



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

January 15, 2020

Mr. Daniel Burlingame  
Dunn Paper  
144 North 1<sup>st</sup> Street  
Menominee, Michigan 49858

SRN: B1855, Menominee County

Dear Mr. Burlingame:

**VIOLATION NOTICE**

On December 6, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Dunn Paper located at 144 North 1<sup>st</sup> Street, Menominee, Michigan. The purpose of this inspection was to determine Dunn Paper'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 Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B1855-2016.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Paper manufacturing and converting (FGPROCESS)	R 336.1201 Special Condition VI.1	Records indicate non-compliance with Rule 290

This is a violation of the recordkeeping condition specified in Special Condition VI.1 under FGPROCESS of ROP number MI-ROP-B1855-2016.

The conditions of ROP number MI-ROP-B1855-2016 require the permittee to keep current records to show eligibility with the permit exemption Rule 290. Records provided indicate that the source is no longer eligible. This is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the FGPROCESS equipment. An application form is available by request, or at the following website: [www.michigan.gov/air](http://www.michigan.gov/air) (in the shaded box on the upper right-hand side of the page).

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

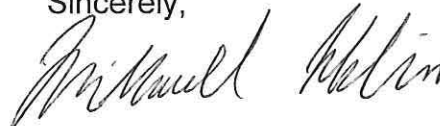
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 5, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the 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 recurrence.

Please submit the written response to EGLE, AQD, Marquette District Office, 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 Dunn Paper 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 Dunn Paper. 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,



Michael Conklin  
Environmental Engineer  
Air Quality Division  
906-202-0013

cc: Mr. Kevin French, Dunn Paper  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Ed Lancaster, EGLE