

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Pregis	SRN : N6944
Location : 2700 Wills Street	District : Southeast Michigan
	County : SAINT CLAIR
City : MARYSVILLE State: MI Zip Code : 48040	Compliance Status : Compliance
Source Class : MAJOR	Staff : Kaitlyn Leffert
FCE Begin Date : 9/1/2017	FCE Completion Date : 9/25/2019
Comments : Pregis Marysville appears to be in compliance with all conditions of its ROP. The only lingering concern is the exempt oven, for which additional records are needed to prove its exempt status.	


List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/13/2019	Stack Test	Compliance	2019 Relative Accuracy Test Audit Summary Report
08/09/2019	ROP Semi 1 Cert	Compliance	Timely
08/02/2019	Excess Emissions (CEM)	Compliance	Second Quarter 2019 Emissions Report. 12-month rolling average VOC emissions are 124.3 tons, which is in compliance with their ROP limit of 178 tpy.
08/02/2019	Scheduled Inspection	Compliance	FY2019 Scheduled Inspection. Pregis appears to be in compliance with the conditions of its permit. Since the last inspection of the facility, a new pyrolytic oven has been installed, which appears to exempt. Additional follow-up may be needed to confirm that this equipment is exempt.
07/10/2019	Stack Test Observation	Compliance	CEMS Test Observation
07/02/2019	Other	Compliance	Visit to the facility to introduce myself as the new inspector and to gain a general understanding of the process.
05/16/2019	MAERS	Compliance	Reviewed and uploaded.

Activity Date	Activity Type	Compliance Status	Comments
05/13/2019	Excess Emissions (CEM)	Compliance	Revised Certification - 1st Quarter 2019 Emissions Report. ----- Reported 17 hours of downtime during the first quarter due to a primary analyzer malfunction. The facility also reported VOC emissions of a 12-month rolling period of 125.9 tons, which is below their permitted limit of 178 tons.
02/11/2019	ROP SEMI 2 CERT	Compliance	All deviations were corrected and the facility is in compliance.
02/11/2019	Excess Emissions (CEM)	Compliance	4th Quarter 2018 Emissions Report.
02/04/2019	ROP Annual Cert	Compliance	All deviations were corrected and the facility is in compliance.
11/16/2018	Excess Emissions (CEM)	Compliance	3rd Quarter 2018 Emissions Report.
08/21/2018	ROP Semi 1 Cert	Compliance	Timely
08/21/2018	Excess Emissions (CEM)	Compliance	Second Quarter 2018 Emissions Report. 2nd Quarter Report 2018. The report shows that the daily VOC emissions, 8-hr emissions and isobutane usages are in compliance with the permit limits.

Activity Date	Activity Type	Compliance Status	Comments
06/06/2018	ROP Other	Compliance	MAERS Certification form. Signed by RO. Resubmitted with correct reporting period.
06/06/2018	Excess Emissions (CEM)	Compliance	First Quarter 2018 Emissions Report.
04/03/2018	MAERS	Compliance	<p>MAERS Report Submission. The submittal did not pass the completeness check. I changed Emission basis from MAERS emission factor to CEMS. It required emission factor and control efficiency.</p> <p>I entered 18.07×10^{-2} (total VOC emissions/total Isobutane usage = $267747/1478097$) and the control efficiency you calculated 80.55%. Please correct your file with data.</p>
02/06/2018	ROP Annual Cert	Compliance	Deviations corrected. In compliance.
02/06/2018	ROP SEMI 2 CERT	Compliance	Deviations corrected. In compliance.
02/06/2018	Excess Emissions (CEM)	Compliance	<p>Fourth Quarter 2017 Emissions Report. On February 6, 2018, AQD reviewed the 2017 4th Quarter VOC emissions report from the facility. The report also included CMS daily calibrations, 3rd quarter CGA reports (10/05/2017, 12/07/2017), and Air Current Smoke Test (12/23/2017), and CAMS downtime report. The report stated that the monitor downtime was 41.57 hours (1.9%). The facility's current Renewable Operating Permit (ROP) No.: MI-ROP-N6944-2017 limits VOC emissions to 476 pounds per 8-hr and 178.0 TPY. 8-hr annual emissions in compliance. The CAMS calibrations report and CGA reports are given to TPU staff for review.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/06/2017	Excess Emissions (CEM)	Compliance	Third Quarter 2017 Emissions Report. Compliance with annual and 8-hr VOC limits.

Name:  Date: 9/25/19 Supervisor: SK
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