



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
CADILLAC DISTRICT OFFICE



C. HEIDI GREYHER  
DIRECTOR

February 1, 2017

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

SRN: A0884, Delta County

Dear Mr. Archambeau:

**VIOLATION NOTICE**

The Department of Environmental Quality (DEQ), Air Quality Division (AQD), has conducted a review of your report for performance testing during the week of August 29, 2016. The Renewable Operating Permit number MI-ROP-A0884-2016 requires EU11B68 – #11Boiler and FG9B03 – #9 Boiler System to comply with Title 40 of the Code of Federal Regulations (CFR) Part 63, Subpart A and Subpart DDDDD.

During the report review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
#11 Boiler	MI-ROP-A0884-2016, EU11B68, IX, 3	Failure to comply with 40 CFR Part 63, Subparts A and DDDDD
#9 Boiler	MI-ROP-A0884-2016 FG9B03, IX, 4	Failure to comply with 40 CFR Part 63, Subparts A and DDDDD

While performance testing was conducted for mercury, it was not acceptable due to failing quality assurance. The tubes used for sampling mercury on EU11B68 (#11 Boiler) were manufactured incorrectly causing zero runs to pass quality assurance and invalidating all runs. Only two runs passed quality assurance for sampling mercury on FG9B03 (#9 Boiler). Under 40 CFR Part 63, Subpart A requires that a compliance test consist of three valid runs.

Annual testing is required to be performed within 13 months of the previous test. The last acceptable performance test was completed September 4, 2015. Escanaba Paper has failed to meet the requirement for annual testing. Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 15, 2017 (which coincides with 14 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,



Jeremy Howe  
Environmental Quality Analyst  
Air Quality Division  
231-876-4416 / howej1@michigan.gov

cc: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Karen Kajiya-Mills, DEQ  
Ms. Janis Ransom, DEQ  
Mr. Joel Asher, DEQ