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Mr. Michael Conklin  
Michigan Department of Environment, Great Lakes, and Energy  
Air Quality Division (AQD)  
Marquette District Office  
1504 West Washington Street  
Marquette, MI 49855

**Re: Response to Violation Notice  
Dunn Paper - Menominee (SRN: B1855)**

Dear Mr. Conklin:

Dunn Paper - Menominee (Dunn Paper) is submitting this letter in response to the violation notice (VN) dated January 15, 2020 from the Michigan Department of Environment, Great Lakes, and Energy (EGLE) that alleges non-compliance with Rule 290.

Dunn Paper operates various paper manufacturing and coating processes that are identified as exempt from Michigan Air Pollution Control Rule R 336.1201 (Rule 201) air permitting requirements pursuant to R 336.1290 (Rule 290) for emission units with limited emissions. Specifically, these processes are identified in flexible group FGPROCESS in Renewable Operating Permit (ROP) No. MI-ROP-B1855-2016. Special Condition (SC) VI.1 of FGPROCESS requires records of the information specified in Rule 290.

EGLE performed an air quality inspection on December 6, 2019 and subsequent review of FGPROCESS records for Rule 290. EGLE's inspection report, dated January 13, 2020, alleges that:

- The paper machine and converting processes in FGPROCESS utilize a glue identified as "R-12027LS" that contains ethylene oxide. Ethylene oxide has an initial risk screening level (IRSL) of 0.0002 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ), established by EGLE on January 17, 2017 (the IRSL was previously established at 0.03  $\mu\text{g}/\text{m}^3$  on September 22, 1982). Rule 290 does not permit the emission of pollutants with IRSLs less than 0.04  $\mu\text{g}/\text{m}^3$ .
- Facility records indicate that over 1,000 pounds per month (lb/mo) of sodium hypochlorite is being emitted from FGPROCESS. Rule 290 does not permit uncontrolled emissions of air contaminants to exceed 1,000 lb/mo.

EGLE alleges in the VN dated January 15, 2020 that the paper manufacturing and converting processes under flexible group FGPROCESS are not eligible for exemption under Rule 290, and a Permit to Install (PTI) application may be required pursuant to Rule 201.



### **Rule 290 Exemption Applicability**

Exemptions in the Michigan Part 2 Rules specifically cover the installation/construction of emission units. The emission units in FGPROCESS were installed as early as 1940; predating the establishment of the ethylene oxide IRSL and the Rule 290 requirement that restricts pollutants with IRSLs less than 0.04  $\mu\text{g}/\text{m}^3$  (this language was added to Rule 290 and became effective in 1997). We are in the process of evaluating our paper manufacturing and coating processes for the appropriate application of Rule 290 exemption criteria.

Additionally, Dunn Paper discovered that the "R-12027LS" glue product containing ethylene oxide was inadvertently listed in records for several emission units that do not use the material, including EUDRYWAXER#1, EUDRYWAXER#2, EUDRYWAXER#3, and EU#2PAPERMACH. Therefore, these emission units are not excluded by ethylene oxide from using Rule 290.

Dunn Paper utilizes a bleach containing sodium hypochlorite in EU#2PAPERMACH, and is also used separately in the water filtration plant. The recordkeeping spreadsheets log a total *combined* bleach usage between EU#2PAPERMACH and the water filtration plant; however, application of Rule 290 is on a per emission unit basis. Dunn Paper is in the process of verifying bleach usage in EU#2PAPERMACH only to be consistent with Rule 290.

### **Response to Violation Notice**

Dunn Paper is in the process of reviewing our records and regulatory requirements for FGPROCESS emission units to confirm exemption applicability and address EGLE's alleged violation. Dunn Paper respectfully requests a 30-day extension (by March 6, 2020) to evaluate Rule 290 and respond to the VN.

If there are questions regarding this response, please contact me at (906) 864-5341, or Ms. Mary Mello of NTH Consultants, Ltd at (248) 662-2033.

Sincerely,

Daniel Burlingame  
Environmental Health Safety Engineer

cc: Mr. Ed Lancaster, EGLE – AQD  
Mr. Christopher Ethridge, EGLE – AQD  
Ms. Jenine Camilleri, EGLE – AQD  
Mr. Kevin French, Dunn Paper  
Ms. Mary Mello, NTH Consultants, Ltd.