

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

B256128543

FACILITY: PACKAGING CORPORATION OF AMERICA		SRN / ID: B2561
LOCATION: 3251 Chicago Dr, GRANDVILLE		DISTRICT: Grand Rapids
CITY: GRANDVILLE		COUNTY: KENT
CONTACT: Jaime Kiste, Maintenance Manager		ACTIVITY DATE: 02/11/2015
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection. Jaime Kiste, Maintenance Manager, Rich Ford, General Manager and Kym Harmon, Quality Systems Manager all met with me during the pre-inspection meeting. I presented them with the DEQ Environmental Inspections: Rights and Responsibilities brochure and its contents were discussed.

FACILITY DESCRIPTION

This facility as described on the website is a full-service manufacturer of corrugated shipping containers, high-impact graphics packaging, point-of-sale packaging and multi-color wax-cascaded containers. Equipment includes exempt devices that are covered under Opt-out Permit to install No. 86-14. This facility-wide permit contains legally enforceable conditions to limit the potential to emit of HAPs, PM and VOC. This site works three shifts 5-6 days per week and employs ~140 people.

During the facility inspection, we utilized file information on equipment present in order to observe all operations that generate an air contaminant. There was a question on whether or not the facility has already submitted NSPS Dc notifications, but once I returned to the office I saw this was already documented and on file. No further action needed.

No issues with the equipment were observed during the plant physical inspection. Mr. Kiste took us to his office where the recordkeeping was immediately available. Because they had similar recordkeeping requirements pursuant to Rule 208a, not a lot of change was necessary.

Opt-out PTI No. 86-14.

Emissions limits present for HAPS, PM and VOC. The largest HAP emissions come from the glycol ethers group at 0.62 tons per 12-month rolling time period from January 2014-December 2014. Total HAP emissions are 2.87 tons. PM is limited to 42 tons per year and reported emissions through December 2014 are listed as 6.3 tons. VOCs are limited to 89 tons per year and reported emissions through December 2014 are listed as 4.03 tons.

A review of emissions indicated that the Rule 290 emission unit categories at the facility may contain more than one separate emission units. At this time, this is acceptable, because as a group all emissions are below the limit imposed by Rule 290. Additionally, the material usage is being recorded per purchase records. The records technically should be recorded based on actual monthly usage. At this time, no overages are identified using this method, though July of 2014 adhesive is at 852 lbs with a limit of 1,000 based on purchase records.

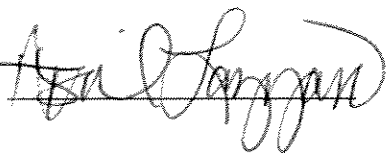
Ms. Harmon clarified that with each batch of material comes a data sheet listing the contents of each material. This is used, per batch, to cross reference with the regulatory report they utilize. (see attached for example) This list has the contents by CAS # and the HAP and VOC data. This is acceptable.

Mr. Kiste has created a log sheet to maintain a record of the required visible emissions readings from the scrap collection cyclone. This observation is recorded once a month and was up-to-date. No visible emissions have been observed from the cyclone. The recordkeeping should list whether or not Mr. Kiste is a certified observer. This was discussed, but should be updated on the actual paper record being kept.

As detailed above, the facility is adequately maintaining HAP, VOC and PM recordkeeping as required by Opt-out PTI No. 86-14.

CONCLUSION

The facility was in compliance at the time of the inspection.

NAME 

DATE 2-24-15

SUPERVISOR PAB