

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

FCE Summary Report

Facility : OTSEGO PAPER INC		SRN : A0023
Location : 320 N Farmer St.		District : Kalamazoo
		County : ALLEGAN
City : OTSEGO	State: MI	Zip Code : 49078
Compliance Status :		Compliance
Source Class : MAJOR	Staff : Cody Yazzie	
FCE Begin Date : 12/10/2020	FCE Completion Date :	12/10/2021
Comments : The facility appeared in compliance with during the last inspection. The facility is submitting MAERS annually and ROP certifications.		

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
12/10/2021	On-site Inspection	Compliance	On-site inspection
11/30/2021	NSPS (Part 60)	Compliance	<p>Quarterly Sulfur Dioxide and Operating Data for EUPACKAGEBOILER.</p> <p>During the reporting period Otsego Paper's 10% capacity factor for EUPACKAGEBOILER is 211,992 MMBTU on natural gas and 203,232 MMBTU on oil. For the previous 12-month period the heat input for natural gas and oil are both 0 MMBTU. these calculate to a ratio of 0.00 when compared to the 10% annual capacity factor.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/30/2021	Excess Emissions (CEM)	Compliance	<p>Quarterly Excess Emission Report and monitoring System Performance Report for EUTURBINE1, EUTURBINE2, EDUCTBURNER1, EDUCTBURNER2</p> <p>Quarterly Excess Emissions and Monitoring Systems Performance Report: EUTURBINE1, EUTURBINE2, EDUCTBURNER1, and EDUCTBURNER2 - The facility reported no excess emissions for EDUCTBURNER1, EDUCTBURNER2, EUTURBINE1, and EUTURBINE2. The facility did report 0.1% of monitor downtime for EDUCTBURNER1 and EUTURBINE1 for the reporting period this monitor downtime is insignificant and roughly 1 hours of the total 1993.53 hours that the units were operated. The facility did report 0.1% of monitor downtime for EDUCTBURNER2 and EUTURBINE2 for the reporting period this monitor downtime is insignificant and roughly 1 hours of the total 1997.86 hours that the units were operated.</p>
08/04/2021	Excess Emissions (CEM)	Compliance	<p>Quarterly Excess Emissions and Monitoring Systems Performance Report: EUTURBINE1, EUTURBINE2, EDUCTBURNER1, and EDUCTBURNER2 - The facility reported no excess emissions for EDUCTBURNER1, EDUCTBURNER2, EUTURBINE1, and EUTURBINE2. The facility did not report any monitor downtime for EDUCTBURNER1 and EUTURBINE1. The reported total hours of operation for the monitor for EDUCTBURNER1 and EUTURBINE1 was 2022.54 hours. The facility did not report any monitor downtime for EDUCTBURNER2 and EUTURBINE2. The reported total hours of operation for the monitor for EDUCTBURNER2 and EUTURBINE2 was 2024.29 hours.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/04/2021	ROP Semi 1 Cert	Compliance	The facility reported that there were no deviations during the reporting period.
08/04/2021	NSPS (Part 60)	Compliance	<p>Quarterly Sulfur Dioxide and Operating Data for EUPACKAGEBOILER.</p> <p>During the reporting period Otsego Paper's 10% capacity factor for EUPACKAGEBOILER is 211,992 MMBTU on natural gas and 203,232 MMBTU on oil. For the previous 12-month period the heat input for natural gas and oil are both 0 MMBTU. These calculate to a ratio of 0.00 when compared to the 10% annual capacity factor.</p>
07/08/2021	CEM RATA	Compliance	<p>Facility Submitted the Results from TRC for RATA testing that was conducted on EUTURBINE1 and EUTURBINE2 CEMS units. Results showed that both units passed the 40 CFR Part 75 annual performance specification for NOx and the 40 CFR Part 60 performance specifications for NOx and O2. The Relative Accuracy were 6.38% and 2.39% for NOx lb/MMBTU for EUTURBINE1 and EUTURBINE2 respectively. The Part 75 annual performance specification is less than 7.5%. EUTURBINE1 had an RA of 7.15% for NOx ppmvd @ 15% O2 and a RA of 0.04% for O2 percent. EUTURBINE2 had an RA of 1.02% for NOx ppmvd @ 15% O2 and a RA of 0.08% for O2 percent. The Part 60 accepted performance specification is less than 20% RA for NOx ppmvd @ 15% O2 and less than 1.0% for O2 percent.</p>

Activity Date	Activity Type	Compliance Status	Comments
06/22/2021	NSPS (Part 60)	Compliance	<p>Quarterly Sulfur Dioxide and Operating Data for EUPACKAGEBOILER.</p> <p>During the reporting period Otsego Paper's 10% capacity factor for EUPACKAGEBOILER is 211,992 MMBTU on natural gas and 203,232 MMBTU on oil. For the previous 12 month period the heat input for natural gas and oil are both 0 MMBTU. these calculate to a ratio of 0.00 when compared to the 10% annual capacity factor.</p>
06/22/2021	Excess Emissions (CEM)	Compliance	<p>Quarterly Excess Emission Report and monitoring System Performance Report for EUTURBINE1, EUTURBINE2, EUDUCTBURNER1, and EUDUCTBURNER2</p> <p>The facility does is not required to and does not operate the CEMS outside of ozone season.</p>
04/20/2021	CEMS Test Observation	Unknown	CEMS RATA Testing
03/25/2021	MAERS	Compliance	Facility submitted their MAERS Report electronically
03/16/2021	Excess Emissions (CEM)	Compliance	<p>Quarterly Excess Emission Report and Monitoring System Performance Report for EUTURBINE1, EUTURBINE2, EUDUCTBURNER1, EUDUCTBURNER2 and EUPACKAGEBOILER.</p> <p>The CEMS unit is only required to monitor during Ozone season. The CEMS unit was not required to operate during this reporting period.</p>
03/16/2021	ROP Annual Cert	Compliance	Facility stated that there were no deviations to report during the reporting period.
03/16/2021	ROP SEMI 2 CERT	Compliance	Facility stated that there were no deviations to report during the reporting period

Activity Date	Activity Type	Compliance Status	Comments
02/09/2021	NSPS (Part 60)	Compliance	<p>Quarterly Sulfur Dioxide and Operating Data for EUPACKAGEBOILER.</p> <p>During the reporting period Otsego Paper's 10% capacity factor for EUPACKAGEBOILER is 211,992 MMBTU on natural gas and 203,232 MMBTU on oil. For the previous 12 month period the heat input for natural gas and oil are both 0 MMBTU. these calculate to a ratio of 0.00 when compared to the 10% annual capacity factor.</p>
02/09/2021	Excess Emissions (CEM)	Compliance	<p>Quarterly Excess Emissions and Monitoring Systems Performance Report: EUPACKAGEBOILER, EUTURBINES, and FGDUCTBURNERS - The facility reported no excess emissions for EUDUCTBURNER1 and EUTURBINE1. The facility did report 0.1% of monitor downtime for EUDUCTBURNER1 and EUTURBINE1 for the reporting period this monitor downtime is insignificant and roughly 2 hours of the total 2105 hours that the units were operated. The facility reported no excess emission for EUDUCTBURNER2 and EUTURBINE2. The facility did report 0.1% of monitor downtime for EUDUCTBURNER2 and EUTURBINE2 for the reporting period this monitor downtime is insignificant and roughly 2 hours of the total 2105 hours that the units were operated.</p>

Name: Cody Yungis Date: 4/28/2022 Supervisor: RIL 4/26/22