



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
UPPER PENINSULA DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

August 4, 2017

Mr. David Schultz
Neenah Paper Michigan, Inc.
501 East Munising Avenue
Munising, Michigan 49862

SRN: B1470, Alger County

Dear Mr. Schultz:

VIOLATION NOTICE

The Department of Environmental Quality (DEQ), Air Quality Division (AQD) reviewed the Stack Test Report received January 2017 (testing performed on November 1-3, 2017) and the 2016 MAERS submittal for Neenah Paper Michigan, Inc. located at 501 East Munising Avenue, Munising, Michigan. The purpose of reviewing the reports was to determine Neenah Paper'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); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B1470-2013a.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Hydrochloric acid (HCL) emissions from EU-05 coal fired boiler currently covered under MI-ROP-B1470-2013a	Source Wide Condition I.1. Each Individual HAP emission must be below 9 tons per year (12 month rolling time period)	The facility reported annual HCL emissions of 9.2 tons per year in the 2016 MAERS submittal.
HCL emissions from EU-05 coal fired boiler currently covered under MI-ROP-B1470-2013a	Source Wide Condition I.1. Each Individual HAP emission must be below 9 tons per year (12 month rolling time period)	Stack test results showed an HCL emission rate of 2.41 lbs/hr. The facility operated 8520 hours in 2016. Using the emission factor from the stack test actual HCL emissions for 2016 are 10.3 tons per year. This makes Neenah Paper a major source for HAPs.

HCL emissions from EU-05 coal fired boiler currently covered under MI-ROP-B1470-2013a	40 CFR Part 63 Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers	Exceeded area source HAP limit of less than 10 tons per year.
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The conditions of ROP number MI-ROP-B1470-2013a limit the emissions of HCL to 9 tpy.

This process is also subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Industrial, Commercial, and Institutional Boilers.. These standards are found in 40 CFR Part 63, Subpart JJJJJJ.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 25, 2017 (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.

If Neenah Paper 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 visit to Neenah Paper. 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,



Sydney Bruestle
Environmental Quality Analyst
Air Quality Division
906-236-3995

cc: Ms. Natalie Kentner, Neenah Paper Michigan, Inc.
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Mr. Ed Lancaster, DEQ