

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Packaging Corporation of America - Filer City Mill	SRN : B3692
Location : 2246 Udell St.	District : Cadillac
	County : MANISTEE
City : FILER CITY State: MI Zip Code : 49634	Compliance Status : Compliance
Source Class : MAJOR	Staff : Rob Dickman
FCE Begin Date : 1/1/2020	FCE Completion Date : 4/27/2021
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
04/27/2021	On-site Inspection	Compliance	Walk through portion of a scheduled inspection for this ROP source.
04/13/2021	On-site Inspection	Compliance	Records review of this major source.
04/13/2021	Malfunction Abatement Plan	Compliance	MAP included as part of ROP application. MAP is dated 9/27/19. Approved 4/13/21
04/13/2021	ROP Other	Compliance	Fugitive Dust Plan received on 10/10/2019 with ROP Renewal Application. Plan is dated 5/1/18. Approved on 4/13/21.
03/16/2021	ROP Annual Cert	Compliance	Multiple reports contained within one document. Annual reporting for 2020. Deviations were corrected in a timely and complete manner.
03/16/2021	ROP SEMI 2 CERT	Compliance	Multiple reports contained within one document. Semi annual reporting for the second half of 2020. Two deviations reported were CEM downtime and were previously reviewed. These deviations were corrected in a timely and complete manner.
03/16/2021	CAM Excursions/Exceedances	Compliance	Multiple reports in one document. No excursions noted.
03/16/2021	CAM monitor downtime	Compliance	Multiple reports in one document. No monitoring system downtime noted.

Activity Date	Activity Type	Compliance Status	Comments
03/16/2021	MACT (Part 63)	Compliance	Multiple reports in one document. Startup, Shutdown, Malfunction (SSM) report per 40 CFR 63, Subpart S. All issues listed amounted to less than 1% of the total source operating time. No further action is recommended.
03/15/2021	MAERS	Compliance	See MAERS for further info.
02/12/2021	Excess Emissions (CEM)	Compliance	MACT and EER contained in one submission. Fourth quarter 2020 EER for Boilers 1, 2, and 4A. Report OK, no issues. All excess emissions and monitoring system downtime less than 1% of the total source operating time.
02/12/2021	MACT (Part 63)	Compliance	40 CFR 63 Subpart DDDDD certification with all emission limits and work practices. Report OK. No Deviations noted.
02/12/2021	MACT (Part 63)	Compliance	MACT and EER contained in one submission. Fourth quarter 2020 RTO temperature report. Reporting required pursuant to 40 CFR 63.864(k)(1). Zero exceedances reported.
02/12/2021	ROP Other	Compliance	Notice of Testing & Test Protocols, Boiler 4A RATA protocol, Biogas and LDAR Test protocol. Submitted in a timely manner. Testing is scheduled for March 23, 2021
01/11/2021	Malfunction Abatement Plan	Compliance	Submittal of Updated MAP Plan. This update is required as testing performed in 2020 indicates a new minimum compliant RTO temperature of 1689°F. Plan is acceptable.
11/13/2020	Excess Emissions (CEM)	Compliance	MACT and EER contained in one submission. Third quarter 2020 EER for Boilers 1, 2, and 4A. Report OK, no issues. All excess emissions and monitoring system downtime less than 1% of the total source operating time.
11/13/2020	MACT (Part 63)	Compliance	MACT and EER contained in one submission. Third quarter 2020 RTO temperature report. Reporting required pursuant to 40 CFR 63.864(k)(1). Zero exceedances reported.

Activity Date	Activity Type	Compliance Status	Comments
11/12/2020	Stack Test	Compliance	Submittal of Original Cert for PM testing on August 25, 2020. The Test Report was Received Electronically on 10/23/20. Testing indicates compliance. PM emission limit is 0.2 #/1000# at 50% excess air, results were 0.05 #/1000# at 50% excess air.
09/09/2020	CAM Excursions/Exceedances	Compliance	Multiple reports in one document. No excursions noted.
09/09/2020	CAM monitor downtime	Compliance	Multiple reports in one document. No monitor downtime reported. No further action is recommended.
09/09/2020	MACT (Part 63)	Compliance	Multiple reports in one document. Startup, Shutdown, Malfunction (SSM) report per 40 CFR 63, Subpart S. No exceedances noted. No further action is recommended.
09/08/2020	ROP Semi 1 Cert	Compliance	Multiple reports contained within one document. Semi annual reporting for the first half of 2020. Two of the deviations reported were CEM downtime and were previously reviewed. Another was a boiler tune up due to Covid 19. The last was a deviation from RTO Temperature parameters which was also previously reviewed. All deviations were corrected in a timely and complete manner.
09/08/2020	ROP Tech Review Notes	Compliance	
08/19/2020	Excess Emissions (CEM)	Compliance	MACT and EER contained in one submission. Second quarter 2020 EER for Boilers 1, 2, and 4A. Report OK, no issues. All excess emissions and monitoring system downtime less than 1% of the total source operating time.
08/19/2020	MACT (Part 63)	Compliance	MACT and EER contained in one submission. Second quarter 2020 RTO temperature report. Reporting required pursuant to 40 CFR 63.864(k)(1). Zero exceedances reported.
08/12/2020	ROP Other	Compliance	Test Protocol for EUCOPELAND+DiSTANK PM Testing. Protocol was reviewed and approved on 7/23/20.

