



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



DAN WYANT
DIRECTOR

December 18, 2013

Mr. Ocie Gregory, Jr.
Consumers Energy
4600 Coolidge Highway
Royal Oak, Michigan 48073

SRN: N5573, St. Joseph County

Dear Mr. Gregory:

VIOLATION NOTICE

On December 10, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), met with representatives of Consumers Energy, White Pigeon Compressor Station (Facility), located at 68536 A Road, Route 1, White Pigeon, Michigan. The purpose of this meeting was to discuss the Facility's compliance with the requirements of the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines found in 40 CFR, Part 60, Subpart JJJJ.

Staff of the AQD has determined the following violations:

Process Description	Rule/Permit Condition Violated	Comments
EUEMERGGEN	40 CFR 60.4243(b)(2)(ii)	Initial performance test was not performed.
EUENGINE1, EUENGINE2, EUENGINE3, EUENGINE4	40 CFR 60.4243(b)(2)(ii)	Initial performance test was not performed for volatile organic compounds (VOC); performance test for oxides of nitrogen (NOx) performed late (after 180 days).
EUEMERGGEN, EUENGINE1, EUENGINE2, EUENGINE3, EUENGINE4	60 CFR 4245(c)	Initial Notification not submitted.

Five engines at White Pigeon Compressor Station are subject to the federal Standards of Performance for New Sources for Stationary Spark Ignition Internal Combustion Engines. These standards are found in Title 40 of the Code of Federal Regulations (CFR), Part 60, Subpart JJJJ. These engines were not certified by the manufacturer. The engines are EUEMERGEN, EUENGINE1, EUENGINE2, EUENGINE3, and EUENGINE4. An initial performance test for carbon monoxide (CO), NOx, and VOC was required for these engines within 180 days after initial startup according to 40 CFR, 60.4243(b)(2)(ii), and 40 CFR, 60.8(a). On October 5 and 6, 2010, the four non-emergency engines were tested for CO. This may satisfy the initial testing requirement for CO. The initial performance test was not performed for

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EUEMERGEN. For the four non-emergency engines, the initial performance test was not performed for VOC. On March 30 and 31, 2011, the four non-emergency were tested for NOx. This test occurred after the 180 day timeline required by 40 CFR, 60.8(a).

An Initial Notification was required by 40 CFR, 60.4245(c). This notification has not been received.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 10, 2014. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If the Facility 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 violations cited above. If you have any questions regarding the violations or the actions necessary to bring the Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Dennis Dunlap
Environmental Quality Specialist
Air Quality Division
269-567-3553

DD:CF

cc: Ms. Amy Kapuga, Consumers Energy
Mr. James Walker, Consumers Energy
Mr. Jason Prentice, Consumers Energy
Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