DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

FCE Summary Report

Facility: Consumers Energy - Ray Compressor Station	SRN:	B6636
Location: 69333 OMO RD.	District :	Warren
	County :	MACOMB
City: ARMADA State: MI Zip Code: 48005 Compli		Compliance
Source Class: MAJOR Staff	: Robert	Elmouchi
FCE Begin Date: 1/1/2019 FCE Date	Completion :	9/28/2020
Comments: The permittee appears to be in compliance wit all even	valuated perr	nit conditions.

List of Partial Compliance Evaluations:

Activity Date	Activity Type	Compliance Status	Comments
09/28/2020	ROP Semi 1 Cert	Compliance	Zero deviations reported.

08/26/2020	ROP Other	Compliance	Continuous Compliance Test Report
			CPMS DOWNTIME Duration of Downtime (minutes): 4530 [3.15 days] Percent of Operating Time: 4.18 One event: 7/3/2017 8:00 a.m. to 7/6/2017 11:30 a.m. Reason: DTE transformer failure on X-Phase failed to trip main breakers causing complete power outage at station.
			Emission Unit: EUENGINE3-4 Parameter: Temperature Interval: 4-HR ROLLING Limit: 450 F to 1350 F
			CPMS DEVIATIONS Number of Deviation Events: 0 Duration of Event (minutes): 0 Percent of Operating Time: 0
			CPMS DOWNTIME Duration of Downtime (minutes): 4530 [3.15 days] Percent of Operating Time: 4.82
			One event: 7/3/2017 8:00 a.m. to 7/6/2017 11:30 a.m. Reason: DTE transformer failure on X-Phase failed to trip main breakers causing complete power outage at station.
			Emission Unit: EUENGINE3-5 Parameter: Temperature Interval: 4-HR ROLLING Limit: 450 F to 1350 F
			CPMS DEVIATIONS Number of Deviation Events: 0 Duration of Event (minutes): 0 Percent of Operating Time: 0
			CPMS DOWNTIME Duration of Downtime (minutes): 4530 [3.15 days] Percent of Operating Time: 5.26
			One event: 7/3/2017 8:00 a.m. to 7/6/2017 11:30 a.m. Reason: DTE transformer failure on X-Phase failed to trip main breakers causing complete power

08/26/2020	ROP Other	Compliance	outage at station. (end)
08/26/2020	MACT (Part 63)	Compliance	Compliance Test Report for FGENGINES3. 40 CFR Part 63 Subpart ZZZZ, Continuous Compliance Test Report for EUENGINE31, EUENGINE32, EUENGINE33, EUENGINE34, and EUENGINE35.
07/31/2020	ROP Tech Review Notes		
07/31/2020	Release Reports	Non Compliance	National Response Center, Incident Report # 1283199. Reports indicates an emergency natural gas release occurred at this source on July 5, 2020. I spoke with Ms. Carmella King on Friday, July 31, 2020. Ms. King stated that Consumers Energy had not yet determined the amount of natural gas that was vented on July 5, 2020. Ms. King stated that she expects to be able to report to me on Tuesday, August 4, 2020, about the volume of natural gas released on July 5, 2020. A violation notice was issued.
06/16/2020	Stack Test Observation	Compliance	CO emission reduction tests of FGENGINES3.
06/15/2020	ROP R215 Notification	Compliance	Change of Responsible Official: Mr. Avelock Robinson Change of Authorized Representative: Mr. Dominic Tomasino
05/06/2020	MAERS	Compliance	MAERS Certification form received March 15, 2020.
04/16/2020	ROP Other	Compliance	EUEMERGGEN3 Testing Extension Request - Notification of Force Majeure under the abiding of Governor Whitmer's "Stay at Home" Order due to the COVID- 19 pandemic.
03/19/2020	MACT (Part 63)	Compliance	Semi-Annual CPMS Compliance Report.
03/19/2020	MACT (Part 63)	Compliance	Compliance Test Report, 40 CFR Part 63, Subpart HHH - EUGLYCDEHYD01 and EUGLYCDEHYD02.
03/19/2020	MAERS	Compliance	MAERS Report Submission.

Activity Date	Activity Type	Compliance Status	Comments
03/19/2020	ROP Annual Cert	Non Compliance	Because Consumers Energy implemented corrective actions to prevent a corrective actions to prevent a recurrence of operator error. I applied enforcement discretion because the deviation has been corrected.
03/19/2020	ROP SEMI 2 CERT	Compliance	Zero deviations reported.
03/19/2020	MACT (Part 63)	Compliance	Semi-Annual CPMS Compliance Report.

