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Mark Ozoga, Environmental Manager
UP Paper LLC
402 W Elk Street
Manistique, MI 49854

April 15, 2024

Michigan Department of Environment, Great Lakes, and Energy
Marquette District Office
Air Quality Division – Permit Section
1504 West Washington Street
Marquette, MI 49855
RE: ROP Renewal MI-ROP-A6475-2019

To Whom it May Concern:

Please find enclosed the Renewable Operating Permit (ROP) Renewal Application for UP Paper LLC (UP Paper), ROP number MI-ROP-A6475-2019. UP Paper manufactures kraft paper from recycled cardboard. This renewal proposes to remove emission limits, material limits, and process and operating restrictions that are obsolete practices at UP Paper.

The ROP Renewal Application package consists of the completed ROP Renewal Application Form, a marked-up copy of the existing ROP with the proposed changes, and the supplemental information as required by the application: Michigan Air Emissions Reporting System (MAERS) data and the Malfunction Abatement Plan for EUBLR004.

If you need additional information, or if you have any questions related to this application, do not hesitate to contact me at (906) 286-4265. Thank you for your consideration.

Sincerely,

Mark Ozoga, Environmental Manager

Enclosure: Renewable Operating Permit (ROP) Application for UP Paper LLC

A Native American Owned Small Business

ISBEE Certified

TRIMEDIA
ENVIRONMENTAL & ENGINEERING

Renewable Operating Permit (ROP) Renewal Application for UP Paper, LLC

Submitted to:
Michigan Department of Environment, Great Lakes and Energy
Marquette District Office
Air Quality Division
1504 West Washington Street
Marquette, MI 49855
906-228-4853

Submitted by:
UP Paper LLC
402 West Elk Street
Manistique, MI 49854
906-286-4265

Prepared by:
TriMedia Environmental & Engineering
830 W. Washington Street
Marquette, MI 49855
906.228.5125

Table of Contents

ROP Renewal Application Form

EGLE

RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to instructions for additional information to complete the Renewable Operating Permit Renewal Application Form.

GENERAL INSTRUCTIONS

This application form should be submitted as part of an administratively complete application package for renewal of a Renewable Operating Permit (ROP). This application form consists of nine parts. Parts A – H must be completed for all applications and must also be completed for each section of a sectioned ROP. Answer all questions in all parts of the form unless directed otherwise. Detailed instructions for this application form can be found at http://michigan.gov/air (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").

PART A: GENERAL INFORMATION

Enter information about the source, owner, contact person and the responsible official.

SOURCE INFORMATION

SRN	SIC Code	NAICS Code	Existing ROP Number	Section Number (if applicable)
A6475	2621	322121	MI-ROP-A6475-2019	

Source Name: UP Paper LLC

Street Address: 402 West Elk Street

City	State	ZIP Code	County
Manistique	MI	49854	Schoolcraft

Section/Town/Range (if address not available):

Source Description: Recycled kraft paper manufacturing

☐ Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.

OWNER INFORMATION

Owner Name	Section Number (if applicable)
ProAmpac Holdings Inc.	

Mailing address (☐ check if same as source address): 12025 Tricon Road

City	State	ZIP Code	County	Country
Cincinnati	OH	45246	Hamilton	USA

☐ Check here if any information in this ROP renewal application is confidential. Confidential information should be identified on an Additional Information (AI-001) Form.

SRN: A6475	Section Number (if applicable):

PART A: GENERAL INFORMATION (continued)

At least one contact and responsible official must be identified. Additional contacts and responsible officials may be included if necessary.

CONTACT INFORMATION

Contact 1 Name				Title
Mark Ozoga				Environmental Manager
Company Name & Mailing address (☒ check if same as source address)				
UP Paper LLC				
City	State	ZIP Code	County	Country
Manistique	MI	49854	Schoolcraft	USA
Phone number		E-mail address		
906-286-4265		markozoga@uppaperllc.com		

Contact 2 Name (optional)				Title
Kellie Heiden				EHS Manager
Company Name & Mailing address (☒ check if same as source address)				
UP Paper LLC				
City	State	ZIP Code	County	Country
Manistique	MI	49854	Schoolcraft	USA
Phone number		E-mail address		
906-286-4265		kellieheiden@uppaperllc.com		

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name				Title
Brian Gustafson				VP of Manufacturing
Company Name & Mailing address (☒ check if same as source address)				
UP Paper LLC				
City	State	ZIP Code	County	Country
Manistique	MI	49854	Schoolcraft	USA
Phone number		E-mail address		
906-286-4265		briangustafson@uppaperllc.com		

Responsible Official 2 Name (optional)				Title
Company Name & Mailing address (☐ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

☐ Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID:

SRN: A6475	Section Number (if applicable):

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

Identify the items that are included as part of your administratively complete application in the checklist below. For your application to be complete, it must include information necessary to evaluate the source and to determine all applicable requirements. Answer the compliance statements as they pertain to all the applicable requirements to which the source is subject. The source's Responsible Official must sign and date this form.

Listing of ROP Application Contents. Check the box for the items included with your application.

☒	Completed ROP Renewal Application Form (and any AI-001 Forms) (required)	☐	Compliance Plan/Schedule of Compliance
☒	Mark-up copy of existing ROP using official version from the AQD website (required)	☐	Stack information
☐	Copies of all Permit(s) to Install (PTIs) that have not been incorporated into existing ROP (required)	☐	Acid Rain Permit Initial/Renewal Application
☒	Criteria Pollutant/Hazardous Air Pollutant (HAP) Potential to Emit Calculations	☐	Cross-State Air Pollution Rule (CSAPR) Information
☒	MAERS Forms (to report emissions not previously submitted)	☐	Confidential Information
☐	Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP	☒	Paper copy of all documentation provided (required)
☐	Compliance Assurance Monitoring (CAM) Plan	☒	Electronic documents provided (optional)
☒	Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	☐	Other, explain:

Compliance Statement

This source is in compliance with **all** of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	☒ Yes ☐ No
This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	☒ Yes ☐ No
This source will meet in a timely manner applicable requirements that become effective during the permit term.	☒ Yes ☐ No

The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.

If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.

Name and Title of the Responsible Official (Print or Type)

Brian Gustafson, VP of Manufacturing

As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.

Signature of Responsible Official	**Date** 4-23-2024

SRN: A6475	Section Number (if applicable):

PART C: SOURCE REQUIREMENT INFORMATION

Answer the questions below for specific requirements or programs to which the source may be subject.

C1.	Actual emissions and associated data from **all** emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have not been reported in MAERS for the most recent emissions reporting year? If Yes, identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	☐ Yes ☒ No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	☐ Yes ☒ No
C3.	Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If Yes, a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	☐ Yes ☒ No ☐ Yes ☐ No
C4.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO_2, VOC, lead) emissions? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If No, criteria pollutant potential emission calculations do not need to be included.	☐ Yes ☒ No
C5.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions must be included in HAP emission calculations. If No, HAP potential emission calculations do not need to be included.	☐ Yes ☒ No
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If Yes, identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	☐ Yes ☒ No
C7.	Are any emission units subject to the federal Acid Rain Program? If Yes, identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?	☐ Yes ☒ No ☐ Yes ☒ No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If Yes, identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to EGLE, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy. Is a CAM plan included with this application? If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible	☐ Yes ☒ No ☐ Yes ☒ No ☐ ☐
C9.	Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If Yes, then a copy must be submitted as part of the ROP renewal application.	☒ Yes ☐ No
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If Yes, then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	☐ Yes ☒ No
☐	Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: **AI-**	

SRN: A6475	Section Number (if applicable):

PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION

Review all emission units at the source and answer the question below.

D1. Does the source have any emission units that do not appear in the existing ROP but are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules? If Yes, identify the emission units in the table below. ☐ Yes ☒ No

If No, go to Part E.

Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either Part G or H of this application form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).

Emission Unit ID	**Emission Unit Description**	**Rule 212(4) Citation** [e.g. Rule 212(4)(c)]	**Rule 201 Exemption Rule Citation** [e.g. Rule 282(2)(b)(i)]

Comments:

☐ Check here if an AI-001 Form is attached to provide more information for Part D. Enter AI-001 Form ID: **AI-**

SRN: A6475	Section Number (if applicable):

PART E: EXISTING ROP INFORMATION

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP and answer the questions below as they pertain to **all** emission units and **all** applicable requirements in the existing ROP.

E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP? If Yes, identify changes and additions on Part F, Part G and/or Part H.	☒ Yes ☐ No
E2. For each emission unit(s) identified in the existing ROP, all stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were not reported in the most recent MAERS reporting year? If Yes, identity the stack(s) that was/were not reported on applicable MAERS form(s).	☐ Yes ☒ No
E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? If Yes, complete Part F with the appropriate information.	☐ Yes ☒ No
E4. Have any emission units identified in the existing ROP been dismantled? If Yes, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.	☐ Yes ☒ No
Comments:	

☐ Check here if an AI-001 Form is attached to provide more information for Part E. Enter AI-001 Form ID: **AI-**

SRN: A6475	Section Number (if applicable):

PART F: PERMIT TO INSTALL (PTI) INFORMATION

Review all emission units and applicable requirements at the source and answer the following questions as they pertain to **all** emission units with PTIs. Any PTI(s) identified below must be attached to the application.

