Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division

State Registration Number		ROP Number
A0884	**RENEWABLE OPERATING PERMIT STAFF REPORT**	MI-ROP-A0884-2021b

Billerud Escanaba LLC and Omya, Incorporated

State Registration Number (SRN): A0884

Located at

7100 County Road 426, Escanaba, Delta County, Michigan 49829

Permit Number:	MI-ROP-A0884-2021b
Staff Report Date:	June 28, 2021
Amended Date:	April 5, 2022 October 25, 2022

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) of the administrative rules promulgated under Act 451, requires that the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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A0884

RENEWABLE OPERATING PERMIT

JUNE 28, 2021 - STAFF REPORT

ROP Number

MI-ROP-A0884-2021

Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with an ROP pursuant to Title V of the federal Clean Air Act; and Michigan's Administrative Rules for Air Pollution Control promulgated under Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This Staff Report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft ROP terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft ROP pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

General Information

Stationary Source Mailing Address:	Verso Escanaba LLC and OMYA, Incorporated 7100 County Road 426 Escanaba, Michigan 49829
Source Registration Number (SRN):	A0884
North American Industry Classification System (NAICS) Code:	322121
Number of Stationary Source Sections:	2
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	202000121
Responsible Official:	Mark Crockford, Mill Manager 906-233-2448
AQD Contact:	Sydney Hewson, Senior Environmental Quality Analyst 906-236-3995
Date Application Received:	August 12, 2020
Date Application Was Administratively Complete:	August 12, 2020
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	June 28, 2021
Deadline for Public Comment	June 28, 2021

Source Description

Verso Escanaba LLC (Verso) operates an integrated pulp and paper mill at 7100 County Road 426, Escanaba, Michigan. The existing facility includes the following general process operations: woodyard, refiner mechanical pulp (RMP) mill, Kraft pulp mill, chemical recovery, recausticizing system, bleach plant, boiler house, and coated paper manufacturing operations.

Hardwood and softwood pulp are produced from roundwood logs, which are chipped on-site, or from purchased chips delivered to the mill. The RMP process or the Kraft cooking process is used to separate the lignen and wood fiber to produce unbleached pulp from wood chips. In the RMP mill, hardwood chips are treated with hot caustic and the soft chips are then macerated mechanically using refiners to produce unbleached pulp. Brightening of the unbleached pulp is performed using hydrogen peroxide. In the Kraft mill, hardwood and softwood chips are chemically cooked in one of eight batch digesters using sodium hydroxide, sodium sulfide, and steam in a pressure vessel. Following the batch digester, the resulting brownstock pulp is washed, separated from wood knots, screened, and bleached using chlorine dioxide.

The organic or lignen laden filtrates (weak black liquor) from the Kraft pulping and washing processes are concentrated through evaporators and concentrators. The concentrated black liquor is burned in a recovery furnace. The recovery furnace produces steam for energy regeneration and heat for the pulp and papermaking processes. The molten inorganic ash (smelt) from the recovery furnace is dissolved in water or weak wash to make green liquor which is reprocessed into usable cooking chemicals. The causticizing process combines lime with the green liquor in a slaker to produce a sodium hydroxide and sodium sulfide solution (white liquor). The lime mud from slaking is washed and reburned in a rotary lime kiln to produce reusable lime.

The mill uses four power boilers to produce steam for energy generation and to provide heat for the pulping and papermaking processes. The mill operates steam-driven turbines to produce a portion of the electricity required by the facility.

Uncoated paper is manufactured using one of three paper machines. The machines use a combination of RMP and Kraft pulp. The Kraft pulp is produced on-site and purchased. Following the paper machines, coating is applied using one of three coaters. After the coating application, the paper is cut into rolls for customers. Excess Kraft pulp is formed and dried on a pulp dryer for future use during pulp mill outages or for sale to external customers.

Omya, Incorporated (Omya) operates a precipitated calcium carbonate (PCC) plant at Verso in Escanaba, Michigan. The PCC plant is co-located with Verso although the PCC plant is separately owned and operated by Omya. The PCC is manufactured as a raw material for paper manufacturing. The production of PCC is a multi-step batch process that involves slaking lime, reacting the lime (calcium oxide – CaO) with carbon dioxide (CO2), and final processing of the product. The final product is used as a filler and whitening agent for paper and is added to paper machine raw stock to improve the optical properties of the formed sheet of paper. The PCC plant relies on Verso's Lime Kiln exhaust gas for a rich source of CO2.

