

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

B423873473

<b>FACILITY:</b> FRENCH PAPER LLC		<b>SRN / ID:</b> B4238
<b>LOCATION:</b> 100 FRENCH STREET, NILES		<b>DISTRICT:</b> Kalamazoo
<b>CITY:</b> NILES		<b>COUNTY:</b> BERRIEN
<b>CONTACT:</b> Shane Fenske , President		<b>ACTIVITY DATE:</b> 08/22/2024
<b>STAFF:</b> Chance Collins	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Scheduled inspection for FCE		
<b>RESOLVED COMPLAINTS:</b>		

On August 22, 2024, AQD staff traveled to Berrien County to perform an inspection of French Paper Company. The purpose of the inspection was to determine the facility's compliance with Permit to Install No. 395-96A and applicable state and federal air pollution control regulations.

The facility is an operating paper mill. The facilities paper making process starts out by adding either shredded virgin pulp paper, post-consumer materials, recycled envelope clippings and/or a combination of them into a vat where they get mixed with water and the appropriate powder or liquid dye. A mixing blade inside the vat blends it together. The mixed pulp then gets run through various sized mesh screens to eliminate any pulp paper that's bigger than required. The pulp paper then gets squirted out on a fine mesh screen where it begins to dry. It then goes through various roller presses to help remove some of the excess water before going into more roller presses that are heated by the boiler steam to help further drying. The beginning of the roller drying operation is approximately 110 degrees F and the end is approximately 310 degrees F. The finished paper then runs through various QA machines to make sure it is as desired prior to being rolled on a spindle ready for shipping. It may also go to a slicing area if required.

AQD staff arrived on site at 11:30 a.m. to sunny conditions with a temperature of 73°F with a SW wind of 5 mph. There were no noticeable odors upon arrival. AQD staff met with Shane Fenske (President) who walked staff around the facility and answered all questions.

The following discusses the findings of the inspection and review of records:

### EU-GASBOILER

**Description:** Natural gas and distillate oil fired boiler with a rated heat release of approximately 69 million BTU's per hour.

Pollutant	Limit	Time Period/Operating Scenario	Equipment
1. SO <sub>2</sub>	0.055 lb/MMBTU	Test Protocol	EU-GASBOILER
2. SO <sub>2</sub>	3.50 pph	Monthly averaging period	EU-GASBOILER
3. NO <sub>x</sub>		Test Protocol	EU-GASBOILER

	<b>0.145 lb/MMBTU</b>		
<b>4. NOx</b>	<b>9.9 pph</b>	<b>Monthly averaging period</b>	<b>EU-GASBOILER</b>

Facility appears to be in compliance. 1 and 3 above would have to be determined by testing which the AQD hasn't requested at this time. Records reviewed for the last 12 months regarding the pound per hour limits in 2 and 4 above indicate SO2 emissions ranged from a low of 0.015 pounds to a high of 0.026 pounds and NOx emissions ranging from 2.739 pounds to 4.303 pounds.

#### Material Limits:

<b>Material</b>	<b>Limit</b>	<b>Time Period/Operating Scenario</b>	<b>Equipment</b>
1. Sulfur content of distillate oil	<b>0.05% by weight</b>	<b>Instantaneous</b>	<b>EU-GASBOILER</b>
2. Distillate Oil	<b>493 gallons per hour</b>	<b>Monthly averaging period</b>	<b>EU-GASBOILER</b>

Facility appears to be in compliance. AQD staff was informed that the facility hasn't combusted any fuel/distillate oil in the boiler in 15 years. The sulfur content of the distillate oil during past inspections appeared to always be 0.05%.

#### Monitoring/Recordkeeping:

Facility appears to be in compliance. All records were kept in a satisfactory manner.

#### Stack/Vent Restrictions:

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter/Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>
<b>SV-GASBOILER</b>	<b>96</b>	<b>200</b>

**Facility appears to be in compliance. The stack appears to meet the above dimensions.**

**Other Requirements:**

1. The permittee shall not operate the existing col fired boiler. **Facility appears to be in compliance.** The facility does not operate the coal fired boiler and it has been rendered inoperable.
2. Visible emission from EU-GASBOILER shall not exceed a six- minute average of 10 percent opacity. **Facility appears to be in compliance.** AQD staff did not note any VE's coming from the stack during the inspection.

NAME

DATE 8/22/2024SUPERVISOR Monica Brothers