

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B156330123

FACILITY: GREAT LAKES TISSUE		SRN / ID: B1563
LOCATION: 437 S MAIN ST, CHEBOYGAN		DISTRICT: Gaylord
CITY: CHEBOYGAN		COUNTY: CHEBOYGAN
CONTACT: Bill McCarney ,		ACTIVITY DATE: 07/08/2015
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: 2015 FCE Site Inspection		
RESOLVED COMPLAINTS:		

Source Description: Great Lakes Tissue manufactures tissue paper at their facility located at 437 South Main Street, Cheboygan, Michigan. They make pulp by pounding used paper in water. They use this pulp in paper making machines to produce large bulk rolls of tissue paper. This bulk paper may be sold to outside customers. Great Lakes Tissue also cuts, rolls, and packages the tissue paper into consumer-sized packages, chiefly as a supplier of "store brand" paper products.

The paper making machines require heat. Historically, two boilers provide paper making machines process heat, as well as building heat. One boiler is a 60,000 pounds of steam per hour coal-fired boiler, the other is a 60,000 pounds of steam per hour gas-fired boiler. The coal-fired boiler burns low sulfur coal. The gas boiler burns natural gas. Either boiler is able to supply the complete steam requirements of the facility. In recent years the coal-fired boiler has not operated. Additionally, the facility generates electricity using their onsite hydro dam.

Permit. On December 9, 2013 the AQD issued permit MI-ROP-B1563-2013 which expires on December 9, 2018. An administratively complete ROP renewal application is due between June 9, 2017 and June 9, 2018.

If/when the ROP is renewed, Torello has marked-up the ROP's EUCOALBOILER table with suggestions and corrections for the ROP renewal, see attached. A copy of the table will be put in the yellow ROP file.

MAP. On September 16, 2008, the AQD approved the malfunction abatement plan (MAP). The MAP includes the EUCOALBOILER only.

MAERS. The 2014 MAERS's EU Gas Boiler operated and reported 7.4 tons of CO, and 8.8 tons of NOx. The ROP does not limit CO and NOx emissions from the Gas Boiler. The 2014 MAERS reported the Coal Boiler did not operate in 2014.

Records. The ROP requires record keeping associated with EU Coal Boiler. Great Lakes Tissue staff said the EU Coal Boiler has not operated for many years; therefore AQD staff did not request records. The ROP does not have recordkeeping requirements associated with Source-Wide Conditions, EU Gas Boiler, or FG Fire Pumps.

MACTS. EUCOALBOILER at the stationary source has a limit on coal throughput to reduce the potential to emit HAPs making the facility minor for haps.

EUCOALBOILER and EUGASBOILER are subject to the MACT standards under the National Emission Standards for Hazardous Air Pollutants for Area Sources for

Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR, Part 63, Subpart JJJJJJ, promulgated on March 21, 2011.

EUFIREPUMP NORTH and EUFIREPUMP SOUTH at the stationary source are subject to the MACT standards under the National Emission Standards for Hazardous Air Pollutants for Area Sources for Stationary Reciprocating Internal Combustion Engines, 40 CFR, Part 63, Subpart ZZZZ.

This is an area source (minor for HAPs). The EPA has not delegated these subparts to MI AQD and the subparts were not reviewed.

MACES. MACES' Facility Information was reviewed and no change was made.

MACES' Regulatory Information was reviewed and the following changes were made:
Regulatory Summary:

1. Changed HAPs to Minor,
2. Subject To, added the ROP number after Permit (ROP) Title V,
3. Added Subparts JJJJJJ, and ZZZZ.

Permit Cards & ROP Look-Up. Permit 50-79A shows up as Active in Permit Cards and ROP Look-Up. It is determined permit 50-79A is obsolete. Torello will request to void permit 50-79A.

Compliance. A review of AQD's MACES report generator shows four violation notices with dates ranging from November 2008 to March 2013. All four violation notices have a "Date Resolved."

A summary of consent judgments related to this facility will be attached.

