



**Michigan Department of Natural Resources and Environment  
Air Quality Division**

Effective Date: January 27, 2011

Issued To:

***MENOMINEE PAPER COMPANY***

Located At:

***144 First Street, Menominee, Michigan 49858***

State Registration Number (SRN): B1855

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-B1855-2011

Expiration Date: December 31, 2015

Administratively Complete ROP Renewal Application Due Between June 30, 2014 and June 30, 2015

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

**SOURCE-WIDE PERMIT TO INSTALL**

Permit Number: MI-PTI-B1855-2011

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Natural Resources and Environment  
Air Quality Division

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Chris Hare, Upper Peninsula District Supervisor

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## **AUTHORITY AND ENFORCEABILITY**

For the purpose of this permit, the permittee is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The department is defined in Rule 104(d) as the Director of the Michigan Department of Natural Resources and Environment (MDNRE) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements will be identified for each ROP term or condition. All terms and conditions that are included in a PTI, are streamlined or subsumed, or is state only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

## A. GENERAL CONDITIONS

### Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **[R336.1213(5)]**
- Those conditions that are hereby incorporated in a state only enforceable Source-wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **[R336.1213(5)(a), R336.1214a(5)]**
- Those conditions that are hereby incorporated in federally enforceable Source-wide PTI No. MI-PTI-B1855-2011 pursuant to Rule 201(2)(c) are designated by footnote two. **[R336.1213(5)(b), R336.1214a(3)]**

### General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state only" are not enforceable by the USEPA or citizens pursuant to the CAA. **[R336.1213(1)(a)]**
2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **[R336.1213(1)(b)]**
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **[R336.1213(1)(c)]**
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities: **[R336.1213(1)(d)]**
  - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
  - c. Inspect, at reasonable times, any of the following:
    - i. Any stationary source.
    - ii. Any emission unit.
    - iii. Any equipment, including monitoring and air pollution control equipment.
    - iv. Any work practices or operations regulated or required under the ROP.
  - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.

5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **[R336.1213(1)(e)]**
6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **[R336.1213(1)(f)]**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **[R336.1213(1)(g)]**
8. This ROP does not convey any property rights or any exclusive privilege. **[R336.1213(1)(h)]**

### Equipment and Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **[R336.1370]**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **[R336.1910]**

### Emission Limits

11. Except as provided in subrules 2, 3, and 4 of Rule 301, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of Rule 301(1)(a) or (b) unless otherwise specified in this ROP. The grading of visible emissions shall be determined in accordance with Rule 303: **[R336.1301(1) in pertinent part, R336.1303]**
  - a. A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity.
  - b. A limit specified by an applicable federal new source performance standard.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
  - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.<sup>1</sup> **[R336.1901(a)]**
  - b. Unreasonable interference with the comfortable enjoyment of life and property.<sup>1</sup> **[R336.1901(b)]**

## Testing and Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1). **[R336.2001]**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **[R336.2001(2), R336.2001(3), R336.2003(1)]**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **[R336.2001(4)]**

## Monitoring and Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate: **[R336.1213(3)(b)]**
  - a. The date, location, time, and method of sampling or measurements.
  - b. The dates the analyses of the samples were performed.
  - c. The company or entity that performed the analyses of the samples.
  - d. The analytical techniques or methods used.
  - e. The results of the analyses.
  - f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **[R336.1213(1)(e), R336.1213(3)(b)(ii)]**

## Certification and Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a responsible official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **[R336.1213(3)(c)]**
19. A responsible official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **[R336.1213(4)(c)]**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **[R336.1213(4)(c)]**

21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP: **[R336.1213(3)(c)]**
  - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
  - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
  - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.
22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **[R336.1213(3)(c)]**
  - a. Submitting a certification by a responsible official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
  - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a responsible official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **[R336.1213(3)(c)(i)]**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **[R336.1212(6)]**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a responsible official in a manner consistent with the CAA. **[R336.1912]**

## Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied:  
**[R336.1213(6)(a)(i), R336.1213(6)(a)(ii)]**
- The applicable requirements are included and are specifically identified in the ROP.
  - The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.
- Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.
27. Nothing in this ROP shall alter or affect any of the following:
- The provisions of Section 303 of the CAA, emergency orders, including the authority of the EPA under Section 303 of the CAA. **[R336.1213(6)(b)(i)]**
  - The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **[R336.1213(6)(b)(ii)]**
  - The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **[R336.1213(6)(b)(iii)]**
  - The ability of the EPA to obtain information from a source pursuant to Section 114 of the CAA. **[R336.1213(6)(b)(iv)]**
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
- Operational flexibility changes made pursuant to Rule 215. **[R336.1215(5)]**
  - Administrative amendments made pursuant to Rule 216(1)(a)(i)-(iv). **[R336.1216(1)(b)(iii)]**
  - Administrative amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **[R336.1216(1)(c)(iii)]**
  - Minor permit modifications made pursuant to Rule 216(2). **[R336.1216(2)(f)]**
  - State-only modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **[R336.1216(4)(e)]**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **[R336.1217(1)(c), R336.1217(1)(a)]**

## Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **[R336.1215, R336.1216]**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **[R336.1219(2)]**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **[R336.1210(9)]**

33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **[R336.1216(1)(c)(iii), R336.1216(2)(d), R336.1216(4)(d)]**

## Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
- If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **[R336.1217(2)(a)(i)]**
  - If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **[R336.1217(2)(a)(ii)]**
  - If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **[R336.1217(2)(a)(iii)]**
  - If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **[R336.1217(2)(a)(iv)]**

## Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **[R336.1210(7)]**

## Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.
37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

## Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of Part 68 no later than the latest of the following dates as provided in 68.10(a):
  - a. June 21, 1999,
  - b. Three years after the date on which a regulated substance is first listed under 68.130, or
  - c. The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **[40 CFR Part 68]**

## Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **[R336.1213(12)]**

## Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.<sup>2</sup> **[R336.1201(1)]**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.<sup>2</sup> **[R336.1201(8), Section 5510 of Act 451, PA 1994]**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDNRE.<sup>2</sup> **[R336.1219]**

46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months, or has been interrupted for 18 months, the applicable terms and conditions from that PTI shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDNRE, AQD, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.<sup>2</sup> [R336.1201(4)]

### **Alternative Operating Scenarios**

47. The permittee shall maintain contemporaneous records at the facility of any changes from one operating scenario to another. This includes recording in a log the scenario under which it is operating and any additional information associated with the scenario in question, including, but not limited to batch records, fuel records, operating schedule, or process records. [R336.1213(8)(a)]

#### **Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## **B. SOURCE-WIDE CONDITIONS**

At the time of issuance of this Renewable Operating Permit, the Air Quality Division has determined that there are no additional specific source-wide requirements which apply to all emission unit / process groups at this stationary source. Therefore, the permittee is subject to the General Requirements in Part A and other terms and conditions contained in this Renewable Operating Permit.

### C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this Renewable Operating Permit.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table.

#### EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment and Control Devices)	Installation/ Modification Date	Flexible Group ID
EUBOILER#1	<b>Boiler #1</b> is a Badenhausen natural gas fired boiler with a rated capacity of 70,000 pounds of steam per hour. Boiler #1 is used for process steam and heating. <i>{Permit to Install #319-96}</i>	1928 1986	NA
EUBOILER#3	<b>Boiler #3</b> is a Wickes spreader stoker coal and natural gas fired boiler with multicyclone and baghouse dust collectors. Rated capacity is 75,000 pounds of steam per hour. The baghouse is also utilized by EUBOILER#5. Boiler #3 is used for process steam, heating, and electric power generation. <i>{Permit to Install 328-81A}</i>	1962 1991 1999	NA
EUBOILER#5	<b>Boiler #5</b> is a Babcock & Wilcox spreader stoker coal and natural gas fired boiler with multicyclone and baghouse dust collectors. Rated capacity is 60,000 pounds of steam per hour. Heat input capacity is approximately 82 million BTU per hour. The baghouse is also utilized by EUBOILER#3. Boiler #5 is used for process steam, heating, and electric power generation. <i>{Permit to Install #328-81A}</i>	1949 1991 1999	NA
EUASHHANDLING	<b>Ash Handling and Storage Equipment</b> , including the ash vacuum system and associated cyclonic separators and air washer, ash silo with fabric filter, and ash loadout system with rotary augers and ash wetting sprays. <i>{No Permit to Install}</i>	1947	NA
EUZEPWASHER	<b>ZEP Cold Cleaner</b> having an air/vapor interface of approximately 6 square feet and using non-chlorinated solvent. Emissions are controlled by an attached cover. The unit exhausts into the general in-plant environment. <i>{No Permit to Install}</i>	2000	NA
EUPROCESS	<b>Paper Manufacturing, Coating, and Miscellaneous Operations</b> – Manufacture of paper from purchased pulp, web coating of paper stock with wax, and miscellaneous handling, adhesive application, and packaging operations including the #2 Paper Machine, Dry Waxers #1, #2, and #5, Bag Machines #1, #2, #3, #4, #5, #6, and #7, Core Machine, Calendar Stacks #1 and #2, Auto Rewinders #1, #2, #3, and #4, and Dilts Rewinder. <i>{No Permit to Install}</i>	1940 1947 1948 1952 1955 1960 1993	NA

**EUBOILER#1**  
**EMISSION UNIT CONDITIONS**

**PROCESS AND CONTROL EQUIPMENT**

**Boiler #1** is a Badenhausen natural gas fired boiler with a rated capacity of 70,000 pounds of steam per hour. Boiler #1 is used for process steam and heating. *{Permit to Install #319-96}*

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	Boiler #1	NA	NA

**II. MATERIAL LIMITS**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Natural Gas	The permittee shall burn only sweet natural gas in Boiler #1.	Instantaneous	Boiler #1	SC VI.1	R336.1213(2)

**III. PROCESS OR OPERATIONAL RESTRICTIONS**

1. NA

**IV. DESIGN OR EQUIPMENT PARAMETERS**

1. NA

**V. TESTING AND SAMPLING**

1. NA

**VI. MONITORING AND RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. **[R336.1213(3)(b)(ii)]**

1. The permittee shall keep a record of annual fuel usage for Boiler #1, and shall submit this data to the Air Quality Division annually with the MAERS emission inventory report. **[R336.1213(3)]**

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. See Appendix 8. [R336.1213(3)(c)(ii)]
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. See Appendix 8. The report shall be postmarked or received by the appropriate AQD district office by March 15 for the reporting period July 1 to December 31 and by September 15 for the reporting period January 1 to June 30. [R336.1213(3)(c)(i)]
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. See Appendix 8. The report shall be postmarked or received by the appropriate AQD district office by March 15 for the previous calendar year. [R336.1213(4)(c)]

**VIII. STACK OR 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:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV1	120 <sup>1</sup>	186 <sup>1</sup>	R336.1901, R336.1201(3)

**IX. BOILER MACT REQUIREMENTS**

1. NA

**X. OTHER REQUIREMENTS**

1. NA

**Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUBOILER#3**  
**EMISSION UNIT CONDITIONS**

**PROCESS AND CONTROL EQUIPMENT**

**Boiler #3** is a Wickes spreader stoker coal and natural gas fired boiler with multicyclone and baghouse dust collectors. Rated capacity is 75,000 pounds of steam per hour. The baghouse is also utilized by EUBOILER#5. Boiler #3 is used for process steam, heating, and electric power generation. *{Permit to Install #328-81A}*

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.45 lb / 1000 lbs exhaust gases, corrected to 50% excess air. <sup>2</sup>	Test Protocol	Boiler #3	GC 13,14,15	R336.1331(a), R336.1201(3)

**II. MATERIAL LIMITS**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Coal	1.5% by weight sulfur content, calculated on the basis of 12,000 BTU per pound of coal. <sup>2</sup>	As specified in Appendix 4.	Boiler #3	SC VI.3	R 336.1401, R336.1201(3)

**III. PROCESS OR OPERATIONAL RESTRICTIONS**

- The steam production rate from Boiler #3 shall not exceed 82,500 pounds per hour.<sup>2</sup> [R336.1201(3)]

**IV. DESIGN OR EQUIPMENT PARAMETERS**

- NA

**V. TESTING AND SAMPLING**

- NA

**VI. MONITORING AND RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. [R336.1213(3)(b)(ii)]

1. The permittee shall operate a continuous opacity meter on Boiler #3. The permittee shall keep records of the opacity on a continuous basis and with instrumentation acceptable to the Air Quality Division. [R336.1213(3)]
2. The permittee shall monitor and record the hourly steam production rate from Boiler #3 in order to determine compliance with the limit specified under Section III.1 above. [R336.1213(3)]
3. The permittee shall obtain and keep records of the sulfur and ash content of the coal burned in Boiler #3, as detailed in Appendix 4. [R336.1213(3)]

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. See Appendix 8. [R336.1213(3)(c)(ii)]
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. See Appendix 8. The report shall be postmarked or received by the appropriate AQD district office by March 15 for the reporting period July 1 to December 31 and by September 15 for the reporting period January 1 to June 30. [R336.1213(3)(c)(i)]
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. See Appendix 8. The report shall be postmarked or received by the appropriate AQD district office by March 15 for the previous calendar year. [R336.1213(4)(c)]

**VIII. STACK OR 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:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV1	120 <sup>1</sup>	186 <sup>1</sup>	R336.1901, R336.1201(3)

**IX. BOILER MACT REQUIREMENTS**

1. NA

## **X. OTHER REQUIREMENTS**

Records shall be maintained on file for a period of 5 years. **[R336.1213(3)(b)(ii)]**

1. The permittee shall implement an *Inspection and Maintenance Program*, including the keeping of a daily log or checklists, for all air cleaning devices to assure that the air cleaning devices are installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control Rules and existing law. The permittee shall keep records of the *Inspection and Maintenance Program* including records of problems found, repairs done and/or corrective action taken, and scheduled and completed maintenance on the air cleaning devices. **[R336.1213(2), R336.1213(3), R336.1301, R336.1331, R336.1910]**

### **Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUBOILER#5**  
**EMISSION UNIT CONDITIONS**

**PROCESS AND CONTROL EQUIPMENT**

**Boiler #5** is a Babcock & Wilcox spreader stoker coal and natural gas fired boiler with multicyclone and baghouse dust collectors. Rated capacity is 60,000 pounds of steam per hour. The baghouse is also utilized by EUBOILER#3. Boiler #5 is used for process steam, heating, and electric power generation.  
*{Permit to Install #328-81A}*

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.45 lb / 1000 lbs of exhaust gases, corrected to 50% excess air. <sup>2</sup>	Test Protocol	Boiler #5	GC 13, 14, 15	R336.1331(a), R336.1201(3)

**II. MATERIAL LIMITS**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Coal	1.5% by weight sulfur content, calculated on the basis of 12,000 BTU per pound of coal. <sup>2</sup>	As specified in Appendix 4.	Boiler #5	SC VI.3	R336.1401, R336.1201(3)

**III. PROCESS OR OPERATIONAL RESTRICTIONS**

- The steam production rate from Boiler #5 shall not exceed 60,000 pounds per hour.<sup>2</sup> [R336.1201(3)]

**IV. DESIGN OR EQUIPMENT PARAMETERS**

- NA

**V. TESTING AND SAMPLING**

- NA

**VI. MONITORING AND RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. [R336.1213(3)(b)(ii)]

1. The permittee shall operate a continuous opacity meter on Boiler #5. The permittee shall keep records of the opacity on a continuous basis and with instrumentation acceptable to the Air Quality Division. [R336.1213(3)]
2. The permittee shall monitor and record the hourly steam production rate from Boiler #5 in order to determine compliance with the limit specified under Section III.1 above. [R336.1213(3)]
3. The permittee shall obtain and keep records of the sulfur and ash content of the coal burned in Boiler #5, as detailed in Appendix 4. [R336.1213(3)]

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. See Appendix 8. [R336.1213(3)(c)(ii)]
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. See Appendix 8. The report shall be postmarked or received by the appropriate AQD district office by March 15 for the reporting period July 1 to December 31 and by September 15 for the reporting period January 1 to June 30. [R336.1213(3)(c)(i)]
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. See Appendix 8. The report shall be postmarked or received by the appropriate AQD district office by March 15 for the previous calendar year. [R336.1213(4)(c)]

**VIII. STACK OR 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:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV1	120 <sup>1</sup>	186 <sup>1</sup>	R336.1901, R336.1201(3)

**IX. BOILER MACT REQUIREMENTS**

1. NA

## **X. OTHER REQUIREMENTS**

Records shall be maintained on file for a period of 5 years. **[R336.1213(3)(b)(ii)]**

1. The permittee shall implement an *Inspection and Maintenance Program*, including the keeping of a daily log or checklists, for all air cleaning devices to assure that the air cleaning devices are installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control Rules and existing law. The permittee shall keep records of the *Inspection and Maintenance Program* including records of problems found, repairs done and/or corrective action taken, and scheduled and completed maintenance on the air cleaning devices. **[R336.1213(2), R336.1213(3), R336.1301, R336.1331, R336.1910]**

### **Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUASHHANDLING  
 EMISSION UNIT CONDITIONS**

**PROCESS AND CONTROL EQUIPMENT**

**Ash Handling and Storage Equipment**, including the ash vacuum system and associated cyclonic separators and air washer, the ash silo with fabric filter, and the ash loadout system with rotary augers and ash wetting sprays.  
*{No Permit to Install}*

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.10 lb / 1000 lbs of exhaust gases	Test Protocol	Ash Handling and Storage	GC 14	R336.1331(1)

**II. MATERIAL LIMITS**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	Ash Handling and Storage	NA	NA

**III. PROCESS OR OPERATIONAL RESTRICTIONS**

1. NA

**IV. DESIGN OR EQUIPMENT PARAMETERS**

1. NA

**V. TESTING AND SAMPLING**

1. NA

**VI. MONITORING AND RECORDKEEPING**

1. NA

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. See Appendix 8. [R336.1213(3)(c)(ii)]
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. See Appendix 8. The report shall be postmarked or received by the appropriate AQD district office by March 15 for the reporting period July 1 to December 31 and by September 15 for the reporting period January 1 to June 30. [R336.1213(3)(c)(i)]
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. See Appendix 8. The report shall be postmarked or received by the appropriate AQD district office by March 15 for the previous calendar year. [R336.1213(4)(c)]

**VIII. STACK OR 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:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. NA	NA	NA	NA

**IX. OTHER REQUIREMENTS**

1. The permittee shall implement an *Inspection and Maintenance Program*, including the keeping of a daily log or checklists, for all air cleaning devices to assure that the air cleaning devices are installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control Rules and existing law. The permittee shall keep records of the *Inspection and Maintenance Program* including records of problems found, repairs done and/or corrective action taken, and scheduled and completed maintenance on the air cleaning devices. [R336.1213(2), R336.1213(3), R336.1301, R336.1331, R336.1910]

**Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUZEPWASHER  
 EMISSION UNIT CONDITIONS**

**PROCESS AND CONTROL EQUIPMENT**

**ZEP Cold Cleaner** having an air / vapor interface of approximately 6 square feet. Emissions from the Cold Cleaner are controlled by an attached cover. The unit exhausts into the general in-plant environment. **{No Permit to Install}**

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	ZEP Cold Cleaner with attached cover	NA	NA

**II. MATERIAL LIMITS**

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Solvent	The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof.	Instantaneous	ZEP Cold Cleaner with attached cover	SC VI.1	R336.1213(3)
2. Solvent	0.3 psia Reid Vapor Pressure	Instantaneous	ZEP Cold Cleaner with attached cover	SC VI.1	R336.1707

**III. PROCESS OR OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate the Cold Cleaner unless all of the following conditions are met: **[R336.1707(1), R336.1213(2)]**
  - a. The cover shall be kept closed when parts are not being handled in the Cold Cleaner. **[R336.1707(3)(a)]**
  - b. Cleaned parts shall be drained not less than 15 seconds or until dripping ceases. **[R336.1707(3)(b)]**
  - c. Waste solvent shall be stored only in closed containers. **[R336.1707(3)(c)]**

**IV. DESIGN OR EQUIPMENT PARAMETERS**

1. NA

**V. TESTING AND SAMPLING**

1. NA

**VI. MONITORING AND RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. [R336.1213(3)(b)(ii)]

1. The permittee shall maintain on file Material Safety Data Sheet(s) or Product Data Sheet(s) for the solvent(s) used in the Cold Cleaner. The data sheet(s) shall contain sufficient information to determine whether the solvent used is in compliance with the MATERIAL LIMITS specified above. The permittee shall submit a copy of the data sheet(s) with the semiannual reports required under REPORTING below. [R336.1213(3)]

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. See Appendix 8. [R336.1213(3)(c)(ii)]
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. See Appendix 8. The report shall be postmarked or received by the appropriate AQD district office by March 15 for the reporting period July 1 to December 31 and by September 15 for the reporting period January 1 to June 30. [R336.1213(3)(c)(i)]
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. See Appendix 8. The report shall be postmarked or received by the appropriate AQD district office by March 15 for the previous calendar year. [R336.1213(4)(c)]

**VIII. STACK OR VENT RESTRICTIONS**

1. NA

**IX. OTHER REQUIREMENTS**

1. The permittee shall develop written procedures for compliance with provisions 1(a), 1(b), and 1(c) of PROCESS OR OPERATIONAL RESTRICTIONS above. The procedures shall be posted in an accessible, conspicuous location near the Cold Cleaner. [R336.1213(2), R336.1707(4)]

**Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUPROCESS  
 EMISSION UNIT CONDITIONS**

**PROCESS AND CONTROL EQUIPMENT**

**Paper Manufacturing, Coating, and Miscellaneous Operations** – Manufacture of paper from purchased pulp; web coating of paper stock with wax; and miscellaneous handling, adhesive application, and packaging operations. The following Rule 290 permit exempt processes are included in this Emission Unit / Process Group: #2 Paper Machine, Dry Waxers #1, #2, and #5, Bag Machines #1, #2, #3, #4, #5, #6, and #7, Core Machine, Calendar Stacks #1 and #2, Auto Rewinders #1, #2, #3, and #4, and Dilts Rewinder. **{No Permit to Install}**

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Hazardous Air Pollutants (HAPs)	See OTHER REQUIREMENTS below	40 CFR 63.3320	Paper Coating Operations	40 CFR 63 Subpart JJJJ	40 CFR 63 Subpart JJJJ

**II. MATERIAL LIMITS**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	Paper Coating Operations	NA	NA

**III. PROCESS OR OPERATIONAL RESTRICTIONS**

- 1. NA

**IV. DESIGN OR EQUIPMENT PARAMETERS**

- 1. NA

**V. TESTING AND SAMPLING**

- 1. NA

## **VI. MONITORING AND RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. [R336.1213(3)(b)(ii)]

1. The following Rule 290 permit exempt processes are included in this Emission Unit / Process Group:

Paper Machine #2, Dry Waxers #1, #2, and #5, Bag Machines #1, #2, #3, #4, #5, #6, and #7, Core Machine, Calendar Stacks #1 and #2, Auto Rewinders #1, #2, #3, and #4, and Dilts Rewinder.