F1. Has the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP? If Yes, complete the following table. If No, go to Part G. ☐ Yes ☒ No

Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (*Include Process Equipment, Control Devices and Monitoring Devices*)	Date Emission Unit was Installed/ Modified/ Reconstructed

F2. Do any of the PTIs listed above change, add, or delete terms/conditions to **established emission units** in the existing ROP? If Yes, identify the emission unit(s) or flexible group(s) affected in the comments area below or on an AI-001 Form and identify all changes, additions, and deletions in a mark-up of the existing ROP. ☐ Yes ☐ No

F3. Do any of the PTIs listed above identify **new emission units** that need to be incorporated into the ROP? If Yes, submit the PTIs as part of the ROP renewal application on an AI-001 Form, and include the new emission unit(s) or flexible group(s) in the mark-up of the existing ROP. ☐ Yes ☐ No

F4. Are there any stacks with applicable requirements for emission unit(s) identified in the PTIs listed above that were not reported in MAERS for the most recent emissions reporting year? If Yes, identity the stack(s) that were not reported on the applicable MAERS form(s). ☐ Yes ☐ No

F5. Are there any proposed administrative changes to any of the emission unit names, descriptions or control devices in the PTIs listed above for any emission units not already incorporated into the ROP? If Yes, describe the changes on an AI-001 Form. ☐ Yes ☐ No

Comments:

☐ Check here if an AI-001 Form is attached to provide more information for Part F. Enter AI-001 Form ID: **AI-**

SRN: A6475	Section Number (if applicable):

PART G: EMISSION UNITS MEETING THE CRITERIA OF RULES 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290

Review all emission units and applicable requirements at the source and answer the following questions.

G1. Does the source have any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.

If Yes, identify the emission units in the table below. If No, go to Part H. ☐ Yes ☒ No

Note: If several emission units were installed under the same rule above, provide a description of each and an installation/modification/reconstruction date for each.

Origin of Applicable Requirements	**Emission Unit Description – *Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices***	**Date Emission Unit was Installed/ Modified/ Reconstructed**
☐ Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation		
☐ Rule 287(2)(c) surface coating line		
☐ Rule 290 process with limited emissions		

Comments:

☐ Check here if an AI-001 Form is attached to provide more information for Part G. Enter AI-001 Form ID: **AI-**

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

Complete this part of the application form for all proposed additions, changes or deletions to the existing ROP. This includes state or federal regulations that the source is subject to and that must be incorporated into the ROP or other proposed changes to the existing ROP. **Do not include additions or changes that have already been identified in Parts F or G of this application form.** If additional space is needed copy and complete an additional Part H.

Complete a separate Part H for each emission unit with proposed additions and/or changes.

H1. Are there changes that need to be incorporated into the ROP that have not been identified in Parts F and G? If Yes, answer the questions below.	☒ Yes ☐ No
H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If Yes, describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP.	☐ Yes ☒ No
H3. Does the source propose to add a new emission unit or flexible group to the ROP not previously identified in Parts F or G? If Yes, identify and describe the emission unit name, process description, control device(s), monitoring device(s) and applicable requirements in questions H8 – H16 below and in a new Emission Unit Table in the mark-up of the ROP. See instructions on how to incorporate a new emission unit/flexible group into the ROP.	☐ Yes ☒ No
H4. Does the source propose to add new state or federal regulations to the existing ROP? If Yes, on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify each state or federal regulation that should be added. Also, describe the new requirements in questions H8 – H16 below and add the specific requirements to existing emission units/flexible groups in the mark-up of the ROP, create a new Emission Unit/Flexible Group Table, or add an AQD template table for the specific state or federal requirement.	☐ Yes ☒ No
H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If Yes, list the CO/CJ number(s) below and add or change the conditions and underlying applicable requirements in the appropriate Emission Unit/Flexible Group Tables in the mark-up of the ROP.	☐ Yes ☒ No
H6. Does the source propose to add, change and/or delete **source-wide** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H7. Are you proposing to **streamline** any requirements? If Yes, identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.	☐ Yes ☒ No

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H8. Does the source propose to add, change and/or delete **emission limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Removal of Kerosene requirements for EUPROCESS. Kerosene will no longer be used at UP Paper.

H9. Does the source propose to add, change and/or delete **material limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

EUBLR003 – Eliminate No. 2 Fuel Oil from material limits.

H10. Does the source propose to add, change and/or delete **process/operational restriction** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

EUBLR003 – Change III.2 to remove 'and diesel fuel'

H11. Does the source propose to add, change and/or delete **design/equipment parameter** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☐ Yes ☒ No

H12. Does the source propose to add, change and/or delete **testing/sampling** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☐ Yes ☒ No

H13. Does the source propose to add, change and/or delete **monitoring/recordkeeping** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Removal of Kerosene and the associated monitoring/recordkeeping requirements for EUPROCESS. Kerosene will no longer be used at UP Paper.

Removal of No.2 Fuel oil requirements for EUBLR003.

H14. Does the source propose to add, change and/or delete **reporting** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☐ Yes ☒ No

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H16. Does the source propose to add, change and/or delete any **other** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
☐ Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 Form ID: **AI-**	

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN: A6475	Section Number (if applicable):

1. Additional Information ID
AI-

Additional Information

2. Is This Information Confidential? ☐ Yes ☐ No

Page of

M-001 Rule 216 Modification and C-001 Certification

EGLE

Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division

RENEWABLE OPERATING PERMIT
M-001: RULE 215 CHANGE NOTIFICATION
RULE 216 AMENDMENT/MODIFICATION APPLICATION

This information is required by Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment.

1. SRN A6475	2. ROP Number MI-ROP-A6475-2019	3. County Schoolcraft
4. Stationary Source Name UP Paper LLC		
5. Location Address 402 West Elk Street		6. City Manistique

7. Submittal Type - *The submittal must meet the criteria for the box checked below. Check only one box. Attach a mark-up of the affected ROP pages for applications for Rule 216 changes.*

- ☐ **Rule 215(1) Notification of change.** *Complete Items 8 – 10 and 14*
- ☐ **Rule 215(2) Notification of change.** *Complete Items 8 – 10 and 14*
- ☐ **Rule 215(3) Notification of change.** *Complete Items 8 – 11 and 14*
- ☐ **Rule 215(5) Notification of change.** *Complete Items 8 – 10 and 14*
- ■ **Rule 216(1)(a)(i)-(iv) Administrative Amendment.** *Complete Items 8 – 10 and 14*
- ☐ **Rule 216(1)(a)(v) Administrative Amendment.** *Complete Items 8 – 14. Results of testing, monitoring & recordkeeping must be submitted. See detailed instructions.*
- ☐ **Rule 216(2) Minor Modification.** *Complete Items 8 – 12 and 14*
- ☐ **Rule 216(3) Significant Modification.** *Complete Items 8 – 12 and 14, and provide any additional information needed on ROP application forms. See detailed instructions.*
- ☐ **Rule 216(4) State-Only Modification.** *Complete Items 8 – 12 and 14*

8. Effective date of the change. (MM/DD/YYYY) *See detailed instructions.* 4/ 19 / 2024

9. Change in emissions? ☐ Yes ■ No

10. Description of Change - *Describe any changes or additions to the ROP, including any changes in emissions and/or pollutants that will occur. If additional space is needed, complete an Additional Information form (AI-001).*

Owner change to ProAmpac Holding Inc.

11. New Source Review Permit(s) to Install (PTI) associated with this application? ☐ Yes ■ No

If Yes, enter the PTI Number(s) ___ - ___ - ___ - ___ - ___

12. Compliance Status - *A narrative compliance plan, including a schedule for compliance, must be submitted using an AI-001 if any of the following are checked No.*

a. Is the change identified above in compliance with the associated applicable requirement(s)? ■ Yes ☐ No

b. Will the change identified above continue to be in compliance with the associated applicable requirement(s)? ■ Yes ☐ No

c. If the change includes a future applicable requirement(s), will timely compliance be achieved? ■ Yes ☐ No

13. Operator's Additional Information ID - *Create an Additional Information (AI) ID for the associated AI-001 form used to provide supplemental information.* **AI**

14. Contact Name	Telephone No.	E-mail Address
Mark Ozoga	906-286-4265	markozoga@uppaperllc.com

15. This submittal also updates the ROP renewal application submitted on ___ / ___ / ___ ☐ Yes ■ N/A
(If yes, a mark-up of the affected pages of the ROP must be attached.)

NOTE: A CERTIFICATION FORM (C-001) SIGNED BY A RESPONSIBLE OFFICIAL MUST ACCOMPANY ALL SUBMITTALS

EGLE Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division

RENEWABLE OPERATING PERMIT APPLICATION
C-001: CERTIFICATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to provide this information may result in civil and/or criminal penalties. Please type or print clearly.

This form is completed and included as part of Renewable Operating Permit (ROP) initial and renewal applications, notifications of change, amendments, modifications, and additional information.

Form Type **C-001**	SRN A6475

Stationary Source Name	
UP Paper LLC	
City	County
Manistique	Schoolcraft

SUBMITTAL CERTIFICATION INFORMATION

1. Type of Submittal *Check only one box.*

☐ Initial Application (Rule 21( )
■ Notification / Administrative Amendment / Modification (Rules 215/216)
☐ Renewal (Rule 210)
☐ Other, describe on AI-001

2. If this ROP has more than one Section, list the Section(s) that this Certification applies to _____

3. Submittal Media ■ E-mai ☐ FTP ☐ Disk ■ Paper

4. Operator's Additional Information ID - Create an Additional Information (AI) ID that is used to provide supplemental information on AI-001 regarding a submittal.

AI

CONTACT INFORMATION

Contact Name	Title
Mark Ozoga	Environmental Manager
Phone number	E-mail address
906-286-4265	markozoga@uppaperllc.com

This form must be signed and dated by a Responsible Official.

Responsible Official Name	Title
Brian Gustafson	VP of Manufacturing

Mailing address
402 West Elk Street

City	State	ZIP Code	County	Country
Manistique	MI	49854	Schoolcraft	USA

As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate and complete.

