

Tuscola Energy, Inc.

920 North Water Street, Suite 213
Bay City, Michigan 48708

3/8/2024

Mr. Daniel A. McGeen
Environmental Quality Analyst
EGLE, AQD

Re: Response to Violation Notice: February 15, 2024 – SRN: B5462

Dear Mr. Daniel A. McGeen

Below I have provided our responses to the Violation Notice.

Response to Violation Notice dated February 15, 2024

<u>Allegation</u>	<u>Response</u>
In-shed hydrogen sulfide (H ₂ S) monitors were not operating.	Sheds at the gas plant are no longer in use. Dismantling of the buildings will begin this spring.
Required records of maintenance were not being kept.	Created a maintenance record file/folder for the office out in the field that will be kept up to date by the pumpers
Required records of daily visible emission checks were not being kept, and staff were not trained to recognize the 20% opacity threshold for corrective action	We are signing up for Smoke School through Eastern Technical Associates to have a lecture about opacity and field training for employees to become certified. We are trying to schedule classes in March or April. Once we have this figured out, we will then create a daily track keeping of daily visible emissions. We have now sent multiple emails to debbie@smokeschool.com and are waiting for a response.
No sign was posted with emergency contact numbers for local and state police and ambulance service	In addition to the signs posted to contact our office in case of an emergency that were already posted, we have posted the emergency contact numbers (911) for local and state police and ambulance service.
The facility's emergency procedures plan was not reviewed with appropriate local emergency personnel prior to June 1 of 2023	Have tried calling fire department to have them come out to review the facilities emergency procedures plan. Currently still waiting on a response from them. Hoping to have this scheduled by the end of March 2024.

<p>Intermittent, frequent opacity from flare indicates control device is not maintained or operated in a satisfactory manner.</p>	<p>We have cleaned out the gas line and sucked out the drip tank to remove fluid from lines. This is given a more consistent gas flow to the flare.</p>
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Respectfully submitted,

Tuscola Energy, Inc.

By: 

Jeffrey M. Adler - President