



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SAGINAW BAY DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

November 5, 2018

Mr. Jeff Adler, President
Tuscola Energy, Inc
7998 M-25
Akron, Michigan 48701-9773

SRN: N7954, Tuscola County

Dear Mr. Adler:

VIOLATION NOTICE

On September 12, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) and Oil, Gas, and Minerals Division (OGMD) visited your McPherson crude oil production facility located at 6082 Cass City Road in Wisner Township, Michigan. The facility is covered by air use Permit to Install (PTI) number 14-09E issued July 13, 2018 and previously by PTI number 14-09D.

During the visit and previous records review, the following violations were noted:

Process Description	Rule/Permit Condition Violated	Comments
McPherson A-1-24 Crude oil production facility	AQD PTI 14-09E FGOILPRODUCTION SC IV.2	The vent line from the separator pressure relief valve was open to the atmosphere. It should be connected directly to the flare. Tuscola Energy, Inc. was issued a violation notice for the same issue in 2016.
	AQD PTI 14-09D & E FGOILPRODUCTION SC II.1	Data indicated the H2S feed rate to the flare exceeded the limit of 310 pounds per day 21 times between June 17 and August 17, 2018.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 26, 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 recurrence.

Mr. Jeff Adler
Page 2
November 5, 2018

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.

It should be noted the facility is subject to the conditions of a Consent Order (AQD 37-2015, OOGM 2997) which was effective as of December 17, 2015. The violations presented above may result in stipulated penalties for the facility.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations, or the actions necessary to bring this facility into compliance, please contact Matt Karl at 989-439-3779, or via correspondence addressed to Air Quality Division, 401 Ketchum Street, Suite B, Bay City, Michigan 48708.

Sincerely,



Ben Witkopp
Environmental Engineer
Air Quality Division
989-894-6219

cc: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Chris Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Mr. Chris Hare, DEQ
Mr. James Armbruster, DEQ
Mr. Matt Karl, DEQ