Inspection. On July 9, 2015 Gloria Torello, AQD, inspected the facility. Prior to going on site, Torello observed the facility from different off site locations. Torello observed a steam plume on the gas fired boiler stack.

Torello met Mr. Bill McCarney, B1563, at the facility for this unannounced compliance inspection. Bill has worked at the facility since approximately 2010 and may be reached at 231-290-1552, and bmc.231@yahoo.com. Typically Todd Korman is the environmental contact, but Todd was out. Mr. Clarence Roznowski is the president and CEO of the facility. Torello reviewed the ROP conditions with Bill and then made a walking tour of the facility.

The facility was operating during the site visit. Torello made a walkthrough of the facility from the warehouse storing the "raw material" (including used juice boxes), to the pulping area (caution is needed here because of the wet floors), to the paper making and drying machines, to the cutting room, to the operations room, to the boiler areas and hydro dam.

EUCOALBOILER is partially dismantled: the stoker drive is dismantled; the ID fan and FD fan motors are removed.

The EUGASBOILER reading on the Mag was 9-inches water, steam pressure has a set point of 142 and the actual reading was 141.8, the boiler pressure reading was 142. The operations room readings were similar.

The facility generates some of its electricity from the on-site hydro dam. The US FERC regulates the dam. Torello spoke with DEQ's Jim Pawlowski, dam specialist. Jim is aware of the dam and has limited involvement.

Torello talked about Michigan's RE-TAP program. Torello attempted to send an email to Bill with RE-TAP info, but the email was returned. Torello will send a printed brochure in the mail.

The facility employs approximately 100 staff, and makes approximately forty 8 foot x 5 foot bulk or parent rolls of tissue paper a day. Approximately five semi loads raw material enter the facility per day, approximately one semi load of non-usable material remains after the process. The remaining non-usable material (example: plastic) is stored onsite and there is a lot of it. At this time there is little use for the non-usable material.

MI-ROP-B1563-2013 Permit Conditions:

EUCOALBOILER

Per Bill, it has been approximately five years since EUCOALBOILER was fired up and used. EUCOALBOILER is partially dismantled: the stoker drive is dismantled; the ID fan and FD fan motors are removed.

Emission Limits on PM, VE and SO₂ require testing and/or monitoring. A review of MACES notes dating back to 2008 show no testing has been completed. A review of AQD files show 2003 results of emission sampling to determine PM emissions from the coal fired boiler exhaust. There is no ongoing monitoring of the emissions because EUCOALBOILER has not been in operation. It is noted there are Monitoring/Recordkeeping requirements pursuant to Consent Judgment 05-007522-CE.

The Process/Operational Restriction requires a MAP. On September 16, 2008 the AQD approved a MAP relating to EUCOALBOILER. The MAP includes monitoring EUCOALBOILER and Multiclone operating parameters, maintenance schedules, and startup-shutdown procedures. Since EUCOALBOILER has not operated, there were no records to review.

The facility has discussed voiding the ROP as it relates to EUCOALBOILER. To date, AQD has not seen any paperwork to void any portion of the ROP.

EUGASBOILER

The opacity emissions are limited to 20 percent and the demonstration of compliance is to burn only natural gas in the boiler. There is no limit on the amount of natural gas that may be burned. Bill said only natural gas is burned in EUGASBOILER. The facility receives the natural gas via pipeline, similar to the pipeline other businesses and residences in the community receive their gas.

Brochure: The inspection brochure will be forwarded to the permittee with the site inspection notes via email.

Conclusions.

There is one active consent judgment relating to this facility.

If/when the ROP is renewed, the ROP's EUACOALBOILER table may be updated with Torello's suggestions and corrections, see the marked up table attached. A copy of the table will be put in the yellow ROP file.

Via onsite inspection, discussion with facility staff, and review of the ROP conditions, it is determined the permittee demonstrates compliance with the conditions of permit MI-ROP-B1563-2013 and the emission units that are operational at this time at the facility.

NAME *Genia Torello*

DATE 8-13-15

SUPERVISOR *[Signature]*