DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

A621859745

FACILITY: Dunn Paper, Inc.		**SRN / ID:** A6218
LOCATION: 218 RIVERVIEW ST, PORT HURON		**DISTRICT:** Warren
CITY: PORT HURON		**COUNTY:** SAINT CLAIR
CONTACT: Elizabeth Powell , EHS & S Manager		**ACTIVITY DATE:** 08/16/2021
STAFF: Rem Pinga	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Scheduled On-site Inspection		
RESOLVED COMPLAINTS:		

On August 16, 2021, I conducted a scheduled on-site inspection at Dunn Paper, Inc. (SRN: A6218), located at 218 Riverview, Port Huron, Michigan. The purpose of the inspection was to determine the 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 Quality Division (AQD) Administrative Rules, and the facility's Permit to Install (PTI) Nos. 514-95B and 113-97. Prior to the walk-through inspection, I met and conducted a pre-inspection meeting with Elizabeth Powell, EHS & S Manager, Ronald Koglin, Environmental Technician, and Ms. Brittany Kutz, Environmental Specialist of Alliance Consultants, LLC. Ms. Powell, Ms. Kutz, and Mr. Koglin accompanied me during the walk-through inspection.

To comply with the COVID-19 Emergency AQD Field Inspection Guidance Update (June 2020), the inspection was announced and scheduled. I entered the facility wearing face mask, face shield, safety glasses, hard hat, and safety shoes. My temperature was checked at the security guard outpost inside the building on the second floor. I completed the Covid-19 Health and Safety Questionnaire electronically outside the outpost and was certified by Ms. Powell.

Since 1924, Dunn Paper is a specialty paper manufacturer and converter outside of printing and writing grade. The company is based in Alpharetta, Georgia, but has several manufacturing/paper mill facilities across the USA and Canada. The company produces paper types such as clay-coated paper, wax-coated paper, water-based coated paper, machine-glazed base paper, creped tissue, through air-dried tissue, etc. The various facilities engineer, test, and manufacture innovative specialty paper, tissue products, and packaging products across North America for Food Services, Medical, Retail/Grocery, Sanitary/Hygiene, and Industrial customers.

In the Port Huron facility, Dunn Paper, Inc. produces paper sheet rolls from pulp and secondary fiber (recycled fiber). The primary products are dry wax, coated, uncoated, and fluorocarbon treated papers. The facility is currently permitted to operate 4 paper machine Lines under AQD PTI Nos. 514-95B and 113-97. During inspection, I was informed that Machine 2 has

been shutdown for 20 years and Machine 4 also shutdown last June 2020. During walk-through inspection, I only observed one line, Machine 3, running. The general production process at the facility starts from the pulp + recycled paper raw material that is mixed with water in one of six pulpers (four primary and two secondary) and then soaked into "slush". The slush goes into the wire conveyor of the paper machine to drain the water and where additives are added followed by screening. The paper material in the conveyor then goes to the vacuum process to remove the water prior to the natural gas fired first drying process, the Yankee Can. From the dryer, the paper in the conveyor goes to the coating process followed by another infra-red drying process (for the coated paper). Machines 1 & 4 are used to make wax paper. Machine 3 is used for coating papers. The line ends with the rolling process to produce 48" paper roll products. The facility may conduct additional end product processes such as slicing the roll into smaller paper rolls, printing/labeling, etc.

Permits to Install (PTI) Nos. 514-95B and 113-97 contained applicable emission rate restrictions to opt the facility out of the Clean Air Act of 1990, Title V, Renewable Operating Permit (ROP) requirements, and be considered as synthetic minor permits. This stationary source is not considered a major source of Hazardous Air Pollutant (HAP) emissions because the company's PTI No. 113-97 contained facility-wide single HAP and combined/aggregate HAPs emission rates restrictions, supported by monthly 12-month rolling total emission rates recordkeeping requirements, to demonstrate continued compliance as a synthetic minor facility. PTI No. 113-97 also contained VOC emission rate restrictions for Dunn Paper to be considered a synthetic minor facility for VOC. PTI No. 514-95B contained facility-wide emission rate restrictions for SO2, NOx, and CO, thus making the facility also an opt-out/synthetic minor facility for the applicable pollutants.