Activity Date	Activity Type	Compliance Status	Comments
07/20/2020	CEM RATA	Compliance	RATA, Boilers 2&4A, Boiler 2 NOx RA was 5%, Boiler 4A RA was 0.5%, Limit is less than or equal to 20%. Report is good.
07/20/2020	Stack Test	Compliance	Biogas testing, heat content and hydrogen sulfide content. Pre combustion H2S was 0.0135 #/hr, limit is 0.0449. Post combustion H2S was 1.38 #/hr, limit is 4.49, Sulfur dioxide was 2.6 #/hr, limit is 8.45. Higher heating value for the biogas was 705 BTU/standard cubic foot. No limit on this. Report is good.
07/20/2020	Stack Test	Compliance	LDAR system testing. Testing required per MACT Subpart S. Leak is defined as 500 ppm above background. A total of 161 points were tested, no leaks noted.
07/14/2020	ROP Other	Compliance	Fugitive Dust Control Plan - Received with ROP Renewal, plan is acceptable.
07/14/2020	Malfunction Abatement Plan	Compliance	MAP - Received with ROP Renewal, plan is acceptable.
07/14/2020	ROP Other	Compliance	CEMS Quality Assurance and Quality Control Plan - Received with ROP Renewal, this plan is acceptable but is not required to be approved.
07/14/2020	ROP Other	Compliance	CEMS EUBoiler4A - Quality Assurance and Quality Control Plan - Received with ROP Renewal. This plan is not required to be approved.
07/14/2020	ROP Other	Compliance	Greenhouse Gas Monitoring Plan - Received with ROP Renewal. This plan is not required to be approved.
07/13/2020	Excess Emissions (CEM)	Compliance	MACT and EER contained in one submission. First quarter 2020 EER for Boilers 2 and 4A. Report OK, no issues. All excess emissions and monitoring system downtime less than 1% of the total source operating time.
07/13/2020	Stack Test	Compliance	2020 Compliance Emissions Testing for Boilers 1 and 2. Report OK, results demonstrate compliance with emissions limits.
07/13/2020	MACT (Part 63)	Compliance	MACT and EER contained in one submission. First quarter 2020 RTO temperature report. Reporting required pursuant to 40 CFR 63.864(k)(1). Zero exceedances reported.

Activity Date	Activity Type	Compliance Status	Comments
07/08/2020	Stack Test	Compliance	Addendum to stack testing report. Initial report received 4/13/20. Addendum defends the use of outlet flow number for inlet flow in determining DE. Please see file for details.
04/28/2020	ROP Other	Compliance	Notification page submitted for Test Protocol. Protocols were submitted electronically. Protocols appear complete and were submitted in a timely manner. Report has been printed for the file.
04/20/2020	Stack Test	Compliance	EUCOPLELAND+DISTANK Destruction Efficient Performance Testing Report for HAPS. Report OK. Permitted limit is >90% DE or 2.97# per ton of black liquor processed. Destruction efficiency was calculated to be 92.5%.
03/16/2020	MAERS	Compliance	See MAERS for Further Info.
03/12/2020	ROP Annual Cert	Compliance	Multiple reports contained within one document. Annual certification for 2019. Five of the deviations reported were previously reported and documented. One of the others was a differential pressure excursion and the other was a missed visible emissions reading. All deviations were corrected in a timely and complete manner.
03/12/2020	ROP SEMI 2 CERT	Compliance	Multiple reports contained within one document. Semi annual reporting for the second half of 2019. Two of the deviations reported were CEM downtime and were previously reviewed. One of the others was a differential pressure excursion and the other was a missed visible emissions reading. All deviations were corrected in a timely and complete manner.
03/12/2020	MACT (Part 63)	Compliance	Multiple reports in one document. Startup, Shutdown, Malfunction (SSM) report per 40 CFR 63, Subpart S. All issues listed amounted to 0.03% of the total source operating time. No further action is recommended.
03/12/2020	CAM Excursions/Exceedances	Compliance	Multiple reports in one document. No excursions noted.

Activity Date	Activity Type	Compliance Status	Comments
03/12/2020	CAM monitor downtime	Compliance	Multiple reports in one document. Monitor downtime totaled 5 minutes on the Copeland Scrubber. No further action is recommended.
03/11/2020	Stack Test Observation	Compliance	Compliance testing on Boiler 1
02/11/2020	ROP Other	Compliance	Cert form to go with Electronically submitted Test Protocol for EUCOPELAND+DISTANK RTO VOC Destruction Efficiency Testing. Protocol approved on 2/6/20.
02/10/2020	Excess Emissions (CEM)	Compliance	MACT and EER contained in one submission. Fourth Quarter 2019 EER for Boilers 2 and 4A. Report OK, no issues. All excess emissions and monitoring system downtime less than 1% of the total source operating time.
02/10/2020	MACT (Part 63)	Compliance	MACT and EER contained in one submission. Fourth Quarter 2019 RTO temperature report. Reporting required pursuant to 40 CFR 63.864(k)(1). Zero exceedances reported.
01/27/2020	MACT (Part 63)	Compliance	40 CFR 63 Subpart DDDDD certification with all emission limits and work practices. Report OK. No Deviations noted.

Name: _____

Date: _____

Supervisor: _____