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EGLE/AQD

OCT 07 2020

**Verso Corporation**

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**Adam Becker**

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October 6, 2020

Ms. Sydney Bruestle  
Environmental Quality Analyst  
EGLE Air Quality Division  
1504 West Washington Street  
Marquette, MI 49855

**RE: Violation Notice Response for Violation Notice received September 14<sup>th</sup>, 2020 – Plant ID# A0884**

Dear Ms. Bruestle:

This letter is in response to the Violation Notice submitted to Verso Escanaba (VE) from the Michigan Department of Environment, Great Lakes, and Energy (EGLE) dated September 14<sup>th</sup>, 2020. VE completed Repeat Performance Testing (RPT) on the No. 11 Boiler (EU11B68) on June 15-16<sup>th</sup>, 2020. This testing was to demonstrate compliance with the requirements of the applicable standards for 40 CFR 63 subpart DDDDD. During the testing completed on June 15<sup>th</sup>, 2020 by Advanced Industrial Resources (AIR), AQD staff documented the onsite field data sheet for the second compliance test run. After the stack testing report was submitted to EGLE on August 19<sup>th</sup>, 2020, it was determined that the submitted field data sheet for the second compliance run had been altered from the original.

EGLE has chosen not to accept any of the compliance testing completed by AIR during that testing event. The tests that have not been accepted are as follows:

- Thermal Oxidizer (FGTO33) testing for HAPs in the form of methanol to demonstrate compliance with 63.457(b)(5)(ii).
- Bleach Plant (FGB25) testing for chlorinated HAPs on the #1 and #2 scrubber to demonstrate compliance with 63.457(b)(5)(ii).
- Boiler 11 (EU11B68) HCl Repeat Performance Testing to comply with 40 CFR Part 63, Subpart DDDDD (63.7540(a)(4)).
- Boiler 11 (EU11B68) Relative Accuracy Test Audit (RATA) for Nitrogen Oxide (NOx) and Oxygen (O2)
- Boiler 8 (EU8B13) Relative Accuracy Test Audit (RATA) for Nitrogen Oxide (NOx) and Oxygen (O2)

After discussing the field data sheet discrepancies with AIR, VE has terminated the working relationship with AIR and will use other testing consultants to complete future testing.

VE conducted an HCl Repeat Performance Test on Boiler 11 (EU11B68) on September 29<sup>th</sup>, 2020 using Mostardi Platt as the testing consultants. VE has scheduled to complete the rest of the compliance testing cited in the attached VN using Mostardi Platt as the testing consultants the week of October 19<sup>th</sup>, 2020.

VE does not believe a VN is warranted for Boiler 8 (EU8B13) RATA testing. RATA testing was completed on Boiler 8 (EU8B13) February 27<sup>th</sup>, 2020. According to 40 CFR 60, Appendix F, RATA testing must be completed once every four calendar quarters. Boiler 8 (EU8B13) NO<sub>x</sub> and O<sub>2</sub> has not exceeded more than four quarters without successfully passing a RATA test.

Please contact me with any further questions or concerns.

Sincerely,



Adam Becker  
Environmental Engineer

Electronic CC: Jeff Maule (VE), Michael Glodowski (VE), Mark Crockford (VE), Brad Nurmela (VE), Jenine Camilleri (EGLE), Edward Lancaster (EGLE), File 8.3.1