

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> Verso Escanaba LLC	<b>SRN :</b> A0884
<b>Location :</b> 7100 COUNTY 426 M.5 ROAD PO BOX 757	<b>District :</b> Upper Peninsula
	<b>County :</b> DELTA
<b>City :</b> ESCANABA <b>State:</b> MI <b>Zip Code :</b> 49829	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Sydney Bruestle
<b>FCE Begin Date :</b> 6/1/2016	<b>FCE Completion Date :</b> 1/8/2018
<b>Comments :</b> 2018 FCE for Verso Escanaba	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
10/18/2017	Scheduled Inspection	Compliance	Scheduled onsite inspection to verify compliance with MI-ROP-A0884-2016 and all other applicable state and federal air quality regulations
09/19/2017	ROP Semi 1 Cert	Compliance	Semi-Annual Report Certification from 1/1/2017-6/30/2017. Opacity Excess emissions (COMs). Thermal Oxidizer Discharge temp dropped below 1339 (3 hours) corrected. Stage two scrubber pH dropped below 7.8, line froze (in January) corrected. Lime Kiln scrubber flow dP dropped below 13 in H2O (Lime kiln shut down until corrected).
09/19/2017	CAM Excursions/Exceedances	Compliance	40 CFR 64 Compliance Assurance Monitoring (CAM) Excursion Summary Report from 1/1/2017 to 6/30/2017
09/19/2017	CAM monitor downtime	Compliance	40 CFR 64 Compliance Assurance Monitoring (CAM) Monitor Downtime Summary Report from 1/1/2017 to 6/30/2017
09/19/2017	ROP Semi 1 Cert	Compliance	Omya, Inc - Semi-Annual Report Certification from Jan 1, 2017, to June 30, 2017
09/07/2017	MACT (Part 63)	Compliance	2017 Annual Closed Vent Collection System Leak Inspection Report from Jan1, 2017 to Dec 31, 2017. No leaks above 500 ppm methane

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09/07/2017	CEM RATA	Compliance	2017 CEMS RATA Test Report from Jan 1, 2017 to Dec 31, 2017. Boiler 8 and boiler 11 both passed the CEMS RATA accuracy limit of 20%. Test was done June 12-13, 2017
09/07/2017	ROP Other	Compliance	No. 11 Compliance Test Reports, June 14, 2017 and Chip Thickness Screen System from 6/12/2017 to 6/12/2022 Average Measured PM values were 0.00219 gr/dscf and 1.29 lb/hr. Both below allowable limits.
09/07/2017	ROP Other	Compliance	Compliance Testing - Testing was conducted in accordance with the approved test plans and source operating under maximum routine operating conditions from 6/12/2017 to 6/12/2022. Compliance testing for Boiler 8 and Boiler 11 Measured CO and Hg emission values were below the allowable limits
08/29/2017	ROP Qrtly Cert	Compliance	COMS/ CEMS 2nd Quarter Report. two COMS Four CEMS reports attached. CEMS EE less than 1% down time less than 1%.
08/29/2017	MACT (Part 63)	Compliance	Semi-annual reports for 40 CFR 63 Subpart S, 40 CFR 63 Subpart MM, 40 CFR 63 Subpart JJJJ.
08/29/2017	MACT (Part 63)	Compliance	40 CFR 63 Subpart DDDDD Semi-Annual Report from Jan 1, 2017 to June 30, 2017
05/16/2017	MACT (Part 63)	Compliance	40 CFR 63 Part MM Quarterly Report from January 1, 2017 to March 31, 2017 Reported 120 minutes of EE (0.09% operating time), 114 due to control equipment malfunction; and 402 minutes of CEM downtime (0.31% operating time).
05/16/2017	MACT (Part 63)	Compliance	Two COMS quarterly reports for No. 10 Recovery Furnace and No. 11 Power Boiler and four CEMS quarterly reports for No. 10 Recovery Furnace and Lime Kiln (TRS and O2); Nos. 8 and 11 Power Boilers (NOx and O2).
03/16/2017	ROP Annual Cert	Compliance	Annual Compliance Certification from 1/1/2016 to 12/31/2016

