

State Registration Number

B6636

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number

MI-ROP-B6636-2020b

Consumers Energy Company - Ray Compressor Station

State Registration Number (SRN): B6636

Located at

69333 Omo Road, Armada, Macomb County, Michigan 48005

Permit Number: MI-ROP-B6636-2020b

Staff Report Date: October 12, 2020

Amended Dates: October 12, 2022
February 23, 2023

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) of the administrative rules promulgated under Act 451, requires that the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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State Registration Number

B6636

RENEWABLE OPERATING PERMIT

ROP Number

MI-ROP-B6636-2020

OCTOBER 12, 2020 - STAFF REPORT

Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with an ROP pursuant to Title V of the federal Clean Air Act; and Michigan’s Administrative Rules for Air Pollution Control promulgated under Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source’s applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This Staff Report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft ROP terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft ROP pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

General Information

Stationary Source Mailing Address:	Consumers Energy Company - Ray Compressor Station 69333 Omo Road Armada, Michigan 48005
Source Registration Number (SRN):	B6636
North American Industry Classification System (NAICS) Code:	486210
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201900176
Responsible Official:	Avelock Robinson, Director Gas Compression Operations 586-716-3326
AQD Contact:	Kerry Kelly, Senior Environmental Quality Analyst 586-506-9817
Date Application Received:	October 16, 2019
Date Application Was Administratively Complete:	October 16, 2019
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	October 12, 2020
Deadline for Public Comment:	November 11, 2020

Source Description

Consumers Energy Company - Ray Compressor Station is a natural gas storage and transmission facility located in northern Macomb County Michigan. The ROP contains requirements for three glycol dehydration units (EUGLYCDEHYD01, EUGLYCDEHYD02, EUDEHY3), six engines (EUENGINE2-7, EUENGINE31, EUENGINE32, EUENGINE33, EUENGINE34, EUENGINE35) and two turbines (EUTURBINE2-5, EUTURBINE2-6), two boilers (EUAUXBLR2-7, EUBOILER3), six pipe heaters (EUPIPEHTR1, EUPIPEHTR2, EUPIPEHTR3, EUPIPEHTR4, EUPIPEHEATER31, EUPIPEHEATER32), three process heaters (EUDEHYBLR1, EUDEHYBLR2, EUDEHY3REBLR), two fuel gas heaters (EUFGHEATER, EUFGHTR-P1) and two emergency generator engines (EUAUXGEN2-7, EUEMERGGEN3). Other processes at the facility that are not subject to any process-specific emission limits or standards in any applicable requirement are listed in the "Processes in Application Not Identified in Draft ROP" section of this Staff Report. The area surrounding Ray Compressor Station is rural and the nearest residence is located approximately one-tenth of a mile east of the station.

The compressor engines and turbines are natural gas-fired and range in size from 3,100 HP to 6,000 HP and are used to drive compressors to pump natural gas into and out of underground rock formations. Normally natural gas is injected into the storage field using the compressors between April and November and is ready for withdraw and distribution to customers between November and March. Natural gas will free flow early in the withdrawal season when the storage field pressure is greater than the pipeline pressure. The gas needs to be pumped out, using compressors powered by two natural gas-fired internal combustion engines, later in the season as the pressure decreases within the storage field.

During the storage period, the natural gas absorbs hydrocarbons and moisture while in the formation. The facility has installed three glycol dehydration systems to remove moisture and hydrocarbons from the gas before sending it to the pipeline system for customers. When natural gas is taken out of storage at a higher pressure than the pipeline pressure, the water in the gas can freeze in the pipeline. The six natural gas-fired pipe heaters are used to prevent the water in the gas from freezing. The gas from the field goes through scrubbers where some of the liquids fall out of the gas. Next the gas goes through glycol dehydration process.

In the glycol dehydration process, natural gas is pumped into one of the contact towers where it crosses a series of glycol trays. The glycol in these trays absorbs moisture and hydrocarbons in the natural gas and the dry gas is then sent to a pipeline. The rich glycol, containing moisture and hydrocarbons, accumulates at the bottom of each tower and is sent to a 3-Phase separator, also referred to as the flash tank, to remove entrained gas and hydrocarbon liquid. From the 3-Phase separator, the resulting glycol is sent through filters before being sent to the reboiler unit. The reboiler heats the glycol to drive off moisture. The resulting lean glycol is recirculated back to a surge tank and then to the glycol contact towers.

