



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

April 8, 2024

VIA EMAIL AND U.S. MAIL

Brian Houghton
Neenah Paper Michigan, Inc.
501 East Munising Avenue
Munising, Michigan 49862

SRN: B1470, Alger County

Dear Brian Houghton:

VIOLATION NOTICE

On February 8, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Neenah Paper located at 501 East Munising Avenue, Munising, Michigan. The purpose of this inspection was to determine Neenah Paper's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B1470-2019a.

During the inspection and records review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGJJJJJJ-EU05	40 CFR 63.11224(a)(7), Table 3.8 and Table 6.3 of 40 CFR Part 63 Subpart JJJJJJ, Special Condition (SC) VI.8	Operating limit for oxygen level (oxygen analyzer system) was not established during previous stack testing.
FGJJJJJJ-EU05	40 CFR 63.11212(c), Table 3.7 and Table 6.4 of 40 CFR Part 63, Subpart JJJJJJ, SC V.3	Operating limit for boiler load was not established during previous stack testing.

EU05 (Boiler#1) is subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area sources. These standards are found in 40 CFR Part 63, Subpart JJJJJJ.

During this inspection, it was determined Neenah Paper did not establish operating limits for the oxygen level and boiler load from the previous CO performance test in December 2021. At the time of the inspection, Neenah Paper was not aware of the

operating limit requirements and was unable to provide an operating limit for the oxygen trim system or boiler load. Operating limits are confirmed or reestablished during performance tests for 40 CFR Part 63, Subpart JJJJJJ. This is a violation of Special Condition V.3, and SC VI.8 under FGJJJJJJ-EU05, and also of the standards in place in 40 CFR Part 63, Subpart JJJJJJ.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 29, 2024 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations 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 Lauren Luce at EGLE, AQD, Marquette District, at 1504 West Washington Street, Marquette, Michigan 49855 or LuceL1@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Neenah 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 violations cited above and for the cooperation that was extended to me during my inspection of Neenah Paper. A copy of the inspection report is enclosed. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Lauren Luce
Environmental Quality Analyst
Air Quality Division
(906) 202-9843

Enclosure

cc: Brian Ciupak, Neenah Paper Michigan, Inc.
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Michael Conklin, EGLE