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03/16/2017	ROP SEMI 2 CERT	Compliance	Semi-Annual Report Certification from 7/1/2016 to 12/31/2016 EURF15 - electric fields on ESP out of service for 1 hour FGSTARCH, EUSS66 - 1 week missing documentation FGFAHS68, EU2AS68 - opacity from silo loading area FG9B03, EU9B03 - low flow on scrubber towers FGTO33 - low pH on scrubber
03/16/2017	CAM Excursions/Exceedances		40 CFR 64 Compliance Assurance Monitoring (CAM) Excursion Summary Report from 7/1/2016 to 12/31/2016 EU - # incidents EULK29 - 1 EU9BB03 - 2 EURF15 - 1 EU11B68 - 2 EUOC33 - 1
03/16/2017	CAM monitor downtime	Compliance	40 CFR 64 Compliance Assurance Monitoring (CAM) Monitor Downtime Summary Report from 7/1/2016 to 12/31/2016  EU - # incidents EUOC33 - 7 EUs29 - 1 EU Lime Kiln System - 1 EU11B68 - 4 EURF15 - 13
03/16/2017	ROP Annual Cert	Compliance	Annual Compliance Certification from 1/1/2016 to 12/31/2016.  No deviations reported.
03/16/2017	ROP SEMI 2 CERT	Compliance	Semi-Annual Report Certification from 7/1/2016 to 12/31/2016.  No deviations reported.
03/13/2017	MAERS	Compliance	2016 MAERS - refer to MAERS for any comments  Review completed 4/4/17.

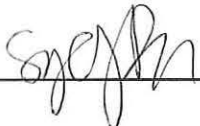


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02/06/2017	MACT (Part 63)	Compliance	<p>40 CFR 63 Subpart DDDDD Semi-Annual Report from January 31, 2016 to December 31, 2016. (CEMS minutes downtime, % unavailable; EER minutes duration, % EE)</p> <p>BLR9-B #2 North Scrubber dP transducer: 5, .05%; 0, 0%</p> <p>BLR9-B #2 North Scrubber flow meter: 5, .05%; 0, 0%</p> <p>BLR9-B #3 South Scrubber dP transducer: 5, .05%; 0, 0%</p> <p>BLR9-B #3 South Scrubber flow meter: 5, .05%; 0, 0%</p> <p>BLR9-B Boiler Steam Flow: 5, .05%; 0, 0%</p> <p>MFB Daily Average Opacity: 1248, 0.27%; 0, 0%</p> <p>MFB Boiler Steam Flow: 13, 0.04%; 0, 0%</p> <p>All information was submitted electronically to CEDRI.</p>
02/06/2017	MACT (Part 63)	Compliance	<p>40 CFR 63 Subpart S Semi-Annual Report &amp; 40 CFR 63 Subpart MM Semi-Annual Report from July 1, 2016 to December 31, 2016. Total duration of LVHD deviations reported was 10.80 hours yielding 0.25% of time; total duration of HVLC deviations reported was 2.06 hours yielding 0.05% of time; total duration of pulping condensate deviations reported was 0 hours; total duration of bleaching system deviations reported was 0 hours.</p> <p>The Subpart MM report for the kraft recovery furnace shows the CEMS were unavailable for 360 minutes or 0.14% of the time; excess emission occurred for 6 minutes or 0.00% of the time; total duration of smelt dissolving tank deviations reported was 0 hours; total duration of lime kiln deviations reported was 3.0 hours yielding 0.07% of time.</p>
02/06/2017	MACT (Part 63)	Compliance	<p>40 CFR 63 Subpart JJJJ Semi-Annual Report from July 1, 2016 to December 31, 2016. No deviations reported.</p>