Under normal conditions, the primary source of CO2 to supply the carbonators is exhaust gases from Verso's Lime Kiln because the Lime Kiln is capable of providing a concentrated source of CO2 necessary for the PCC process. However, the PCC plant is configured such that a CO2 tank is available to be used as a back-up source during periods of time when the Lime Kiln exhaust gas is not available. Omya will schedule deliveries of liquid CO2 as necessary to provide an adequate back-up supply of CO2 gas.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2020**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	1914
Lead (Pb)	0.015
Nitrogen Oxides (NO_x)	1403
Particulate Matter (PM)	184
Sulfur Dioxide (SO_2)	661
Volatile Organic Compounds (VOCs)	134

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2020 by MAERS:

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
HCl	0.4
Total Hazardous Air Pollutants (HAPs)	**0.4**

**As listed pursuant to Section 112(b) of the federal Clean Air Act.

See Parts C and D in the ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

Regulatory Analysis

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

The stationary source is in Delta County, which is currently designated by the United States Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because the potential to emit of all criteria pollutants exceeds 100 tons per year and the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act, is equal to or more than 10 tons per year and the potential to emit of all HAPs combined is equal to or more than 25 tons per year.

EU11B68 (#11 Boiler) and EURF15 (Chemical Recovery Furnace) at the stationary source were subject to review under the Prevention of Significant Deterioration regulations of 40 CFR 52.21, because at the time of New Source Review permitting the potential to emit of carbon monoxide was greater than 100 tons per year.

EU8B13 (#8 Boiler), EU11B68 (#11 Boiler), EURF15 (Chemical Recovery Furnace), EU9B03 (#9 Boiler), and EUSB03 (Wood Residue Surge Bin for #9 Boiler) at the stationary source were subject to review under the Prevention of Significant Deterioration regulations of 40 CFR 52.21, because at the time of New Source Review permitting the potential to emit of nitrogen oxides was greater than 100 tons per year.

EU11B68 (#11 Boiler), EURF15 (Chemical Recovery Furnace), EUST15 (Smelt Dissolving Tank), EUCH68 (Coal Handling), EUFH68 (Fuel Handling for #11 Boiler), EU1S68 (#1 Coal Silo for #11 Boiler), EU2S68 (#2 Coal Silo for #11 Boiler), EU3S68 (#3 Coal Silo for #11 Boiler), EU1AS68 (#1 Ash Silo for #11 Boiler), and EU2AS68 (#2 Ash Silo for #11 Boiler) at the stationary source were subject to review under

the Prevention of Significant Deterioration regulations of 40 CFR 52.21, because at the time of New Source Review permitting the potential to emit of particulate matter was greater than 100 tons per year.

EU4PM64 (#4 Paper Machine System) at the stationary source was subject to review under the Prevention of Significant Deterioration regulations of 40 CFR 52.21, because at the time of New Source Review permitting the potential to emit of volatile organic compounds was greater than 100 tons per year.

EU11B68 (#11 Boiler) and EURF15 (Chemical Recovery Furnace) at the stationary source were subject to review under the Prevention of Significant Deterioration regulations of 40 CFR 52.21, because at the time of New Source Review permitting the potential to emit of sulfur dioxides was greater than 100 tons per year.

The source has applicable requirements for GHG as a result of review under the Prevention of Significant Deterioration regulations. These Best Available Control Technology requirements for GHG are included in the ROP. The mandatory Greenhouse Gas Reporting Rule under 40 CFR Part 98 is not an ROP applicable requirement and is not referenced in the ROP.

EU11B68 (#11 Boiler) at the stationary source is subject to the Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971, promulgated in 40 CFR Part 60, Subparts A and D.

EU11B68 (#11 Boiler) at the stationary source is subject to the Standards of Performance for Industrial-Commercial-Institutional-Steam Generating Units promulgated in 40 CFR Part 60, Subparts A and Db.

