

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

EFFECTIVE DATE: August 30, 2016

REVISION DATE: March 6, 2020

ISSUED TO

Menominee Acquisition Corporation

State Registration Number (SRN): B1855

LOCATED AT

144 First Street, Menominee, Menominee County, Michigan 49858

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B1855-2016a

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(1) of Act 451. Pursuant to Rule 214a of the administrative rules promulgated under Act 451, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environment, Great Lakes, and Energy

Ed Lancaster, Marquette District Supervisor

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A. GENERAL CONDITIONS

Equipment & Design

1. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2).² **(R 336.1370)**

Emission Limits

2. The permittee shall comply with Rule 301, which states, in part, "Except as provided in Subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:"² **(R 336.1301(1))**
 - a. A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity.
 - b. A limit specified by an applicable federal new source performance standard.

The grading of visible emissions shall be determined in accordance with Rule 303.

3. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ **(R 336.1901(a))**
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ **(R 336.1901(b))**

Testing/Sampling

4. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).² **(R 336.2001)**

Certification & Reporting

5. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.² **(R 336.1912)**

Permit to Install (PTI)

6. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² **(R 336.1201(1))**

7. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² **(R 336.1201(8), Section 5510 of Act 451)**
8. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, EGLE.² **(R 336.1219)**
9. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² **(R 336.1201(4))**

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

C. EMISSION UNIT SPECIAL CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUBOILER#1	EUBOILER#1 is a Badenhausen natural gas fired boiler with a rated capacity of 70,000 pounds of steam per hour. EUBOILER#1 is used for process steam and heating.	1928 1986	NA
EUBUBOILER	A natural gas fired backup boiler with a maximum heat input capacity of 86 MMBTU/hr. This boiler will be operated as a backup boiler to EUBOILER#1	2015	NA
EUPROCESS	Paper Manufacturing, Coating, and Miscellaneous Operations – Manufacture of paper from purchased pulp, web coating of paper stock with wax, and miscellaneous handling, adhesive application, and packaging operations including the #2 Paper Machine, Dry Waxers #1, #2, and #5, Bag Machines #2, #3, #4, #5, #6, and #7, Core Machine, Calendar Stacks #1 and #2, Auto Rewinders #1, #2, #3, and #4, and Dilts Rewinder.	1940 1947 1948 1952 1955 1960 1993	NA

EUBOILER#1 EMISSION UNIT CONDITIONS
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DESCRIPTION

EUBOILER#1 is a Badenhausen natural gas fired boiler with a rated capacity of 70,000 pounds of steam per hour. EUBOILER#1 is used for process steam and heating.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Natural Gas	The permittee shall only burn sweet natural gas in Boiler #1	Instantaneous	EUBOILER#1	SC VI.1	40 CFR 52.21(c) & (d)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall keep a record of annual fuel usage for EUBOILER#1 and shall keep the records on file at the facility and make them available to the Department upon request. (40 CFR 52.21(c) & (d))

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV1	120	186	40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

EUBUBOILER EMISSION UNIT CONDITIONS
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DESCRIPTION

A natural gas fired back up boiler with a maximum heat input capacity of 86 MMBTU/hr. This boiler will be operated as a backup boiler to EUBOILER#1.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	108 lb/MMSCF	Test Protocol*	EUBUBOILER	SC VI.3 GC 4	R 336.1205 40 CFR 52.21(c) & (d)

*Test Protocol shall specify averaging time.

II. MATERIAL LIMIT(S)

1. The permittee shall burn only pipeline quality natural gas in EUBUBOILER. **(R 336.1205, R 336.1225, R 336.1702, 40 CFR 52.21(c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The maximum design heat input capacity for EUBUBOILER shall not exceed 86 MMBtu per hour on a fuel heat input basis. **(R 336.1205, R 336.1225, 40 CFR 52.21(c) & (d), 40 CFR Part 60, Subpart Dc)**
2. The permittee shall install, calibrate, maintain and operate, in a satisfactory manner, a device to monitor the natural gas usage for EUBUBOILER on a continuous basis. **(40 CFR 60.48c)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall record and keep, in a satisfactory manner, the natural gas usage for EUBUBOILER each calendar month. The permittee shall keep the records on file at the facility and make them available to the Department upon request. **(40 CFR 60.48c(g))**
2. The permittee shall keep records for EUBUBOILER in accordance with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and Dc. The permittee shall make all records available to the Department upon request. **(40 CFR Part 60, Subparts A and Dc)**

