



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

April 20, 2018

CERTIFIED MAIL – 7010 0290 0000 3734 2774
RETURN RECEIPT

Mr. Mark Bailey
Paxton Resources
132 N. Ostego Ave.
Gaylord, MI 49735

SRN: P0901, Washtenaw County

Dear Mr. Bailey:

VIOLATION NOTICE

On 4/2/2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Paxton Resources, Koshy A1-15 HD1 located at West Michigan Ave. (S of 9685 W. Mich. Ave), Saline, Michigan. The purpose of this inspection was to determine Paxton Resource'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; and the conditions of New Source Performance Standard (NSPS) OOOO.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Open flare at oil and gas facility - Koshy A1-15 HD1	Rule 301(1)(b) and NSPS OOOO	The open flare was continuously emitting black smoke.

This process is also subject to the federal Standards of Performance for New Sources (NSPS) for Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced after August 23, 2011, and on or before September 18, 2015. These standards are found in Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart OOOO.

During this inspection it was noted that Paxton Resources - Koshy open flare processes were emitting opacity in excess of emissions allowed by Act 451, Rule 301.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 13, 2018. The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been

taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Paxton Resources 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 violation cited above and for the cooperation that was extended to me during my inspection of Paxton Resources - Koshy. 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,



Zack Durham
Environmental Quality Analyst
Air Quality Division
517-416-3351

cc: Mr. Scott Miller, DEQ

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Chris Ethridge, DEQ
Mr. Malcolm Mead-O'Brien, DEQ