Signature of Responsible Official

4-23-2024
Date

Marked-up Copy of Existing ROP

MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION

Style Definition: TOC 1

EFFECTIVE DATE: December 3, 2019

ISSUED TO

~~**Zollar MPI Equipment, Inc.**~~
UP Paper, LLC

State Registration Number (SRN): A6475

LOCATED AT

402 West Elk Street, Manistique, Schoolcraft County, Michigan 49854

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-A6475-2019

Expiration Date: December 3, 2024

Administratively Complete ROP Renewal Application Due Between
June 3, 2023 to June 3, 2024

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Rule 210(1) of the administrative rules promulgated under Act 451, this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-A6475-2019

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(1) of Act 451. Pursuant to Rule 214a of the administrative rules promulgated under Act 451, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environment, Great Lakes, and Energy

~~Ed Lancaster~~Michael Conklin, Marquette District Supervisor

TABLE OF CONTENTS

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AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environment, Great Lakes, and Energy (EGLE) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements are identified for each ROP term or condition. All terms and conditions that are included in a PTI are streamlined, subsumed and/or is state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**
- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**

2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**

3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**

4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities: **(R 336.1213(1)(d))**
   a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
   c. Inspect, at reasonable times, any of the following:
      i. Any stationary source.
      ii. Any emission unit.
      iii. Any equipment, including monitoring and air pollution control equipment.
      iv. Any work practices or operations regulated or required under the ROP.
   d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.

5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**

7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**

8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2).[2] **(R 336.1370)**

10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in Subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:"[2] **(R 336.1301(1))**
    a. A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity.
    b. A limit specified by an applicable federal new source performance standard.

    The grading of visible emissions shall be determined in accordance with Rule 303.

12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
    a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.[1] **(R 336.1901(a))**
    b. Unreasonable interference with the comfortable enjoyment of life and property.[1] **(R 336.1901(b))**

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).[2] **(R 336.2001)**

14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**

15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. **(R 336.1213(3)(b))**
    a. The date, location, time, and method of sampling or measurements.
    b. The dates the analyses of the samples were performed.
    c. The company or entity that performed the analyses of the samples.
    d. The analytical techniques or methods used.
    e. The results of the analyses.
    f. The related process operating conditions or parameters that existed at the time of sampling or measurement.

17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**

19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. **(R 336.1213(4)(c))**

20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**

21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
    a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
    b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
    c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **(R 336.1213(3)(c))**
    a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that; "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete." The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.

23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**

24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**

25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.[2] **(R 336.1912)**

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
    a. The applicable requirements are included and are specifically identified in the ROP.
    b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

    Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

27. Nothing in this ROP shall alter or affect any of the following:
    a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
    b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
    c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
    d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:

a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**

b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**

29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**

31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**

32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(10))**

33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
    a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
    b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
    c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
    d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(9))**

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.

37. If the permittee is subject to 40 CFR Part 82 and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).

39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
    a. June 21, 1999,
    b. Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
    c. The date on which a regulated substance is first present above a threshold quantity in a process.

40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.

41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **(R 336.1213(12))**

Permit to Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.[2] **(R 336.1201(1))**

44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.[2] **(R 336.1201(8), Section 5510 of Act 451)**

45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, EGLE.[2] **(R 336.1219)**

46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.[2] **(R 336.1201(4))**

Footnotes:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

C. EMISSION UNIT SPECIAL CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUBLR003	99 MMBtu/hr boiler fired on natural gas ~~or #2 fuel oil~~. Boiler No. 3	05/01/1994 10/11/2012	NA
EUDYE001	Paper dyeing process #1	01/01/1920 11/22/1994	NA
EUPROCESS	Process chemical usage	01/01/1965	NA
EUBLR004	A natural gas-fired boiler rated at 186.8 MMBtu/hr for steam production used on the paper machine. The boiler is equipped with low NOx burners and flue gas recirculation.	02/19/2014	NA

EUBLR003
EMISSION UNIT CONDITIONS

DESCRIPTION

Boiler rated 99 MMBtu/hr, fired on natural gas and No.2 fuel oil.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	14.35 pph[2]	Hourly	EUBLR003	SC V.1	**R 336.1205(1)(a) R 336.2803 R 336.2804 40 CFR 52.21(c) & (d)**
2. NOx	26.4 tpy[2]	12-month rolling time period as determined at the end of each calendar month	EUBLR003	SC VI.5	**R 336.1205(3)**
3. SO_2	50.94 pph[2]	Hourly	EUBLR003	SC V.1	**R 336.1205(1)(a) R 336.2803 R 336.2804 40 CFR 52.21(c) & (d)**
4. SO_2	27.8 tpy[2]	12-month rolling time period as determined at the end of each calendar month	EUBLR003	SC VI.5	**R 336.1205(3)**
5. PM	0.10 lbs/1000 lbs exhaust gas[2]	Instantaneous	EUBLR003	SC V.1	**R 336.1331(1)(a)**

*Test protocol shall determine averaging time

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. ~~No. 2 fuel oil~~	~~775,000 gallons per year[2]~~	~~12-month rolling time period as determined at the end of each calendar month~~	~~EUBLR003~~	~~SC IV.2 SC VI.2~~	~~R 336.1205(3)~~

~~Material~~	~~Limit~~	~~Time Period/ Operating Scenario~~	~~Equipment~~	~~Monitoring/ Testing Method~~	~~Underlying Applicable Requirements~~
2. ~~No. 2 fuel oil~~	~~The sulfur content shall not exceed 0.5 percent by weight[2]~~	~~Instantaneous~~	~~EUBLR003~~	~~SC VI.4~~	~~R 336.1225~~ ~~R 336.1402(1)~~ ~~40 CFR 52.21 (c) & (d)~~ ~~40 CFR Part 60.42c(d)~~

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not exceed 867,240 MMBtu per year of heat input into EUBLR003, based on a 12-month rolling time period as determined at the end of each calendar month[2]. **(R 336.1205(3), 40 CFR Part 60.40c(a))**

2. The permittee shall burn only pipeline quality natural gas ~~and diesel fuel~~ in EUBLR003.[2] **(R 336.1225, R 336.1702, 40 CFR Part 60.41c)**

3. The permittee shall operate EUBLR003 in accordance with manufacturer's recommendations for safe and proper operation to minimize emissions during periods of startup, shutdown and malfunction.[2] **(R 336.1912)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The heat input capacity of EUBLR003 shall not exceed a maximum of 99 million BTU per hour.[2] **(R 336.1205(3), R 336.1225, 40 CFR Part 60.40c(a))**

2. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the use of each fuel used in EUBLR003 on a monthly basis.[2] **(R 336.1205(3), R 336.1225)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. Upon request from the district supervisor, the permittee shall verify NOx, SO2, and PM emission rates from EUBLR003 by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M
NOx	40 CFR Part 60, Appendix A
SO_2	40 CFR Part 60, Appendix A

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.[2] **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**

2. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted.[2] **(R 336.1213(3))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.[2] **(R 336.1205(3), R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))**

2. The permittee shall keep, in a satisfactory manner, monthly fuel use records for EUBLR003. The records must indicate the type and total amount of each fuel used in EUBLR003. All records shall be kept on file and made available to the Department upon request.[2] **(R 336.1205(3), R 336.1225, 40 CFR 60.48c(g))**

3. The permittee shall keep, in a satisfactory manner, records of calculations of the heat input to EUBLR003 on a monthly and a 12-month rolling time period basis as determined at the end of each calendar month.[2] **(R 336.1205(3), 40 CFR Part 60.40c(a))**

~~4. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in EUBLR003, demonstrating that the fuel sulfur content meets the requirement of SC II.2. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil.[2] **(R 336.1205(3), R 336.1402(1), 40 CFR Part 60.48c(f)(1))**~~

~~5~~4. The permittee shall keep, in a satisfactory manner, NO_x and SO_2 emission calculations for EUBLR003 on a monthly and 12-month rolling time period basis as determined at the end of each calendar month. All records shall be kept on file and made available to the Department upon request.[2] **(R 336.1205(3), R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

See Appendix4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBLR003	48[2]	33[2]	R 336.1225 R 336.2803, R 336.2804 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and Dc, as they apply to EUBLR003. **(40 CFR Part 60, Subparts A & Dc)**

2. The permittee shall comply with all provisions of the federal National Emissions Standards for Hazardous Air Pollutants in 40 CFR Part 63, Subparts A and DDDDD, as they apply to EUBLR003. **(40 CFR Part 63, Subparts A & DDDDD)**

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EUDYE001
EMISSION UNIT CONDITIONS

DESCRIPTION

Paper Dyeing

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Tank Covers

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	9.1 pph[2]	Hourly	EUDYE001	SC VI.1 SC VI. 2	**R 336.1201(3)**
2. VOC	26.7 tpy[2]	12-month rolling time period	EUDYE001	SC VI.2	**R 336.1201(3)**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUDYE001 unless the tank covers are in place.[2] **(R 336.1201(3), (R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain a record of the Volatile Organic Compound content of each material used in EUDYE001.[2] **(R 336.1201(3), (R 336.1213(3))**
2. The permittee shall maintain a monthly record of the usage rate of each VOC containing material used in EUDYE001.[2] **(R 336.1201(3), (R 336.1213(3))**
3. The permittee shall keep a written record to document the status of compliance with material limitations, emission limits, and other requirements specified in this table.[2] **(R 336.1213(3))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EUPROCESS
EMISSION UNIT CONDITIONS

