



GRETCHEN WHITMER  
GOVERNOR

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

**EGLE**  
LIESL EICHLER CLARK  
DIRECTOR

March 17, 2022

Jeff Adler  
Tuscola Energy, Inc.  
920 North Water Street, Suite 201  
Bay City, Michigan 48708

SRN: N1586, Tuscola County

Dear Mr. Adler:

**VIOLATION NOTICE**

On March 9, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Tuscola Energy - Nixon Farm's located at 7611 Bay City Forestville Road, Akron, Michigan. The purpose of this inspection was to determine Tuscola Energy - Nixon Farm's 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 (Act 451); the Air Pollution Control Rules; the conditions of Permit to Install (PTI) number 20-12B; and to investigate a complaint received on March 5, 2022, regarding odors attributed to Tuscola Energy - Nixon Farm operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGOILPRODUCTION	PTI No. 20-12B, FGOILPRODUCTION, Special Condition (SC) IV.2	No wind shroud for flare
FGOILPRODUCTION FGOILTREATSYS	PTI No. 20-12B, FGOILPRODUCTION, SC IV.3 and FGOILTREATSYS, SC IV.1	Oil storage tank not vented to flare

During the March 9, 2022 complaint investigation, the flare onsite was noted to be in operation without a wind shroud. This is a violation of PTI No. 20-12B, FGOILPRODUCTION, SC IV.2.

Also, during the March 9, 2022 complaint investigation, an oil storage tank was noted not being vented to the flare. This is a violation of PTI No. 20-12B, FGOILPRODUCTION, SC IV.3 and FGOILTREATSYS, SC IV.1.

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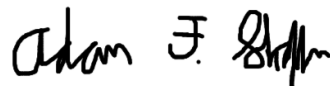
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 7, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the 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.

Please submit the written response to EGLE, AQD, Bay City District, at 401 Ketchum Street Suite B, Bay City, Michigan 48708 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Tuscola Energy - Nixon Farm's 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 and for the cooperation that was extended to me during my inspection of Tuscola Energy - Nixon Farm's. 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,



Adam Shaffer  
Environmental Quality Analyst  
Air Quality Division  
989-225-4789

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Chris Hare, EGLE