



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
KALAMAZOO DISTRICT OFFICE



PHILLIP D. ROOS
DIRECTOR

April 4, 2024

Rachel Plotner QA/QC Manager
J. Rettenmaier USA LP
16369 US 131 Highway
Schoolcraft, MI 49087

SRN: U391700037, Kalamazoo County

Dear Rachel Plotner:

VIOLATION NOTICE

On April 6, 2023, The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), issued J. Rettenmaier USA LP (facility) located at 16369 US 131 Highway, Schoolcraft, Michigan a Violation Notice for Rule 201, Rule 370, and Rule 910 (enclosed). This Violation Notice also requested that the facility submit Potential to Emit (PTE) calculations as part of their response.

On February 9, 2024, the AQD staff reviewed the most recent PTE calculations and exemption demonstration submitted by the facility. The purpose of the PTE and exemption demonstration review was to determine J. Rettenmaier USA LP'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); and Air Pollution Control Rules.

Based on the PTE review, AQD staff allege the following:

Process Description	Rule/Permit Condition Violated	Comments
Cellulose Production	R 336.1210 (Rule 210)	Unpermitted major source of Particulate Matter ≤10 microns (PM10) and Particulate Matter ≤ 2.5 microns (PM2.5) under Title V.
Cellulose Production	R 336.2802 (Rule 1802)	Unpermitted Prevention of Significant Deterioration (PSD) major source of particulate matter (PM) emissions.

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AQD staff disagrees with the PTE calculations and exemption demonstration submitted by the facility. Additionally, AQD staff disagrees with the facility that the baghouses are inherent to the process, and therefore the control efficiencies of the baghouses cannot be considered when calculating PTE. According to the facility's PTE calculations and process flow rates, without the baghouse control efficiencies, it appears that the facility's PTE is over both Major Source thresholds for Title V for PM10 and PM2.5 and PSD thresholds for PM.

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 25, 2024 (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, including submitting a complete permit application for the cellulose production process equipment; and what steps are being taken to prevent a reoccurrence. An application form is available at the following website: www.michigan.gov/air.

Please submit the written response to Michael Cox at EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 or Coxm9@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If J. Rettenmaier USA LP 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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of J. Rettenmaier USA LP. 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,

Michael T. Cox

Michael Cox
Environmental Quality Analyst
Air Quality Division
616-240-3607

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Monica Brothers, EGLE
Grant Schertzing, Miller Johnson