

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : GRAPHIC PACKAGING INTERNATIONAL LLC	SRN : B1678
Location : 1500 N. PITCHER ST.	District : Kalamazoo
	County : KALAMAZOO
City : KALAMAZOO State: MI Zip Code : 49007	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Monica Brothers
FCE Begin Date : 7/28/2021	FCE Completion Date : 7/28/2022
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
07/28/2022	Excess Emissions (CEM)	Compliance	Second quarter summary report for gaseous excess emission and monitoring system performance for Boiler 9. They report no excess emissions and 143 hours (6.86%) of CEMS downtime for NOx.
07/28/2022	Excess Emissions (CEM)	Compliance	Second quarter summary report for gaseous excess emission and monitoring system performance for Boilers 10 and 11. They report no excess emissions and 42 hours (1.94%) of CEMS downtime for NOx on Boiler 10 and no excess emissions and 41 hours (1.94%) of CEMS downtime for NOW on Boiler 11.
07/28/2022	Complaint Investigation	Compliance	This was an odor investigation for a complaint that was called in to AQD staff, Monica Brothers, at 8:37 am on July 28, 2022.
07/28/2022	Complaint Investigation	Compliance	This was an odor investigation for a complaint that was called in to AQD staff, Monica Brothers, at 8:14 pm on July 28, 2022.
07/28/2022	On-site Inspection	Non Compliance	Unannounced scheduled inspection
07/25/2022	Complaint Investigation	Compliance	This was an odor complaint investigation of two odor complaints that were received by AQD staff via phone at 11:47 pm on July 24, 2022 and 12:10 am on July 25, 2022 from Deann Winfield and Timothy Johnson, respectively.

Activity Date	Activity Type	Compliance Status	Comments
07/14/2022	CEM RATA	Compliance	April 26-27, 2022 RATA & Linearity Check Report
06/08/2022	CEMS Test Observation	Compliance	Observation of RATA on Boiler 10
05/04/2022	Meeting Notes		Odor Task Force Meeting Notes
04/27/2022	CEMS Test Observation	Compliance	RATA on Boiler #8 CEMS
04/20/2022	Excess Emissions (CEM)	Compliance	Excess emissions report for Boiler 9. Summary report for gaseous and opacity excess emission and monitoring system performance satisfies NOx and O2 CEMS quarterly reporting for Boiler 9. They reported no excess emissions and a total of 0 hours (0.0%) of CEMS downtime for NOx.
04/20/2022	Excess Emissions (CEM)	Compliance	Excess emissions report for Boilers 10 and 11. Summary report for gaseous excess emissions and monitoring system performance satisfies NOx CEMS quarterly reporting for Boilers 10 and 11. They reported no excess emissions and a total of 0 hours (0.0%) of CEMS downtime for NOx.
04/19/2022	ROP Other		First quarter Jerome meter readings as required by the Nuisance Minimization Plan for Odors, section 5.2.
04/04/2022	ROP Annual Cert	Compliance	The company reports compliance with all requirements for the period.
04/04/2022	ROP SEMI 2 CERT	Compliance	The company reports compliance with all requirements for the period.
03/21/2022	NSPS (Part 60)		Second revised Boiler 10 and 11 notification of start-up. EGLE and GPI agreed on the start-up date of 2-2-2022 because this is the date when the new K2 paper machine began making paper using the new boilers 10 and 11.
03/09/2022	ROP SEMI 2 CERT	Compliance	The company reports compliance with all requirements for the period.
03/09/2022	ROP Annual Cert	Compliance	The company reports compliance with all requirements for the period.
03/04/2022	ROP Other	Compliance	Notification of completion of installation of EUSTARCH, as required by SC VII.1 of PTI#133-19A and their ROP.

Activity Date	Activity Type	Compliance Status	Comments
02/23/2022	Meeting Notes		Odor Task Force Meeting Notes
02/04/2022	Excess Emissions (CEM)	Compliance	Excess emissions report for Boilers 10 and 11. Summary report for gaseous excess emissions and monitoring system performance satisfies NOx CEMS quarterly reporting for Boilers 10 and 11. They reported no excess emissions and a total of 0 hours (0.0%) of CEMS downtime for NOx.
01/28/2022	ROP Tech Review Notes		ROP Technical Review Notes
01/13/2022	CEM RATA	Compliance	RATA Report for GPI EUBOILER 10 conducted on December 2, 2021 RATA Report for GPI EUBOILER 11 conducted on December 3, 2021
01/13/2022	ROP Other		Fourth quarter Jerome meter readings as required by the Nuisance Minimization Plan for Odors, section 5.2.
01/10/2022	Excess Emissions (CEM)	Compliance	Excess emissions report for Boiler 9. 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 for Boiler 9. They reported no excess emissions and a total of 92 hours (4.2%) of CEMS downtime for NOx.
01/10/2022	Stack Test	Compliance	RATA reports for Boilers 10 and 11.
12/15/2021	NSPS (Part 60)	Compliance	Notification of Start-Up of Boilers 10 and 11.
12/01/2021	CEMS Test Observation	Compliance	NOx and CO RATA on Boiler 10
10/28/2021	CEM RATA		RATA Protocol for Boilers 10 and 11-including beginning of 30 day performance test CEMS Monitoring Plan
10/21/2021	Excess Emissions (CEM)	Compliance	Excess emissions report for Boiler 9. 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 for Boiler 9. They reported no excess emissions and no CEMS downtime for NOx.

Activity Date	Activity Type	Compliance Status	Comments
10/21/2021	ROP Other		Third quarter Jerome meter readings as required by the Nuisance Minimization Plan for Odors, section 5.2.
09/24/2021	ROP Semi 1 Cert	Compliance	The company reports compliance with all requirements for the period.
09/24/2021	Excess Emissions (CEM)	Compliance	Graphic Packaging International, LLC. 8/19/2021 Boiler 9 Q3 2021 Cylinder Gas Audit Report. This does not include the excess emissions report or CEMS downtime.
09/24/2021	ROP Semi 1 Cert	Compliance	The company reports compliance with all requirements for the period.
08/24/2021	Stack Test	Compliance	Source Test Report 2021 CEMS Relative Accuracy Test Audit Graphic Packaging International, LLC Kalamazoo. Michigan Boiler No. 9 (Euboiler#9)
08/20/2021	ROP Tech Review Notes	Compliance	ROP Renewal Technical Review Notes

Name:  Date: 9/8/22 Supervisor: RIL 9/8/22