03/19/2020	ROP Other	Compliance	Annual Compliance Report; Major Source Boiler.
			CPMS DOWNTIME Duration of Downtime (minutes): 4530 [3.15 days] Percent of Operating Time: 4.18 One event: 7/3/2017 8:00 a.m. to 7/6/2017 11:30 a.m. Reason: DTE transformer failure on X-Phase failed to trip main breakers causing complete power outage at station.
			Emission Unit: EUENGINE3-4 Parameter: Temperature Interval: 4-HR ROLLING Limit: 450 F to 1350 F
			CPMS DEVIATIONS Number of Deviation Events: 0 Duration of Event (minutes): 0 Percent of Operating Time: 0
			CPMS DOWNTIME Duration of Downtime (minutes): 4530 [3.15 days] Percent of Operating Time: 4.82
			One event: 7/3/2017 8:00 a.m. to 7/6/2017 11:30 a.m. Reason: DTE transformer failure on X-Phase failed to trip main breakers causing complete power outage at station.
			Emission Unit: EUENGINE3-5 Parameter: Temperature Interval: 4-HR ROLLING Limit: 450 F to 1350 F
			CPMS DEVIATIONS Number of Deviation Events: 0 Duration of Event (minutes): 0 Percent of Operating Time: 0
			CPMS DOWNTIME Duration of Downtime (minutes): 4530 [3.15 days] Percent of Operating Time: 5.26
			One event: 7/3/2017 8:00 a.m. to 7/6/2017 11:30 a.m. Reason: DTE transformer failure on X-Phase failed to trip main breakers causing complete power

03/19/2020	ROP Other	Compliance	outage at station. (end)
03/19/2020	MACT (Part 63)	Compliance	40 CFR Part 63, Subpart ZZZZ Semiannual CPMS Compliance Report 40 CFR Part 63, Subpart HHH Semiannual Periodic Report
01/31/2020	MACT (Part 63)	Compliance	40 CFR Part 63, Subpart HHH Compliance Test Report - EUDEHY3 BTEX Emission limit = 1.9 Mg/yr. BTEX Emission RATE = <0.02 Mg/yr. Minimum Combustion Chamber Temperature = 1,530 F.
01/30/2020	Scheduled Inspection	Compliance	Scheduled inspection.
12/13/2019	MACT (Part 63)	Compliance	Semi-Annual Periodic Report. A violation notice has been issued for operating FGDEHYHHH while thermal oxidizer combustion chamber was below the operational set point on two dates. The violations have been resolved.
11/19/2019	ROP Other	Compliance	Notice of force majeure regarding EUGLYCDEHYD02 because of fire damage caused on January 30, 2019. Testing is currently scheduled to occur about April 30, 2020, or within 30 calendar days following commissioning of the unit.
10/11/2019	ROP Other	Compliance	Emissions Test Report Review
10/11/2019	ROP Other	Compliance	TEST PROTOCOL - Ray Compressor Station. Test protocol for verification of system performance in compliance with 40 CFR Section 63.1281(f)(1). Testing is scheduled to occur during the week of December 2, 2019.

Activity Date	Activity Type	Compliance Status	Comments
09/16/2019	ROP Semi 1 Cert	Non Compliance	EUGLYCDEHYD01: Permittee reported two events; the first event occurred from 1/21/2019 through 1/31/2019 for a duration of 11 days. The second event occurred from 2/16/2019 through 2/18/2019, for a duration of 3 days. The deviation description for both events was that the daily average combustion chamber temperature fell below the minimum established operating value for EUGLYCDEHYD01. The reason for the multiple day duration was the operator, or oncall person, silenced the alarm. The permittee indicated corrective actions after the first event included replacement of a temperature controller on the thermal oxidizer and review of operating parameters with site personnel.
09/16/2019	MACT (Part 63)	Compliance	Semi-Annual CPMS (Continuous Parametric Monitoring System) Compliance Report for EUENGINE3-1 through EUENGINE3-5. Permittee reported zero exceedances, zero monitor downtime, and zero deviations.
09/12/2019	ROP Semi 1 Cert	Compliance	Zero deviations reported.
09/06/2019	Release Reports	Compliance	Planned natural gas release greater than 1 million standard cubic feet at 8550 Fish Lake Road, Holly, MI 48442. This report was entered under SRN: B6636 because it appears to be the closest Consumers Energy facility. Reported by Walter Bies III on 9/6/20019 via email. Location: 8550 Fish Lake Road, Holly, MI 48442. Scheduled date: 9/8/2019. Planned release amount: 1.300 MMCF. Cause: Scheduled pipeline remediation.
06/11/2019	Stack Test Observation	Compliance	EUENGINES3 emission test.
06/06/2019	MACT (Part 63)	Compliance	Semi-Annual Periodic Report (40 CFR Part 63, Subpart HHH - NESHAP for Natural Gas Transmission & Storage Facilities).

Activity Date	Activity Type	Compliance Status	Comments
04/22/2019	Release Reports	Compliance	Release valve blow that resulted in release of 1,020 MMCF of natural gas. This event occurred on 4/22/2019 at approximately 11:49 hours. Release report was submitted to PEAS by Camella King, Consumers Energy, tel. 989-280-2963.
03/19/2019	MAERS	Compliance	MAERS Certification form received March 13, 2019.