EURF15 (Chemical Recovery Furnace), EUBB22 (Digester System), EUBB23 (Brownstock NSPS Devices), EUBB33 (Steam Stripping System NSPS Devices), EUBB05 (Evaporator System), and EUSA33 Soda Ash Storage Tank) at the stationary source are subject to the Standards of Performance for Kraft Pulp Mills promulgated in 40 CFR Part 60, Subparts A and BB.

EU7B17 (#7 Boiler), EU8B13 (#8 Boiler), EU9B03 (#9 Boiler), and EUSB03 (Wood Residue Surge Bin for #9 Boiler) at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters promulgated in 40 CFR Part 63, Subparts A and DDDDD. The final compliance date for this standard has not occurred at the time of this ROP issuance. The ROP will be reopened or modified to reflect accurate times and compliance methods at the time of the Subpart DDDDD compliance date.

EUCOND (Condensate Collection and Treatment System), EUBB05 (Evaporator System), EUOT22 (Digester Other Devices), EUBB22 (Digester System), EUMT22 (Miscellaneous Turpentine Handling Devices), EUBB33 (Steam Stripping System NSPS Devices), EUMC33 (Miscellaneous Condensate Stripping System Devices), EUBB23 (Brownstock NSPS Devices), EUME05 (Miscellaneous Evaporator System Devices), EUSA33 Soda Ash Storage Tank), EUS25 (Bleaching System), EUB25 (Chlorine Dioxide Generator Plant), EUED25 (Extraction Devices), and EUM25 (Methanol Storage) at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants from the Pulp & Paper Industry promulgated in 40 CFR Part 63, Subparts A and S.

EURF15 (Chemical Recovery Furnace), EUST15 (Smelt Dissolving Tank), EULK29 (Lime Kiln), and EULKI29 (Lime Storage Bins) at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semi chemical Pulp Mills from the promulgated in 40 CFR Part 63, Subparts A and MM.

EU3C27 (#3 Coater System) and EU4C65 (#4 Coater System) at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants: Paper and Other Web Coating promulgated in 40 CFR Part 63, Subparts A and JJJJ.

EU11B68 (#11 Boiler) at the stationary source is subject to the National Emission Standard for Hazardous Air Pollutants for Mercury promulgated in 40 CFR Part 61, Subparts A and E.

EULKSIRICE (Lime Kiln Emergency Drive Motor), EUEOCSIRICE (EOC Back-up Generator), EUE1CIRICE (E1 Emergency Lift Pump), EUFW1CIRICE (Water Treatment Building Emergency Fire Water Pump), EUFW2CIRICE (Administrative Building Emergency Fire Water Pump), and EUTTGCIRICE (Turbine Turning Gear Back-up Generator) at the stationary source are subject to the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ (RICE Area Source MACT). The ROP contains special conditions provided by Verso in their application for applicable requirements from 40 CFR Part 63, Subparts A and ZZZZ. The AQD is not delegated the regulatory authority for this area source MACT.

Verso failed to demonstrate compliance with the conditions of MACT DDDDD, MACT S, and the conditions of ROP No. MI-ROP-A0844-2016. This includes exceeding the Hydrochloric Acid (HCl) limit in MACT DDDDD during an August 21, 2019, performance test, failing to conduct a valid MACT DDDDD performance test for #11 Boiler, failing to conduct a valid Relative Accuracy Test Audit (RATA) for #11 Boiler and #8 Boiler, and failing to conduct a valid Subpart S performance test for the Thermal Oxidizer and the Bleach Plant Scrubbers. The facility has since retested for both standards and submitted valid, passing test reports.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the "Procedure for Evaluating Periodic Monitoring Submittals."

All emisison units but those listed in the table below do not have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64, because the unit(s) does/do not have potential pre-control emissions over the major source thresholds.

