



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 28, 2022

VIA EMAIL ONLY

Jeff Adler
Tuscola Energy, Inc.
920 North Water Street, Suite 201
Bay City, Michigan 48709

SRN: N7954, Tuscola County

Dear Jeff Adler:

VIOLATION NOTICE

On June 2, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Tuscola Energy, Inc. - McPherson A-1-24 located at 6082 Cass City Road, Wisner Township, Michigan. The purpose of this inspection was to determine Tuscola Energy, Inc.'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 14-09E, and Consent Order AQD number 37-2015.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGOILPRODUCTION	PTI No. 14-09E, FGOILPRODUCTION, Special Condition (SC) II.1, and Consent Order AQD No. 37-2015, Sections 15.E.1 and 15.D	Hydrogen sulfide material limit exceedance
FGOILPRODUCTION	PTI No. 14-09E, FGOILPRODUCTION, SC IV.3, and Consent Order AQD No. 37-2015, Sections 15.E.1 and 15.E.5	Vapor return line system not installed for oil storage tank

Records reviewed showed that Tuscola Energy, Inc. exceeded their daily hydrogen sulfide material limit. This is a violation of PTI No. 14-09E, FGOILPRODUCTION, SC II.1, and Consent Order AQD No. 37-2015, Sections 15.E.1 and 15.D.

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At the time of the inspection, a vapor return line system was not installed for the one oil storage tank onsite. This is a violation of PTI No. 14-09E, FGOILPRODUCTION, SC IV.3, and Consent Order AQD NO. 37-2015, Sections 15.E.1 and 15.E.5.

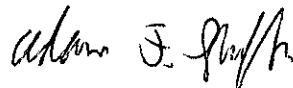
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 19, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the 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 Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Tuscola Energy, Inc. 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, Inc. 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,



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

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