

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B185542730

FACILITY: Menominee Acquisition Corporation		SRN / ID: B1855
LOCATION: 144 FIRST STREET, MENOMINEE		DISTRICT: Upper Peninsula
CITY: MENOMINEE		COUNTY: MENOMINEE
CONTACT: Alison Stillings , Environmental, Health, Safety Engineer		ACTIVITY DATE: 12/07/2017
STAFF: Shamim Ahammod	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Conducted a scheduled inspection of the facility to determine the compliance with ROP No. MI-ROP-B1855-2016.		
RESOLVED COMPLAINTS:		

FACILITY: Menominee Acquisition Corporation

INSPECTION DATE: December 7, 2017

MDEQ-AQD Staff: Shamim Ahammod, Environmental Engineer

FACILITY REPRESENTATIVE: Alison Stillings, Environmental, Health, Safety Engineer

LOCATION: The facility is located at 144 First Street, Menominee, MI 49858

SOURCE DESCRIPTION:

Menominee Acquisition Corporation manufactures specialty papers, primarily waxed paper from purchased pulp. The facility operates under ROP No. MI-ROP-B1855-2016. The facility has EUBOILER#1 and EUBOILER#3, both fired by natural gas. At the time of inspection, EUBOILER#1 was in operation, and EUBOILER # 3 was in shutdown. At present, EUBOILER is not on site. FGPROCESS equipment was in operation except for EUBAGMACHINE 1 and 3.

INSPECTION:

On December 7, 2017, Joe Scanlan and I conducted a scheduled inspection of the Menominee Acquisition Corporation. We arrived at the facility's office at the late morning and called their phone number as directed at the front desk. Alison Stillings received the call, and then she opened the door. I told her the purpose of the inspection was to conduct a scheduled inspection of the facility to determine the company's compliance with their issued ROP No: MI-ROP-B1855-2016. At the beginning of our meeting, we discussed issued permit and then we went on a brief walk through the plant to get an idea of the overall operations at the plant. After the brief tour the facility, Alison provided me the most recent data compiled for fuel usage and the maintenance records for the boilers and fire pump. At my request monthly energy usage data was sent via email.

EMISSION UNIT DETAILS:

EUBOILER#1:

EUBOILER#1 is a natural gas-fired boiler with a rated capacity of 70,000 pounds of steam per hour. It provides steam for the paper and converting processes, as well as for the steam heaters. During the inspection, EUBOILER#1 was in operation. It burns only sweet natural gas as directed in Special Condition (SC) II.1. However, SC Nos. I, III,

IV, and V are not applicable to this equipment. The facility is required to keep records of annual fuel usage (SC VI.1). Alison provided records of monthly fuel usage for this unit. According to their report, Boiler #1 has consumed about 1827 MMSCF of natural gas for the time period May 2013 through September 2017 (SC VI.1).

EUBOILER#3:

During the inspection, EUBOILER#3 was not in operation. It is restricted to only operate in

natural gas firing mode with the 12.5 MMBTU/hr rated start-up burner (SC III.1 and 2, and SC II.1). They operated boiler #3 in March 2013 (SC VI.1). I asked them, the reason for not operating the boiler #3. They said, boiler #1 provides enough steam for the paper and converting processes at this facility.

EUBUBOILER:

EUBUBOILER is a natural gas-fired back up boiler with a maximum heat input capacity of 86 MMBTU/hr (SC II.1, and IV.1). This boiler will be operated as a backup boiler to EUBOILER#1. At present EUBUBOILER is not onsite.

EUZEPWASHER:

EUZEPWASHER has an air/vapor interface of approximately 6 square feet. Emissions from the EUZEPWASHER are controlled by an attached cover as observed during the inspection. According to SC III.1 (a), the facility is required to keep the cover on the parts washer closed when parts are not being handled in the cold cleanser. At the time of inspection, the unit was not in use and the cover was closed as required. The facility maintains a Safety Data Sheet (SDS) for the solvent used in the cold cleaner (SC VI.1). They submitted a copy of the SDS which is from ZEP Manufacturing. The product name is "DYNA 143" parts cleaner solvent.

EUFIREPUMP:

They have two fire pumps. One electric fire pump (Jockey pump) that is the primary fire pump for the facility. It is online 24/7. The diesel pump (EUFIREPUMP) exists only as a backup to the electric fire pump systems. According to SC III. 5, the permittee shall not allow EUFIREPUMP to exceed 100 hours per calendar year for maintenance checks and readiness testing. As we requested for records, they provided fire pump test results and it shows that the most recent meter reading on 10/26/17 was 98.5 hours. This satisfies the SC III.5, IV.1, VI.3, VI.4, and VI.5 set forth in ROP No. MI-ROP-B1855-2016.

FGPROCESS Emission Unit:

The emission units in this group are Rule 290 permit exempt processes. This flexible group includes the paper machine and converting process. Bag machine # 1 is permanently closed and bag machine #3 is not used currently. All others emission units in FGPROCESS were in operation while inspecting the facility.

FGPROCESS SC I.1.b requires the permittee shall limit the organic HAP emissions and it is no more than 4 percent of the mass of coating materials applied for each month. Based on their SDS sheet, they have used less than 0.1% organic HAP in the process.

This satisfies the permit requirement specified in section FGPROCESS SC I.1.b.

By keeping monthly record, they satisfy permit requirements set forth in SC VI.2.1.a.i, ii and iii and R 336.1213(30(b)(ii)).

As described in (R 336.1290(2)(a)(i), each emission unit can be emitted uncontrolled noncarcinogenic volatile organic compounds are not more than 1000 pounds per month.

In the month of November, Auto Rewinder #1, Auto Rewinder #2, Auto Rewinder #3, and Auto Rewinder #4 have emitted 0.50 lb, 7.99 lb, 1.44 lb and 8.10 lb VOC respectively (Rule 290 Report November -17).

VOC emissions from Calendar Stack #1, Calendar Stack #2, Dilts Rewinder, Dry Waxer #1, Dry Waxer #2, Core machine, Wet Waxer #3, Wet Waxer #4 and Wet Waxer # 4 were 6.66 lb, 6.66 lb, 6.68 lb, 5.96 lb, 20.54 lb, 8.41 lb, 7.35 lb, 10.3 lb, and 10.28 lb respectively (November -2017 monthly report). Similarly, monthly VOC emissions from Bag machine #1, Bag machine #2, Bag machine #3, Bag machine #4, Bag machine #5, Bag machine #6 and Bag machine #7 were 0.00 lb, 44.56 lb, 0.00 lb, 91.93 lb, 37.93 lb, 25.61 lb, 25.61 lb and 91.94 lb respectively.

In the month of November-2017, VOC emissions from each unit was less than 1000 lbs, this satisfies the permit requirements set forth in (R 336.1290(2)(a)(i).

At the time of the inspection and after review of the follow-up materials, Menominee Acquisition Corporation appears to be in compliance with their ROP, and Air Pollution Control Rules.

NAME 

DATE 12/26/2017 SUPERVISOR 