



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 15, 2022

VIA EMAIL ONLY

Avelock Robinson, Director Gas Compression Operations
Consumers Energy Company - Muskegon River Compressor Station
8613 Pine Road
Marion, Michigan 49665

SRN: N2901, Clare County

Dear Avelock Robinson:

VIOLATION NOTICE

On October 6, 2022, a performance test was conducted on a natural gas-fired Solar Taurus 70 combustion turbine-driven compressor unit, identified as EUTURBINE2-2, at Consumers Energy Company’s – Muskegon River Compressor Station (Consumers). Testing was conducted to evaluate compliance with Title 40 of the Code of Federal Regulations (40 CFR), Part 63, Subpart YYYY, National Emissions Standards for Hazardous Air Pollutants for Stationary Combustion Turbines and Permit to Install (PTI) Number 16-21A.

The deadline for the compliance demonstration was no later than 180 days from March 9, 2022, which was September 5, 2022. Consumers submitted a testing extension request for EUTURBINE2-2 to the USEPA on September 2, 2022. In the extension request, Consumers stated the events causing the missed deadline may qualify for the “force majeure” provisions of 40 CFR 63.7(a)(4). Consumers requested a testing extension from September 5, 2022 to December 31, 2022.

On December 6, 2022, the USEPA provided a written response denying the request from Consumers for an extension of the initial performance test deadline for EUTURBINE2-2. As a result of EPA’s denial of the extension request, the initial compliance demonstration completed on October 6, 2022, was 31 calendar days late from the September 5, 2022, deadline.

Process Description	Rule/Permit Condition Violated	Comments
Initial performance test for formaldehyde emission rates from EUTURBINE2-2	PTI No. 16-21A, FGMACTYYYY, Special Condition V. 1.	An initial performance test for formaldehyde emission rates was required no later than September 5, 2022. The initial performance test was completed on October 6, 2022.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 5, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor, at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Consumers 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,



Nathanael Gentle
Environmental Quality Analyst
Air Quality Division
gentlen@michigan.gov
989-778-0025

cc: Amy Kapuga, Consumers
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Chris Hare, EGLE