



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



May 20, 2023

*Transmitted Electronically and by US Mail*

Andrew Riley  
Environmental Quality Analyst  
Air Quality Division – Warren District  
27700 Donald Court  
Warren, MI 48092  
586.565.7379  
[RileyA8@michigan.gov](mailto:RileyA8@michigan.gov)

**Re: Response to Violation Notice dated May 15, 2023 for:  
Pregis LLC  
2700 Willis Street  
Marysville, MI  
St. Clair County  
SRN: N6944**

Dear Mr. Riley:

Pregis has prepared this letter in response to the Notice of Violation letter dated May 15, 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 and Duration of the Violation**

A reporting deviation on the CEMS Unit was first noted on January 11, 2023. The CEMS Unit was fully functional on January 25, 2023.

**Explanation of the Cause**

On January 11, the FID analyzer on the CEMS Unit experienced a reporting deviation. The system calibrated as expected and then unexpectedly experienced a "FLAME" default thereafter. The FID analyzer lost its "flame" and stopped monitoring. All emission levels were in compliance before the malfunction. VOC (lb/hr) were 26.3 and the CEMS reported a "PASS" on the daily calibration at 7AM. The Pregis team conducted initial equipment checks and tried to manually restart the FID analyzer. The Pregis team included: Colin Ferres, Plant Manager, Marc Cobb, EHS Specialist and Jacob Scriver, Maintenance Manager.



### **Summary of Actions Taken to Correct Violation**

At approximately 9:30 AM, on January 11<sup>th</sup>, Pregis contacted Envea and worked with their Service Tech over the phone to diagnose the problem. Tasks included:

- Clearing capillary lines
- Testing voltage
- Confirm lines were not plugged with a foreign object
- Replacing the thermal couple (Spare parts were on hand)
- Turning to light flame “manually”

At approximately 2 PM, Pregis requested an Envea Emergency Service Tech to come to site as soon as available as the team could not get the FID analyzer operational. Emergency Service Tech arrived on Friday, January 13<sup>th</sup>. Envea conducted equipment checks and troubleshooting. Envea also replaced the ignitor and thermal couple and could not get the unit operational.

The Emergency Service Tech (with consulting with the manufacture) decided to return the analyzer back to their facility in Illinois for further diagnosis. Pregis continued to monitor the situation through the weekend and received an email late Monday, January 15<sup>th</sup> that unit was working at the Envea facility. The FID analyzer was returned and re-installed Thursday, January 19<sup>th</sup>. At 9:45 AM, the unit reported a good ZERO and SPAN (calibration).

Around noon on Thursday, January 19<sup>th</sup>, the Emergency Service Tech tried to hook up the “clean” air supply and the unit did not reignite. After several attempts, the unit was returned back to the Envea facility in Illinois for further diagnoses.

On January 25<sup>th</sup>, the FID analyzer was returned to Pregis and re-installed and fully operational. The daily emission report for January 25 is included with this letter and demonstrates that the CEMS Unit was in compliance.

### **Proposed Actions**

The actions taken to correct the violation were completed on January 25, 2023. There are currently Preventative Maintenance (PM) tasks for the CEMS unit which include internal PMs and an annual PMs by Envea.

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

These actions are already in place. PMs will continue at the intervals recommended by ENVEA.



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**Steps Taken to Prevent Reoccurrence**

Continued inspection and PMs are anticipated to 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 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", with a long horizontal flourish extending to the right.

Colin Ferres  
Plant Manager

**Attachments:** Daily Emission Report for January 26, 2023  
Cc: Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760