



STATE OF MICHIGAN
 DEPARTMENT OF
 ENVIRONMENT, GREAT LAKES, AND ENERGY
 KALAMAZOO DISTRICT OFFICE



GRETCHEN WHITMER
 GOVERNOR

LIESL EICHLER CLARK
 DIRECTOR

October 9, 2019

Mr. Henry Krell
 Otsego Paper
 320 North Farmer Street
 Otsego, Michigan 49078

SRN: A0023, Allegan County

Dear Mr. Krell:

VIOLATION NOTICE

On September 13, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a deviation report for monitor downtime on EUTURBINE1 at Otsego Paper located at 320 North Farmer Street, Otsego, Michigan. The purpose of this report was to identify any deviations from ROP requirements in MI-ROP-A0023-2019 that Otsego Paper experienced during the reporting period of July 1, 2019 to September 30, 2019.

During the review of the deviation report, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
EUTURBINE1	Special Condition VI.1-2	Facility is required to continuously monitor NOx emissions and the flue gas oxygen concentrations from EUTURBINE1. It is required that both the NOx emissions and flue gas oxygen concentration be monitored and recorded in a manner and with instrumentations in compliance with Performance Specification 3, of Appendix B, 40 CFR Part 60. Facility reported downtime that lasted 6 Days and 9 Hours. This equates to roughly a 7% monitor downtime for the CEMS unit on EUTURBINE1 for the reporting period of July 1, 2019 to September 30, 2019.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 25, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the

Mr. Henry Krell
Otsego Paper
Page 2
October 9, 2019

violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Otsego Paper believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Otsego Paper. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Cody Yazzie
Environmental Engineer
Air Quality Division
269-567-3554

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE