



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 2, 2021

Mr. John von Zellen
Maintenance/Environmental
Pregis LLC
2700 Wills Street
Marysville, MI 48040

SRN: N6944, St. Clair County

Dear Mr. Zellen:

VIOLATION NOTICE

On February 10, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Pregis located at 2700 Wills Street, Marysville, Michigan. The purpose of this inspection was to determine Pregis' 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 (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N6944-2017.

Following the inspection, staff identified the following:

Process Description	Rule/Permit Condition Violated	Comments
Facility-wide	MI-ROP-N6944-2017, FG-FACILITY, S.C. I.2.	Hourly emissions records provided by the facility indicate that the 8-hour VOC emission limit was exceeded on January 8, 2020.
Facility-wide	MI-ROP-N6944-2017, FG-FACILITY, S.C. VI.2.	Pregis was found to be not maintaining records of VOC emission calculations for the 8-hour VOC emission rate.

During this inspection, Pregis was unable to produce records of the 8-hour VOC emission rate calculations. This is a violation of the recordkeeping requirements specified in Special Condition VI.2 of MI-ROP-N6944-2017, which requires the maintenance of records of VOC emissions calculations determining the 8-hour VOC emission rate.

The hourly VOC emission records provided demonstrate that actual emissions of volatile organic compounds (VOCs) from the facility process equipment reached 478.7

Mr. John von Zellen
Pregis LLC
Page 2
June 2, 2021

lb/8-hour period on January 8, 2020, which exceeds the VOC emission limit in MI-ROP-N6944-2017. The conditions of MI-ROP-N6944-2017 limit the emissions of VOC to 476 pounds per 8-hour period.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 23, 2021 (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 EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Pregis 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 violation cited above and for the cooperation that was extended to me during my inspection of Pregis. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Kaitlyn Leffert
Environmental Quality Analyst
Air Quality Division
586-249-6505

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Joyce Zhu, EGLE