DESCRIPTION

Paper manufacturing process chemical use

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	82.3 tpy[2]	12-month rolling time period	EUPROCESS (Total VOCs including cleaning solvents)	SC VI.3	**R 336.1201(3)** **R 336.1702(3)**
2. ~~Kerosene (CAS No. 8008-20-6)~~	~~349 lbs[2]~~	~~8-hour shift~~	~~EUPROCESS~~	~~SC VI.1~~	~~**R 336.1201(3)**~~ ~~**R 336.1702**~~ ~~**R 336.1901**~~
3. Petroleum Distillate (CAS No. 64742-47-8)	18.72 tpy[2]	12-month rolling time period	EUPROCESS	SC VI.2	**R 336.1201(3)** **R 336.1702** **R 336.1901**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

~~1. The permittee shall record the usage rates and calculate the No. 1 fuel oil or kerosene (CAS #8008-20-6) emission rates from EUPROCESS for each 8-hour shift to determine compliance with the limitation specified under Emission Limits above.[2] **(R 336.1201(3), R 336.1213(3))**~~

~~2.~~1. The permittee shall record the usage rates and calculate the petroleum distillates (CAS #64742-47-8) emission rates from EUPROCESS for each month and year based on a 12-month rolling time period as determined at the end of each calendar month to determine compliance with the limitation specified under Emission Limits above.[2] **(R 336.1201(3), R 336.1213(3))**

~~3.~~2. The permittee shall record the usage rates and calculate the total VOC emission rates from EUPROCESS including the cleaning solvents and excluding the dye, for each month and year based on a 12-month rolling time period as determined at the end of each calendar month to determine compliance with the limitation specified under Emission Limits above.[2] **(R 336.1201(3), R 336.1213(3))**

~~4.~~3. The permittee shall keep records of the VOC content, water content and density of each VOC containing material used or mixed.[2] **(R 336.1201(3), (R 336.1213(3))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (Inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
#1-Beater #2	8[2]	30.7[2]	(R 336.1201(3), R 336.1901)
#2-Machine-1	60[2]	44[2]	(R 336.1201(3), R 336.1901)
#3-Machine-2	48 x 48[2]	44[2]	(R 336.1201(3), R 336.1901)
#4-Machine-3	36[2]	47[2]	(R 336.1201(3), R 336.1901)
#5-Machine-4	36[2]	47[2]	(R 336.1201(3), R 336.1901)
#6-Machine-5	48[2]	45[2]	(R 336.1201(3), R 336.1901)
#7-Machine-6	67 x 62[2]	43[2]	(R 336.1201(3), R 336.1901)
#8-Machine-7	42 x 42[2]	45[2]	(R 336.1201(3), R 336.1901)
#9-Machine-8	48[2]	45[2]	(R 336.1201(3), R 336.1901)
#10-Machine-9	60[2]	42[2]	(R 336.1201(3), R 336.1901)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EUBLR004
EMISSION UNIT CONDITIONS

DESCRIPTION

A natural gas-fired boiler rated at 186.8 MMBtu/hr for steam production. The boiler is equipped with low NOx burners and flue gas recirculation.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Low NOx burners and flue gas recirculation

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	0.20 lb/MMBTU[2]	30-day average rolling time period	EUBLR004	SC VI.2 or SC VI.3	**40 CFR 60.44b(l)**
2. GHG as CO_{2e}	74, 975 tpy[2]	12-month rolling time period as determined at the end of each calendar month	EUBLR004	SCVI.6	**R 336.1205(1)(a) & (b)**
*Test Protocol shall determine averaging time					

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Natural Gas	1247 MMcf[2]	12-month rolling time period as determined at the end of each calendar month	EUBLR004	SC VI.5	**R 336.1205(1)(a) & (b) R 336.1224 R 336.1225 R 336.1702(a) 40 CFR 52.21(c) & (d)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUBLR004 unless a malfunction abatement plan (MAP) as described in Rule 911(2), for EUBLR004 operation, has been submitted within 180 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
   a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
   b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
   c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1225, R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d))**

2. The permittee shall burn only pipeline quality natural gas in EUBLR004.[2] **(R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d), 40 CFR Part 60, Subpart Db)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The maximum design heat input capacity for EUBLR004 shall not exceed 186.8 MMBtu per hour on a fuel heat input basis.[2] **(R 336.1205(1)(a) & (b), 40 CFR 52.21(c) & (d), 40 CFR Part 60, Subpart Db)**

2. The permittee shall not operate EUBLR004 unless the low NOx burners and flue gas recirculation system are installed, maintained, and operated in a satisfactory manner.[2] **(R 336.1205(1)(a) & (b), R 336.1910, 40 CFR 52.21(c) & (d))**

3. The permittee shall install, calibrate, maintain and operate, in a satisfactory manner, a device to monitor and record the daily natural gas usage rate for EUBLR004 on a continuous basis.[2] **(R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d), 40 CFR 60.49b(d))**

4. If the permittee chooses the compliance method specified in SC VI.2, the permittee shall install, calibrate, maintain and operate in a satisfactory manner, devices to monitor and record the NO_x emissions, and oxygen (O_2), or carbon dioxide (CO_2), content of the exhaust gas from EUBLR004 on a continuous basis.[2] **(R 336.1205(1)(a) & (b), 40 CFR 52.21(c) & (d), 40 CFR 60.48b, 40 CFR Part 75)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.[2] **(R 336.1205(1)(a) & (b), 40 CFR 52.21(c) & (d), 40 CFR Part 60, Subpart Db)**

2. Except as specified in SC VI.3, the permittee shall continuously monitor and record, in a satisfactory manner, the NO_x emissions and the O_2, or CO_2, emissions from EUBLR004. The permittee shall operate each Continuous Emission Monitoring System (CEMS) to meet the timelines, requirements and reporting detailed in Appendix A and shall use the CEMS data for determining compliance with SC I.1.[2] **(R 336.1205(1)(a) & (b), 40 CFR 52.21(c) & (d), 40 CFR Part 60, Subpart Db)**

3. As an alternative to the compliance method specified in SC VI.2, the permittee may demonstrate compliance by monitoring EUBLR004 operating conditions and predicting NO emission rates in a satisfactory manner. The permittee shall submit a plan that identifies the operating conditions to be monitored and the records to be maintained. The permittee shall operate each Predictive Emission Monitoring System (PEMS) to meet the timelines, requirements and reporting detailed in Appendix A and shall use the PEMS data for determining compliance with SC I.1.[2] **(R 336.1205(1)(a) & (b), 40 CFR 52.21(c) & (d), 40 CFR Part 60, Subpart Db)**

4. The permittee shall keep monthly natural gas usage records, in a format acceptable to the AQD District Supervisor, indicating the amount of natural gas used, in cubic feet, on an average calendar day basis, a calendar month basis, and a 12-month rolling time period basis. The permittee shall keep all records on file at the facility and make them available to the Department upon request.[2] **(R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d), 40 CFR 60.49b(d))**

5. The permittee shall calculate and keep, in a satisfactory manner, records of the monthly and 12-month rolling annual capacity factor for natural gas for EUBLR004. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(40 CFR 60.49b(d))**

6. The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling total CO_2e emissions for EUBLR004, as required by SC I.2. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1205(1)(a) & (b))**

7. The permittee shall keep, in a satisfactory manner, records of the fuel receipts from the fuel supplier that certify that the natural gas meets the definition of natural gas defined in 40 CFR 60.41b for EUBLR004 on file at the facility and make them available to the Department upon request.[2] **(R 336.1205(1)(a) & (b), 40 CFR 52.21(c) and (d), 40 CFR Part 60, Subpart Db, 40 CFR 60.49b(r)(1))**

8. The permittee shall maintain records of all information necessary for all notifications and reports as specified in these special conditions as well as that information necessary to demonstrate compliance with the emission limits of this permit. This information shall include, but shall not be limited to the following:
   a) Compliance tests and any testing required under the special conditions of this permit.
   b) Monitoring data.
   c) Verification of heat input capacity required to show compliance with SC IV.1.
   d) Identification, type and the amounts of fuel combusted in EUBLR004 on an average calendar day basis.
   e) All records required by 40 CFR 60.7 and 60.49b.
   f) All calculations necessary to show compliance with the limits contained in this permit.

   All of the above information shall be stored in a format acceptable to the AQD and shall be consistent with the requirements of 40 CFR 60.7(f).[2] **(R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a), R 336.1912, 40 CFR 52.21(c) & (d), 40 CFR 60.7(f), 40 CFR Part 60, Subpart Db)**

See Appendix 3

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall provide written notification of construction and operation to comply with the federal Standards of Performance for New Stationary Sources, 40 CFR 60.7. The permittee shall submit this notification to the AQD District Supervisor within the time frames specified in 40 CFR 60.7.[2] **(40 CFR 60.7)**

5. The permittee shall provide written notification of the actual date of initial startup to comply with the federal Standards of Performance for New Stationary Sources, 40 CFR 60.49b(a). The notification shall include:
   a. The design heat input capacity of EUBLR004 and identification of the fuels to be combusted in EUBLR004.
   b. The annual capacity factor at which the owner or operator anticipates operating the facility based on all fuels fired and based on each individual fuel fired.

The permittee shall submit this notification to the AQD District Supervisor within 15 days after initial startup occurs.[2] **(40 CFR 60.49b(a))**

6. The permittee shall submit all reports required by the federal Standards of Performance for New Stationary Sources, 40 CFR 60.49b, as applicable. The permittee shall submit these reports to the AQD District Supervisor within the time frames specified in 40 CFR 60.49b and/or 40 CFR 60.7.[2] **(40 CFR 60.7, 40 CFR 60.49b(h) & (i))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBOILER4	72[2]	40[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and Db, as they apply to EUBLR004. **(40 CFR Part 60, Subparts A & Db)**

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

D. FLEXIBLE GROUP SPECIAL CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that the requirements identified in the table below are not applicable to the specified emission unit(s) and/or flexible group(s). This determination is incorporated into the permit shield provisions set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii). If the permittee makes a change that affects the basis of the non-applicability determination, the permit shield established as a result of that non-applicability decision is no longer valid for that emission unit or flexible group.

