

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

N392948536

FACILITY: RESOLUTE FOREST PRODUCTS - MENOMINEE		SRN / ID: N3929
LOCATION: 701 FOURTH AVE, MENOMINEE		DISTRICT: Upper Peninsula
CITY: MENOMINEE		COUNTY: MENOMINEE
CONTACT: Emily Lang , Environmental Engineer		ACTIVITY DATE: 03/19/2019
STAFF: Michael Conklin	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced inspection on the Menominee Pulp Mill for compliance with PTI No. 635-93B.		
RESOLVED COMPLAINTS:		

Facility: Resolute Forest Products – Menominee Pulp Mill (N3929)

Location: 701 Fourth Avenue / P.O. Box 277

Contacts: Emily Lang, Environmental Engineer, 906-864-9154

John Groleau, Environmental Manager, 906-864-9168

Regulatory Authority

Under the Authority of Section 5526 of Part 55 of NREPA, The Department of Environmental Quality may upon the presentation of their card, and stating the authority and purpose of the investigation, enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with NREPA, Rules promulgated thereunder, and the federal Clean Air Act.

Facility Description

Resolute Forest Products (RFP) is a wood product manufacturer based out of Montreal, Quebec, Canada. The company has 40 manufacturing facilities across the United states and Canada producing a variety of wood-derived products. Operations and products include market pulp, lumber, tissue, newsprint, and specialty papers. The Menominee Pulp Mill is one of seven pulp mills for RFP with an annual production capacity of 178,000 air-dried metric tons of recycled bleached kraft pulp (RBK). The facility contains a raw materials warehouse, deinking mill, and a pulp mill. The market pulp is used for a variety of consumer products such as tissues, packaging, specialty papers, diapers, and other absorbent products.

The table below summarizes the emission units subject to permitting at the source.

Emission Unit ID	Description
EUBOILER	162 MMBtu/hr natural gas fired boiler using low NOx burners and flue gas recirculation

The table below shows the facility's Michigan Air Emissions Reporting System (MAERS) 2018 submittal. EUBOILER is subject to the federal New Source Performance Standards, 40 CFR Subpart Db, and thus the facility is required to report their annual emissions.

Pollutant	Pounds per Year (PPY)	Tons per Year (TPY)
CO	58513.22	29.26
NOx	38312	19.16
PM10	5294	2.65
PM2.5	5294	2.65
SO2	417.95	<1
VOC	3831.22	1.92

Compliance History

The facility has not received any violation notices in the past five years. The facility was last inspected in 2011 and was found to be in compliance with all applicable air quality rules and regulations at that time.

Inspection

On March 19, 2019, I (Michael Conklin) and Ed Lancaster conducted an unannounced inspection on the Menominee Pulp Mill in Menominee, MI. We arrived to the facility at 2:00 PM and met with Emily Lang, Environmental Engineer for RFP. I explained to Ms. Lang that the purpose of the inspection was to ensure compliance with the facility's Permit to Install (PTI) No. 635-93B. We began by touring the facility and then inspecting the permitted equipment held in the PTI. No changes have occurred since the issuance of PTI No. 635-93B.

Regulatory Analysis

The Menominee Pulp Mill currently holds PTI No. 635-93B for a 162 MMBtu/hr natural gas fired boiler. This PTI was a modification from 635-93A that increased the NOx lb/MMBtu emission limit to 0.20 lb/MMBtu, which is the applicable limit from 40 CFR 60.44b. The facility is considered an area source for hazardous air pollutants (HAP) because the potential to emit of any single HAP is less than 10 tpy and aggregate HAP emissions are less than 25 tpy. The facility is considered a true minor source because the PTE of all criteria pollutants is below 100 tpy. EUBOILER is subject to 40 CFR Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.

EUBOILER

The facility operates a Nebraska natural gas-fired boiler equipped with low NOx burners and fluegas recirculation for NOx control. The nameplate capacity of boiler is 136,000 pounds of steam per hour and a heat input rate of 170 MMBtu/hr. PTI No. 635-93B restricted the heat input rate to 162 MMBtu/hr. For 2018, the boiler consumed 696.59 MMCF of natural gas and emitted 38,312 lb of NOx, or 19.16 tpy. This is in compliance with the NOx limit of 39.4 tpy.

At the time of the inspection, the CEMS data was reporting the boiler was operating at 97.9 MMBtu/hr and NOx emissions were 4.9 lb/hr, 0.05 lb/MMBtu, and 18.3 tpy based on 12 month rolling time period. These operating parameters show compliance with SC I.1, I.2, 1.3, III.1, and VI.2.

Resolute Forest Products has been prompt and complete in submitting excess emissions (CEM) and CEM RATA reports.

Compliance

Based on this inspection, it appears that the Resolute Forest Products – Menominee Pulp Mill is in compliance with PTI No. 635-93B.

NAME



DATE

4/16/19

SUPERVISOR

