



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

March 29, 2021

Mr. Ken Prior, Operations Manager
Omimex Energy - Claybanks 2 Facility
4854 West Angling Road
Ludington, Michigan 49431

SRN: N2096, Oceana County

Dear Mr. Prior:

VIOLATION NOTICE

On February 2, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Omimex Energy - Claybanks 2 facility located at 5954 West Arthur Road, New Era, Michigan. The purpose of this inspection was to determine Omimex Energy - Claybanks 2'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 Permit to Install (PTI) 201-89A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Natural gas sweetening (Amine Plant)	Rule 201	No Permit to Install for construction and/or operation of process equipment.
Flare	Rule 201	No Permit to Install for construction and/or operation of process equipment.

During this inspection, it was noted that Omimex Energy - Claybanks 2 did not have a PTI for the construction and/or operation of equipment at this facility. The AQD staff advised Mr. Prior on March 29, 2021, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the Amine Plant and Flare process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

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Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 20, 2021 (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, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Omimex Energy - Claybanks 2 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 Omimex Energy - Claybanks 2 Facility. 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,



Chris Robinson
Environmental Quality Analyst
Air Quality Division
616-286-0083

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE
Mr. Louis Schineman, OGLM
Mr. Staff Dusenbury, OGLM