

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : OTSEGO PAPER INC	SRN : A0023
Location : 320 N Farmer St.	District : Kalamazoo
	County : ALLEGAN
City : OTSEGO State: MI Zip Code : 49078	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Cody Yazzie
FCE Begin Date : 12/13/2022	FCE Completion Date : 12/13/2023
Comments : The facility had appears to be submitting the ROP semi annual and annual certs as required. During most recent inspection the facility were sent a violation notice.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
12/13/2023	On-site Inspection	Non Compliance	Scheduled Inspection
11/02/2023	Excess Emissions (CEM)	Compliance	<p>Quarterly Excess Emission Report and monitoring System Performance Report for EUTURBINE1, EUTURBINE2, EUDUCTBURNER1, and EUDUCTBURNER2 - The facility reported no excess emissions for EUDUCTBURNER1, EUDUCTBURNER2, EUTURBINE1, and EUTURBINE2. The facility did report 11 hours of monitor downtime for EUDUCTBURNER1 and EUTURBINE1. The total operation hours for EUTURBINE1 and EUDUCTBURNER1 was 1947.68 hours. This calculates to 0.56% of total CEMS System Downtime. The facility did report 1 hours of monitor downtime for EUDUCTBURNER2 and EUTURBINE2. The total operation hours for EUTURBINE2 and EUDUCTBURNER2 was 1938.47 hours. This calculates to 0.05% of total CEMS System Downtime. The amount of downtime for the monitors for the time operated appear to be minimal and corrected in a manner which minimizes operation downtime, which do not appear to warrant a violation notice at this time.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/22/2023	ROP SEMI 2 CERT	Compliance	Facility indicated that there were no deviations to report for the reporting period.
08/22/2023	Excess Emissions (CEM)	Compliance	Quarterly Excess Emission Report and monitoring System Performance Report for EUTURBINE1, EUTURBINE2, EUDUCTBURNER1, and EUDUCTBURNER2 - The facility reported no excess emissions for EUDUCTBURNER1, EUDUCTBURNER2, EUTURBINE1, and EUTURBINE2. The facility did not report any monitor downtime for EUDUCTBURNER1 and EUTURBINE1 or EUDUCTBURNER2 and EUTURBINE2. Total operation hours for the CEMS unit for EUDUCTBURNER1 and EUTURBINE1 unit were reported as 2057.64 hours. Total operation hours for CEMS unit for EUDUCTBURNER2 and EUTURBINE2 were reported as 2093.74 hours.

Activity Date	Activity Type	Compliance Status	Comments
07/06/2023	Stack Test	Compliance	<p>Test Report for NSPS KKKK Stack Testing for EUTURBINE2 and EUDUCTBURNER2.</p> <p>Otsego Paper conducted subsequent testing in accordance with the NSPS KKKK regulation. The previous test was conducted March 25, 2022 and the most recent test was conducted May 17, 2023. This testing date is within the allowed 14-month period required for compliance. This Testing was to demonstrate compliance with FGNSPSKKKK SC.I.1, which has a limit of 42 ppmvd (parts per million by volume @ 15% Oxygen and on a dry gas basis) or 150 ng/J of useful output of NOx emissions. 3-one hour test were used to collect data of NOx emissions during that time. The following were the results for each test run corrected to 15% Oxygen and on a dry gas basis. Calculated NOx emissions were 14.1 ppmvd, 14.4 ppmvd, and 14.4 ppmvd for test runs 1, 2, and 3 respectively. These three test runs had an average NOx emission of 14.3 ppmvd, which is well below the NSPS KKKK standard of 42 ppmvd.</p>

Activity Date	Activity Type	Compliance Status	Comments
07/06/2023	CEM RATA	Compliance	<p>Test Report for RATA performed at EUTURBINE1, EUDUCTBURNER1, EUTURBINE2, EUDUCTBURNER2.</p> <p>Facility Submitted the Results from TRC for RATA testing that was conducted on EUTURBINE1 and EUTURBINE2 CEMS units. Results showed that both units passed the 40 CFR Part 75 annual performance specification for NOx and the 40 CFR Part 60 performance specifications for NOx and O2. The Relative Accuracy for EUTURBINE1 and EUDUCTBURNER1 were 3.97% for NOx lb/MMBTU, which less than the required 7.5% for annual Part 75 performance specifications. EUTURBINE2 and EUDUCTBURNER2 reported that it met the Part 75 annual performance specification for Relative accuracy being plus or minus 0.015 NOx lb/MMBTU. The testing results showed the relative accuracy was 0.011 NOx lb/MMBTU for EUTURBINE2 and EUTURBINE2.</p>
06/13/2023	ROP R215 Notification	Compliance	R25(5) for a Responsible Official change to Eric Bock, Plant Manager
04/27/2023	Excess Emissions (CEM)	Compliance	Quarterly Excess Emission Report and monitoring System Performance Report for EUTURBINE1, EUTURBINE2, EUDUCTBURNER1, and EUDUCTBURNER2 - The facility reported that the CEMS units that serve these emission units do not operate outside of Ozone Season. The Calendar time period for this is from October 1st through April 30th.
04/19/2023	Annual Emissions Report (or MAERS)	Compliance	The facility reported that they submitted their MAERS report.
04/19/2023	ROP Other	Compliance	The facility submitted Rule 215(5) notification of Change of Responsible Official. Facility submitted necessary M-001 Form/C-001 Certification form. Staff inputted changes in MACES Facility Contacts.

Activity Date	Activity Type	Compliance Status	Comments
02/22/2023	Excess Emissions (CEM)	Compliance	Quarterly Excess Emission Report and monitoring System Performance Report for EUTURBINE1, EUTURBINE2, EUDUCTBURNER1, and EUDUCTBURNER2 - The facility reported that the CEMS units that serve these emission units do not operate outside of Ozone Season. The Calendar time period for this is from October 1st through April 30th.
02/15/2023	ROP Annual Cert	Compliance	The facility reported that there were no deviations during the reporting period.
02/15/2023	ROP SEMI 2 CERT	Compliance	The facility reported that there were no deviations during the reporting period.

Name: Cody Yaggin Date: 5/9/24 Supervisor: Monica