As mentioned above, PTI No. 113-97 became the VOC, individual HAP, and aggregate HAPs facility opt-out/synthetic minor permit. Per PTI No. 113-97, special condition 13, submitted records showed that the highest VOC emission rate from January 2020 through April 2021 occurred in January 2021 at 3.26 tons per year (tpy) and less than the 61.0 tpy permit limit. Per PTI No. 113-97, special condition 14, submitted records showed that the highest pound per hour (lb./hr.) VOC emission rate was emitted in February, July, and October 2020 by Machine 3 at 14.231 lb./hr. and less than the 40 lb./hr. permit limit. Machine 1 showed highest VOC emission rate of 0.586 lb./hr. in November 2020 and January 2021 while Machine 4 emitted highest VOC emission rate of 0.007 lb./hr. for January 2020 prior to shutdown in June 2020. Per PTI No. 113-97, special condition 15, I did not observe any visible emissions inside and outside the facility including the paper machine areas. Per PTI No. 113-97, special condition 21, the highest monthly 12-month rolling total grease repellant usage occurred in July 2020 at 4,871 gallons/12 months and less than the 34,000 gallons/12 months

permit limit. The facility used Unidine 8111 and Unidine 8731 as grease repellant agents. Per PTI No. 113-97, special condition 22, Dunn Paper did not use any release agent thus in compliance with the 11,000 gallons/12 months permit limit. Per PTI No. 113-97, special condition 23, the highest monthly 12-month rolling total individual Hazardous Air Pollutant (HAP) emission, Chlorine, occurred in February 2020 at 0.56 ton and less than the 8.9 tpy permit limit. The highest monthly 12-month rolling total aggregate HAPs emissions occurred in February 2020 at 0.65 ton and less than the 22.4 tpy permit limit.

PTI No. 514-95B was issued for EU00001 and EU00017 emission unit boilers. The fuel oil/natural gas fired boilers contained facility-wide emission rate restrictions for SO2, NOx, and CO, to opt the facility out of being classified as a major source for the applicable pollutants and consider the permit as synthetic minor PTI. Per PTI No. 514-95B, special condition EU00001, I verified during walk-through inspection that the boiler is shutdown. I was informed that EU00001 boiler has been shutdown since 2009. Per PTI No. 514-95B, special condition EU00017, the emission unit pertains to a 94.7 MMBTU/hr. Nebraska low NOx boiler permitted to fire natural gas, and No. 2 fuel oil. Ms. Powell mentioned using only natural gas as fuel source. I was shown that the 2 fuel oil tanks have been decommissioned. Per PTI No. 514-95B, special condition EU00017 (I.3 & 5), the facility is reporting 0.042 lb./MMBTU NOx emission factor and 0.15 lb./MMBTU CO emission factor for natural gas usage. Per PTI No. 514-95B, special condition EU00017 (II.1), the facility did not fire fuel oil as fuel for the boiler. Per PTI No. 514-95B, special condition EU00017 (IV.1), the highest MMBTU/month was reported for January 2020 at 34,041 MMBTU. With the boiler monthly hours of operation reported at 730 hours, the highest average monthly MMBTU/hr. was calculated at 46.63 MMBTU/hr. and less than the 94.7 MMBTU/hr. permit limit. Per PTI No. 514-95B, special condition EU00017 (IV.2), Ms. Powell indicated that the Nebraska boiler is a low NOx boiler. Per PTI No. 514-95B, special condition EU00017 (VI.3), the facility keeps daily recordkeeping and monthly summaries of natural gas usage for the boiler. Per PTI No. 514-95B, special condition FGBOILERS (I.1), the highest SO2 monthly emission for natural gas usage occurred in January 2020 at 0.01 ton. It calculated to a monthly 12-month rolling average of 0.11 tpy and less than the 89.0 tpy permit limit. Per PTI No. 514-95B, special condition FGBOILERS (I.2), the highest NOx monthly emission for natural gas usage also occurred in January 2020 at 0.71 ton and calculated to a monthly 12-month rolling average of 8.00 tpy and less than the 45.0 tpy permit limit. Per PTI No. 514-95B, special condition FGBOILERS (I.3), the highest CO monthly emission for natural gas usage occurred in January 2020 at 2.55 tons and calculated to a monthly 12-month rolling average of 28.58 tpy and less than the 81.1 tpy permit limit. Per PTI No. 514-95B, special condition FGBOILERS (III.1), the facility did not use fuel oil as fuel for the boiler. Per PTI No. 514-95B, special condition

FGFACILITY (I.1), Dunn Paper reported that the highest facilitywide SO2 monthly 12-month rolling total emission rate for natural gas usage occurred in January 2020 at 0.16 tpy and less than the 99.9 tpy permit limit. Per PTI No. 514-95B, special condition FGFACILITY (I.2), Dunn Paper reported that the highest facilitywide NOx monthly 12-month rolling total emission rate for natural gas usage also occurred in January 2020 at 16.22 tpy and less than the 99.9 tpy permit limit. Per PTI No. 514-95B, special condition FGFACILITY (I.3), Dunn Paper reported that the highest facilitywide CO monthly 12-month rolling total emission rate for natural gas usage occurred in January 2020 at 28.58 tpy and less than the 99.9 tpy permit limit. Per PTI No. 514-95B, special condition FGFACILITY (II.3), Ms. Powell mentioned that the facility is using pipeline quality natural gas supplied by DTE Energy.

Overall, I did not find any non-compliance issues during inspection.

NAME _____ DATE 09/14/2021 SUPERVISOR _____