Excess Emissions (CEM)	Compliance	Semi-annual Excess Emissions & Monitoring System Performance/Summary Reports - 40 CFR 60.7(c) They reported no excess emissions for the reporting period. The report is acceptable as submitted.
02/03/2021	MACT (Part 63)	Compliance	Existing CI RICE, HP>500, Non-Black Start, Standby Diesel Generator at Area Source of HAP - 40 CFR 63, subpart ZZZZ They reported no deviations for the reporting period. The report is acceptable as submitted.
12/17/2020	MACT (Part 63)	Compliance	Performance Test Notification for 3 March, 2021 emergency diesel generator (emission unit EUEDG) performance testing at the Jackson Generating Station in Jackson MI. Notification of intent to conduct a subsequent performance test for the facility MACTZZZZ, Emergency Diesel Generator.
11/30/2020	ROP Semi 1 Cert	Compliance	All monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.

Activity Date	Activity Type	Compliance Status	Comments
09/22/2020	Excess Emissions (CEM)	Compliance	Semi Annual excess emissions and monitoring report They reported no excess emission during the reporting period. The report is acceptable as submitted.
09/22/2020	MACT (Part 63)	Compliance	Report for existing CI RICE, HP>500, non-black start, standby diesel generator at area source of HAP - 40 CFR63 subpart ZZZZ They reported no deviations. The report is acceptable as submitted.
06/10/2020	Scheduled Inspection	Compliance	Scheduled Biennial Inspection
05/05/2020	ROP SEMI 2 CERT	Compliance	They reported one deviation for the reporting period. EUEADB7, on July 28, 2020 did not activate and sustain the dry low NOx technology within the prescribed 2 hours. They reported that they corrected the issue and additional alarms were installed. The unit will also be programed in the fall of 2020 to not operate at high load without the control in operation as required with the potential of having shut itself down to minimize emissions in the case of operator inaction. No enforcement action is necessary. The report is acceptable as submitted.
05/05/2020	ROP Annual Cert	Compliance	They reported one deviation for the reporting period. EUEADB7, on July 28, 2020 did not activate and sustain the dry low NOx technology within the prescribed 2 hours. They reported that they corrected the issue and additional alarms were installed. The unit will also be programed in the fall of 2020 to not operate at high load without the control in operation as required with the potential of having shut itself down to minimize emissions in the case of operator inaction. No enforcement action is necessary. The report is acceptable as submitted.

Activity Date	Activity Type	Compliance Status	Comments
04/14/2020	MAERS	Compliance	<p>With the permission of Jason Prentice (Consumers Energy), I corrected the fuel usage for EUEDFP from 0.2458 E3 gallons to 0.2548 E3 gallons. I had also asked about the SO2 emission factor for the same unit. Jason responded "In essence, the SO2 emissions from a diesel engine should not really vary based upon the size of the engine, and should instead be a function of the sulfur content of the diesel. The AP-42 SO2 factor/MAERS factor for diesel engines less than 600 hp does not account for the sulfur content of the fuel. If you back calculate a sulfur content in order to arrive at the stated factor for engines less than 600 hp, you get 0.30% by weight sulfur, and this is simply not reflective of the diesel being used in EUDFP." I determined that this is an acceptable explanation and concluded the report is acceptable as submitted.</p>

Name: Brian Culey Date: 3/15/21

Supervisor: 