



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 14, 2020

VIA E-MAIL

Mr. Mark Crockford
Verso Escanaba LLC
7100 County Road 426
Escanaba, Michigan 49829

SRN: A0884, Delta County

Dear Mr. Crockford:

VIOLATION NOTICE

On August 19, 2020 , the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received performance testing reports from Verso Escanaba LLC located at 7100 County Road 426 , Escanaba , Michigan. A Relative Accuracy Test Audit was done on Boiler 8 and Boiler 11 on June 13-14, 2020, Boiler MACT Performance Testing was done on Boiler 11 on June 15-16, 2020, and 40 CFR Part 63, Subpart S Performance Testing was done on the Bleach Plant and Thermal Oxidizer on June 17-18, 2020. The purpose of the testing was to determine Verso Escanaba LLC'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; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-A0884-2016.

During the performance testing report review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU11B68—Boiler 11 is a combustion engineering combination fuel boiler rated at approximately 1040 million BTU per hour heat input, the boiler burns natural gas, pulverized coal, wood residue, wastewater treatment plant residuals and Tire-Derived fuel.	The facility is subject to 40 CFR Part 63, Subpart S and is required to test the Thermal Oxidizer to verify compliance with methanol emission standards and the Bleach Plant Scrubbers to verify compliance with chlorine emission standards (63.457(b)(5)(ii)).	AQD recorded run 2 field data while onsite during performance testing of Boiler 11 Run 2 field data submitted in the final test report appears to have been altered and is not consistent with the data observed at the time of the test. As a result of this discrepancy, AQD is not able to accept any of the testing conducted by the contractor June 13-18, 2020.
FGB25—Bleach Plant Scrubbers receive gases from the pulp bleaching stages.	The facility is subject to 40 CFR Part 63, Subpart DDDDD and is required to test Boiler 11 to verify compliance with hydrogen chloride emission standards (63.7540(a)(4)).	
FGTO33—Thermal Oxidizer incinerates low volume high concentration noncondensable gases from the Digester Consent Order Devices, Evaporator System,		

<p>Steam Stripping System, and Digester System.</p> <p>EU8B13—Boiler 8 is a Combustion Engineering boiler rated at approximately 594 million BTU per hour heat input. This boiler burns natural gas and fuel oil.</p>	<p>The facility is required to perform annual Relative Accuracy Test Audits on Boiler 8 and Boiler 11 Continuous Emissions Monitoring Systems (MI-ROP-A0884-2016).</p>	
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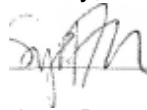
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 4, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the 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 and for the cooperation that was extended to me during my inspection of Verso Escanaba LLC. 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: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Edward Lancaster, EGLE