3. The permittee shall keep records from the vendor that demonstrates compliance with the emission limits in SC I.1. These records can consist of a vendor emission guarantee or equivalent, as approved by the AQD District Supervisor. **(R 336.1205, 40 CFR 52.21(c)(d))**

VII. REPORTING

1. The permittee shall submit notification of the date of construction and actual startup of EUBUBOILER in accordance with 40 CFR 60.7. This notification shall include: **(40 CFR 60.7, 40 CFR 60.48c)**
 - a. The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
 - b. If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c, or 40 CFR 60.43c.
 - c. The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
 - d. Notification if an emerging technology will be used for controlling SO₂ emissions. The Administrator will examine the description of the control device and will determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of 40 CFR 60.42c(a) or (b)(1), unless and until this determination is made by the Administrator.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBUBOILER	48	20	R 336.1225 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall provide written notification of construction and operation to comply with the federal Standards of Performance for New Stationary Sources, 40 CFR 60.7. The permittee shall submit this notification to the AQD District Supervisor within the time frames specified in 40 CFR 60.7. **(40 CFR 60.7)**
2. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subpart A and Subpart Dc, as they apply to EUBUBOILER. **(40 CFR Part 60, Subparts A & Dc)**
3. In the event that a boiler complying with EUBUBOILER is removed from this location, the permittee may install and operate a boiler complying with EUBUBOILER at this location pursuant to this Permit to Install. **(R 336.1205)**

EUPROCESS EMISSION UNIT CONDITIONS

DESCRIPTION

Paper Manufacturing, Coating, and Miscellaneous Operations – Manufacture of paper from purchased pulp; web coating of paper stock with wax; and miscellaneous handling, adhesive application, and packaging operations including the #2 Paper Machine, Dry Waxers #1, #2, and #5, Bag Machines #2, #3, #4, #5, #6, and #7, Core Machine, Calendar Stacks #1 and #2, Auto Rewinders #1, #2, #3, and #4, and Dilts Rewinder..

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. The permittee shall limit the organic HAP emissions to one of the levels specified below:
 - a. No more than 5 percent of the organic HAP applied for each month (95 percent reduction); or
 - b. No more than 4 percent of the mass of coating materials applied for each month; or
 - c. No more than 20 percent of the mass of coating solids applied for each month.
 - d. If the permittee uses an oxidizer to control organic HAP emissions, the oxidizer shall be operated such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.

The permittee shall demonstrate compliance with the emission limits specified above following the procedures as specified in 40 CFR 63.3370. **(40 CFR 63.3320(b) & (c))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall determine the organic HAP or volatile matter and coating solids content of coating materials according to procedures in 40 CFR 63.3360(c) & (d). If applicable, determine the mass of volatile matter retained in the coated web or otherwise not emitted to the atmosphere according to 40 CFR 63.3360(g). The permittee shall determine the organic HAP mass fraction of each coating material "as-purchased" by following one of the procedures outlined in 40 CFR 63.3360(c)(1)-(3) and determine the organic HAP mass fraction of each coating material "as-applied" by following the procedures in 40 CFR 63.3360 (c)(4). If the organic HAP content values are not determined using the procedures in paragraphs 40 CFR 63.3360(c)(1)-(3), the owner or operator must submit an alternative test method for determining their values for approval by the Administrator in accordance with 40 CFR 63.7(f). The recovery efficiency of the test method must be determined for all of the target organic HAP and a correction factor, if necessary, must be determined and applied. If the permittee complies with the emission standards in 40 CFR 63.3320 and use the volatile organic content as a surrogate

for the organic HAP content of coatings, the permittee must determine the as-purchased volatile organic content and coating solids content of each coating material applied by following the procedures in 40 CFR 63.3360(d)(1) or (2), and the as applied volatile organic content and coating solids content of each coating material by following the procedures in 40 CFR 63.3660(d)(3). **(40 CFR 63.3360(a)(1)(c)&(d))**

