



October 21, 2019

Cody Yazzie
Environmental Engineer
EGLE - Air Quality Division
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49009-5025

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AOD-KALAMAZOO

**Subject: Otsego Paper, Inc.
Response to Violation Notice
SRN: A0023, Allegan County**

Dear Mr. Yazzie,

This letter is in response to the Violation Notice dated October 9, 2019 issued to Otsego Paper, Inc. The NOV states that during the review of a deviation report that was submitted to EGLE by Otsego Paper, Inc. for monitor downtime on EUTURBINE1, staff noted a Rule/Permit Condition Violation, specifically Special Condition VI. 1-2.

The Continuous Emissions Monitoring System (CEMS) for EUTURBINE1 failed calibration due to a blown card that supplies power to the actuator valve, which feeds NOx to the analyzer. Due to the failure, the CEMS unit would not collect valid data. EGLE was contacted by phone the day of the failure and a message was left for Cody Yazzie. The monitoring downtime started at approximately 8:50AM on 8/31/2019 and lasted to 9/6/2019 for a total of 6 days and 9 hours. The Horiba field service rep was able to troubleshoot the equipment to determine the problem and replace the card with scavenged parts from monitoring equipment at their facility in California. The parts were shipped from California to the Otsego location. The unit was operational and collecting valid data at 5:22 PM on 9/6/2019.

Corrective Action: The CEMS unit experienced an abnormal condition and was repaired and placed back into service as soon as possible. Long term, USG plans to replace the aging CEMS unit with a new Predictive Emissions Monitoring System (PEMS)

USG Otsego Paper currently has an aging Continuous Emission Monitoring System (CEMS) that is at the end of its lifecycle. This system is used to monitor and report emissions (NOx and O2) for two (2) Combined Cycle Combustion Turbines (CCCT) with duct-burners and



Heat Recovery Steam Generations (HRSGs). All fired equipment uses Natural Gas (NG) as a fuel source.

An Environmental Information System (EIS) PowerEMS (PEMS) system is recommended to replace the current CEMS system. An EIS PEMS unit will monitor and report emissions for two (2) CCCT with duct-burners and HRSGs. A Dell T630 physical server for PowerEMS software and reporting will be integrated to the current CirrusDAHS software. The PEMS Model will be validated through use of a portable gas analyzer in accordance with the EPAs performance specification PEMS (PS-16) and Part75 Subpart-E accuracy requirements.

The CEMS unit has become dated and unreliable with many of the parts no longer in production. USG has requested capital funding for the PEMS project described above. Provided required approvals are in place, we expect installation to be complete before the start of ozone season, which begins on May 1, 2020.

If you have any questions, please feel free to contact Frank Knowles at 269-384-6351.

Sincerely,

A handwritten signature in black ink that reads "Henry Krell". The signature is written in a cursive, flowing style.

Henry Krell
Vice President, Manufacturing, Paper

cc: Eric Bock
Frank Knowles