Each glycol dehydration unit contains two process vents: the flash tank vent and the vent from the reboiler still. The ROP contains conditions allowing for the emissions from the flash tank to be directed to the reboiler burner for fuel or to a thermal oxidizer. Consumers has indicated that they stopped burning emissions from the flash tank in the reboiler and currently send all flash tank emissions to the thermal oxidizer. Emissions from the reboiler go through the reboiler still and then are sent to the thermal oxidizer for volatile organic compound (VOC) destruction.

EUAUXBLR2-7 and EUBOILER3 are used for space heating and EUAUXGEN2-7 and EUEMERGGEN3 is used for power generation in the event of a power outage.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2019**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	2.8
Lead (Pb)	0
Nitrogen Oxides (NO _x)	18.4
Particulate Matter (PM)	0.3
Sulfur Dioxide (SO ₂)	0.2
Volatile Organic Compounds (VOCs)	3.2

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2019 by Consumers Energy Company:

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
Benzene	0.0069

**As listed pursuant to Section 112(b) of the federal Clean Air Act.

See Parts C and D in the ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

Regulatory Analysis

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

Macomb County is currently designated by the United States Environmental Protection Agency (USEPA) as a non-attainment area with respect to the eight-hour ozone standard.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because the potential to emit of carbon monoxide and nitrogen oxides exceeds 100 tons per year and the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act, is equal to or more than 10 tons per year and/or the potential to emit of all HAPs combined is equal to or more than 25 tons per year.

EUDEHY3, EUEMERGGEN3, EUBOILER3, EUENGINE31, EUENGINE32, EUENGINE33, EUENGINE34, EUENGINE35, EUPIPEHEATER31, EUPIPEHEATER32, EUAUXGEN2-7 at the stationary source were subject to review under the Prevention of Significant Deterioration regulations of 40 CFR 52.21, because at the time of New Source Review permitting the potential to emit of nitrogen oxides was greater than 250 tons per year.

The source has applicable requirements for GHG as a result of review under the Prevention of Significant Deterioration regulations. These Best Available Control Technology (BACT) requirements for GHG are included in the ROP. The mandatory Greenhouse Gas Reporting Rule under 40 CFR Part 98 is not an ROP applicable requirement and is not referenced in the ROP.

MI-ROP-B6636-2015 was modified in 2016 to remove EUENGINE1-2 and EUENGINE1-3 from the ROP because the engines were disconnected and abandoned in place. EUFGHTR-P1 was added to the ROP during the 2016 modification as well. EUFGHTR-P1 was installed November 18, 2015 and subject to 40 CFR Part 63, Subparts A and DDDDD.

MI-ROP-B6636-2015a included six requirements deemed Non-Applicable in Part E. In particular 40 CFR 63, Subpart ZZZZ for EUENGINE2-7, 40 CFR 60.334(a), 40 CFR 60.7(c), 40 CFR 60.7(d), 40 CFR 60.13, and 40 CFR 63, Subparts A and YYYYY for FGTURBINES. In the application for the renewal of MI-ROP-B6636-2015, Consumers indicated that there are not any specific requirements that the source proposes to be identified in the ROP as nonapplicable. As a result, the Non-Applicable requirements were removed from the Draft ROP.

EUEMERGGEN3, EUENGINE31, EUENGINE32, EUENGINE33, EUENGINE34, and EUENGINE35 at the stationary source are subject to the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines promulgated in 40 CFR Part 60, Subparts A and JJJJ.

EUBOILER3 at the stationary source is subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units promulgated in 40 CFR Part 60, Subparts A and Dc.

EUTURBINE2-5 and EUTURBINE2-6 at the stationary source are subject to the Standards of Performance for Stationary Gas Turbines promulgated in 40 CFR Part 60, Subparts A and GG.

