

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

B423873473

FACILITY: FRENCH PAPER LLC		SRN / ID: B4238
LOCATION: 100 FRENCH STREET, NILES		DISTRICT: Kalamazoo
CITY: NILES		COUNTY: BERRIEN
CONTACT: Shane Fenske , President		ACTIVITY DATE: 08/22/2024
STAFF: Chance Collins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection for FCE		
RESOLVED COMPLAINTS:		

On August 22, 2024, AQD staff traveled to Berrien County to perform an inspection of French Paper Company. The purpose of the inspection was to determine the facility's compliance with Permit to Install No. 395-96A and applicable state and federal air pollution control regulations.

The facility is an operating paper mill. The facilities paper making process starts out by adding either shredded virgin pulp paper, post-consumer materials, recycled envelope clippings and/or a combination of them into a vat where they get mixed with water and the appropriate powder or liquid dye. A mixing blade inside the vat blends it together. The mixed pulp then gets run through various sized mesh screens to eliminate any pulp paper that's bigger than required. The pulp paper then gets squirted out on a fine mesh screen where it begins to dry. It then goes through various roller presses to help remove some of the excess water before going into more roller presses that are heated by the boiler steam to help further drying. The beginning of the roller drying operation is approximately 110 degrees F and the end is approximately 310 degrees F. The finished paper then runs through various QA machines to make sure it is as desired prior to being rolled on a spindle ready for shipping. It may also go to a slicing area if required.

AQD staff arrived on site at 11:30 a.m. to sunny conditions with a temperature of 73°F with a SW wind of 5 mph. There were no noticeable odors upon arrival. AQD staff met with Shane Fenske (President) who walked staff around the facility and answered all questions.

The following discusses the findings of the inspection and review of records:

EU-GASBOILER

Description: Natural gas and distillate oil fired boiler with a rated heat release of approximately 69 million BTU's per hour.

Pollutant	Limit	Time Period/Operating Scenario	Equipment
1. SO ₂	0.055 lb/MMBTU	Test Protocol	EU-GASBOILER
2. SO ₂	3.50 pph	Monthly averaging period	EU-GASBOILER
3. NO _x		Test Protocol	EU-GASBOILER

	0.145 lb/MMBTU		
4. NOx	9.9 pph	Monthly averaging period	EU-GASBOILER

Facility appears to be in compliance. 1 and 3 above would have to be determined by testing which the AQD hasn't requested at this time. Records reviewed for the last 12 months regarding the pound per hour limits in 2 and 4 above indicate SO₂ emissions ranged from a low of 0.015 pounds to a high of 0.026 pounds and NO_x emissions ranging from 2.739 pounds to 4.303 pounds.

Material Limits:

Material	Limit	Time Period/Operating Scenario	Equipment
1. Sulfur content of distillate oil	0.05% by weight	Instantaneous	EU-GASBOILER
2. Distillate Oil	493 gallons per hour	Monthly averaging period	EU-GASBOILER

Facility appears to be in compliance. AQD staff was informed that the facility hasn't combusted any fuel/distillate oil in the boiler in 15 years. The sulfur content of the distillate oil during past inspections appeared to always be 0.05%.

Monitoring/Recordkeeping:

Facility appears to be in compliance. All records were kept in a satisfactory manner.

Stack/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 Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)
SV-GASBOILER	96	200

Facility appears to be in compliance. The stack appears to meet the above dimensions.

Other Requirements:

1. The permittee shall not operate the existing col fired boiler. **Facility appears to be in compliance.**
The facility does not operate the coal fired boiler and it has been rendered inoperable.
2. Visible emission from EU-GASBOILER shall not exceed a six- minute average of 10 percent opacity. **Facility appears to be in compliance.** AQD staff did not note any VE's coming from the stack during the inspection.

NAME



DATE 8/22/2024

SUPERVISOR Monica Brothers