DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

| Facility : | Dart Container | Corpora | tion | of Michigan | | | SRN : | D8065 |
|------------|------------------|---------|------|-------------|-------|----------------|------------|------------|
| _ocation : | 432 Hogsback | Rd | | | | | District : | Lansing |
| | | | | | | | County : | INGHAM |
| City: | MASON | State: | MI | Zip Code : | 48854 | Comp Status | | Compliance |
| Source Cla | ss: MAJOR | | | | | Staf | f: Samar | ntha Davis |
| CE Begin | Date : 9/17/2019 | 9 | | | | FCE Date | Completion | 9/17/2020 |
| Comments | : | | | | | | | |

List of Partial Compliance Evaluations :

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| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-----------------------------------|-------------------|---|
| 09/17/2020 | ROP Semi 1 Cert | Compliance | MI-ROP-D8065-2014a Section 2, Ken Turner- Machinery Mfg Plant Manager, no deviations. |
| 09/17/2020 | ROP Semi 1 Cert | Compliance | Semi-Annual Compliance certs for Sections 1 for MI-ROP-D8065- 2014a. Marc Landry - Cup Plant Manager, deviations summary: chart recorder down, or boiler shut down due to lack of steam demand, or operator missing entering data points. |
| 09/17/2020 | ROP Semi 1 Cert | Compliance | MI-ROP-D8065-2014a Section 3, John Alfano- Facilities Engineer Director, no deviations. |
| 09/17/2020 | CAM Excursions/Exceedan ces | Compliance | Detailed list provided. Deviations mainly consist of pentane venting to atmosphere due mostly to equipment error and operator error. Longest incident of pentane venting to atmosphere due to boiler 8 not reading properly due to pilot tube error. It was checked and repaired/corrected. |
| 09/17/2020 | MACT (Part 63) | Compliance | Subpart N Chrome Ongoing Compliance Report: 153.4 operating hours for tank 4A, 533.4 operating hours for tank 4B, 0 malfunctions or exceedances; 572,512 cumulative amp-hours |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|----------------------|-------------------|--|
| 09/17/2020 | Stack Test | Compliance | This was a retest of the FG- RECYCLE test that was originally performed on 7/21/20 (See MACES entry). This test was performed as a requirement of PTI 205-18A to determine the level of pentane remaining in the EPS blocks of pre and post-consumer scrap after the densifying process. This test was performed with a more rigorous sampling technique to provide a more representative idea of the VOCs being released from specific scrap material. The permit limit requires a minimum of 40% pentane remaining in the blocks. This test showed that 76% pentane was remaining in the blocks. |
| 08/12/2020 | Scheduled Inspection | Compliance | Scheduled inspection as part of an FCE. |
| 07/30/2020 | Stack Test | Unknown | This report was received later than originally outlined in PTI 205-18a because of COVID-19. The appropriate EGLE COVID-19 Enforcement Discretion guidance was followed to allow for this. The report received was for EU- RECYCLE as a requirement of PTI 205-18a. The purpose of this test was to determine the % VOC emitted from cup and post- consumer scrap. This sampling showed that the post-consumer scrap was not meeting the min of 40% VOC remaining in the blocks. As of right now a violation will not be issued because more sampling data points are required to determine a more representative idea of the scrap coming into the recycling center. This process is currently on a quarterly testing schedule. Future sampling tests will determine if a modification to the permit will be needed. |
| 06/01/2020 | MAERS | Compliance | 2019 MAERS. Audit completed. See MAERS for comments. |
| 03/26/2020 | ROP Annual Cert | Compliance | MI-ROP-D8065-2014a Section 1, Byron Chen- Cup Plant Manager, deviations summary: chart recorder down, or boiler shut down due to lack of steam demand. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-----------------------------------|-------------------|---|
| 03/26/2020 | ROP SEMI 2 CERT | Compliance | MI-ROP-D8065-2014a Section 1, Byron Chen- Cup Plant Manager, deviations summary: chart recorder down, or boiler shut down due to lack of steam demand. |
| 03/26/2020 | MACT (Part 63) | Compliance | Subpart N Chrome Ongoing Compliance Report: pressure drop 0.3-4.3 inches for Tank 4A, pressure drop 0.4-4.4 inches for Tank 4B, 663 operating hours for tank 4A, 622 operating hours for tank 4B, 0 malfunctions or exceedances; 675,348 amp-hours |
| 03/26/2020 | ROP Annual Cert | Compliance | MI-ROP-D8065-2014a Section 2, Ken Turner- Machinery Mfg Plant Manager, no deviations. |
| 03/26/2020 | ROP SEMI 2 CERT | Compliance | MI-ROP-D8065-2014a Section 2, Ken Turner- Machinery Mfg Plant Manager, no deviations. |
| 03/26/2020 | ROP Annual Cert | Compliance | MI-ROP-D8065-2014a Section 3, John Alfano- Facilities Engineer Director, no deviations. |
| 03/26/2020 | ROP SEMI 2 CERT | Compliance | MI-ROP-D8065-2014a Section 3, John Alfano- Facilities Engineer Director, no deviations. |
| 02/18/2020 | Other Non ROP | Compliance | Sampling and Analysis Plan received for quarterly pentane content ananlysis of material processed through FG-RECYCLE Testing required per PTI 205-18A to establish the emission rate for the FG-RECYCLE process. Submitted by Mr. Dennis Archer. |
| 11/18/2019 | ROP R215 Notification | Compliance | Notification for the removal of EU- RECYCEXTRUDER-1 and the installations of EU-RECDENSIFY as of 10/02/19. |
| 10/08/2019 | CAM Excursions/Exceedan ces | Compliance | Detailed list provided. Deviations mainly consist of pentane venting to atmosphere due mostly to lack of steam demand, pentane chart recorder down, and missed hourly operational checks. |
| 10/08/2019 | ROP Semi 1 Cert | Compliance | Semi-Annual Compliance certs for Sections 1 for MI-ROP-D8065- 2014a. Kelly Winland- Cup Plant Manager, deviations summary: chart recorder down, or boiler shur down due to lack of steam demand, or operator missing entering data points. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-----------------|-------------------|---|
| 10/08/2019 | MACT (Part 63) | Compliance | Subpart N Chrome Ongoing Compliance Report: pressure drop 0.3-4.3 inches for Tank A, pressure drop 0.4-4.4 inches for Tank B, 791.7 operating hours for tank 4A, 788.9 operating hours for tank 4B, 0 malfunctions or exceedances; 932,355 amp-hours |
| 10/08/2019 | ROP Semi 1 Cert | Compliance | MI-ROP-D8065-2014a Section 3, John Alfano- Facilities Engineer Director, no deviations. |
| 10/08/2019 | ROP Semi 1 Cert | Compliance | MI-ROP-D8065-2014a Section 2, Ken Turner- Machinery Mfg Plant Manager, no deviations. |
| 10/07/2019 | Stack Test | Compliance | Test Report for Verification of Total Chromium Emissions from Hard Chrome Electroplating Operations. Testing was performed June 13th and 14th. Total chromium concentration 1.03E-03 mg/dscm. Permitted limit is 6.0E-03 mg/dscm. |

Name: Samantha Davis Date:

9/24/2020

Supervisor:

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