



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



DAN WYANT
DIRECTOR

May 21, 2014

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

SRN: N5573, St. Joseph County

Dear Mr. Gregory:

VIOLATION NOTICE

On March 11 and 12, 2014, Consumers Energy, White Pigeon Compressor Station (Facility) located at 68536 A Road, Route 1, White Pigeon, Michigan, conducted stack testing on EUENGINE2, EUENGINE3, and EUENGINE4. The parameters tested for included nitrogen oxides (NOx), volatile organic compounds (VOC) and carbon monoxide (CO) removal efficiency. The purpose of this testing was to determine the Facility's compliance with the requirements of 40 CFR Part 63 Subpart ZZZZ and 40 CFR Part 60 Subpart JJJJ. In addition, Renewable Operating Permit (ROP) number MI-ROP-N5573-2013 contains emission limits for NOx and CO removal efficiency. The testing was halted on March 12, 2014, was restarted on March 14, 2014, and was completed on March 16, 2014. The re-testing included EUENGINE1, EUENGINE2, EUENGINE3, and EUENGINE4. EUEMERGEN was tested on April 2, 2014.

The testing was halted on March 12, 2014, because the NOx emission rate was higher than expected for EUENGINE3 and EUENGINE4, and the CO removal efficiency was lower than expected for EUENGINE2 and EUENGINE4. EUENGINE2 completed two test runs and was not tested for VOC until after the testing restarted on March 14, 2014.

From the test results, it appears that emission limits based on ROP number MI-ROP-N5573-2013, were not met for EUENGINE2 (CO removal efficiency), EUENGINE3 (NOx), and EUENGINE4 (CO removal efficiency and NOx) during the initial testing on March 11 and 12, 2014. EUENGINE2 and EUENGINE4 did not achieve the minimum CO removal efficiency of the 93 percent required by 40 CFR 63.6600(b), listed in Table 2a of the regulation (40 CFR Part 63 Subpart ZZZZ); these are summarized in the table below.

In addition, the Michigan Department of Environmental Quality, (MDEQ) Air Quality Division (AQD), was not notified of the re-test date. Rule 1001(4) requires notifying the AQD not less than 7 days before performance tests are conducted so that a representative of the MDEQ has the opportunity to witness the tests. This is also summarized in the table below.

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Process Description	Rule/Permit Condition Violated	Comments
EUENGINE2	Special Condition (SC) I.3. of permit MI-ROP-N5573-2013; 40 CFR 63.6600(b) Table 2a	Carbon monoxide reduction efficiency not achieved.
EUENGINE3	SC I.1. of permit MI-ROP-N5573-2013	NOx emission limit exceeded.
EUENGINE4	SC I.1, SC I.3. of permit MI-ROP-N5573-2013; 40 CFR 63.6600(b) Table 2a	Carbon monoxide reduction efficiency not achieved; NOx emission limit exceeded.
EUENGINE1, EUENGINE2, EUENGINE3, EUENGINE4	R 336.2001(4) (Rule 1001(4))	AQD was not notified of the re-test dates of March 14-16.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **June 10, 2014**, which coincides with 21 calendar days from the date of this letter. 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; 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 this facility into compliance, please contact me at the number listed below.

Sincerely,



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

cc: Ms. Mary Douglas, DEQ
cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