EUFGHEATER, EUAUXBLR2-7, EUDEHYBLR1, EUDEHYBLR2, EUDEHY3REBLR, EUFGHTR-P1, EUPIPEHTR1, EUPIPEHTR2, EUPIPEHTR3, EUPIPEHTR4, EUPIPEHEATER31, EUPIPEHEATER32, and EUBOILER3 at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters promulgated in 40 CFR Part 63, Subparts A and DDDDD.

EUAUXGEN2-7, EUEMERGGEN3, EUENGINE31, EUENGINE32, EUENGINE33, EUENGINE34, EUENGINE2-7 and EUENGINE35 at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ. Per 40 CFR 63.6590(b)(3)(i), EUENGINE2-7 does not have to meet the requirements of 40 CFR Part 63, Subparts A and ZZZZ, including initial notification requirements because it is an existing spark ignition, two-stroke lean burn stationary engine greater than 500 HP located at a major source of HAP. Per 40 CFR 63.6590(b)(3)(iii), EUAUXGEN2-7 does not have to meet the requirements of 40 CFR Part 63, Subparts A and ZZZZ, including initial notification requirements because it is an existing emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP.

EUGLYCDEHYD01, EUGLYCDEHYD02 and EUDEHY3 at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities promulgated in 40 CFR Part 63, Subparts A and HHH.

PSD BACT for NO_x for EUENGINE31, EUENGINE32, EUENGINE33, EUENGINE34, and EUENGINE35 was determined to be good combustion practices/lean burn combustion technology supplied by the engine manufacturer, the manufacturer's guarantee of 0.5 g NO_x/HP-Hr is the BACT emission limitation.

PSD BACT for VOCs for EUENGINE31, EUENGINE32, EUENGINE33, EUENGINE34, and EUENGINE35 was determined to be an emission limitation and the use of an oxidation catalyst which will reduce VOC emissions by up to 70%. The oxidation catalyst along with good combustion practices will minimize VOC emissions from the engines.

PSD BACT for NO_x for the pipeline heaters and EUBOILER3 was determined to be the use of a low-NO_x burner. An emission limitation that is based on the use of a low-NO_x burner is included in the permit. PSD BACT for VOCs for the pipeline heaters and EUBOILER3 was determined to be an emission limitation based on good combustion practices.

PSD BACT for VOCs for EUDEHY3 was determined to be an emission limitation and the use of a thermal oxidizer with a minimum control efficiency of 98%. PSD BACT for NOx for the fuel burning equipment associated with the dehydrator system was determined to be an emission limitation that is based on good combustion practices. A NOx limit has been included in the permit.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the "Procedure for Evaluating Periodic Monitoring Submittals."

FGGLYCDEHYDS, EUDEHY3, EUENGINE31, EUENGINE32, EUENGINE33, EUENGINE34 and EUENGINE35 do not have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64, because the unit(s) do not have potential pre-control emissions over the major source thresholds. The major source thresholds for CO and VOC are 100 tons/year and the major source threshold for a single HAP is 10 tons/year. VOC and benzene emissions from the units in FGGLYCDEHYDS and EUDEHY3 are controlled by a thermal oxidizer. The potential pre-control VOC emissions from FGGLYCDEHYDS and EUDEHY3 were determined using data from GRI-GlyCalc. The potential pre-control VOC emissions from FGGLYCDEHYDS are 70 tons/year based on data from GRI-GlyCalc using the worst-case operating parameters and worst-case gas sample data between 2016 and 2020 as inputs to the model. The potential pre-control benzene emissions from EUGLYCDEHYD01 and EUGLYCDEHYD02 are 2.0 tons/year per unit based on data from GRI-GlyCalc using the worst-case operating parameters and worst-case gas sample data between 2016 and 2020 as inputs to the model. The potential pre-control VOC and benzene emissions from EUDEHY3 are 63.8 tons/year and 3.1 tons/year respectively based on GRI-GlyCalc data using the worst-case operating parameters and worst-case gas sample data between 2016 and 2020 as inputs to the model. CO and VOC emissions from EUENGINE31, EUENGINE32, EUENGINE33, EUENGINE34 and EUENGINE35 are controlled by two-way oxidation catalyst. The pre-control potential CO and VOC emissions were calculated using stack test data from the engine with the highest pre-control CO and VOC rate since 2014. The potential pre-control CO and VOC rate per engine is 96.17 tons/year and 28.81 tons/year, respectively.