Emission Unit/Flexible Group ID	Non-Applicable Requirement	Justification
EUPROCESS	40 CFR Part 60, Subpart BB	Facility is not a Kraft Paper Mill
EUPROCESS	40 CFR Part 63, Subpart S	Facility process and materials not subject to Subpart S

APPENDICES

Appendix 1. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO_2e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
		HAP	Hazardous Air Pollutant
EGLE	Michigan Department of Environment, Great Lakes, and Energy	Hg	Mercury
		hr	Hour
EU	Emission Unit	HP	Horsepower
FG	Flexible Group	H_2S	Hydrogen Sulfide
GACS	Gallons of Applied Coating Solids	kW	Kilowatt
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	m	Meter
HVLP	High Volume Low Pressure*	mg	Milligram
ID	Identification	mm	Millimeter
IRSL	Initial Risk Screening Level	MM	Million
ITSL	Initial Threshold Screening Level	MW	Megawatts
LAER	Lowest Achievable Emission Rate	NMOC	Non-methane Organic Compounds
MACT	Maximum Achievable Control Technology	NO_x	Oxides of Nitrogen
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfunction Abatement Plan	PM	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	Particulate Matter equal to or less than 10 microns in diameter
NA	Not Applicable		
NAAQS	National Ambient Air Quality Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	pph	Pounds per hour
		ppm	Parts per million
NSPS	New Source Performance Standards	ppmv	Parts per million by volume
NSR	New Source Review	ppmw	Parts per million by weight
PS	Performance Specification	%	Percent
PSD	Prevention of Significant Deterioration	psia	Pounds per square inch absolute
PTE	Permanent Total Enclosure	psig	Pounds per square inch gauge
PTI	Permit to Install	scf	Standard cubic feet
RACT	Reasonable Available Control Technology	sec	Seconds
ROP	Renewable Operating Permit	SO_2	Sulfur Dioxide
SC	Special Condition	TAC	Toxic Air Contaminant
SCR	Selective Catalytic Reduction	Temp	Temperature
SNCR	Selective Non-Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TEQ	Toxicity Equivalence Quotient	µg	Microgram
USEPA/EPA	United States Environmental Protection Agency	µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
VE	Visible Emissions	yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. **(R 336.1213(4)(a), R 336.1119(a)(ii))**

Appendix 3. Monitoring Requirements

NO_x Monitoring
Continuous Emission Monitoring System (CEMS) and Predictive Emission Monitoring System (PEMS) Requirements

1. Within 30 calendar days after commencement of trial operation, the permittee shall submit two copies of a Monitoring Plan to the AQD, for review and approval. The Monitoring Plan shall include drawings or specifications showing proposed locations and descriptions of the required CEMS/PEMS.

2. Within 150 calendar days after commencement of trial operation, the permittee shall submit two copies of a complete test plan for the CEMS/PEMS to the AQD for approval.

3. Within 180 calendar days after commencement of trial operation, the permittee shall complete the installation and testing of the CEMS/PEMS.

4. Within 60 days of completion of testing, the permittee shall submit to the AQD two copies of the final report demonstrating the CEMS/PEMS complies with the requirements of the corresponding Performance Specifications (PS) in the following table.

Pollutant	Applicable PS
NO_x	2
O_2 and CO_2	3
PEMS	16

5. The span value shall be 2.0 times the lowest emission standard or as specified in the federal regulations.

6. The CEMS shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and PS 2 and 3 of Appendix B to 40 CFR Part 60. If a PEMS is installed in lieu of a CEMS, the PEMS shall be installed, maintained, and operated in accordance with PS 16 of Appendix B to 40 CFR Part 60, as proposed or promulgated.

7. Each calendar quarter, the permittee shall perform the Quality Assurance Procedures of the CEMS set forth in Appendix F of 40 CFR Part 60. If a PEMS is installed in lieu of a CEMS, the permittee shall perform the Quality Assurance Procedures of the PEMS set forth in PS 16 of Appendix B to 40 CFR Part 60, as proposed or promulgated. Within 30 days following the end of each calendar quarter, the permittee shall submit the results to the AQD in the format of the data assessment report (Figure 1, Appendix F).

8. In accordance with 40 CFR 60.7(c) and (d), the permittee shall submit two copies of an excess emission report (EER) and summary report in an acceptable format to the AQD, within 30 days following the end of each calendar quarter. The Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). The EER shall include the following information:

   a. A report of each exceedance above 0.20 lb NO_x/MMBtu. This includes the date, time, magnitude, cause and corrective actions of all occurrences during the reporting period. A report of all periods of CEMS/PEMS

downtime and corrective action. A report of the total operating time of EUBLR004 during the reporting period. A report of any periods that the CEMS/PEMS exceeds the instrument range. If no exceedances or CEMS/PEMS downtime occurred during the reporting period, the permittee shall report that fact.

The permittee shall keep all monitoring data on file for a period of at least five years and make them available to the AQD upon request.

~~**Appendix 4. Recordkeeping**~~

~~**Fuel Oil Analysis:**~~

~~For each fuel oil shipment received, the permittee shall obtain from the fuel oil supplier a laboratory analysis of the sulfur content. The determination of sulfur content (percent by weight) shall be carried out in accordance with any of the following procedures: ASTM Method D129-64 or ASTM Method 1552-83, or ASTM Method 2622-87 or ASTM Method 1266-87, or an alternative method approved by the AQD District Supervisor. For each fuel oil shipment received, the permittee shall also record the date received, source of fuel oil and supplier, and gallons received. These records shall be retained by the permittee for a minimum of 5 years and made available to the Air Quality Division upon request.~~

Appendix 45. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 56. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-A6475-2014a. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-A6475-2014a is being reissued as Source-Wide PTI No. MI-PTI-A6475-2019.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	NA	NA	NA

Appendix 67. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 78. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use EGLE, AQD, Report Certification form (EQP 5736) and EGLE, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.

2023 MAERS report

2023 Emissions Inventory Report

UP Paper LLC. (A6475)

Emissions Summary

CRITERIA AIR POLLUTANT (CAP) EMISSIONS TOTALS

Pollutant Code/CAS #	Pollutant Name	Total Emissions (tons)*
CO	Carbon Monoxide	5.8165
7439921	Lead	0.00025
NOX	Nitrogen Oxides	17.45938
PM10-PRI	PM10 Primary (Filt + Cond)	3.75896
PM10-FIL	PM10 Filterable	0.93974
PM25-PRI	PM2.5 Primary (Filt + Cond)	3.75896
PM25-FIL	PM2.5 Filterable	0.93974
PM-CON	PM Condensible	2.81922
SO2	Sulfur Dioxide	0.29676
VOC	Volatile Organic Compounds	7.1103
NH3	Ammonia	1.58272

HAZARDOUS AIR POLLUTANT (HAP) and/or OTHER POLLUTANT EMISSIONS TOTALS

Pollutant Code/CAS #	Pollutant Name	Is VOC/PM?	Total Emissions (tons)*
CO2	Carbon Dioxide (GHG)	-	59,352.0
CH4	Methane (GHG)	-	1.13758
N2O	Nitrous Oxide (GHG)	-	1.08812
91576	2-Methylnaphthalene (HAP)	-	0.00001
56495	3-Methylcholanthrene (HAP)	-	<.00001
57976	7,12-Dimethylbenz[a]Anthracene (HAP)	-	0.00001
83329	Acenaphthene (HAP)	-	<.00001
208968	Acenaphthylene (HAP)	-	<.00001
120127	Anthracene (HAP)	-	<.00001
7440382	Arsenic (HAP)	-	0.0001
56553	Benz[a]Anthracene (HAP)	-	<.00001
71432	Benzene (HAP)	VOC	0.00104
50328	Benzo[a]Pyrene (HAP)	-	<.00001
205992	Benzo[b]Fluoranthene (HAP)	-	<.00001

Pollutant Code/CAS #	Pollutant Name	Is VOC/PM?	Total Emissions (tons)*
191242	Benzo[g,h,i,]Perylene (HAP)	-	<.00001
207089	Benzo[k]Fluoranthene (HAP)	-	<.00001
7440417	Beryllium (HAP)	-	0.00001
7440439	Cadmium (HAP)	-	0.00054
7440473	Chromium (HAP)	-	0.00069
218019	Chrysene (HAP)	-	<.00001
7440484	Cobalt (HAP)	-	0.00004
53703	Dibenzo(a,h)Anthracene (HAP)	-	<.00001
206440	Fluoranthene (HAP)	-	<.00001
86737	Fluorene (HAP)	-	<.00001
50000	Formaldehyde (HAP)	VOC	0.03709
110543	Hexane (HAP)	VOC	0.89028
193395	Indeno[1,2,3-c,d]Pyrene (HAP)	-	<.00001
7439965	Manganese (HAP)	-	0.00019
7439976	Mercury (HAP)	-	<.00001
91203	Naphthalene (HAP)	VOC	0.0003
7440020	Nickel (HAP)	-	0.00104
85018	Phenanthrene (HAP)	-	0.00001
129000	Pyrene (HAP)	-	<.00001
7782492	Selenium (HAP)	-	0.00001
108883	Toluene (HAP)	VOC	0.00168

EMISSIONS TOTALS

Total CAP Emissions (tons)*	Total HAP/OTHER Emissions (tons)*	Total Emissions (tons)*
44.48253	59,355.15874	59,399.64127

*Rounded to 5 digits past the decimal point. Note that where rounding results in 0, <.00001 is indicated.

