

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> Pregis	<b>SRN :</b> N6944
<b>Location :</b> 2700 Wills Street	<b>District :</b> Warren
	<b>County :</b> SAINT CLAIR
<b>City :</b> MARYSVILLE <b>State:</b> MI <b>Zip Code :</b> 48040	<b>Compliance Status :</b> Non Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Noshin Khan
<b>FCE Begin Date :</b> 7/30/2022	<b>FCE Completion Date :</b> 6/22/2023
<b>Comments :</b> facility violated VOC 8-hr emission limit (S.C. I.2) on 04/12/23, 05/19/23, 05/23/23, 05/31/23, and 06/02/23	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
06/05/2023	ROP Qrtly Cert	Non Compliance	1st Quarterly Deviation Report. Facility 15% CMS downtime, including time for malfunction previously reported for 01/11-1/25. Andrew Riley sent a VN on 05/15/23 for this downtime.
05/09/2023	MAERS	Compliance	MAERS Report Submission. MAERS audit passed 05/09/2023. Source total reported emissions are 276388 lbs VOCs, which is consistent with records provided during inspection.
04/24/2023	ROP Other		Facility reports CEMS reporting deviation. On April 14th, facility ran out of span gas due to inventory issues, and cylinders arrived on April 24th.
03/29/2023	On-site Inspection	Non Compliance	scheduled inspection; facility is in violation of S.C. I.2
03/27/2023	ROP Annual Cert	Compliance	Annual ROP certification. VOC emissions below 178 tpy 12-month rolling for each month in 2022. Smoke tests performed 06/30, 09/27, 12/20.
03/27/2023	ROP SEMI 2 CERT	Compliance	Semi-Annual ROP certification. 2 deviations reported. 4 hours CMS downtime in Qtr 3; 8 hours CMS downtime in Qtr 4 due to malfunctions, quality assurance calibration, and other known causes.

Activity Date	Activity Type	Compliance Status	Comments
02/02/2023	ROP Qrtly Cert	Compliance	4th Quarterly Deviation Report. Facility reports no excess emissions periods and 8 total hours of CMS downtime. Facility sent timely notification of deviation on 10/07/22.
12/20/2022	Other	Non Compliance	smoke test observation
10/20/2022	ROP Other	Compliance	October 7, 2022 CEMS Calibration Failure due to an issue with the Electronic Ignition System. Problem was found to be plugged EIS lines, which were cleaned out with dry air, resolving the issue. About 6 hours of data were lost. VOC records indicate that emissions were below 8-hour limit before and after calibration failure.
09/27/2022	ROP Semi 1 Cert	Compliance	Reported 5 deviations - three were due to monitor error, resulting in four total hours of monitor downtime; the other two were on consecutive days (5/30 and 5/31) where the ion Cambridge unit had a failure.
09/09/2022	ROP Qrtly Cert	Non Compliance	Q2 Quarterly Deviation Report. During the reporting period, the 8-hour emission limit was exceeded on May 30th and May 31st. The exceedance was attributed to a failure with an ion Cambridge unit. In response, the facility shut down one of the production lines.

Name: Washim Khan Date: 6/26/2023

Supervisor: K. Kelly