

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> Rob Dickman
<b>FCE Begin Date :</b> 7/1/2018	<b>FCE Completion Date :</b> 7/24/2019
<b>Comments :</b>	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
07/24/2019	Scheduled Inspection ✓	Compliance	Scheduled inspection of this major source
06/06/2019	Stack Test	Compliance	Boiler 4A emissions testing for CO. Testing report submitted in a timely manner. Results of three 1-hour runs was 5.1 pounds per hour, emission limit is 22.4 pounds per hour.
05/20/2019	Excess Emissions (CEM) ✓	Compliance	MACT and EER contained in one submission. First Quarter 2019 EER for Boilers 2 and 4A. Report OK, no issues. All excess emissions and monitoring system downtime less than 1% of the total source operating time.
05/20/2019	MACT (Part 63)	Compliance	MACT and EER contained in one submission. First Quarter 2019 RTO temperature report. Reporting required pursuant to 40 CFR 63.864(k)(1). There were a total of six instances where the RTO was operating below minimum temperature for a total of 0.87 hours or 0.04% of the source operating time. Each instance was resolved in a timely and correct manner. No further action is recommended.
04/18/2019	ROP Other	Compliance	Test Protocol for RATA, LDAR & Bio Gas. Protocol was submitted in a timely manners and approved by J. Howe on 4/10/19.

Activity Date	Activity Type	Compliance Status	Comments
03/22/2019	ROP Annual Cert ✓	Compliance	Several reports in one document. Annual report appears complete. Most of the deviations were CEM downtime and control equipment parameter issues. All were corrected in a timely manner.
03/22/2019	ROP SEMI 2 CERT ✓	Compliance	Several reports in one document. Semi-Annual report appears complete. Most of the deviations were CEM downtime and control equipment parameter issues. All were corrected in a timely manner.
03/22/2019	CAM Excursions/Exceedances ✓	Compliance	Multiple reports in one document. No excursions noted.
03/22/2019	CAM monitor downtime ✓	Compliance	Multiple reports in one document. No monitor downtime noted.
03/22/2019	MACT (Part 63)	Compliance	Multiple reports in one document. Startup, Shutdown, Malfunction (SSM) report per 40 CFR 63, Subpart S. Report OK. Facility detailed several SSM events, the sum of which were less than the 1% excess emissions allowance.
03/19/2019	MAERS ✓	Compliance	See MAERS for further info.
03/08/2019	ROP Other	Compliance	Test Protocol for EUBolier 4a CO Emissions - Cert form received via mail - Test Report Received via email.
01/24/2019	MACT (Part 63)	Compliance	40 CFR 63 Subpart DDDDD certification with all emission limits and work practices. Report OK. No Deviations noted.
01/17/2019	Excess Emissions (CEM)	Compliance	MACT and EER contained in one submission. Fourth quarter 2018 EER for Boilers 2 and 4A. Report OK, no issues. All excess emissions and monitoring system downtime less than 1% of the total source operating time.
01/17/2019	MACT (Part 63)	Compliance	MACT and EER contained in one submission. Fourth Quarter 2018 RTO temperature report. Reporting required pursuant to 40 CFR 63.864(k)(1). There were a total of four instances where the RTO was operating below minimum temperature for a total of 2.54 hours or 0.1% of the source operating time. Each instance was resolved in a timely and correct manner. No further action is recommended.

Activity Date	Activity Type	Compliance Status	Comments
11/08/2018	Excess Emissions (CEM) ✓	Compliance	MACT and EER contained in one submission. Third quarter 2018 EER for Boilers 2 and 4A. Report OK, no issues. All excess emissions and monitoring system downtime less than 1% of the total source operating time.
11/08/2018	MACT (Part 63)	Compliance	MACT and EER contained in one submission. Third Quarter 2018 RTO temperature report. Reporting required pursuant to 40 CFR 63.864(k)(1). No occurrences in which the RTO temperature dropped below the minimum established pursuant to stack testing.
09/21/2018	ROP Semi 1 Cert ✓	Compliance	Several reports in one document. Semi-Annual report appears complete. Most of the deviations were CEM downtime and control equipment parameter issues. All were corrected in a timely manner.
09/21/2018	CAM Excursions/Exceedances ✓	Compliance	Multiple reports in one document. No excursions noted.
09/21/2018	CAM monitor downtime ✓	Compliance	Multiple reports in one document. No monitor downtime noted.
09/21/2018	MACT (Part 63)	Compliance	Multiple reports in one document. Startup, Shutdown, Malfunction (SSM) report per 40 CFR 63, Subpart S. Report OK. Facility detailed several SSM events, the sum of which were less than the 1% excess emissions allowance.
07/30/2018	Excess Emissions (CEM) ✓	Compliance	MACT and EER contained in one submission. Second quarter 2018 EER for Boilers 2 and 4A. Report OK, no issues. All excess emissions and monitoring system downtime less than 2% of the total source operating time.
07/30/2018	MACT (Part 63)	Compliance	Leak detection report per MACT Subpart S. Report appears complete. Results demonstrate compliance with the 500 ppm VOC leak above background levels.
07/30/2018	Stack Test	Compliance	EUBIOGASFLARE test report. Testing performed 5/16/18. Report appears complete. Results demonstrate compliance with permitted limits for pre and post combustion H2S emissions and also for SO2 emissions.

Activity Date	Activity Type	Compliance Status	Comments
07/30/2018	CEM RATA	Compliance	RATA test report for Boilers 2 and 4A. Report appears complete. Results demonstrate compliance with the 20% relative accuracy threshold as per 40 CFR 60, Appendix F.
07/30/2018	MACT (Part 63)	Compliance	MACT and EER contained in one submission. Second Quarter 2018 RTO temperature report. Reporting required pursuant to 40 CFR 63.864(k)(1). No occurrences in which the RTO temperature dropped below the minimum established pursuant to stack testing.

Name: 

Date: 8/21/19

Supervisor: 