

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

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| 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 : Compliance |
| Source Class : MAJOR | Staff : Michael Cox |
| FCE Begin Date : 12/19/2022 | FCE Completion Date : 12/19/2023 |
| Comments : FY 2023 FCE | |

List of Partial Compliance Evaluations :

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|------------------------|-------------------|--|
| 11/17/2023 | Excess Emissions (CEM) | Compliance | <p>2023 Third Quarter Summary Report for Gaseous Excess Emission and Monitoring System Performance Boiler 10. 2023 Third Quarter Summary Report for Gaseous Excess Emission and Monitoring System Performance Boiler 11. Cylinder Gas Audit (CGA) Boiler 10 (EUBOILER#10) September 27, 2023 Cylinder Gas Audit (CGA) Boiler 11 (EUBOILER#11) September 27, 2023</p> <p>Excess emissions report for Boilers 10 and 11 and cylinder gas audit. 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 1.0 hours (0.05%) of CEMS downtime for NOx on Boiler 10 and a total of 0 hours (0.0%) of CEMS downtime for NOx on Boiler 11.</p> |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-------------------------|-------------------|---|
| 11/17/2023 | Excess Emissions (CEM) | Compliance | 2023 Third Quarter Summary Report for Gaseous Excess Emission and Monitoring System Performance Boiler 9. 2023 Third Quarter Cylinder Gas Audit for Boiler 9. Excess emissions report and cylinder gas audit 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 4.5 hours (0.56%) of CEMS downtime for NOx and O2. |
| 11/17/2023 | ROP Other | Compliance | Third quarter Jerome meter readings as required by the Nuisance Minimization Plan for Odors, section 5.2. |
| 11/02/2023 | On-site Inspection | Compliance | Scheduled unannounced Inspection |
| 10/17/2023 | Complaint Investigation | Compliance | Investigation of several odor complaints submitted to AQD staff on 10/14/2023 through 10/17/2023. |
| 10/12/2023 | Complaint Investigation | Compliance | Investigation of an odor complaint that was received by EGLE staff at 7:40 am. |
| 10/12/2023 | Complaint Investigation | Compliance | Investigation of four odor complaints that were submitted between 9:23 am and 10:18 am. |
| 10/06/2023 | Complaint Investigation | Compliance | Investigation of a complaint received at 11:24 AM. |
| 09/28/2023 | Complaint Investigation | Compliance | Investigation of two odor complaints that were submitted to AQD staff on 9-28-23. |
| 09/28/2023 | Complaint Investigation | Compliance | Investigation of an odor complaint that was submitted online at 4:44 pm. |
| 09/27/2023 | Complaint Investigation | Compliance | Investigation of an odor complaint that was received by AQD staff at 1:11 PM |
| 09/26/2023 | Complaint Investigation | Compliance | Investigation of an odor complaint that was received by AQD staff at 10:40 AM |
| 09/22/2023 | ROP Semi 1 Cert | Compliance | The company reports compliance with all requirements for the period. No deviations reported. |
| 09/22/2023 | ROP Semi 1 Cert | Compliance | The company reports compliance with all requirements for the period. No deviations reported. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-------------------------|-------------------|--|
| 09/22/2023 | Complaint Investigation | Compliance | Investigation of an odor complaint that was received by AQD staff at 10:29AM |
| 09/21/2023 | Complaint Investigation | Compliance | Investigation of an odor complaint that was received by AQD staff at 9:35AM |
| 09/12/2023 | Complaint Investigation | Compliance | Investigation of an odor complaint that was received by AQD staff at 4:04PM. |
| 09/08/2023 | Complaint Investigation | Compliance | Investigation of an odor complaint that was received by AQD staff at 9:45 am. |
| 08/31/2023 | Complaint Investigation | Compliance | Investigation of an odor complaint that was received by AQD staff at 1:40 pm. |
| 08/31/2023 | Complaint Investigation | Compliance | Investigation of an odor complaint that was received by AQD staff at 9:00 am. |
| 08/28/2023 | Complaint Investigation | Compliance | Investigation of four odor complaints that were submitted the morning of 8/28/23. |
| 08/21/2023 | Complaint Investigation | Compliance | Investigation of two odor complaints that were submitted on 8/21/23. |
| 08/21/2023 | Telephone Notes | | Telephone notes for a discussion with an anonymous complainant. |
| 08/15/2023 | ROP Other | | Second quarter Jerome meter readings as required by the Nuisance Minimization Plan for Odors, section 5.2. |
| 08/04/2023 | Complaint Investigation | Compliance | Investigation of odor complaints that was submitted to AQD staff, Amanda Cross and Michael Cox on August 4, 2023. |