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02/01/2017	Excess Emissions (CEM)		Two Continuous Opacity Monitoring quarterly reports and four Continuous Emission Monitoring System quarterly reports for the fourth quarter of 2016. Originals sent to TPU in Lansing for review.
11/17/2016	ROP Other	Compliance	R 336.1801 No. 8 Boiler Ozone Season Summary Report from May 1, 2016 to September 30, 2016.  Boilers #9 and #11 burned 100% natural gas during Ozone Control Period and do not meet the definition of fossil fuel-fired boiler, therefore they are not subject to Rule 801.  Review of Report to be conducted by TPU.
11/02/2016	MACT (Part 63)	Compliance	40 CFR 63 Subpart DDDDD No. 9 Boiler MACT Performance Test Report, September 2016 Testing was conducted in accordance with the approved test plans and sources were operating under maximum routine operating conditions.
11/02/2016	MACT (Part 63)	Compliance	40 CFR 63 Subpart DDDDD No. 11 Boiler MACT Performance Test Report, August 2016 Testing was conducted in accordance with the approved test plans and sources were operating under maximum routine operating conditions.
11/02/2016	MACT (Part 63)		Notification of compliance status with Boiler MACT 40 CFR Part 63 Subpart DDDDD
10/10/2016	Excess Emissions (CEM)		2016 Third Quarter COMS, CEMS, and CERMS Report. Original sent to Karen Kajiya Mills, TPU, and EPA, Air Enforcement and Compliance Assurance Section.
09/07/2016	ROP Semi 1 Cert	Compliance	Semi-Annual Report Certification from Jan. 1, 2016 to June 30, 2016
09/07/2016	CAM Excursions/Exceedances	Compliance	40 CFR 64 Compliance Assurance Monitoring (CAM) Excursion Summary Report from Jan 1, 2016 to June 30, 2016

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09/07/2016	CAM monitor downtime	Compliance	40 CFR 64 Compliance Assurance Monitoring (CAM) Monitoring Downtime Summary Report from Jan 1, 2016 to June 30, 2016
09/07/2016	ROP Semi 1 Cert	Compliance	Semi-Annual Report Certification from Jan 1, 2016 to June 30, 2016
09/07/2016	MACT (Part 63)		Copy of response to EPA 114(a) information request relating to 40 CFR Part 63 Subpart DDDDD (Boiler MACT). Flash drive of data requested by EPA included.
08/31/2016	Stack Test Observation		Stack test of Boiler #11
08/17/2016	ROP Other	Compliance	NESHAP Subpart S Notif. of Compliance Status - Bleach Plant Repeat Performance Test from January 1, 2015 to December 31, 2015  This report was resubmitted to satisfy an internal audit conducted by the company.
08/17/2016	ROP Other	Compliance	NESHAP Subpart S Notif. of Compliance Status - Thermal Oxidizer Repeat Performance Test from January 1, 2015 to December 31, 2015  This report was resubmitted to satisfy an internal audit conducted by the company.
08/02/2016	MACT (Part 63)	Compliance	Paper and other Web Coating NESHAP Subpart JJJJ Semi-Annual Report for January 1, 2016 to June 30, 2016. ROP Certification cover sheet (EQP 5736) submitted on 7/28/16).
08/02/2016	MACT (Part 63)	Compliance	MACT Subpart S (MACT I) & Subpart MM (MACT II) Semi-Annual Report (January 1 - June 30, 2016) ROP Report Certification cover sheet (EQP 5736) submitted 7/28/16.
07/18/2016	Excess Emissions (CEM)		2016 Second Quarter COMS, CEMS, and CERMS Report. Original sent to Karen Kajiya Mills, TPU, and EPA, Air Enforcement and Compliance Assurance Section.

Activity Date	Activity Type	Compliance Status	Comments
07/06/2016	ROP Other	Compliance	2016 Annual Closed Vent Collection System Leak Inspection (1/1/2016 - 12/31/2016) - Leak inspection testing occurred on May 3, 2016.
07/06/2016	CEM RATA	Compliance	2016 CEMS RATA Test Report (1/1/2016 - 12/31/2016); testing dates May 3-4, 2016

Name:  Date: 01/18/2018 Supervisor: 