



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 10, 2020

Mr. Aveolock Robison
Director - Gas Compression Operations
Consumers Energy
10021 Marine City Highway
Ira, Michigan 48023-1005

SRN: B6636, Macomb County

Dear Mr. Avelock:

VIOLATION NOTICE

On July 30, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), was informed by Consumers Energy that an emergency venting of natural gas had occurred on July 5, 2020, at Consumers Energy - Ray Compressor Station located at 69333 Omo Road, Armada, Michigan. On August 3, 2020, the AQD was informed that the amount of natural gas released during the emergency venting was 1.49 MMCF (million cubic feet). Per communication with Consumers Energy and a review of the pollution emergency alert system records, it was determined that Consumers Energy failed to notify the pollution emergency alert system within 24 hours of an emergency pipeline venting of natural gas in amounts greater than 1,000,000 standard cubic feet.

The conditions of Renewable Operating Permit (ROP) number MI-ROP-B6636-2015a, FG-RULE285(mm) VII.6, and R 336.1285(2)(mm)(iv) require the permittee to notify the pollution emergency alert system (PEAS) within 24 hours of an emergency pipeline venting.

The permittee appears to be in violation of the following:

Process Description	Rule/Permit Condition Violated	Comments
Emergency venting of 1.49 MMCF of natural gas.	MI-ROP-B6636-2015a, FG-RULE285(mm) VII.6, and R 336.1285(2)(mm)(iv)	Permittee failed to notify the pollution emergency alert system within 24 hours of an emergency pipeline venting of natural gas in amounts greater than 1,000,000 standard cubic feet.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 31, 2020. 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, Warren District, at 27700 Donald Court, Warren, Michigan 48092, and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Consumers Energy 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 and for the cooperation that was extended to me. 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,



Robert Elmouchi
Senior Environmental Quality Analyst
Air Quality Division
586-854-3244

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE
Mr. Dominic Tomasino, Consumers Energy
Ms. Amy Kapuga, Consumers Energy
Ms. Carmella King, Consumers Energy