The following Emission Units/Flexible Groups are subject to CAM:

Emission Unit/Flexible group ID	Pollutant/ Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM? *
EU9B03	PM 0.50 lb/1000 lbs exhaust gas, at 50% excess air if wood residue is >75% of the total hear input. If wood residue is <75% of the total heat input then PM shall not exceed the fraction of total heat inputfrom the wood residue times 0.67 lb/1000 lbs exhau	R336.1201, R336.1331	Two Wet Scrubbers	Pressure drop across the scrubbers = Minimum of 3 inches of water column on both the North and South Scrubbers Minimum of 900 gallons per minute on both the North and South Scrubbers based on a 3-hour averaging time	FG9B03	No

Emission Unit/Flexible group ID	Pollutant/ Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM? *
EU11B68	PM 0.06 lb/MMBtu heat input when firing solid fuels	R336.1201, 40 CFR 52.21, 40 CFR Part 60 Subpart D	Dry Electrostatic Precipitator	Opacity below 20% on a 6-minute averaging time	FG11BFA	No
EUOC33	SO2 <=55 ppm nor 12 lbs/hour, based on a 12-hour averaging time	R336.1201	Packed Scrubber	Scrubber liquid feed rate: 536 gpm (1st stage)- 122 gpm (2nd stage) pH of scrubbing liquid: minimun of 6.3 su (1st stage)- 7.8 su (2nd stage) Pressure drop: minimum of 0.5 " W.C.	FGTO33	No
EUS29	PM <=0.10 lbs/1000 lbs exhaust gas	R336.1331	Wet Scrubber	Scrubber liquid flow rate Minimum flow of 150 gpm, based on 3 hour averaging time	EUS29	No
EULK129	PM = 0.10 lbs/1000 lbs exhaust gas measured at operating conditions	R 336.1331	Baghouse	Pressure drop Minimum pressure drop of 0.25 inches of water on a daily average	FGLK29	No

*Presumptively Acceptable Monitoring (PAM)

EU9B03

The emission unit is the No. 9 Boiler which burns primarily wood residue, but may also burn natural gas, and paper cores. Particulate emissions are currently controlled by two wet scrubbers, operating in parallel, with approximately 50% of the exhaust gas flow rate going through each scrubber body. Particulate is removed by physical contact with the scrubbing medium.

Use of a pressure drop and water flow are good indicators of scrubber performance to ensure proper liquid to particulate matter contact for effective removal of the particulate matter from the air stream. If the scrubber pressure drop or water flow falls below the indicator levels, optimum contact between scrubber liquid and particulate matter in the air stream may not be achieved. The pressure is measured at the inlet and outlet of the scrubbers. Scrubber liquid flow rates are measured at the pump discharge.

The selected indicator ranges are a minimum scrubber pressure drop of 3" W.C. and a minimum water flow of 900 GPM to each control device. These indicator ranges are based on manufacturer's recommendations and historic stack testing results that demonstrate compliance with the requirements of the Title V Permit. Corrective actions are taken following any excursion from these indicators.

EU11B68

The emission unit is the No. 11 Boiler. Particulate emissions are currently controlled by an electrostatic precipitator. Particulate is given an electrical charge and collected from the air stream as it passes through the high voltage area of the device. Opacity below 20%, based on a 6-minute averaging time, is a good indicator of ESP performance as long as proper maintenance is performed. The COMS continuously monitors and records opacity in the duct. A comparison of COMS readings taken during PM emission tests shows that compliance was demonstrated at opacity levels <20%. The compliance stack test for the No. 11 Boiler in September 2010 indicated particulate emission rates of 0.0578 lb/MMBtu compared to the permit limitation of 0.06 lb/MMBtu. Opacity during the performance tests was less than 20%.

EUOC33

The emission unit is the Thermal Oxidizer. SO_2 emissions are currently controlled by a packed scrubber. SO_2 is removed by physical contact with the scrubbing liquid and medium. Use of scrubber liquid feed rate, pH of the scrubbing liquid, and scrubber pressure drop are good indicators of scrubber performance to ensure proper liquid supply, contact time, and chemical availability for effective removal of the SO_2 from the air stream. The scrubber liquid feed rate is measured at inlet to scrubber, pH of scrubbing liquid: is measured at the inlet to scrubber and the pressure drop is measured between inlet and outlet of scrubber. The selected indicator ranges of 536/122 GPM, 6.3/7.8 pH, and 0.5" W.C. are based on compliance stack testing completed in October 2010. The SO_2 emissions were 24.4 ppm and 1.27 lbs/hr during this testing versus the limit of 55 ppm and 12 lbs/hr. Corrective actions are taken following any excursion from these indicators.

