



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
UPPER PENINSULA DISTRICT OFFICE



C. HEIDI GREETHER  
DIRECTOR

January 4, 2017

Mr. Matt Archambeau  
Escanaba Paper Company  
7100 County Road 426  
Escanaba, MI 49829

SRN: A0884, Delta County

Dear Mr. Archambeau:

**VIOLATION NOTICE**

On December 22, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a review of your submitted emissions testing report. The purpose of this review was to determine your facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-A0884-2016.

During the review, staff observed the following:

| Process Description               | Rule/Permit Condition Violated  | Comments   |
|-----------------------------------|---|--|
| #9 Boiler Flexible Group (FG9B03) | MI-ROP-A0884-2016, FG9B03 SC I.5; PM limit of 0.10 lb/1000 lbs of exhaust gases | TPU calculated the result of the North Stack to be 0.11 lb/1000 lbs of exhaust gases |
| #9 Boiler Flexible Group (FG9B03) | MI-ROP-A0884-2016, FG9B03 SC I.5; PM limit of 0.10 lb/1000 lbs of exhaust gases | TPU calculated the result of the South Stack to be 0.12 lb/1000 lbs of exhaust gases |
| #11 Boiler (EU11B68)              | MI-ROP-A0884-2016, EU11B68 SC I.1; CO limit of 0.50 lb/ MMBTU heat input        | TPU calculated the result to be 0.94 lb/ MMBTU heat input                            |

Stack testing was conducted at Escanaba Paper Company from August 30 to September 2, 2016. This testing was required to determine your facility's compliance with 40 CFR Part 63, Subpart DDDDD; 40 CFR Part 60, Subpart D; and MI-ROP-A0884-2016.

The Technical Programs Unit (TPU) calculated values for the PM emissions for the #9 Boiler on the North Stack and the South Stack were found to be greater than the

permitted limits specified in the ROP. TPU calculated values for CO emissions for the #11 Boiler were also found to be greater than the permitted limits specified in the ROP.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 26, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Escanaba Paper Company believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Joel E Asher  
Environmental Quality Analyst  
Air Quality Division  
906-250-5123

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Janis Ransom, DEQ