| 07/25/2023 | Excess Emissions (CEM) | Compliance | 2023 Second Quarter Summary Report for Gaseous Excess Emission and Monitoring System Performance Boiler 9 attached with Relative Accuracy Test Audit (RATA) 2023 Graphic Packaging, International, LLC Boiler 9 (EUBOILER#9) May 17, 2023. The facility reported no excess emissions and a monitoring downtime of 24.0 hours (1.1%). |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|------------------------|-------------------|---|
| 07/25/2023 | Excess Emissions (CEM) | Compliance | 2023 Second Quarter Summary Report for Gaseous Excess Emission and Monitoring System Performance 10. 2023 Second Quarter Summary Report for Gaseous Excess Emission and Monitoring System Performance 11 attached with Relative Accuracy Test Audit (RATA) 2023 Graphic Packaging, International, LLC Boiler 10 (EUBOILER#10) May 17, 2023, and Relative Accuracy Test Audit (RATA) 2023 Graphic Packaging, International, LLC Boiler 11 (EUBOILER#10) May 17, 2023. The facility reported no excess emissions from Boiler 10 and Boiler 11. Boiler 10 monitoring downtime was reported as 10.0 hours (0.46%) and Boiler 11 monitoring downtime was reported as 40 hours (1.84%). |
| 07/25/2023 | CEM RATA | Compliance | Relative Accuracy Test Audit (RATA) 2023 Graphic Packaging, International, LLC Boiler 9 (EUBOILER#9) May 17, 2023 attached to Excess Emissions Report. RATA conducted on April 19-20, 2023 on NOx and O2 monitoring. Submitted RATA report indicates that both NOx and O2 monitoring passed. |
| 07/25/2023 | CEM RATA | Compliance | Relative Accuracy Test Audit (RATA) 2023 Graphic Packaging, International, LLC Boiler 10 (EUBOILER#10) May 17, 2023, and Relative Accuracy Test Audit (RATA) 2023 Graphic Packaging, International, LLC Boiler 11 (EUBOILER#10) May 17, 2023 attached with 2023 Second Quarter Summary Report for Gaseous Excess Emission and Monitoring System Performance 10. 2023 Second Quarter Summary Report for Gaseous Excess Emission and Monitoring System Performance 11. Submitted RATA report indicates that both NOx and CO2 monitoring passed for both Boiler 10 and Boiler 11. |
| 07/05/2023 | ROP R215 Notification | | Notification of Change of Responsible Official to Greg France. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-------------------------|-------------------|---|
| 06/20/2023 | Complaint Investigation | Compliance | Investigation of an odor complaint that was submitted to AQD staff, Monica Brothers, on 6-20-23. |
| 06/19/2023 | Complaint Investigation | Compliance | Investigation of two complaints that were submitted to AQD staff, Monica Brothers, on 6-19-23. |
| 06/16/2023 | Complaint Investigation | Compliance | Investigation of two odor complaints that were called into AQD staff on 6-16-23. |
| 06/02/2023 | Complaint Investigation | Compliance | Investigation of two complaints that were submitted on 6/2/23. |
| 06/01/2023 | ROP Other | | First quarter Jerome meter readings as required by the Nuisance Minimization Plan for Odors, section 5.2. |
| 05/30/2023 | Complaint Investigation | Compliance | Investigation of three complaints that were submitted on 5/30/23. |
| 05/28/2023 | Complaint Investigation | Compliance | Follow-up on AQD on-line complaints and PEAS complaints received 5/28/23 |
| 05/27/2023 | Complaint Investigation | Compliance | Two on-line air quality complaints were received on 5/27/23 at 7:53 am and 9:17 am. Staff conducted a complaint investigation in both neighborhoods and also in the Northside neighborhood. |
| 05/26/2023 | Complaint Investigation | Compliance | Investigation of three odor complaints that were submitted on 5/26/23 and one that was submitted the evening of 5/25/23. |
| 05/25/2023 | Complaint Investigation | Compliance | Investigation of three odor complaints that were submitted on 5/25/23. |
| 05/24/2023 | Complaint Investigation | Compliance | Investigation of 7 odor complaints that were submitted on 5/24/23. |
| 05/22/2023 | Complaint Investigation | Compliance | Investigation of 16 odor complaints that were submitted on 5/22/23. |
| 05/22/2023 | Complaint Investigation | Compliance | Investigation of an odor complaint that was called into AQD staff at 8:19 pm. |
| 05/18/2023 | Complaint Investigation | Compliance | Investigation of six odor complaints that were submitted to AQD staff on 5/18/23. |
| 05/12/2023 | Complaint Investigation | Compliance | Investigation of two odor complaints that were submitted via PEAS and phone call on 5/12/23. |
| 04/25/2023 | Complaint Investigation | | Investigate AQD on-line complaint received 4/25/23 (time of incident 7:30 a.m.) |
| 04/18/2023 | GEMS Test Observation | Compliance | Observation of NOx RATA on Boiler 10 |