EULK129

The emission unit is the Lime Handling System for the two Lime Storage Bins. Particulate emissions are currently controlled by a common baghouse. Particulate is removed from the air stream as it passes through tightly woven fabric. Use of a pressure drop range is a good indicator of baghouse performance to ensure effective removal of particulate matter from the air stream. If the pressure drop falls below the indicator level, the bags may be ripped and optimum removal of particulate matter in the air stream may not be achieved. The pressure drop is measured across the scrubber. The selected indicator range is based on historical operational performance, engineering judgment, and visual inspections of the baghouse to ensure optimum baghouse performance. In addition to monitoring the differential pressure continuously and recording the daily average, the exhaust of the baghouse is visually inspected on a weekly basis to ensure it is operating correctly. Corrective actions are taken if the differential pressure is low or if visible emissions are observed.

EUS29

The emission unit is the Lime Slaker. The Lime Slaker is considered running when the green liquor flow to the slaker is greater than 300 gpm. The particulate emissions are controlled by the scrubber using green liquor as the scrubbing medium. Use of a minimum scrubber liquid flow rate is a good indicator of scrubber performance to ensure proper liquid to particulate matter contact for effective removal of the particulate matter from the air stream. If the scrubber liquid flow rate falls below the indicator level, optimum contact between the scrubber liquid and particulate matter in the air stream may not be achieved. The scrubber liquid flow rate is measured at the inlet to the control device. The selected indicator range is a minimum

scrubber liquid flow rate of 150 GPM to the control device. This flow is based on a 2011 compliance stack test which demonstrated compliance with the emission limit. The emission rate was 0.0796 lbs/1000 lbs. exhaust at operating conditions versus a limit of 0.10 lbs/1000 lbs exhaust. The indicator range is also based on good engineering judgment. Corrective actions are taken following any excursion from this indicator.

The CAM plan covers monitoring requirements and indicator ranges and QA/QC procedures for the pollution control devices and emission units covered above. When operating within the defined indicator ranges emission units are meeting the emission limits.

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

Source-Wide Permit to Install (PTI)

Rule 214a requires the issuance of a Source-Wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. MI-ROP-A0884-2016 are identified in Appendix 6 of the ROP.

PTI Number			
16-70G	16-70J	16-70N	399-73
483-85B	426-86	800-88A	207-94A
43-96	228-00	229-00	9-01
9-01B	96-02	141-02	56-06
192-06	259-06A	191-07	66-11
127-11D	124-12	23-13	

Streamlined/Subsumed Requirements

This ROP does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

Non-applicable Requirements

Part E of the ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the ROP Application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the ROP pursuant to Rule 213(6)(a)(ii).

Processes in Application Not Identified in Draft ROP

The following table lists processes that were included in the ROP Application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EU00206	Multiple Natural Gas Heaters	R 336.1212(4)(b)	R 336.1282(b)(i)
EU00207	Liquefied Petroleum Heaters (10 or less)	R 336.1212(4)(b)	R 336.1282(b)(i)
EU00208	Liquefied Petroleum Storage Tank, 100 Gallon (10 or less)	R 336.1212(4)(c)	R 336.1284(b)

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EU00209	Liquefied Petroleum and Propane Storage Tank, 250 Gallon (10 or less)	R 336.1212(4)(c)	R 336.1284(b)
EU00210	Gasoline Storage Tank, 2500 Gallon	R 336.1212(4)(c)	R 336.1284(g)(i)
EU00211	Storage of Used Oil Less Than 40,000 Gallons	R 336.1212(4)(c)	R 336.1284(e)
EU00212	Brownstock System Screening and Cleaning	R 336.1212(4)(g)	R 336.1290(a)(i)
EU00213	Brownstock System Decker	R 336.1212(4)(g)	R 336.1290(a)(i)
EU00214	Brownstock Storage Chests	R 336.1212(4)(g)	R 336.1290(a)(i)
EU00215	Lime Kiln Hot End Crushing Operations	R 336.1212(4)(g)	R 336.1290(a)(i)
EU00216	Hydropulpers (No. 2 Pulp Dryer)	R 336.1212(4)(g)	R 336.1290(a)(i)
EU00217	No. 9 Ash Collection Hoppers	R 336.1212(4)(g)	R 336.1290(a)(i)
EU00218	No. 11 Ash Quench Conveyor System	R 336.1212(4)(g)	R 336.1290(a)(i)
EU00219	No. 3 Paper Machine Trim System	R 336.1212(4)(g)	R 336.1290(a)(i)
EU00220	No. 4 Paper Machine Trim System	R 336.1212(4)(g)	R 336.1290(a)(i)