03/19/2019	ROP Other	Compliance	Annual Compliance Report; Major Source Boiler.
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03/19/2019	ROP Other	Compliance	outage at station. (end)
03/19/2019	ROP Annual Cert	Non Compliance	Three of the deviations relate to data acquisition, which is planned to be corrected by installing a new server. The annual boiler tune-up was 33 days late and recurrence of this deviation has been addressed through employee training. The 5th deviation relates to reporting an emergency gas release greater than 1 MMCF within 24 hours. Repeat deviations may result in the issuance of a violation notice.
03/19/2019	ROP SEMI 2 CERT	Non Compliance	Three of the deviations relate to data acquisition, which is planned to be corrected by installing a new server. The annual boiler tune-up was 33 days late and recurrence of this deviation has been addressed through employee training. The 5th deviation relates to reporting an emergency gas release greater than 1 MMCF within 24 hours. Repeat deviations may result in the issuance of a violation notice.

02/19/2019	Release Reports	Compliance	The AQD received an emergency
02/19/2019	incicase nepuls	Соприансе	release report via PEAS. The report stated the following in part: From: HQS-PF-fldr-NRC@uscg.mil Sent: Tuesday, February 19, 2019
			10:29:40 AM (UTC-05:00) Eastern Time (US & Canada) To: DEQ-PEAS; Wolf, Jennifer (DNR); Eickholt, Jay (DEQ);
			Schleusener, Paul (DEQ); Bradt, Dana (DEQ) Subject: NRC#1238054
			NATIONAL RESPONSE CENTER 1-800-424- 8802 ***GOVERNMENT USE
			ONLY***GOVERNMENT USE ONLY*** Information released to a
			third party shall comply with any applicable federal and/or state Freedom of Information and Privacy Laws
			Incident Report # 1238054
			INCIDENT DESCRIPTION
			*Report taken by NRC at 10:23 on 19-FEB-19 Incident Type: PIPELINE Incident Cause: UNKNOWN Affected Area: Incident occurred on 19-FEB-19 at 02:43 local incident time. Affected Medium: AIR
			REPORTING PARTY
			Name: CARMELLA KING Organization: CONSUMERS ENERGY Address: 1945 WEST
			PARNALL RD JACKSON, MI Email Address:
			carmella.king@cmsenergy.com PRIMARY Phone: (989)2802963
			ALTERNATE Phone: (989) 2779435
			Type of Organization: PUBLIC UTILITY

02/19/2019	Release Reports	Compliance	SUSPECTED RESPONSIBLE PARTY Name: CARMELLA KING Organization: CONSUMERS ENERGY Address: 1945 WEST PARNALL RD JACKSON, MI PRIMARY Phone: (989) 2802963ALTERNATE Phone: (989)2779435 Type of Organization: PUBLIC UTILITY
			INCIDENT LOCATION 69333 OMO ROAD County: MACOMB City: ARMADA State: MI
			RELEASED MATERIAL(S) CHRIS Code: ONG Official Material Name: NATURAL GAS Also Known As: Qty Released: 8.2 MMCF
			DESCRIPTION OF INCIDENT CALLER REPORTED 8.2 MMCF OF NATURAL GAS WAS RELEASED TO THE AIR FROM A PIPELINE ON A COMPRESSOR STATION DUE TO AN UNKNOWN CAUSE.

02/02/2019	Release Reports	Compliance	R 285mm(iv) report of the emergency venting of 4.3 NNCF of natural gas.
			PEAS incident notification text excerpt: IN: 2019-01-31 09:50 am RXD PEAS Incident Number: 20190131-095054 Source: A Brief Description: Call Type:Take Report Current Date: 2019-01-31 Time: 09:50:44 Day: Agent: RXD Status: OFFICE HOURS IsTime: TRUE IsDay: TRUE District Office: Southeast Mi Description of Incident, include injuries, fatalities, evacuations: Natural Gas Release At 69333 Omo Rd In Armada, Mi.
			Complainant Name: Carmella King Complainant Co Name: Consumers Energy Complainant Address: 1945 Parnall Rd Complainant City: Jackson Complainant State: MI Complainant Phone: (989)280-2963 Complainant Phone(alt):
			Party Involved - Contact Name: Consumers Energy Party Involved Company: Consumers Energy Party Involved Street Address:1945 Parnall Rd Party Involved City: Jackson Party Involved State: MI Party Involved Phone: (989)280 -2963 Party Involved Phone:
			Incident Location Str address: 69333 Omo Rd Incident Cross Streets: 32nd Mile Rd Incident City or Township: Armada Incident County: Macomb District Southeast Mi

02/02/2019	Release Reports	Compliance	
	·	·	Occurred Date: 01/30/2019
			Occurred Time: 10:25 AM
			Incident Ongoing: No
			Name of Body of Water, Drain or
			Ditch Involved:
			Name of Pollutant: Natural Gas
			Amount Released to Air: 4.3
			Million Particles
			Quantity Released to Ground:
			Quantity Released to Water:
			Cleanup Contractor Name: No
			Release Secured: Yes

Name: Mate: September 29, 2020 Supervisor: