



June 3, 2024

Cody Yazzie  
Environmental Engineer  
Air Quality Division - Kalamazoo District Office  
Michigan Department of Environment, Great Lakes, and Energy  
7953 Adobe Rd  
Kalamazoo, MI 49009

RECEIVED  
JUN 06 2024  
AQD - KALAMAZOO

Subject: Response to Violation Notice  
Otsego Paper, Inc., SRN A0023, Otsego, Michigan  
Renewable Operating Permit No. MI-ROP-A0023-2019b

Dear Mr. Yazzie:

Below please find response to the Violation Notice issued by the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) dated May 13, 2024. The citation of violation and associated comments are provided in **bold** text with our response following in *italic* text.

Otsego Paper strives for complete compliance with environmental statutes and applicable regulations and its permits. We take this commitment very seriously and are in the process of correcting the cited alleged violations. Shortly after receiving the Violation Notice, Otsego Paper contacted Environmental (TRC) to prepare a proposal to address the issues noted in your letter. TRC has been authorized to begin addressing these issues as noted below:

Process Description	Rule/Permit Condition Violated	Comments
SOURCEWIDE	Special Conditions VI.1 and 2	<b>For the Source Wide conditions, the facility should include exempt, permitted, and grandfathered equipment that emit HAP emissions facility wide. The facility appeared to not be including HAP emissions from the Paper Machine, emergency generators, and EUWAREHOUSEHEATERS for the calculation.</b>

*Otsego Paper Response: HAP emissions were not calculated for the Paper Machine, emergency generators, and warehouse heaters prior to the December 12, 2023 inspection conducted by the EGLE, AQD. HAP emissions were not calculated for the equipment listed above and included in the facility-wide HAP emissions total due to an inadvertent oversight.*

*Corrective actions have been initiated. TRC has begun preparing HAP emissions calculations for the Paper Machine, emergency generators and warehouse heaters in tons per 12-month rolling time period as determined at the end of each calendar month. Per your communication with TRC, Otsego Paper will revise historic emission calculations for this equipment beginning*

*with January 2024. The emission calculations are expected be finalized by June 28, 2024 and will be provided to you via E-mail. Otsego Paper will continue to add monthly HAP emissions to the updated emission calculation spreadsheets and continue to comply with the Source-wide Special Conditions VI.1 and 2 going forward.*

Process Description	Rule/Permit Condition Violated	Comments
SOURCEWIDE	Special Condition VI.7	For the Source Wide conditions, the facility should include exempt, permitted, and grandfathered equipment that emit NOx emissions facility wide. The facility appeared to not include NOx emissions from the emergency generators and EUWAREHOUSEHEATERS in the facility wide calculations.

Otsego Paper Response: NOx emissions were not calculated for emergency generators and warehouse heaters prior to the December 12, 2023 inspection conducted by the EGLE, AQD. NOx emissions were not calculated for the equipment listed above and included in the facility-wide NO<sub>x</sub> emissions total due to an inadvertent oversight.

Corrective actions have been initiated. TRC has begun preparing NOx emissions calculations for the emergency generators and warehouse heaters in tons per 12-month rolling time period as determined at the end of each calendar month. Per your communication with TRC, Otsego Paper will revise historic emission calculations for this equipment beginning with January 2024. The emission calculations are expected be finalized by June 28, 2024 and will be provided to you via E-mail. Otsego Paper will continue to add monthly NOx emissions to the updated emission calculation spreadsheets and continue to comply with the Source-wide Special Condition VI.7 going forward.

Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,



Eric Bock  
Plant Manager – USG Otsego Paper, Inc.

cc: John Bolden, USG  
Frank Knowles, USG  
Sultana Haque, TRC