

Tuscola Energy, Inc.

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

3/16/2021

DEQ-AQD

APR 07 2021

SAGINAW BAY

Ms. Jenine Camilleri
Enforcement Unit Supervisor
EGLE, AQD
PO Box 30260
Lansing, MI

Re: Response to Violation Notice: March 16, 2021

Dear Ms. Jenine Camilleri

Below I have provided our responses to the Violation Notice.

Response to Violation Notice dated November 8, 2019

<u>Allegation</u>	<u>Response</u>
Material limit of 500 lbs exceeded twice.	According to the temporary permit No 171-11B we are allowed to exceed 500 lbs, but never to go over 2000 lbs in a day, for four days (two days per well)
Shut down system is ineffective. Minimum flare pilot flame detection temp is set at 200 degrees F.	Shut down system works fine. When temp of flare goes below 200 degrees it shut downs the wells. The outside temp is never above 200 degrees. If the temp was set at 50 degrees and it was 80 degrees outside then I would agree the shut down system would be ineffective.
No vapor return is present.	The flare had been down for a couple years. I do believe they did take oil off the tank one time. We are installing a vapor return this week. We haven't run the wells since the temporary permit expired.
No records of SO2	The flow rates were recorded and H2S calculations were made. A new column has been added to the spreadsheet to calculate the TONS of SO2 for each day. The calculation of 20.1 tons of SO2 during the test period is far below the limit of 39.7 tons.
Hours of operation not recorded.	Hours of operation were recorded, but the records were held by the field operator. Hours of operation were from 7am-12pm on days wells were running.
Material Limit of 100 lbs per day exceeded three times.	We date we started the operating the flare was 8/14/2020. 120 days later was 12/11/2020. Apparently I am getting a violation because the date of the permit was 8/11 and technically 120 days from that date is 12/8, so I have violations from 12/9 through 12/11.

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No vapor return is present.	The flare had been down for a couple years. I do believe they did take oil off the tank one time. We are installing a vapor return this week. We haven't run the wells since the temporary permit expired.

Please contact me if you have any questions.

Respectfully submitted,

Tuscola Energy, Inc.

By:



Jeffrey M. Adler - President