The permittee shall keep a current record of the information specified in Rule 290 to verify that this equipment remains eligible for the permit exemption, and shall make this information available to the Air Quality Division upon request. [R336.1290, R336.1213(3)]

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. See Appendix 8. [R336.1213(3)(c)(ii)]
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. See Appendix 8. The report shall be postmarked or received by the appropriate AQD district office by March 15 for the reporting period July 1 to December 31 and by September 15 for the reporting period January 1 to June 30. [R336.1213(3)(c)(i)]
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. See Appendix 8. The report shall be postmarked or received by the appropriate AQD district office by March 15 for the previous calendar year. [R336.1213(4)(c)]

## **VIII. STACK OR VENT RESTRICTIONS**

1. NA

## **IX. OTHER REQUIREMENTS**

1. The permittee shall comply with all applicable requirements of the *National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating* by the compliance date(s) specified in the Standards. [40 CFR 63 Subpart JJJJ, 40 CFR 63 Subpart A, R336.1213(2), R336.1213(3)]
2. Pursuant to 40 CFR 63.6(e)(3) Subpart A – General Provisions, the permittee shall develop and implement a written Startup, Shutdown, and Malfunction Plan that describes, in detail, procedures for operating and maintaining the affected source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. This plan shall be developed by the permittee by the source's compliance date for that relevant standard. This condition does not apply unless an add-on control system is used to comply with the emission limitations. [40 CFR 63 Subpart JJJJ, 40 CFR 63.6(e)(3) Subpart A – General Provisions]

### **Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## **D. FLEXIBLE GROUP CONDITIONS**

Part D outlines terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this Renewable Operating Permit.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

## **E. NON-APPLICABLE REQUIREMENTS**

At the time of issuance of this Renewable Operating Permit, the Air Quality Division has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

## APPENDICES

### Appendix 1: Abbreviations and Acronyms

AQD	Air Quality Division	MM	Million
acfm	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	MW	Megawatts
BTU	British Thermal Unit	NA	Not Applicable
°C	Degrees Celsius	NAAQS	National Ambient Air Quality Standards
CAA	Federal Clean Air Act	NESHAP	National Emission Standard for Hazardous Air Pollutants
CAM	Compliance Assurance Monitoring	NMOC	Non-methane Organic Compounds
CEM	Continuous Emission Monitoring	NOx	Oxides of Nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
COM	Continuous Opacity Monitoring	PM	Particulate Matter
department	Michigan Department of Natural Resources and Environment	PM-10	Particulate Matter less than 10 microns in diameter
dscf	Dry standard cubic foot	pph	Pound per hour
dscm	Dry standard cubic meter	ppm	Parts per million
EPA	United States Environmental Protection Agency	ppmv	Parts per million by volume
EU	Emission Unit	ppmw	Parts per million by weight
°F	Degrees Fahrenheit	PS	Performance Specification
FG	Flexible Group	PSD	Prevention of Significant Deterioration
GACS	Gallon of Applied Coating Solids	psia	Pounds per square inch absolute
gr	Grains	psig	Pounds per square inch gauge
HAP	Hazardous Air Pollutant	PeTE	Permanent Total Enclosure
Hg	Mercury	PTI	Permit to Install
hr	Hour	RACT	Reasonable Available Control Technology
HP	Horsepower	ROP	Renewable Operating Permit
H <sub>2</sub> S	Hydrogen Sulfide	SC	Special Condition
HVLP	High Volume Low Pressure	scf	Standard cubic feet
ID	Identification (Number)	sec	Seconds
IRSL	Initial Risk Screening Level	SCR	Selective Catalytic Reduction
ITSL	Initial Threshold Screening Level	SO <sub>2</sub>	Sulfur Dioxide
LAER	Lowest Achievable Emission Rate	SRN	State Registration Number
lb	Pound	TAC	Toxic Air Contaminant
M	Meter	Temp	Temperature
MACT	Maximum Achievable Control Technology	THC	Total Hydrocarbons
MAERS	Michigan Air Emissions Reporting System	tpy	Tons per year
MAP	Malfuction Abatement Plan	µg	Microgram
MDNRE	Michigan Department of Natural Resources and Environment	VE	Visible Emissions
mg	Milligram	VOC	Volatile Organic Compounds
mm	Millimeter	yr	Year