The emission limitation(s) or standard(s) for CO at the stationary source with the underlying applicable requirement(s) of 40 CFR 63.6600(b) from EUENGINE31, EUENGINE32, EUENGINE33, EUENGINE34 and EUENGINE35 is exempt from the federal Compliance Assurance Monitoring (CAM) regulation pursuant to 40 CFR 64.2(b)(1)(i) because the National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subpart ZZZZ meet(s) the CAM exemption for NSPS or MACT proposed after November 15, 1990.

The emission limitation(s) or standard(s) for BTEX at the stationary source with the underlying applicable requirement(s) of 40 CFR 63.1275(b)(1)(iii) from EUGLYCDEHYD01, EUGLYCDEHYD02 and EUDEHY3 is exempt from the federal Compliance Assurance Monitoring (CAM) regulation pursuant to 40 CFR 64.2(b)(1)(i) because the National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities promulgated in 40 CFR Part 63, Subpart HHH meet(s) the CAM exemption for NSPS or MACT proposed after November 15, 1990.

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

Source-Wide Permit to Install (PTI)

Rule 214a requires the issuance of a Source-Wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. MI-ROP-B6636 are identified in Appendix 6 of the ROP.

PTI Number			
287-04	448-97	828-93	1018-92
480-85	26-82	206-09	

Streamlined/Subsumed Requirements

This ROP does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

Non-applicable Requirements

Part E of the ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the ROP Application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the ROP pursuant to Rule 213(6)(a)(ii).

Processes in Application Not Identified in Draft ROP

The following table lists processes that were included in the ROP Application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EUMAINBLDBLR	Natural gas-fired main building boiler (300,000 BTU/hr)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUMAINBLDHTR	Natural gas-fired radiant heater for main building (100,000 BTU/hr)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUGASBLDHTR	Natural gas-fired heater for gas analysis building (70,000 BTU/hr)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUSTRBLDHTRS	Two (2) natural gas-fired heaters for storage building (100,000 BTU/hr)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUHOTWATERHTR	Natural gas-fired hot water heater for main building (40,000 BTU/hr)	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EUCONDTNKS	Seven (7) brine/condensate above ground storage tanks	R 336.1212(4)(d)	R 336.1282(2)(e)
EUTEGTANKS	Six (6) triethylene glycol (TEG) aboveground storage tanks	R 336.1212(4)(d)	R 336.1282(2)(i)
EUGASTANK	One (1) 500-gallon gasoline above ground storage tank	R 336.1212(4)(d)	R 336.1282(2)(g)(i)
EULPGTK	One (1) 1,000-gallon liquid propane above ground storage tank	R 336.1212(4)(d)	R 336.1282(2)(b)

Draft ROP Terms/Conditions Not Agreed to by Applicant

This draft ROP does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

Action taken by EGLE, AQD

The AQD proposes to approve this ROP. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the USEPA is allowed up to 45 days to review the draft ROP and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Joyce Zhu, Warren District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the ROP Application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

State Registration Number

B6636

RENEWABLE OPERATING PERMIT

NOVEMBER 13, 2020 - STAFF REPORT ADDENDUM

ROP Number

MI-ROP-B6636-2020

Purpose

A Staff Report dated October 12, 2020, was developed to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by Rule 214(1) of the administrative rules promulgated under Act 451. The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in Rule 214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

Responsible Official:	Avelock Robinson, Director Gas Compression Operations 586-716-3326
AQD Contact:	Kerry Kelly, Senior Environmental Quality Analyst 586-506-9817

Summary of Pertinent Comments

During the 30-day public comment period Consumers Energy commented that emission units cited in FGBLRMACTSMALL Special Condition (SC) III.3 are not correct. FGBLRMACTSMALL SC III.3 pertains to boilers/process heaters with a heat input of equal to or less than 5 MMBtu/hour, however, in the Draft ROP, emission units greater than 5 MMBtu/hour were included (EUPIPEHTR1, EUPIPEHTR2, EUPIPEHTR3, EUPIPEHTR4) and two units with equal to or less than 5 MMBtu/hour (EUDEHY3REBLR, EUFGHTR-P1) were not included.

