

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : GRAPHIC PACKAGING INTERNATIONAL, INC.	SRN : B1678
Location : 1500 N. PITCHER ST.	District : Kalamazoo
	County : KALAMAZOO
City : KALAMAZOO State: MI Zip Code : 49007	Compliance Status : Compliance
Source Class : MAJOR	Staff : Dennis Dunlap
FCE Begin Date : 5/10/2014	FCE Completion Date : 12/18/2015
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
12/16/2015	Scheduled Inspection	Compliance	Scheduled inspection
10/29/2015	Excess Emissions (CEM)	Compliance	Excess emissions report. Monthly SO2 emissions and % sulfur in fuel oil. Summary report for gaseous and opacity excess emission and monitoring system performance satisfies NOx and O2 CEMS quarterly reporting.
09/24/2015	ROP Semi 1 Cert	Compliance	A deviation was reported. A fallout event occurred on 3/5/15 and 3/18/15.
09/24/2015	Excess Emissions (CEM)	Compliance	Quarter 1 and 2 reports.
09/24/2015	ROP Semi 1 Cert	Compliance	
07/21/2015	CEM RATA	Compliance	Boiler 9 CEMS RATA report for RATA completed on 4/22/15.
07/21/2015	Excess Emissions (CEM)	Compliance	Quarterly report for gaseous and opacity excess emissions. Includes SO2 emissions and % sulfur in fuel oil.
06/10/2015	Excess Emissions (CEM)	Compliance	Includes cylinder gas audit and quarterly linearity check..
06/10/2015	ROP Other	Compliance	Monthly SO2 emissions and sulfur in fuel oil. No fuel oil was used during the period.
06/10/2015	CEM RATA	Compliance	Boiler #8 RATA for O2 and NOx conducted on 4/21/15..
06/08/2015	Other Non ROP	Compliance	Report for the 4/6/15 VN.
04/24/2015	Other Non ROP	Compliance	Report for the 4/6/15 VN.
04/15/2015	ROP Tech Review Notes		2015 ROP tech review notes

Activity Date	Activity Type	Compliance Status	Comments
04/14/2015	Telephone Notes		Discussion of AQD's 4/9/15 email (attached) regarding Graphic's 3/31/15 response to odor violations
03/26/2015	ROP SEMI 2 CERT	Compliance	Revised report submitted to add deviations previously cited.
03/26/2015	ROP Annual Cert	Compliance	Revised report submitted to add deviations previously cited.
03/24/2015	ROP SEMI 2 CERT	Compliance	The company still has 2 unresolved 901 violations but no new VNs are being sent as a result of this report, therefore I have marked the status as compliance, even though the facility is currently not in compliance.
03/24/2015	ROP Annual Cert	Compliance	The company still has 2 unresolved 901 violations but no new VNs are being sent as a result of this report, therefore I have marked the status as compliance, even though the facility is currently not in compliance.
03/24/2015	Excess Emissions (CEM)	Compliance	Company submitted EE & CGA reports for all of 2014. All of the reports have been previously submitted and reviewed.
03/24/2015	ROP SEMI 2 CERT	Compliance	The company reports compliance with all requirements for the period.
03/24/2015	ROP Annual Cert	Compliance	Company reports compliance with all requirements for the year. In the 1st semi-annual cert for 2014 they reported 2 deviations that were discovered during the May inspection of the plant. They probably should have reported them here again.
03/24/2015	Complaint Investigation	Compliance	further follow-up on the 3/5 & 3/18 complaints
03/23/2015	Complaint Investigation	Compliance	Follow-up complaint investigation to the 3/19/15 one.
03/19/2015	Complaint Investigation	Compliance	follow-up to fallout complaint on 3/5 & 3/18 by KWWTP, samples have been sent to the lab
02/06/2015	Excess Emissions (CEM)	Compliance	Also reports that no oil was burned in Blr#9 during the qtr. For the NOx and O2 monitors they report 0% downtime and compliance with the cylinder gas audit.

Activity Date	Activity Type	Compliance Status	Comments
11/10/2014	Excess Emissions (CEM)	Compliance	Oil was not burned in Boiler #9. Company reports compliance with gas/CEMS audits. They did have 89 and 88 hrs of downtime (about 4.6% of the time) due to "non-monitor" malfunctions with the NOx and O2 system but there is no explanation provided.
11/07/2014	Complaint Investigation	Compliance	odor complaint
09/18/2014	ROP Semi 1 Cert	Compliance	3 of the 4 deviations were the same and were discovered and corrected through a violation notice at the time of the last inspection. The 4th has been corrected through the permit process.
09/18/2014	ROP Semi 1 Cert	Compliance	The 2 deviations were noted at the most recent inspection.
09/18/2014	Excess Emissions (CEM)	Compliance	Boiler 9 - shows no downtime or EE. CGA was in Feb. 2014 and shows compliance.
08/19/2014	CEM RATA	Compliance	Boiler #9 RATA performed in 4/14. Pending TPU review.
08/12/2014	Excess Emissions (CEM)	Compliance	Company reports compliance (0 % downtimes and duration of excess emissions). for both monitors.
08/12/2014	ROP Other	Compliance	Company reports that no fuel oil was used during the quarter.
06/02/2014	CEM RATA	Compliance	RATA and Part 75 Linearity check - Boiler 8 - appears to pass

Name: Dennis Dunlap Date: 12/18/15 Supervisor: MO 12/21/2015