



Pregis  
1650 Lake Cook Road | Deerfield, IL 60015  
[www.PREGIS.COM](http://www.PREGIS.COM)



February 20, 2023

*Transmitted Electronically and by US Mail*

586.536.1197

[KhanN5@michigan.gov](mailto:KhanN5@michigan.gov)

**Re: Response to Violation Notice dated February 3, 2023 for:  
Pregis LLC  
2700 Willis Street  
Marysville, MI  
St. Clair County  
SRN: N6944**

Dear Ms. Noshin:

Pregis and has prepared this letter in response to the Notice of Violation letter dated February 3, 2023. Below is a response to each of the identified requests in the Notice of Violation. A paraphrased restatement of each request is noted prior to Pregis's response in the paragraphs below.

**Dates the Violation Occurred**

The violation was first noted and observed during a smoke test conducted on December 20, 2022.

**Explanation of the Cause and Duration of the Violation**

While conducting the smoke test, positive pressure was observed at the roll-up door between the Berlyn Reproduction Room and the Storage Area. The team observed a tear in the cloth door that caused the door not to seal properly. The maintenance team was contacted immediately began repairs. The door was repaired within an hour of the finding. It should be noted that all other areas tested passed the smoke test.

**Summary of Actions Taken to Correct Violation**

As discussed above, the maintenance team began repairs immediately with additional tape applied to adequately cover the tears and seal the door. The smoke test was re-run at this location, after you left, and passed, with the smoke staying within the enclosure area and exhibiting negative pressure as required for compliance. As a follow-up, a photograph of the door with the newly applied tape sealing the door and a video of a negative pressure smoke test was taken to demonstrate compliance and submitted via email on the same day, December 20, 2022, to EGLE for their review. The photo below shows the properly sealed door taken on



December 20, 2022. A video of the re-run smoke test on December 20, 2022 with negative pressure and in compliance is also included with this letter and is being submit via email and on a USB drive to accompany the hard copies sent to both EGLE AQD Warren District Office and the EGLE AQD Enforcement Unit in Lansing.



Above: Photograph of repairs to door on December 20, 2022.

### Proposed Actions

**Action 1:** There is currently a monthly Preventative Maintenance (PM) task for these doors which includes verifying that the bay door is free of any rips or tears and that the seal is adequate to ensure negative air pressure and attached for your review. The monthly PM check



will document that this check was completed and any required maintenance to the bay door was scheduled. The date/time that the maintenance was completed will also be noted on the PM task. We are also proposing that the EHS Specialist conducts weekly visual inspections to verify that the door is in good condition and that there is negative pressure.

**Action 2:** Add PM to current Malfunction Abatement Plan (MAP).

**Action 3:** Add replacement doors for consideration in capital investment in FY 2023. The ability to purchase these will be dependent on Pregis' performance and company earnings in 2023.

#### **Dates by Which Proposed Actions Will Take Place**

Pregis has taken this matter seriously and **Action 1** and **Action 2** have already been implemented prior to the submittal of this letter. The MAP has been updated and available upon request. For **Action 3**, replacement doors have been added to the list of capital investments but the actual replacement of the door will be dependent on approval of funds. Approval of funds anticipated to be in the fourth quarter of 2023.

#### **Steps Taken to Prevent Reoccurrence**

Implementation of **Action 1** and **Action 2** are anticipated to prevent a reoccurrence and the Pregis team is committed to weekly inspections by our EHS Specialist to ensure the door is sealed properly. In addition, as a long-term fix, replacement of the door will prevent a reoccurrence.

We trust that this information provides clarification and documentation of actions undertaken by Pregis in response to the issues noted in your Notice of Violation letter. If you have any



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questions or comments, or if we can provide you with additional information, please do not hesitate to contact me at 810.320.7343 or by email at [cferres@pregis.com](mailto:cferres@pregis.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Colin Ferres", written in a cursive style.

Colin Ferres  
Plant Manager

**Attachments:** PM procedure, and Video (thumb drive for mail)  
Cc: Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760