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| 04/06/2023 | 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 3 hours (0.14%) of CEMS downtime for NOx and O2. |
| 04/06/2023 | Excess Emissions (CEM) | Compliance | Excess emissions report for Boilers 10 and 11 and cylinder gas audit. 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 1.4 hours (0.07%) of CEMS downtime for NOx on Boiler 10 and a total of 49 hours (2.2%) of CEMS downtime for NOx on Boiler 11. |
| 04/04/2023 | Complaint Investigation | Compliance | Investigation of a complaint that was received by AQD staff on 4/4/23 at 1:04 pm. |
| 03/26/2023 | Complaint Investigation | Compliance | Investigation of four odor complaints that were received by AQD district staff the evening of March 26, 2023. |
| 03/21/2023 | MAERS | Compliance | 2022 Michigan Air Emissions Report (MAERS) Submitted |
| 03/21/2023 | ROP Annual Cert | Compliance | The company reports compliance with all requirements for the period. |
| 03/21/2023 | ROP SEMI 2 CERT | Compliance | The company reports compliance with all requirements for the period. |
| 03/15/2023 | ROP Annual Cert | Compliance | The facility reports five deviations for the reporting period. Four of these deviations were for violations they received from an inspection that was conducted on July 28, 2022. These violations were detailed in a Violation Notice sent to the company on September 8, 2022. Some of the violations in this Violation Notice were not included in this deviation report because they were for emission units in PTI # 133-19A, which is not currently rolled into the ROP. The fifth deviation was for a violation of Rule 901 for odors on December 14, 2022. |

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| 03/15/2023 | ROP SEMI 2 CERT | Compliance | The facility reports five deviations for the reporting period. Four of these deviations were for violations they received from an inspection that was conducted on July 28, 2022. These violations were detailed in a Violation Notice sent to the company on September 8, 2022. Some of the violations in this Violation Notice were not included in this deviation report because they were for emission units in PTI # 133-19A, which is not currently rolled into the ROP. The fifth deviation was for a violation of Rule 901 for odors on December 14, 2022. |
| 03/10/2023 | Complaint Investigation | Compliance | Investigation of an odor complaint that was called into AQD staff at 12:15 pm. |
| 03/08/2023 | Complaint Investigation | Compliance | Investigation of an odor complaint that was submitted via online complaint form at 7:58 am. |
| 02/09/2023 | Complaint Investigation | Compliance | Investigation of three odor complaints that were reported to EGLE on the morning of 2/9/23. |
| 02/09/2023 | Complaint Investigation | Compliance | Investigation of a complaint that was called in via PEAS at 11:28 am. |
| 01/30/2023 | ROP Other | | Fourth quarter Jerome meter readings as required by the Nuisance Minimization Plan for Odors, section 5.2. |
| 01/30/2023 | 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 16 hours (1.15%) of CEMS downtime for NOx. |
| 01/30/2023 | 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 for either boiler and a total of 27 hours (1.2%) of CEMS downtime for NOx on Boiler 10 and 49 hours (2.2%) of CEMS downtime for NOx on Boiler 11. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-------------------------|-------------------|--|
| 01/13/2023 | Complaint Investigation | Compliance | Investigation of an odor complaint that was submitted via PEAS on January 13, 2023. |
| 01/12/2023 | Complaint Investigation | Compliance | Investigation of an odor complaint that was called into AQD staff at 12:28 pm on January 12, 2023. |
| 01/03/2023 | Complaint Investigation | Compliance | Investigation of a PEAS odor complaint that was received at 1:41 pm on January 3, 2023. |

Name:

[Signature]

Date:

12/19/2023

Supervisor:

[Signature]