

**GRETCHEN WHITMER** 

GOVERNOR

## STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY



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LIESL EICHLER CLARK DIRECTOR

March 2, 2022

UPS NEXT DAY DELIVERY

Ms. Janna Spitz Plant Business Manager Consumers Energy – Jackson Generating Station 2219 Chapin Street Jackson, Michigan 49203

SRN: N6626; Jackson County

## **VIOLATION NOTICE**

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) reviewed the July 2021 through December 2021 semi-annual Continuous Emission Monitoring (CEMS) Downtime and Excess Emission Report submitted electronically on January 27, 2022, by Consumers Energy – Jackson Generating Station located at 2219 Chapin Street in Jackson. The Renewable Operating Permit Number MI-ROP-N6626-2019a requires the facility to monitor and record nitrogen oxides (NO<sub>x</sub>), and carbon monoxide (CO), from EULMDB3 (FGLMDB1-6) on a continuous basis in a manner and with instrumentation acceptable to the AQD. This unit is also subject to Title 40 of the Code of Federal Regulations (40 CFR), Part 60, Subpart GG New Source Performance Standards (NSPS) for stationary combustion turbines, and Part 97 Cross State Air Pollution Rule (CSAPR).

During review of the July 2021 through December 2021 semi-annual CEMS report, the AQD evaluated compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) Numbers MI-ROP-N6626-2019a and MI-PTI-N6626-2019a.

The July 2021 through December 2021 semi-annual excess emissions report indicated that there was an extended period of monitor downtime. During the review, the following violations were identified:

	Rule/Permit	
Process Description	Condition Violated	Comments
EULMDB3, combined-cycle	FGLMDB1-6, SC VI.2, SC VI.3,	Fourth quarter 2021 NO <sub>x</sub>
natural-gas fired combustion	SC VI.13	monitor downtime was
turbine generator		17.0% of the operating time
		for the reporting period
	Rule/Permit	
Process Description	Condition Violated	Comments
EULMDB3, combined-cycle	FGLMDB1-6, SC VI.4, SC VI.5,	Fourth quarter 2021 CO
natural-gas fired combustion	SC VI.13	monitor downtime was
turbine generator		17.0% of the operating time
		for the reporting period

## **VIOLATION NOTICE**

Ms. Janna Spitz Page 2 March 2, 2022

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 23, 2022 (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 and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. 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 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,

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Lindsey Wells Technical Programs Unit Field Operations Section Air Quality Division 517-282-2345 WellsL8@Michigan.gov

cc: Mr. Douglas Mallory, Consumers Energy Mr. Jason Prentice, Consumers Energy Ms. Sarah Marshall, EPA Region 5 Ms. Mary Ann Dolehanty, EGLE Dr. Edward Olaguer, EGLE Mr. Christopher Ethridge, EGLE Ms. Karen Kajiya-Mills, EGLE Ms. Jenine Camilleri, EGLE Mr. Brian Carley, EGLE Mr. Scott Miller, EGLE