2023 Emissions Report

UP Paper LLC. (A6475)

FACILITY

Facility Identifier:	A6475	**Facility Name:**	UP Paper LLC.
Company/Owner Name:	UP Paper LLC.		
Description:	RECYCLED PAPER MANUFACTURER		
Status:	OP - Operating	**Status Year:**	
NAICS:	322121 (Primary) - Paper (except Newsprint) Mills		
Comments:			

ADDRESS

Location Address:	402 West Elk Street MANISTIQUE, MI 49854

LOCATION

Latitude (decimal degress):	45.96		**Longitude (decimal degress):**	-86.2551	
UTM X (meters):	557800	**UTM Y (meters):**	5090600	**UTM Zone:**	16
Collection Method:	001 - address matching-house number	**Data Collection Date:**			
Geographic Reference Point:	101 - Entrance Point of a Facility, System, or Station	**Geodetic Reference System:**	002 - North American Datum of 1983		

RELEASE POINTS					
ID	Type	Description	Status	Details	Location
FUG001 (FUGITIVE)	Fugitive Area	Pseudostack (facility-wide fugitive emissions)	OP	Fugitive Height: , Fugitive Width: , Fugitive Length: , Fugitive Angle:	Uses Facility Site Location
SV0028 (SVBOILER4)	Vertical	Natural gas boiler stack	OP	Height: 40.0 FEET, Shape: Circular, Diameter: 6.0 FEET, Temperature: 594.0 F, Flow Rate: 47,573.0 ACFM, Velocity: 28.04251 FPS	Verified Location: No, Lat/Long: (45.9685, -86.254), UTMX/Y/Z: (557797.224071, 5090818.161268, 16)

CONTROL DEVICES					
ID	Description	Status	Control Measure	Uptime/Effectiveness	Controlled Pollutants
CD0001 (CDFGRBRL4)	Flue Gas Recirculation	OP	26 - Flue Gas Recirculation		
CD0002 (CDLNBLR4)	Low NOX Burners	OP	205 - Low NOx Burner (LNB)		

CONTROL PATHS		
ID	Description	Control Path Segments
CP0001 (CDP0001)	boiler #4	Seq: 1, CD0002 (CDLNBLR4) (Device): 100.0% Seq: 2, CD0001 (CDFGRBR4) (Device): 100.0%
	Controlled Pollutants: CO-Carbon Monoxide: 86.0%, NOX-Nitrogen Oxides: 64.7%	

EMISSION UNITS				
ID	Type	Description	Status	Details
EU0022 (EUBLR003)	100 - Boiler	Portable fuel oil fired boiler or natural gas fired boiler. Heat input rating 99 million BTU per ho	OP	Operation Start: , Design Capacity: 99.0 E6BTU/HR
	Comment: Description truncated to 100 characters, and has been added fully here:[Portable fuel oil fired boiler or natural gas fired boiler. Heat input rating 99 million BTU per hour. Steam output rating 75,000 pounds per hour. Permitted under Permit to Install #155-12.]			
	Additional Information: Emission Unit NAICS: 322121, Electric Generation: No, Combustion Source: Yes, Install Date: 05/06/1994			
EU0031 (EUBLR004)	100 - Boiler	Natural gas fired boiler, rated at 186.8 MMBtu/hr for steam production used on the paper machine.	OP	Operation Start: , Design Capacity: 186.8 E6BTU/HR
	Comment: Description truncated to 100 characters, and has been added fully here:[Natural gas fired boiler, rated at 186.8 MMBtu/hr for steam production used on the paper machine. The boiler is equipped with low NOx burners and flue gas recirculation.]			
	Additional Information: Electric Generation: No, Combustion Source: Yes, Install Date: 02/11/2015			
EU0024 (EUDYE001)	310 - Roof vents/Building vents	Paper dyeing process	OP	Operation Start: , Design Capacity:
	Additional Information: Emission Unit NAICS: 322121, Electric Generation: No, Combustion Source: No, Install Date: 01/01/1920			
EU0032 (EUPROCESS)	310 - Roof vents/Building vents	Papermaking and Pulping operation	OP	Operation Start: , Design Capacity:
	Additional Information: Emission Unit NAICS: 322121, Electric Generation: No, Combustion Source: No			

UNIT PROCESSES					
Emission Unit ID	**Unit Process ID**	**SCC**	**Description**	**Status**	**Details**
EU0022 (EUBLR003)	PR0001	10200501	Portable boiler, Grade #2 fuel oil 1000 gallons per year	OP	**Release Point Apportionment:** FUG001 (FUGITIVE), Not Controlled: 100.0%
	Additional Information: Previous ACDID: 10200501				
EU0022 (EUBLR003)	PR0002	10200602	Portable Boiler, natural gas fired	OP	**Release Point Apportionment:** FUG001 (FUGITIVE), Not Controlled: 100.0%
	Additional Information: Previous ACDID: 10200602				
EU0031 (EUBLR004)	PR0001	10200602	Natural Gas Boiler for SteamProduction for Paper Manufacturing	OP	**Release Point Apportionment:** SV0028 (SVBOILER4), CP0001 (CDP0001): 100.0%
	Additional Information: Previous ACDID: 10200602				
EU0024 (EUDYE001)	PR0002	30799998	Paper dye process, tons of dye used per year	OP	**Release Point Apportionment:** FUG001 (FUGITIVE), Not Controlled: 100.0%
	Additional Information: Previous ACDID: 30799998				
EU0032 (EUPROCESS)	PR0001	30799998	Papermaking and Pulping operation	OP in 2023	**Release Point Apportionment:** FUG001 (FUGITIVE), Not Controlled: 100.0%

PROCESS EMISSIONS

Emission Unit ID	Unit Process ID	Throughput	Operations
EU0022 (EUBLR003)	PR0001 Portable boiler, Grade #2 fuel oil 1000 gallons per year	Process was not operating, or was not required to report emissions, during the reporting period.	

Emission Unit ID	Unit Process ID	Throughput	Operations
EU0022 (EUBLR003)	PR0002 Portable Boiler, natural gas fired	Process was not operating, or was not required to report emissions, during the reporting period.	

Emission Unit ID	Unit Process ID	Throughput	Operations
EU0031 (EUBLR004)	PR0001 Natural Gas Boiler for Steam Production for Paper Manufacturing	**Annual Throughput:** 989.2 MILLION CUBIC FEET (Natural Gas) (Input)	Average Hours/Day: 24.0, Days/Week: 7.0, Weeks/Year: 52.0 Actual Days/Year: 365.0 Actual Hours/Year: 8,760.0 Seasonal Operations: Dec-Feb: 25.0%, Mar-May: 25.0%, Jun-Aug: 25.0%, Sep-Nov: 25.0%

Pollutant	Emis. Factor (Lbs/UOM)	Emis. Factor UOM	Calculation Method	Estimated Emis. (Tons)
CO - Carbon Monoxide	84.0	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	5.816496
	Overall Control Efficiency: 86.0%			
	Ozone Season Emissions (Tons): 2.4235401938832			
7439921 - Lead	0.0005	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.000247299999999
	Overall Control Efficiency: 0.0%			
NOX - Nitrogen Oxides	100.0	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	17.45938
	Overall Control Efficiency: 64.7%			
	Ozone Season Emissions (Tons): 7.274742248646			
PM10-PRI - PM10 Primary (Filt + Cond)	7.6	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	3.75896
	Overall Control Efficiency: 0.0%			
PM10-FIL - PM10 Filterable	1.9	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.93974
	Overall Control Efficiency: 0.0%			
	Emission Comment: Pollutant and meta-data defaulted from Emission Factor reference source.			
PM25-PRI - PM2.5 Primary (Filt + Cond)	7.6	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	3.75896
	Overall Control Efficiency: 0.0%			
PM25-FIL - PM2.5 Filterable	1.9	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.93974
	Overall Control Efficiency: 0.0%			
	Emission Comment: Pollutant and meta-data defaulted from Emission Factor reference source.			
PM-CON - PM Condensible	5.7	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	2.81922
	Overall Control Efficiency: 0.0%			
	Emission Comment: Pollutant and meta-data defaulted from Emission Factor reference source.			

Pollutant	Emis. Factor (Lbs/UOM)	Emis. Factor UOM	Calculation Method	Estimated Emis. (Tons)
SO2 - Sulfur Dioxide	0.6	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.296759999999999
	Overall Control Efficiency: 0.0%			
VOC - Volatile Organic Compounds	5.5	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	2.7203
	Overall Control Efficiency: 0.0%			
	Ozone Season Emissions (Tons): 1.13345842401			
NH3 - Ammonia	3.2	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	1.58272
	Overall Control Efficiency: 0.0%			
CH4 - Methane	2.3	E6FT3 - MILLION CUBIC FEET	29-RF - S/L/T Reference EF (pre-control)	1.13758
	Overall Control Efficiency: 0.0%			
CO2 - Carbon Dioxide	120,000.0	E6FT3 - MILLION CUBIC FEET	29-RF - S/L/T Reference EF (pre-control)	59,352.0
	Overall Control Efficiency: 0.0%			
	Emission Comment: Pollutant and meta-data defaulted from Emission Factor reference source.			
N2O - Nitrous Oxide	2.2	E6FT3 - MILLION CUBIC FEET	29-RF - S/L/T Reference EF (pre-control)	1.08812
	Overall Control Efficiency: 0.0%			
108883 - Toluene	0.0034	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.00168164
	Overall Control Efficiency: 0.0%			
110543 - Hexane	1.8	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.89028
	Overall Control Efficiency: 0.0%			
120127 - Anthracene	0.0000024	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.00000118704
	Overall Control Efficiency: 0.0%			
129000 - Pyrene	0.000005	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.000002473
	Overall Control Efficiency: 0.0%			
191242 - Benzo[g,h,i,]Perylene	0.0000012	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.00000059352
	Overall Control Efficiency: 0.0%			
193395 - Indeno[1,2,3-c,d]Pyrene	0.0000018	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.00000089028
	Overall Control Efficiency: 0.0%			
205992 - Benzo[b]Fluoranthene	0.0000018	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.00000089028
	Overall Control Efficiency: 0.0%			
206440 - Fluoranthene	0.000003	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.0000014838
	Overall Control Efficiency: 0.0%			
207089 - Benzo[k]Fluoranthene	0.0000018	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.00000089028
	Overall Control Efficiency: 0.0%			
208968 - Acenaphthylene	0.0000018	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.00000089028

