

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

B202459099

|   |                               |                           |
|---|-------------------------------|---------------------------|
| FACILITY: OX Paperboard White Pigeon Mill |                               | SRN / ID: B2024           |
| LOCATION: 15781 River St, WHITE PIGEON    |                               | DISTRICT: Kalamazoo       |
| CITY: WHITE PIGEON                        |                               | COUNTY: SAINT JOSEPH      |
| CONTACT:                                  |                               | ACTIVITY DATE: 05/27/2021 |
| STAFF: Chance Collins                     | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MAJOR       |
| SUBJECT: Scheduled Inspection for FCE     |                               |                           |
| RESOLVED COMPLAINTS:                      |                               |                           |

On May 27, 2021, AQD staff traveled to St. Joseph County to perform an inspection of OX Paperboard WP, LLC. The purpose of the inspection was to determine the facility's compliance with MI-ROP-B2024-2015a and applicable state and federal air pollution control regulations 40 CFR Part 63 Subpart ZZZZ, 40 CFR Part 60 Subparts A and Dc and 40 CFR Part 63, Subpart JJJJJJ.

OX Paperboard WP, LLC (the facility) receives recycled paper, mixes it with water, retention aids, dyes and pulp additives to create a slurry of recycled paper fibers, and then manufactures uncoated recycled boxboard from slurry. The facility has two boilers (EUBOILER#2 and EUBOILER#3) for steam generation and one paper machine supplied by several pulping tanks. The paper machine uses retention aids, dyes and pulp additives. The maintenance shop has a small cold cleaner. The facility also has various equipment exempt from permitting.

AQD staff arrived on site at 11:50 a.m. to sunny conditions with a temperature of 63° F, and a NE wind at 7 mph. There were no noticeable odors upon arrival.

AQD staff met with Stephen Rudy (General Manager) and DeMarco Doxe (EHS Manager) of OX Industries who answered all questions and escorted staff around the site. The facility has gone through ownership changes over the last year and had been shut down. The facility began operation again in September of 2020. The facility was shut down at the time of inspection following a schedule of 10 days in operation and 4 days of shut down maintenance. The following discusses the results of the on-site inspection and review of records:

Source-Wide

Emission Limits:

| Pollutant         | Limit                   | Actual  | Compliance |
|-------------------|-------------------------|---------|------------|
| HAPs (individual) | 9.0 tons per year (TPY) | 0.9 TPY | Yes        |
| HAPs (Combined)   | 22.5 TPY                | 0.9 TPY | Yes        |

Records were being kept for individual and combined HAPs and appeared to be in compliance.

All deviations, Semi-Annual and Annual reporting requirements were received in a timely manner.

**EUBOILER#2**

EUBOILER#2 is a 122.5 MMBTU/hr combustion engineering boiler that generates steam for EUPAPERMACHINE. This boiler has not been in operation for several years and the facility has no plans to place it back in operation at this time.

**EUBOILER#3**

EUBOILER#3 is a 96.3 MMBTU/hr Cleaver Brooks gas fired boiler that generates up to 75,000 pounds of steam per hour for EUPAPERMACHINE. The NOx emissions are controlled by flue gas recirculation. EUBOILER#3 is defined as a "Gas-fired Boiler" for purposes of the Boiler MACT, 40 CFR Part 63, Subpart JJJJJJ.

**Emission Limits:**

| Pollutant | Limit    | Actual  | Compliance |
|-----------|----------|---------|------------|
| CO        | 35.5 TPY | 0.4 TPY | Yes        |
| NOx       | 21.1 TPY | 5.6 TPY | Yes        |

A stack test was completed on March 1, 2016 for NOx and CO. The result for NOx was 0.047 lb/MMBTU, and the result for CO was 0.003lb/MMBTU. These are in compliance with the permit limits.

Required records were being kept and appeared to be in compliance.

All deviations, Semi-Annual and Annual reporting requirements were received in a timely manner.

EUBOILER#3 stack and vents dimensions appeared to be in compliance with the permitted limit.

Appropriate maintenance plans and malfunction abatement plan for boiler operation appear to be being followed.

**EUPAPERMACHINE**

EUPAPERMACHINE includes the pulping operation that consists of four hydropulpers where the recycled fibers are made into a slurry and retention aids, dyes and pulp additives are combined with the recycled fiber slurry; and the paper machine that consists of the formation and drying of the product. The three permitted on-line coaters with ovens were removed from the facility in July of 2020.

**Emission Limits:**

| Pollutant                                     | Limit    | Actual  | Compliance |
|---|----------|---------|------------|
| VOC (Retention aids, dyes and pulp additives) | 9.1 pph  | 8.5 pph | Yes        |
| VOC (retention aids, dyes and pulp additives) | 35.0 TPY | 13 TPY  | Yes        |

The facility has a material limit for coatings of 2.9 lb of VOC per gallon of coating, minus water, as applied. The facility no longer has coating machines at the facility.

Required records were being kept and appeared to be in compliance.

All deviations, Semi-Annual and Annual reporting requirements were received in a timely manner.

**EURICEMACT**

All RICE subject to the RICE MACT as specified in 40 CFR Part 63, Subpart ZZZZ. The facility has a 190 hp diesel fire pump engine. The fire pump is operated for 20-30 minutes weekly for readiness testing and has an hour meter. Annual maintenance is performed which includes an oil change and belt checks.

**FGCOLDCLEANERS**

EUPARTSWASHER is in the shop area. The lid was closed and the rules were posted.

NAME 

DATE 6/10/21

SUPERVISOR RIL 8/4/21