2. The permittee may choose to account for the mass of volatile matter retained in the coated web after curing or drying or otherwise not emitted to the atmosphere when determining compliance with the emission standards in 40 CFR 63.3320. If this option is chosen, the permittee shall develop a testing protocol to determine the mass of volatile matter retained in the coated web or otherwise not emitted to the atmosphere and submit this protocol to the Administrator for approval. The permittee shall submit this protocol with the site-specific test plan under 40 CFR 63.7(f). If taking into account the mass of volatile matter retained in the coated web after curing or drying or otherwise not emitted to the atmosphere and demonstrate compliance according to 40 CFR 63.3370(c)(3), (c)(4), (c)(5), or (d), then the test protocol submitted must determine the mass of organic HAP retained in the coated web or otherwise not emitted to the atmosphere. Otherwise, compliance must be shown using the volatile organic matter content as a surrogate for the HAP content of the coatings. **(40 CFR 63.3360(g))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall keep the following records on a monthly basis in accordance with 40 CFR 63.10(b)(1), as applicable to FGPROCESS: **(40 CFR 63.3410(a))**
 - a. Records specified in 40 CFR 63.10(b)(2) of all measurements needed to demonstrate compliance with the requirements of 40 CFR Part 63, Subpart JJJJ:
 - i. Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of 40 CFR 63.3360(c);
 - ii. Volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of 40 CFR 63.3360(d); and
 - iii. Material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of 40 CFR 63.3370(b), (c), and (d).
2. The permittee shall maintain records of all liquid-liquid material balances performed in accordance with the requirements of 40 CFR 63.3370. The records must be maintained in accordance with the requirements of 40 CFR 63.10(b). **(40 CFR 63.3410(b))**

VII. REPORTING

1. The permittee shall submit a semiannual compliance report according to the requirements of 40 CFR 63.3400(c) which shall include: **(40 CFR 63.3400(c))**
 - a. Compliance report dates as specified in 40 CFR 63.3400(c)(1)(i)-(v).
 - b. The compliance report must contain the following information:
 - i. Company name and address.
 - ii. Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.
 - iii. Date of report and beginning and ending dates of the reporting period.
 - iv. If there are no deviations from any emission limitations (emission limit or operating limit) that apply to the facility, a statement that there were no deviations from the emission limitations during the reporting period, and that no continuous monitoring system was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
 - v. For each deviation from an emission limitation (emission limit or operating limit) that applies to the facility and that occurs at an affected source where you are not using a CEMS to comply with the emission limitations 40 CFR Part 63, Subpart JJJJ, the compliance report must contain the information specified in 40 CFR 63.3400(c)(2)(i)-(iii) and 40 CFR 63.3400(c)(2)(v)(A)-(C).

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating by the compliance date(s) specified in the Standards. **(40 CFR Part 63, Subpart JJJJ, 40 CFR Part 63, Subpart A)**

APPENDICES

Appendix 1. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO _{2e}	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP	Hazardous Air Pollutant
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallons of Applied Coating Solids	HP	Horsepower
GC	General Condition	H ₂ S	Hydrogen Sulfide
GHGs	Greenhouse Gases	kW	Kilowatt
HVLP	High Volume Low Pressure*	lb	Pound
ID	Identification	m	Meter
IRSL	Initial Risk Screening Level	mg	Milligram
ITSL	Initial Threshold Screening Level	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	NMOC	Non-methane Organic Compounds
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng	Nanogram
NA	Not Applicable	PM	Particulate Matter
NAAQS	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	%	Percent
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SDS	Safety Data Sheet	TAC	Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature
SRN	State Registration Number	THC	Total Hydrocarbons
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year
USEPA/EPA	United States Environmental Protection Agency	µg	Microgram
VE	Visible Emissions	µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.