Pollutant	Emis. Factor (Lbs/UOM)	Emis. Factor UOM	Calculation Method	Estimated Emis. (Tons)
	Overall Control Efficiency: 0.0%			
218019 - Chrysene	0.0000018	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.00000089028
	Overall Control Efficiency: 0.0%			
50000 - Formaldehyde	0.075	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.037094999999999
	Overall Control Efficiency: 0.0%			
50328 - Benzo[a]Pyrene	0.0000012	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.00000059352
	Overall Control Efficiency: 0.0%			
53703 - Dibenzo(a,h)Anthracene	0.0000012	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.00000059352
	Overall Control Efficiency: 0.0%			
56495 - 3-Methylcholanthrene	0.0000018	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.00000089028
	Overall Control Efficiency: 0.0%			
56553 - Benz[a]Anthracene	0.0000018	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.00000089028
	Overall Control Efficiency: 0.0%			
57976 - 7,12-Dimethylbenz[a]Anthracene	0.000016	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.000007913599999
	Overall Control Efficiency: 0.0%			
	Emission Comment: Pollutant and meta-data defaulted from Emission Factor reference source.			
71432 - Benzene	0.0021	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.001038659999999
	Overall Control Efficiency: 0.0%			
7439965 - Manganese	0.00038	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.000187948
	Overall Control Efficiency: 0.0%			
7439976 - Mercury	0.0000000008	E6FT3 - MILLION CUBIC FEET	29-RF - STLT Reference EF (pre-control)	0.00000000039568
	Overall Control Efficiency: 0.0%			
7440020 - Nickel	0.0021	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.001038659999999
	Overall Control Efficiency: 0.0%			
7440382 - Arsenic	0.0002	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.00009892
	Overall Control Efficiency: 0.0%			
7440417 - Beryllium	0.000012	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.0000059352
	Overall Control Efficiency: 0.0%			
7440439 - Cadmium	0.0011	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.00054406
	Overall Control Efficiency: 0.0%			
7440473 - Chromium	0.0014	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.00069244
	Overall Control Efficiency: 0.0%			
7440484 - Cobalt	0.000084	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.000041546399999
	Overall Control Efficiency: 0.0%			

Pollutant	Emis. Factor (Lbs/UOM)	Emis. Factor UOM	Calculation Method	Estimated Emis. (Tons)
7782492 - Selenium	0.000024	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.0000118704
	Overall Control Efficiency: 0.0%			
83329 - Acenaphthene	0.0000018	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.00000089028
	Overall Control Efficiency: 0.0%			
85018 - Phenanthrene	0.000017	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.0000084082
	Overall Control Efficiency: 0.0%			
86737 - Fluorene	0.0000028	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.000001384879999
	Overall Control Efficiency: 0.0%			
91203 - Naphthalene	0.00061	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.000301706
	Overall Control Efficiency: 0.0%			
91576 - 2-Methylnaphthalene	0.000024	E6FT3 - MILLION CUBIC FEET	28-WF - USEPA WebFIRE EF (pre-control)	0.0000118704
	Overall Control Efficiency: 0.0%			

Emission Unit ID	Unit Process ID	Throughput	Operations
EU0024 (EUDYE001)	PR0002 Paper dye process, tons of dye used per year	Process was not operating, or was not required to report emissions, during the reporting period.	

Emission Unit ID	Unit Process ID	Throughput	Operations
EU0032 (EUPROCESS)	PR0001 Papermaking and Pulping operation	Annual Throughput: 96,541.0 TONS (Product) (Output)	Average Hours/Day: 24.0, Days/Week: 7.0, Weeks/Year: 52.0 Actual Days/Year: 365.0 Actual Hours/Year: 8,760.0 Seasonal Operations: Dec-Feb: 25.0%, Mar-May: 25.0%, Jun-Aug: 25.0%, Sep-Nov: 25.0%

Pollutant	Emis. Factor (Lbs/UOM)	Emis. Factor UOM	Calculation Method	Estimated Emis. (Tons)
VOC- Volatile Organic Compounds			3 - Material Balance (no EF)	4.39
	Ozone Season Emissions (Tons): 1.829166813			

EGLE

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2023 Emissions Report

Submission Confirmation

Your submission was successful.

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Confirmation Number:
S20240312133630-FA6475-R2023

Submitted on:
03-12-2024 13:39:21 GMT-04:00

Submitted

Done

UP Paper LLC.

Facility Identifier:
A6475

Location Address:
402 West Elk Street
MANISTIQUE, MI 49854

Your roles at this facility are:
Editor, Submitter

View Master Facility Inventory - PDF

Signature Page

Signed By

Mark Ozoga UP Paper LLC

URL

https://mienviro.michigan.gov/sleis/Document/Sign

Agreement #1

I certify that I have not violated any term in my Electronic Subscriber Agreement and that I am otherwise without any reason to believe that the confidentiality of my user ID and/or password have been compromised now or at any time prior to this submission. I understand that this attestation of fact pertains to the implementation, oversight, and enforcement of a federal environmental program and must be true to the best of my knowledge.

Agreement #2

I am the owner of the account used to perform the electronic submission and signature.

Agreement #3

I have the authority to submit the data on behalf of the facility I am representing.

Agreement #4

I agree that providing the account credentials to sign the submission document constitutes an electronic signature equivalent to my written signature.

Agreement #5

I have reviewed the electronic report being submitted in its entirety, and agree to the validity and accuracy of the information contained within it to the best of my knowledge.

Agreement #6

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Confirmation Number

S20240312133630-FA6475-R2023

SLEIS signed on: 3/12/2024 1:39:21 PM. See document signature for details.

Malfunction Abatement Plan

Malfunction Abatement Plan
for

UP Paper LLC

Under state of Michigan R 336.1911 a malfunction abatement plan (MAP) shall be prepared to prevent, detect, and correct malfunctions or equipment failures resulting in emissions exceeding any applicable emission limitation. For our facility, a MAP was drafted under the following sections below to fulfill that requirement.

I. Description of Source

UP Paper LLC (UP Paper) has a natural gas boiler capable of generating 150,000 lb/hr of steam at an operating pressure of 300 psig. There are emission limits in place to regulate the amount of GHGs (as CO_2e) and NO_x that are emitted from the boiler.

The emission sources and affected emissions are as follows:

Emission Source	Emission Control Device	Affected Emission
EUBLR004 – Natural Gas Boiler	Low NO_x Burner	NO_x
EUBLR004 – Natural Gas Boiler	Flue Gas Recirculation	NO_x

II. Responsible Parties

The following personnel are responsible for overseeing the specified items:

Maintenance Manager – Inspection, maintenance, and repair of air-cleaning devices.
Shift Supervisor & Boiler Operator – Inspection of air-cleaning devices.

III. Inspection Items

Low NO_x Burner

Items to be inspected daily:

- Gas pressure
- Gas flows
- Flame pattern

Items to be inspected quarterly or at earliest convenience:

- Fuel safety shutoff valve for leakage
- Gas cleaner and drip leg

Items to be inspected annually:

- High and low fuel pressure interlocks
- Igniter and burner components
- Combustion control system
- Combustion air flow
- Piping, hosing, wiring, and electrical connections

Flue Gas Recirculation

Items to be inspected quarterly or at earliest convenience:

- Fan damper linkages for looseness and binding
- Fan for proper operation
- Vibration analysis on combustion fan and electric motor

Items to be inspection annually:

- Ducting and expansion joints for cracks and/or leaks
- Damper louver bearings
- Recalibrate damper positioners

IV. Replacement Parts

Low NO_x Burner

Items to be kept on hand for quick replacement:

- Igniter spark plug
- Pilot low pressure switch
- Main gas low pressure switch
- Main gas high pressure switch
- Main gas safety shutoff valve
- Main gas flow control valve
- Main gas pressure regulator

Flue Gas Recirculation

Items to keep on hand for quick replacement:

- Damper louver bearings
- Damper actuator
- Air flow transmitter
- Combustion fan bearings

V. Normal Operating Parameters

Low NO_x Burner

While operating EUBLR004, the burner will normally run between a firing rate of 0-100%, therefore there is no reason to believe that a certain firing rate would lead to a malfunction. Given the performance specification given to UP Paper by the boiler manufacturer the gas flow rate to this boiler should not exceed 9,100 lb/hr. In addition to this flow rate, by monitoring the flame pattern and watching for any abnormalities, the burner's proper function should be held in check.

Flue Gas Recirculation

The boiler fan that supplies the combustion fan will be driven by a variable frequency drive (VFD). For different operating loads it would not be unlikely to see the fan run at any speed within its capable range. However, while it is running, the inlet ducts have dampers that regulate the amount of flue gas and ambient air that is drawn into the fan inlet to make up the combustion air. There should always be a combination of each being drawn into the fan. Neither damper should be closed during operation.

Air flow readings will be monitored closely and any abrupt changes in flow without an abrupt change in load will be investigated for a root cause. Such air flow changes could be signaling an imminent problem with serious consequences.

