

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Verso Escanaba LLC	SRN : A0884
Location : 7100 COUNTY 426 M.5 ROAD PO BOX 757	District : Upper Peninsula
	County : DELTA
City : ESCANABA State: MI Zip Code : 49829	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Sydney Bruestle
FCE Begin Date : 8/1/2018	FCE Completion Date : 1/13/2020
Comments : FCE To verify compliance with MI-ROP-A0884-2016 and all other applicable state and federal air quality regulations	

List of Partial Compliance Evaluations :

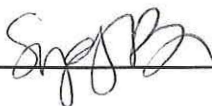
Activity Date	Activity Type	Compliance Status	Comments
01/03/2020	ROP Other	Compliance	R 336.1801 2019 No. 8 Boiler Ozone Season Summary Report (5/1/2019 to 9/30/2019)
12/11/2019	Scheduled Inspection	Non Compliance	Onsite Inspection to Verify Compliance with MI-ROP-A0884-2016 and all other applicable state and federal air quality regulations
11/05/2019	ROP Other	Compliance	3rd Quarter CEMS / COMS Report from July 1, 2019 to Sept 30, 2019
10/24/2019	Stack Test	Non Compliance	40 CFR 63 Subpart DDDDD No. 11 Boiler MACT Performance Test Report August 2019 - Testing was conducted in accordance with the approved test plans and source were operating under maximum routine operating conditions (01/01/2019 - 12/31/2019). HCl emission limit: 2.2E-2 lb/MMBtu. Actual average HCl emissions during the test: 2.4E-2 lb/MMBtu
09/24/2019	ROP Semi 1 Cert	Compliance	Semi-Annual Report Certification from Jan 1, 2019 to June 30, 2019.
09/24/2019	CAM Excursions/Exceedances	Compliance	40 CFR 64 Compliance Assurance Monitoring (CAM) Excursion Summary Report from Jan 1, 2019 to June 30, 2019
09/24/2019	CAM monitor downtime	Compliance	40 CFR 64 Compliance Assurance Monitoring (CAM) Monitor Downtime Report from Jan1, 2019 to June 30, 2019

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09/24/2019	ROP Semi 1 Cert	Compliance	Semi-Annual Report Certification (OMYA, Inc.) from Jan 1, 2019 to June 30, 2019
09/24/2019	Stack Test	Compliance	40 CFR 63 Subpart DDDDD No. 9 Boiler MACT Performance Test Report, July 2019 - Testing was conducted in accordance with the approved test plans and sources were operating under maximum routine operating conditions (1/1/19 to 12/31/19), Boiler No. 9 PM Limit: 0.44 lb/MMBtu Results: 0.20 lb/MMBtu CO limit: 3500 ppm @3% O2 Results: 719 ppm @3% O2
08/07/2019	ROP Other	Compliance	40 CFR 63 Subpart S Semi-Annual Report from Jan 1, 2019 to June 30, 2019
08/07/2019	ROP Other	Compliance	40 CFR 63 Subpart MM Semi-Annual Report from Jan 1, 2019 to June 30, 2019
08/07/2019	ROP Other	Compliance	40 CFR 63 Subpart JJJJ Semi-Annual Report from Jan 1, 2019 to June 30, 2019. Coater 1, 3, and 4 monthly average HAP content less than 0.2 kg/kg coating solids.
08/07/2019	ROP Other	Compliance	2019 Annual Closed Vent Collection System Leak Inspection Report from Jan 1, 2019 to Dec 31, 2019
08/07/2019	CEM RATA	Compliance	2019 CEMS RATA Test Report from Jan 1, 2019 to Dec 31, 2019
08/07/2019	ROP Other	Compliance	40 CFR 63 Subpart DDDDD Semi-Annual Report from Jan 1, 2019 to June 30, 2019. CEMS Boiler 9 0% downtime. Boiler 11: 0 % excess emissions 0.33% CEMS downtime
07/31/2019	ROP Other	Compliance	2nd Quarter CEMS/COMS Report from April 1, 2019 to June 30, 2019. CEMS down time Boiler No. 10 Opacity: less than 2% 0% excess emissions. TRS: less than 1% excess emissions 0% No 11 Boiler: CEMS downtime less than 1% 0 % excess emissions. Lime Kiln TRS 0.cems: less than 0.1% 0 % excess emissions. Boiler Number 11: NOx O2 CEMS Downtime: 0.05% Excess emissions: 0% No. 8 Boiler CEMS NOx downtime: 3.5% Excess emissions 0%

