

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> Packaging Corporation of America - Filer City Mill	<b>SRN :</b> B3692
<b>Location :</b> 2246 Udell St.	<b>District :</b> Cadillac
	<b>County :</b> MANISTEE
<b>City :</b> FILER CITY <b>State:</b> MI <b>Zip Code :</b> 49634	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Shane Nixon
<b>FCE Begin Date :</b> 5/12/2014	<b>FCE Completion Date :</b> 5/12/2015
<b>Comments :</b>	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
05/01/2015	Excess Emissions (CEM)	Compliance	1st quarter 2015 excess emission report. No excess emissions for the reporting period.
05/01/2015	MACT (Part 63)	Compliance	1st quarter 2015 RTO temperature report. 7 reports instances in which the RTO temperature dropped below the minimum. 5 of the 7 lasted for one hour each. The two remaining were a result of RTO destruction efficiency testing.
04/16/2015	Scheduled Inspection	Compliance	On site inspection and records review
04/14/2015	Stack Test	Compliance	RTO Destruction Efficiency and Emissions Test Report. Test report demonstrates compliance with the organic HAP limit and reestablishes minimum RTO temperature (1703°F).
03/16/2015	ROP Annual Cert	Compliance	7 deviations related to CEM downtime and 3 deviations due the RTO temperature dropping below the minimum temperature established during performance testing. All corrective actions were adequate.
03/16/2015	ROP SEMI 2 CERT	Compliance	3 deviations related to CEM downtime and 1 deviation due the RTO temperature dropping below the minimum temperature established during performance testing. All corrective actions were adequate.

Activity Date	Activity Type	Compliance Status	Comments
03/16/2015	CAM Excursions/Exceedances	Compliance	No CAM excursions or exceedances for the reporting period.
03/16/2015	CAM monitor downtime	Compliance	No CAM monitor downtime for the reporting period.
03/16/2015	MAERS	Compliance	See MAERS for further info.
03/16/2015	MACT (Part 63)	Compliance	SSM report for MACT Subpart S. No excess emissions due to control device downtime occurred which were above the 1% allowance listed in Subpart S.
02/06/2015	Excess Emissions (CEM)	Compliance	#1, #2 & #4A Boiler 4th quarter EER. Boiler #2 and Boiler #4A excess NOx emissions were 0.33% and 0.20%, respectively. There were no opacity exceedances for Boilers #1 and #2 for the quarter.
02/06/2015	ROP Other	Compliance	4th quarter 2014 RTO temperature operating report. There were six occasions in which the RTO temperature dropped below the minimum established by stack testing. The drop in temperatures were short time periods. Stack testing in February is planned to reestablish the minimum temp.
11/10/2014	Excess Emissions (CEM)	Compliance	3rd quarter Excess Emissions for #2 and #4A Boiler and Opacity for #1 & #2 Boilers, and RTO Operating Temp. No excess emissions for the reporting period. The RTO was out of range for one hour during the reporting period.
09/19/2014	CAM monitor downtime	Compliance	CAM monitor downtime. Opacity monitor was not operating properly due to a programmable logic controller failure (8 minutes) and opacity monitor audit (309 minutes).
09/19/2014	ROP Semi 1 Cert	Compliance	Four deviations were related to opacity monitor and CEMS monitor downtime which were previously reported in quarterly EERs. Two deviations were to problems associated with the RTO resulting in temperatures lower than the established minimum. These deviations were previously reported.
09/19/2014	CAM Excursions/Exceedances	Compliance	No exceedances or excursions for the reporting period.

Activity Date	Activity Type	Compliance Status	Comments
09/17/2014	MACT (Part 63)	Compliance	SSM Report for MACT Subpart S. A majority of the excess emissions were related to daily digester pulp sampling which is outlined in the SSM plan. Other excess emissions were related to equipment failures and company actions were prompt and adequate.
07/29/2014	CEM RATA	Compliance	NOx RATA for Boilers #2 and #4A. Boiler #2 Relative Accuracy = 8.6%. Boiler #4A Relative Accuracy = 3.4%. Relative accuracies meet the requirements of 40 CFR Part 60.
07/29/2014	Stack Test	Compliance	40 CFR 63 Subpart S non-condensable gas closed vent system. Test report indicates no leaks were detected from the equipment subject to 40 CFR 63Subpart S.
07/29/2014	Excess Emissions (CEM)	Compliance	2nd quarter NOx EER Boiler #2. No excess emissions for the reporting period.
07/29/2014	Excess Emissions (CEM)	Compliance	Boiler #4A NOx EER. No excess emissions for the reporting period.
07/29/2014	Excess Emissions (CEM)	Compliance	Boiler 1 and 2 opacity EER. No excess opacity for the reporting period.
07/29/2014	MACT (Part 63)	Compliance	RTO temperature report. 28 hours reported in which the temperature of the RTO fell below the minimum established during stack testing. Company corrective action was adequate.
07/29/2014	Stack Test	Compliance	Test report of H2S content of biogas in EUBIOGASFLARE. Permit limit = 50 ppmv; test results = 0.397ppmv.
07/17/2014	ROP Other	Compliance	Opacity monitor system audit as required by the ROP. Audit performed on Boiler #2, report indicates compliance.
06/04/2014	Stack Test	Compliance	CO Emissions Test Report for EUBoiler4A. Test results indicate compliance with the permit limit. Test results = 5.2 #/hr.
06/04/2014	ROP Other	Compliance	Two-3hr periods of RTO Operating Temp Below Average for the EUCOPELAND+DISTANK. Company reported the reason for the deviation and corrective action was adequate. Company reported the deviation by phone on 5/16/14.

Activity Date	Activity Type	Compliance Status	Comments
05/27/2014	MAERS	Compliance	See Maers for further Info. No changes.

Name: Shane Nixon

Date: 5/12/15

Supervisor: 