



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING



LIESL EICHLER CLARK  
DIRECTOR

January 7, 2020

UPS NEXT DAY DELIVERY

**ENFORCEMENT NOTICE**

In the matter of:

Verso Escanaba, LLC  
7100 County Road 426  
P.O. Box 757  
Escanaba, Michigan 49829

SRN: A0884; Delta County

ATTENTION: Mr. Todd Downey

This letter is to advise you of the commencement of an escalated enforcement action against Verso Escanaba, LLC (Company). This letter follows the October 25, 2019 Violation Notice issued by the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) which detailed violations of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, Title 40 of the Code of Federal Regulations, Part 63, Subpart DDDDD; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994, PA 451, as amended (NREPA), MCL 324.5501 *et seq.*, and the administrative rules promulgated thereunder, and the conditions of Renewable Operating Permit (ROP) No. MI-ROP-A0844-2016.

The alleged violations against the Company are federally enforceable and are considered a High Priority Violation (HPV) by the United States Environmental Protection Agency (USEPA). The HPV designation means that the USEPA places a priority on enforcing the regulations governing this violation and on formally resolving alleged violations of this type. The AQD is required to report all HPVs to the USEPA, pursuant to the state's grant commitments with the USEPA and the state's delegated enforcement authority of the federal Clean Air Act.

The AQD is providing the Company with an opportunity to formally resolve these violations through the entry of a legally enforceable agreement that will include a compliance program and payment of an appropriate monetary penalty pursuant to Section 5528 of Part 55 of NREPA, MCL 324.5528.

Be advised that failure to respond to this Enforcement Notice in a timely manner and adequately resolve or address the cited violations may result in further enforcement

**ENFORCEMENT NOTICE**

Mr. Todd Downey

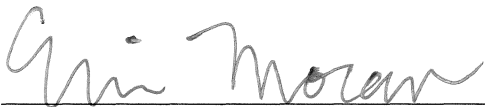
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proceedings, including but not limited to, referral of the matter to the Michigan Department of Attorney General (MDAG) for commencement of civil litigation. This Enforcement Notice does not preclude or limit EGLE's ability to initiate any other enforcement action under federal or state law as appropriate.

Please contact me at 517-284-6769, or by email at MoranE@Michigan.gov, no later than Friday, January 17, 2020 to schedule a meeting to discuss the resolution of this matter.

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENT,  
GREAT LAKES, AND ENERGY

By:   
Erin Moran  
Air Quality Division, Enforcement Unit

Date: 1/27/20

cc: Ms. Sarah Marshall, U.S. EPA, Region 5  
Mr. Neil Gordon, MDAG  
Mr. Ed Lancaster, EGLE  
Ms. Jenine Camilleri, EGLE