



GRETCHEN WHITMER  
GOVERNOR

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



DANIEL EICHINGER  
ACTING DIRECTOR

April 6, 2023

Rachel Plotner  
J. Rettenmaier USA LP  
16369 US 131 Highway  
Schoolcraft, Michigan 49087

SRN: U391700037, Kalamazoo County

Dear Rachel Plotner:

**VIOLATION NOTICE**

On March 28, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of J. Rettenmaier USA LP (facility) located at 16369 US 131 Highway, Schoolcraft, Michigan. The purpose of this 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); and the Air Pollution Control Rules.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Cellulose Production	R 336.1201 (Rule 201)	Facility could not produce an exemption demonstration and does not have a Permit to Install (PTI) for this process. The facility either needs to show compliance with an exemption or apply for a PTI.
Cellulose Production	R 336.1370 (Rule 370)	Improper collection and disposal of particulate matter
Cellulose Production	R 336.1910 (Rule 910)	Improper operation and maintenance of baghouses

Rachel Plotner  
J. Rettenmaier USA LP  
Page 2  
April 6, 2023

On March 28, 2023, the AQD staff observed operation of the cellulose production equipment while the associated baghouses were malfunctioning and emitting particulate. Staff also observed particulate matter caked on the baghouse exhaust vents, and on the roof where the baghouses are located.

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

EGLE, AQD requests that the facility submits a malfunction abatement plan (MAP) as described in Rule 911(2), within 60 days of the date of this letter. The MAP shall, at a minimum, meet the manufacturer's written instructions for operating and maintaining the baghouses and shall specify the following:

- a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
- b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
- c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.
- d. A description of how emissions will be minimized during all startups, shutdowns and malfunctions.

In addition, please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source. Information on calculating PTE can be found at <http://www.michigan.gov/air>. Choose the "Permits" Tab, then "Air Permitting-Potential to Emit" under the Air Permitting Assistance Heading.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 27, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Rachel Plotner  
J. Rettenmaier USA LP  
Page 3  
April 6, 2023

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If J. Rettenmaier USA LP 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 violations cited above and for the cooperation that was extended to me during my inspection of the facility. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

*Monica Brothers*

Monica Brothers  
Senior Environmental Quality Analyst  
Air Quality Division  
269-312-2535

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Rex Lane, EGLE  
Jeffrey Przekora, J. Rettenmaier USA LP