



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
MARQUETTE DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

October 25, 2019

VIA E-MAIL and U.S. MAIL

Mr. Todd Downey  
Verso Escanaba LLC  
7100 County Road 426  
Escanaba, Michigan 49829

SRN: A0884, Delta County

Dear Mr. Downey:

**VIOLATION NOTICE**

On October 22, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the Boiler MACT stack test report for emissions testing conducted on August 21, 2019, on Boiler No. 11 located at Verso Escanaba. The purpose of the stack test was to determine Verso Escanaba'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; the Air Pollution Control Rules; 40 CFR Part 63, Subpart DDDDD; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-A0884-2016.

During the stack test review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Boiler No. 11 (EU11B68) is a combination fuel boiler rated at 1040 MM BTU/hr. The boiler burns natural gas and solid fuels including: pulverized coal, wood residue, wastewater treatment plant residuals, Tire-Derived Fuel, and non hazardous secondary material engineered fuel pellets. Emissions are controlled by an over-fired air system, multi-clone, and electrostatic precipitator.	40 CFR Part 63, Subpart DDDDD Table 1 1. Hydrogen Chloride (HCl) emission limit 2.2E-2 lb/MMBtu of heat input	During the stack test performed on August 21, 2019, average HCl emissions were 2.4E-2 lb/MMBtu. This value exceeds the Boiler MACT Limit.

This process is subject to the federal National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters. These standards are found in 40 CFR Part 63, Subpart DDDDD.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 15, 2019, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Marquette District, at 1504 West Washington Street, Marquette, Michigan 49855 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Verso Escanaba LLC 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 violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Sydney Bruestle  
Environmental Quality Analyst  
Air Quality Division  
906-236-3995

cc: Mr. Adam Becker, Verso Escanaba LLC  
Mr. William Racine, Verso Escanaba LLC  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Ed Lancaster, EGLE