



March 5, 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: Zeeland Generating Station (SRN N6521) Change in Responsible Official
and ROP Administrative Amendment

Zeeland Generating Station is located at 425 N. Fairview Road, Zeeland, Michigan, and is currently operating pursuant to the terms and conditions of MI-ROP-N6521-2020. The facility had previously provided EGLE notice that Mr. Loren Barnes was serving as a Responsible Official (RO) for the facility.

This letter is to inform you that Mr. Loren Barnes has taken a new position within Consumers Energy. Effective February 1, 2021, Mr. Jason Ricketts, former Plant Manager at Jackson Generating Station, has been appointed as the Zeeland Generating Station Plant Manager and will assume Responsible Official (RO) duties at the facility. The contact information for Mr. Ricketts is provided below.

Mr. Jason L. Ricketts
Plant Manager, Zeeland Generating Station
425 N. Fairview Road,
Zeeland, MI 49464
Ph: 616-237-4001 (Office); 517-740-6597 (Cell)
Fax: 616-772-6729
E-mail: Jason.L.Ricketts@cmsenergy.com

Please note that as Mr. Barnes served as Plant Manager throughout 2020, he may still sign off as the RO on certain reports that relate to his historic tenure at the Zeeland Generating Station. Specifically, he may sign off on the 2020 MAERS report and the 2nd semi-annual/annual ROP monitoring and deviation report, both of which are associated with time periods when he served as the Plant Manager of the facility. Please let me know if EGLE has any questions or concerns with this approach.

It is presumed that this letter fulfils the obligation under R 336.1215(5) to provide EGLE with contemporaneous written notification of the change in the RO as previously identified for the facility, but please let me know if anything else is required in this regard.

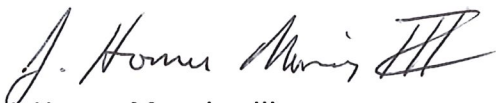
An ROP Administrative Amendment is also attached. When finalizing the ROP records review for the 2nd semi-annual ROP monitoring and deviation report, an error in the ROP renewal issued back on May 14, 2020 was discovered. Specifically, FGCIRICEMACT Condition III.8 is as follows: "For existing emergency CI RICE, the permittee shall inspect the spark plugs every 1000 hours of operation or annually, whichever comes first, and replace as necessary. **(40 CFR 63.6602, 40 CFR 63.6603(a) and Table 2d))**"

Compression ignition (CI) engines such as EUFIREPUMP (the only emission unit included in the FGCIRICEMACT flexible group) don't have spark plugs. Based upon a closer review of Subpart ZZZZ, Table 2d (see category 4. in the table), the work practice standards for emergency CI engines consist of the following: oil and filter changes every 500 hours or annually¹; air cleaner inspection and replacement, if necessary, every 1,000 hours or annually¹; and hose and belt inspection and replacement, if necessary, every 500 hours or annually¹.

This matter was discussed on March 4, 2021, with yourself and Ms. Kaitlyn DeVries of the EGLE Grand Rapids District Office. As part of that discussion, EGLE acknowledged the error in FGCIRICEMACT, Condition III.8 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).

If any further information is required for either the change in RO or the attached ROP Administrative Amendment, please feel free to contact me at 616-237-4004 (homer.manningiii@cmsenergy) or Jason Prentice at 517-788-1467 (jason.prentice@cmsenergy.com).

Sincerely,



J. Homer Manning III
Environmental Health and Safety Specialist
Zeeland Generating Station, Consumers Energy Company

cc: Ms. Kaitlyn DeVries, EGLE Grand Rapids District Office (Electronic Only)
JLRicketts, Zeeland Generating Station (Electronic Only)
JMPrentice, Consumers Energy (Electronic Only)

¹ Whichever comes first.



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.

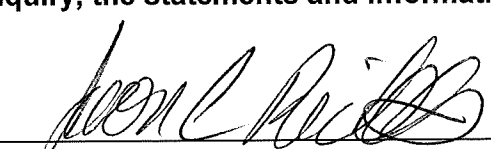
This form is completed and included as part of Renewable Operating Permit (ROP) initial and renewal applications, notifications of change, amendments, modifications, and additional information.

Form Type C-001	SRN N6521
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Stationary Source Name Zeeland Generating Station	
City Zeeland	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 J. Homer Manning	Title Environmental Health & Safety Specialist
Phone number 616-237-4004	E-mail address homer.manningiii@cmsenergy.com

This form must be signed and dated by a Responsible Official.				
Responsible Official Name Jason L. Ricketts			Title Plant Manager	
Mailing address 425 Fairview Road				
City Zeeland	State MI	ZIP Code 49464	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			_____ 3/5/21 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 N6521	2. ROP Number MI-ROP-N6521-2020	3. County Ottawa
4. Stationary Source Name Zeeland Generating Station		
5. Location Address 425 Fairview Road		6. City Zeeland
<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. <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> Rule 215(2) Notification of change. <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> Rule 215(3) Notification of change. <i>Complete Items 8 – 11 and 14</i></p> <p><input type="checkbox"/> Rule 215(5) Notification of change. <i>Complete Items 8 – 10 and 14</i></p> <p><input checked="" type="checkbox"/> Rule 216(1)(a)(i)-(iv) Administrative Amendment. <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> Rule 216(1)(a)(v) Administrative Amendment. <i>Complete Items 8 – 14. Results of testing, monitoring & recordkeeping must be submitted. See detailed instructions.</i></p> <p><input type="checkbox"/> Rule 216(2) Minor Modification. <i>Complete Items 8 – 12 and 14</i></p> <p><input type="checkbox"/> Rule 216(3) Significant Modification. <i>Complete Items 8 – 12 and 14, and provide any additional information needed on ROP application forms. See detailed instructions.</i></p> <p><input type="checkbox"/> Rule 216(4) State-Only Modification. <i>Complete Items 8 – 12 and 14</i></p>		
8. Effective date of the change. (MM/DD/YYYY) <i>See detailed instructions.</i> 03/05/2021		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>Flexible group FGCIRICEMACT applies to emergency stationary compression ignition (CI) RICE located at an area source of HAPs which were installed or reconstructed before June 12, 2006 (i.e., existing CI RICE). In the May 25, 2020 ROP renewal, Condition III.8 mistakenly references "spark plugs" in lieu of "air cleaner".</p>		
11. New Source Review Permit(s) to Install (PTI) associated with this application?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes, enter the PTI Number(s) _____ - _____ - _____ - _____ - _____		
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>		
a. Is the change identified above in compliance with the associated applicable requirement(s)?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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
c. If the change includes a future applicable requirement(s), will timely compliance be achieved?		<input type="checkbox"/> Yes <input type="checkbox"/> No
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	Telephone No.	E-mail Address
J. Homer Manning	616-237-4004	homer.manningiii@cmsenergy.com
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>		

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