Activity Date	Activity Type	Compliance Status	Comments
07/08/2019	ROP Other	Compliance	1st Quarter CEMS/COMS Report submitted April 26, 2019 (from Jan 1, 2019 to March 31, 2019). No 10 Recovery Furnace, less than 1% CEMS downtime, less than 0.1% excess emissions. Boiler 11: less than 1% CEMS downtime, 0 % excess emissions. Lime Kiln: TRS: less than 0.5% downtime 0% excess emissions. Boiler 11 NOx: less than 0.5% CEMS downtime 0% excess emissions. No. 8 Boiler: NOx Less than 1% downtime 0% excess emissions
04/17/2019	ROP Annual Cert	Compliance	Annual Compliance Certification from Jan 1, 2018 to Dec 31, 2018
04/17/2019	ROP SEMI 2 CERT	Compliance	Semi-Annual Report Certification from July 1, 2018 to Dec 31, 2018. Deviations were only a result of emission unit shut down or start up.
04/17/2019	CAM Excursions/Exceedances	Compliance	40 CFR 64 Compliance Assurance Monitoring (CAM) Excursion Summary Report from July 1, 2018 to Dec 31, 2018. EUOC33 (thermal oxidizer) Scrubber pH was out of indicator range for 3 hours due to low soda ash density. 50% caustic was added to the scrubber to increase pH and stabilize. EUS29 Lime Slaker recausticizing system scrubber flow rate was less than 150 gallons per minute as result of low flow to the slaker, slaker was brought offline and flow was increased to the slaker to correct the issue. Scrubber flow
04/17/2019	CAM monitor downtime	Compliance	40 CFR 64 Compliance Assurance Monitoring (CAM) Monitor Downtime Summary Report from July1, 2018 to Dec 31, 2018 EUOC33 pH probe failure total of 23 hours Probes were replaced and calibrated. EU9B03 scrubber pressure drop port was plugged after start up of boiler 9, the port was cleaned.

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04/17/2019	Excess Emissions (CEM)	Compliance	4th Quarter CEMS/COMS Report submitted January 29, 2019 (from July 1 2018 to Dec 31, 2018) Recovery Furnace 10:CEMS downtime 1.3% 0 excess emissions Number 11 Boiler: 0.1% CEMS downtime 0 excess emissions Lime Kiln: 0.23% Downtime 0 excess emissions Number 8 Boiler: 0.05% downtime 0 excess emissions
04/17/2019	ROP Annual Cert	Compliance	OMYA, Inc - Annual Compliance Certification from Jan 1, 2018 to Dec 31, 2018
04/17/2019	ROP SEMI 2 CERT	Compliance	OMYA, Inc Semi-Annual Report Certification from July 1, 2018 to Dec 31, 2018
03/13/2019	MAERS	Compliance	2018 MAERS - refer to MAERS for any comments
02/26/2019	MACT (Part 63)	Compliance	40 CFR 63 Subpart S Semi-Annual Report from July 1, 2018 to Dec 31, 2018
02/26/2019	MACT (Part 63)	Compliance	40 CFR 63 Subpart MM Semi-Annual Report from July 1, 2018 to Dec 31, 2018
02/26/2019	MACT (Part 63)	Compliance	40 CFR 63 Subpart JJJJ Semi-Annual Report from July 1, 2018 to Dec 31, 2018
02/26/2019	MACT (Part 63)	Compliance	40 CFR 63 Subpart DDDDD Semi-Annual Report from July 1, 2018 to Dec 31, 2018 Less than 1% continuous monitor downtime
12/13/2018	ROP Qrtly Cert	Compliance	018 Third Quarter COMS CEMS report. Boiler 10, Boiler 11, Lime Kiln, Boiler 8. Monitor Downtime for all units and pollutants is less than 1%.
12/12/2018	MACT (Part 63)	Compliance	Bleach Plant had a high Oxidation Reduction Potential event for 78 minutes. No Excess emissions at any amount are allowed by 63.445. action was taken to correct and the event will be submitted as a deviation in the next semi annual report.
12/12/2018	ROP Semi 1 Cert	Compliance	OMYA, Inc Semi-Annual Report Certification from Jan 1, 2018, to June 30, 2018
12/12/2018	ROP Semi 1 Cert	Compliance	Verso Escanaba LLC Semi-Annual Report Certification from Jan 1, 2018, to June 30, 2018

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12/12/2018	CAM Excursions/Exceedances	Compliance	40 CFR 64 Compliance Assurance Monitoring (CAM) Excursion Summary Report from Jan 1, 2018, to June 30, 2018
12/12/2018	ROP Other	Compliance	R 336.1801 No. 8 Boiler Ozone Season Summary Report from May 1, 2018, to Sept 30, 2018
08/13/2018	ROP Other	Compliance	40 CFR 63 Subpart S Semi-Annual Report; 40 CFR 63 Subpart MM Semi-Annual Report; 40 CFR 63 Subpart JJJJ Semi-Annual Report from Jan 1, 2018 to June 30, 2018
08/02/2018	ROP Qrtly Cert	Compliance	2018 Second Quarter COMS and CEMS report Verso Escanaba
08/01/2018	ROP Other	Compliance	40 CFR 63 Subpart S Semi-Annual Report from 1/1/2018 to 6/30/2018
08/01/2018	ROP Other	Compliance	40 CFR 63 Subpart MM Semi-Annual Report from 1/1/2018 to 6/30/2018
08/01/2018	ROP Other	Compliance	40 CFR 63 Subpart JJJJ Semi-Annual Report from 1/1/2018 to 6/30/2018
08/01/2018	ROP Other	Compliance	40 CFR 63 Subpart DDDDD Semi-Annual Report from 1/1/2018 to 6/30/2018 Boiler #9 0% monitor downtime Boiler #11 0.94% downtime.

Name: 

Date: 01/13/20

Supervisor: 