## **Appendix 2. Schedule of Compliance**

The permittee certified in the Renewable Operating Permit application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. [R336.1213(4)(a), R336.1119(a)(ii)]

## **Appendix 3. Monitoring Requirements**

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

## **Appendix 4. Recordkeeping**

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in Tables EUBOILER#3 and EUBOILER#5. Alternative formats must be approved by the AQD District Supervisor.

### **Coal Burned in Boilers #3 and #5:**

- (a) For each coal shipment received, the permittee shall record the date received, source of coal and shipper, tons received, and a laboratory analysis of ash content, sulfur content, and moisture content to demonstrate compliance with the 1.5% sulfur content limitation. The determination of sulfur content (percent by weight) of fuel shall be carried out in accordance with a procedure acceptable to the Air Quality Division. The records of ash content and sulfur content shall specify whether they were measured on a dry basis or "as received."
- (b) At least once per calendar year, the permittee shall have a coal analysis performed of the ash content, sulfur content, and moisture content. This analysis shall be independent of the analysis received from the coal supplier with each coal delivery. The determination of sulfur content (percent by weight) of fuel shall be carried out in accordance with ASTM Method 3177-75, Method 4239-85, or a method approved by the District Supervisor.

## **Appendix 5. Testing Procedures**

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

**Appendix 6. Permits to Install**

The following table lists any Permits to Install issued since January 1, 2006, the effective date of current Renewable Operating Permit #MI-ROP-B1855-2006.

Permit to Install Number	Description of Equipment	Corresponding Emission Units or Flexible Groups
#332-06	Trial burn of tire-derived fuel and coal in Boiler #3	EUBOILER#3
#332-06B	Trial burn of tire-derived fuel and coal in Boiler #3	EUBOILER#3

Permits to Install that were incorporated into previous Renewable Operating Permits are listed below:

**Permit to Install #328-81A**

This permit was issued on August 29, 1991 for the installation of natural gas supplemental burners, added as a modification to existing stoker coal fired Boilers #3 and #5.

**Permit to Install #319-96**

This permit was issued on July 25, 1996 for the modification of the stack height requirement for natural gas/fuel oil fired Boiler #1 to make the requirement consistent with the stack height requirement for Boilers #3 and #5, as all three boilers exhaust from the same stack.

**Permit to Install #305-97**

This permit was issued on September 14, 1998 for a ventilation hood, ductwork, and exhaust fan over the #1 Paper Machine Winder. The #1 Winder has been idled since December 1997. The #1 Paper Machine, including the #1 Winder and #1 Winder Hood have been sold and are being removed from the facility.

**Appendix 7. Emission Calculations**

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

## **Appendix 8. Reporting**

### **A. Annual, Semiannual, and Deviation Certification Reporting**

The permittee shall use the MDNRE Report Certification form (EQP 5736) and MDNRE Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting section of the source-wide, emission unit and/or flexible group special conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

### **B. Other Reporting**

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate source-wide, emission unit and and/or flexible group special conditions. Therefore, Part B of this appendix is not applicable.