



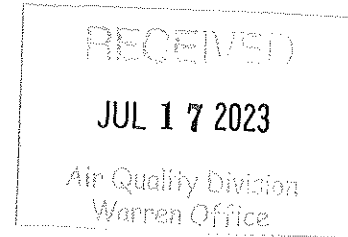
Pregis  
1650 Lake Cook Road | Deerfield, IL 60015  
[www.PREGIS.COM](http://www.PREGIS.COM)



July 3, 2023

*Transmitted Electronically and by US Mail*

Noshin Khan  
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Air Quality Division – Warren District  
27700 Donald Court  
Warren, MI 48092  
586.536.1197  
[khann5@michigan.gov](mailto:khann5@michigan.gov)



**Re: Response to Violation Notice dated June 26, 2023 for:  
Pregis LLC  
2700 Willis Street  
Marysville, MI  
St. Clair County  
SRN: N6944**

Dear Ms. Kahn:

Pregis has prepared this letter in response to the Notice of Violation letter dated June 26, 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**

The violation was first noted on June 5, 2023 and included deviations on May 31, 2023 with an 8-hour rolling emission total above the permitted 476 lbs. VOC for two (2) consecutive hours and on June 2, 2023 for four (4) consecutive hours with an 8-hour rolling emission total above the permitted 476 lbs. VOC.

After review of CEMS Daily Emission Reports and discussion and development of corrective actions with the team, it was also noted that there were exceedances on several other days that were not known until this review. This included seven (7) consecutive hours of time on April 12, seven (7) consecutive hours of time on May 19, and four (4) consecutive hours of time May 23.

In each deviation, VOC emissions were in acceptable limits before and after these time periods.



It should be noted that Pregis's annual average for the 8-hour rolling emission is well below the permitted 476 lbs per 8 hours and includes the following values:

- For 2022 is 252.4 lbs/8 hours
- For 2023 is 266.8 lbs/8 hours (through June, 2023)

#### **Explanation of the Cause**

Outside temperatures were very high during this time period and above average for this time of year. According to the National Weather Service (<https://www.weather.gov/wrh/Climate?wfo=dtx>), the weather in Port Huron (nearest weather station) reached 86 degrees on May 31st, without precipitation. Warm weather with no precipitation continued throughout the week.

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

Operational activities included moving newly created foam rolls into the center of the building and closer to the ventilation system. The actions taken to correct the violation were completed on the same day of each exceedance.

On June 2, EHS Manager and Plant Manager were both contacted and the decision was made to shut production down on one line until temperatures dropped and VOC limit dropped to below the 476 lb. per 8-hour average.

#### **Proposed Actions**

Proposed actions include:

- Closer monitoring of outside temperatures to be able to predict and react quicker to rising VOC emissions, especially during afternoon and early evening hours.
- Coordination with scheduling to ensure that low density PVC materials are scheduled for high temperature days.
- Review of High VOC Procedures and Checklist with employees.
- Update MAP to include High VOC Procedures.
- Increase preventive maintenance intervals during summer months.

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

These actions are already in place.



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**Steps Taken to Prevent Reoccurrence**

Continued monitoring of temperatures in the summer months and implementation of the High VOC Procedures 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 "C Ferres", with a long horizontal flourish extending to the right.

Colin Ferres  
Plant Manager

Cc: Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760