VI. Corrective Procedures

If an equipment malfunction is found as a result of performing routine inspections, UP Paper will take immediate action to remedy the problem. If an issue is found to incur an emission excursion, EGLE will be notified of the problem and a plan will be created to correct the problem as safely and expeditiously as possible.

Given the multiple circumstances that may arise from the several different malfunction scenarios it is difficult to describe each event. In general, if a burner or flue gas recirculation malfunctions shall occur, UP Paper will the following steps.

Low NO_x Burner

- Check gas flows for any surges in flow and/or pressure.
- Check flame pattern for any asymmetries, pulsations, and/or color variations.

If the flame seems to pulsate within the boiler, check to ensure gas flows and pressures are stable. Also check that combustion air flows are stable. If any flows seem to surge, ensure the gas regulator and fan drive are working properly. Any sudden changes to these devices would cause these surges.

If the flame pattern or color changes, ensure that the correct air and gas flows are present at the burner. The incorrect air/fuel ratio can result in poor combustion and potential create emission excursions.

Flue Gas Recirculation

- Check drive output speed with actual fan speed.
- Check inlet damper position with damper position on DCS system.
- Check damper linkages on louvers so that all the louvers are turning together.
- Inspect fresh air inlet for any blockages and/or air flow restrictions.
- Check air flows for any surges in flow and/or pressure.

As long as the boiler load stays relatively constant over a period of time, the amount of flue gas recirculation should remain relatively the same. If the air flows begin to change without a recognizable change in boiler load, there would be reason to believe that the air flow requirements are not being recognized by the control system. If the flow is too low, the fan will likely try to speed up to increase air flow. The VFD will reflect that change. If the air flow will not come up, it is possible that the air louvers are not opening properly or together, creating a block, or the air inlet is blocked, preventing the proper amount of air flow.

ROP Required Monitoring/Recordkeeping

EUBLR004 **Natural Gas (Pipeline Quality)**

	Gas Usage			Annual Capacity Factor (ACF)			
UP Papers	2023 MMCF*	12 Month Rolling Sum MMCF	2022 MMCF*	2023 ACF	12 Month Rolling Ave.	2022 ACF	Operating days
January	86.15	989.2	96.07	0.66	0.63	0.73	31
February	85.24	984.2	90.24	0.65	0.63	0.69	28
March	92.36	980.9	95.73	0.70	0.62	0.73	31
April	59.34	950.6	89.62	0.45	0.60	0.68	30
May	71.75	939.4	82.97	0.55	0.60	0.63	31
June	70.94	931.4	78.95	0.54	0.59	0.60	30
July	56.21	909.1	78.49	0.43	0.58	0.60	31
August	79.00	926.0	62.10	0.60	0.59	0.47	31
September	77.67	935.8	67.90	0.59	0.59	0.52	29
October	83.81	925.6	93.94	0.64	0.59	0.72	31
November	84.56	924.2	86.03	0.65	0.59	0.66	30
December	86.74	933.8	77.13	0.66	0.59	0.59	31
Max		**989.2**					364
(Limit: 1,247.0 MMcf max, 12 month rolling sum)							

*data from SEMCO billing meter

MEARS usage

	Gas Use
Jan,Feb, Dec	27.6%
Mar - May	23.9%
Jun - Aug	22.1%
Sep - Nov	26.3%
	100%

ACF=Actual/Potential
Potential = max steady state load for 8,760hrs
Potential = 0.1796 MMCF/hr x 8760 hr = 1573 MMCF
Potential per month = 1573MMCF/12 = 131.1 MMCF/month
Sample for January 2017: 62.01MMCF (from Gas Usage)/131.1MMCF=0.47

Max steady state load = 1.7960 MCF/hr
186.6 MMBtu/hr / 1.039 Btu Factor = 179.6 MCF/hr
179.6 MCF = 0.1796 MMCF

EUBLR004

UP Papers	20230CO_2e Tonnes*	CO_2e 2023 CO_2e Tons	12 Month Rolling Sum, tpy	2022 CO_2e Tons
January	5096.000	5,616	64,238	6,275
February	5000.000	5,510	63,876	5,872
March	5458.000	6,015	63,673	6,218
April	3469.000	3,823	61,656	5,839
May	4233.000	4,665	60,934	5,387
June	4168.000	4,593	60,413	5,114
July	3099.000	3,415	58,735	5,094
August	4662.000	5,138	59,834	4,038
September	4569.000	5,035	60,463	4,406
October	4913.000	5,414	59,787	6,090
November	4972.000	5,479	59,712	5,555
December	5108.000	5,629	60,331	5,010
Max			**64,238**	
(74,975 tpy max, 12 month rolling sum)				

*PEMS data (1.102 ton = 1 tonne)

UP Papers	Daily Ave. 2023 NO_x lb/MMBtu*
January	0.043
February	0.041
March	0.041
April	0.040
May	0.039
June	0.043
July	0.029
August	0.038
September	0.038
October	0.037
November	0.036
December	0.036
Ave.	0.038
(0.20 lb/MMBtu max)	

*PEMS data

EUPROCESS - 2023 Potential lbs. of VOC Emitted														
Chemical	voc %		Jan.	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
NALSIZE® 7543		product #	239	0	0	0	0	197.5	3756.5	5459	0	23871	1541	0
	0.7%	voc #	1.67					1.38	26.30	38.21		167.10	10.79	
Amercor 1848		product #	1612.34	1253.19	1354.86	1964.46	982.29	1456.47	863.69	1270.19	1134.71	1100.78	609.72	677.40
	48.08%	voc #	775.21	602.53	651.42	944.51	472.29	700.27	415.26	610.70	545.57	529.25	293.15	325.69
Amertrol HT3010		product #	651.79	491.47	548.18	529.28	548.18	538.38	283.54	1531.12	1010.94	831.72	884.65	1353.44
	0.30%	voc #	1.96	1.47	1.64	1.59	1.64	1.62	0.85	4.59	3.03	2.50	2.65	4.06
Perform PC8984		product #	13102	13120	16810	5822	12300	8200	35260	24660	10600	0	0	0
	0.09%	voc #	11.79	11.81	15.13	5.24	11.07	7.38	31.73	22.19	9.54			
Prestige 8536		product #	1401	350	350	467	0	0	3384	0	0	0	0	466
	8.63%	voc #	120.91	30.21	30.21	40.30			292.04					40.22
NALCO® 7542		product #	0	0	0	0	0	0	119	0	0	0	0	0
	0.76%	voc #							0.90					
NALCO 2634		product #	1,035	990	522	630	0	0	0	0	0	0	0	0
	6.00%	voc #	62.10	59.40	31.32	37.80								
DeAirex 8060		product #	4702	3129	4546	5624	1828	4214	7498	3670	8272	4214	3981	4369
	0.48%	voc #	22.57	15.02	21.82	26.99	8.77	20.23	35.99	17.62	39.71	20.23	19.11	20.97
Coreshell 61067		product #	0	0	0	0	0	270	559	1376	0	0	0	0
	22.17%	voc #						59.85	123.90	304.99				
NALBRITE 64007		product #	0	0	0	0	0	0	0	0	0	0	0	0
	5.99%	voc #												
00PG007		product #	0	0	0	0	0	0	0	0	0	0	434	0
	1.21%	voc #											5.25	
		product #												
		voc #												
		Chemical VOC #'s	996.21	720.44	751.54	1,056.44	493.77	790.72	926.97	998.31	597.84	719.07	330.96	390.94
		Rolling sum #'s	9,388.75	9,382.29	9,429.78	9,565.13	9,176.95	9,529.83	9,716.16	9,787.11	9,847.54	9,735.23	9,125.38	8,773.22
		Rolling sum tons	4.69	4.69	4.71	4.78	4.59	4.76	4.86	4.89	4.92	4.87	4.56	4.39
		22 CHEM	816.29	726.91	704.04	921.09	881.96	437.84	740.64	927.37	537.41	831.38	940.81	743.10

Limits

Kerosene	*<349 #/8hr.*	2022 max
Chem. VOC	*<82.3 tpy*	4.92 tpy

Seasonal	Chem
Jan Feb Dec	24.0%
Mar - May	26.2%
Jun - Aug	31.0%
Sep - Nov	18.8%

Calculations

Chemical VOC	8,773.22	#'s
Carb Cleaner VOC		#'s
Total VOC	8,773.22	#'s
Total VOC	4.39	tons
Papermaking (60%)	2.63	tons
Pulpmill (40%)	1.75	tons

Kerosene (#1 Died Fuel Oil)	0.00	lbs
	0.00	tons

Carb Cleaner
cases @ 12-1# cans per case
# of carb cleaner
70% VOC
VOC

UP Papers	EUPROCESS	2023 Petroleum Distillate											
Chemical PD%		Jan.	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
Coreshell 61067	product #	0	0	0	0	0	230	1892	4126	0	0	0	0
30.00%	PD #						81.00	167.70	412.80				
	product #												
	PD #												
# Petroleum Dist.		0.00	0.00	0.00	0.00	0.00	81.00	167.70	412.80	0.00	0.00	0.00	0.00
12 mo. Rolling Sum #'s		0.00	0.00	0.00	0.00	0.00	81.00	248.70	661.50	661.50	661.50	661.50	661.50
12 mo. Rolling Sum tons		0.00	0.00	0.00	0.00	0.00	0.04	0.12	0.33	0.33	0.33	0.33	0.33
	2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Limits

Petroleum Distillate	18.72	tpy (ROP threshold)
Monthly Max Value	0.33	tpy (usage rolling sum)

Calculations:

2023 total #'s	661.50
2023 total tons	0.33