Draft ROP Terms/Conditions Not Agreed to by Applicant

This draft ROP does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

Action taken by EGLE, AQD

The AQD proposes to approve this ROP. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the USEPA is allowed up to 45 days to review the draft ROP and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Ed Lancaster, Marquette District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the ROP Application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

State Registration Number	RENEWABLE OPERATING PERMIT	ROP Number
A0884	AUGUST 4, 2021 - STAFF REPORT ADDENDUM	MI-ROP-A0884-2021

Purpose

A Staff Report dated June 28, 2021, was developed to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by Rule 214(1) of the administrative rules promulgated under Act 451. The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in Rule 214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

Responsible Official:	Michael Glodowski, Mill Manager 906-233-2600
AQD Contact:	Sydney Hewson, Senior Environmental Qualty Analyst 906-236-3995

Summary of Pertinent Comments

No pertinent comments were received during the 30-day public comment period.

Changes to the June 28, 2021 Draft ROP

No changes were made to the draft ROP.

State Registration Number	RENEWABLE OPERATING PERMIT	ROP Number
A0884	APRIL 5, 2022 - STAFF REPORT FOR RULE 216(2) MINOR MODIFICATION	MI-ROP-A0884-2021a

Purpose

On September 22, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-A0884-2021 to Verso Corporation, Verso Escanaba LLC and Omya, Incorporated pursuant to Rule 214 of the administrative rules promulgated under Act 451. Once issued, a company is required to submit an application for changes to the ROP as described in Rule 216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to Rule 216(2).

General Information

Responsible Official:	Michael Glodowski, Mill Manager 906-233-2600
AQD Contact:	Caryn Owens, Senior Environmental Engineer 231-878-6688
Application Number:	202100220
Date Application for Minor Modification was Submitted:	November 2, 2021

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to Rule 216(2).

Description of Changes to the ROP

Minor Modification Number 202100220 was to incorporate PTI No. 184-16A into Section 1 of the ROP, which was for an air system upgrade (ASU) to the existing combustion air system on No.10 Recovery Furnace (Recovery Boiler).

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

Action Taken by EGLE

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-A0884-2021, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the United States Environmental Protection Agency (USEPA) has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is the District Supervisor. The final determination for approval of the Minor Modification will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by any affected states or the USEPA.

State Registration Number	RENEWABLE OPERATING PERMIT	ROP Number
A0884	OCTOBER 25, 2022 - STAFF REPORT FOR RULE 216(1)(a)(i)-(iv) ADMINISTRATIVE AMENDMENT	MI-ROP-A0884-2021b

Purpose

On May 20, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-A0884-2021a to Verso Corporation, Verso Escanaba LLC and Omya, Incorporated pursuant to Rule 214 of the administrative rules promulgated under Act 451. Once issued, a company is required to submit an application for changes to the ROP as described in Rule 216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to Rule 216(1)(a)(i-iv).

General Information

Responsible Official:	Brian Peterson, Mill Manager 906-233-2560
AQD Contact:	Caryn Owens, Senior Environmental Engineer 231-878-6688
Application Number:	202200189
Date Application for Administrative Amendment was Submitted:	July 1, 2022

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for an Administrative Amendment pursuant to Rule 216(1)(a)(iv).

Description of Changes to the ROP

This Administrative Amendment was for a transfer of ownership from Verso Escanaba LLC to Billerud Escanaba LLC, which took place July 1, 2022.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Administrative Amendment to the ROP.

Action Taken by EGLE

The AQD approved an Administrative Amendment to ROP No. MI-ROP-A0884-2021a, as requested by the stationary source. The delegated decision maker for the AQD is the District Supervisor.