Changes to the October 12, 2020 Draft ROP

The emission units cited in FGBLRMACTSMALL SC III.3 were changed from EUFGHEATER, EUAUXBLR2-7, EUDEHYBLR1, EUDEHYBLR2, EUPIPEHTR1, EUPIPEHTR2, EUPIPEHTR3, EUPIPEHTR4 to EUFGHEATER, EUAUXBLR2-7, EUDEHYBLR1, EUDEHYBLR2, EUDEHY3REBLR, EUFGHTR-P1.

State Registration Number

B6636

RENEWABLE OPERATING PERMIT

ROP Number

MI-ROP-B6636-2020a

OCTOBER 12, 2022 - STAFF REPORT FOR RULE 216(1)(a)(i)-(iv) ADMINISTRATIVE AMENDMENT

Purpose

On December 30, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B6636-2020 to Consumers Energy Company - Ray Compressor Station pursuant to Rule 214 of the administrative rules promulgated under Act 451. Once issued, a company is required to submit an application for changes to the ROP as described in Rule 216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to Rule 216(1)(a)(i-iv).

General Information

Responsible Official:	Avelock Robinson, Director Gas Compression Operations 586-716-3326
AQD Contact:	Caryn Owens, Senior Environmental Engineer 231-878-6688
Application Number:	202200183
Date Application for Administrative Amendment was Submitted:	September 26, 2022

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for an Administrative Amendment pursuant to Rule 216(1)(a)(i).

Description of Changes to the ROP

This Administrative Amendment No. 202200183 was to fix a typographical error in the emission unit description of EUAUXBLR2-7. The Emission Unit Description for EUAUXBLR2-7 in the Emission Unit Summary Table, was updated to better align with the applicability for work practice standards for boilers with a heat input capacity of less than or equal to 5 million BTU per hour per the NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters promulgated in 40 CFR Part 63, Subparts A and DDDDD. The NESHAP categorizes boilers to one significant figure based on heat input capacity. The heat input capacity from the nameplate of EUAUXBLR2-7 is 5234 MBTU/hr, which rounds to 5 MMBTU/hr. Therefore, to correct the typo and prevent potential confusion for compliance with the work practice standards, the heat input capacity was updated from 5.0 MMBTU/hr to 5 MMBTU/hr in the ROP Emission Unit Summary Description.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Administrative Amendment to the ROP.

Action Taken by EGLE

The AQD approved an Administrative Amendment to ROP No. MI-ROP-B6636-2020, as requested by the stationary source. The delegated decision maker for the AQD is the District Supervisor.

State Registration Number
B6636

RENEWABLE OPERATING PERMIT
FEBRUARY 23, 2023 - STAFF REPORT FOR RULE
216(2) MINOR MODIFICATION

ROP Number
MI-ROP-B6636-2020b

Purpose

On October 12, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B6636-2020a to Consumers Energy Company - Ray Compressor Station pursuant to Rule 214 of the administrative rules promulgated under Act 451. Once issued, a company is required to submit an application for changes to the ROP as described in Rule 216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to Rule 216(2).

General Information

Responsible Official:	Avelock Robinson, Director Gas Compression Operations 586-716-3326
AQD Contact:	Caryn Owens, Senior Environmental Engineer 231-878-6688
Application Number:	202300021
Date Application for Minor Modification was Submitted:	January 31, 2023

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to Rule 216(2).

Description of Changes to the ROP

Minor Modification Application Number 202300021 was to remove the following equipment from Plant 2: EUENGINE2-7, EUTURBINE2-5 and EUTURBINE2-6, and therefore, the associated conditions and flexible groups from FGTURBINES and FGLOADLIMIT, were removed from the ROP.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

Action Taken by EGLE

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-B6636-2020a, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the United States Environmental Protection Agency (USEPA) has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is the District Supervisor. The final determination for approval of the Minor Modification will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by any affected states or the USEPA.