

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Stack Test Observation

N694459223

FACILITY: Pregis		SRN / ID: N6944
LOCATION: 2700 Wills Street, MARYSVILLE		DISTRICT: Warren
CITY: MARYSVILLE		COUNTY: SAINT CLAIR
CONTACT: Marsha Hicks , Environmental Health and Safety Coordinator		ACTIVITY DATE: 07/14/2021
STAFF: Kaitlyn Leffert	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Observation of the RATA test for the VOC CEMs		
RESOLVED COMPLAINTS:		

On July 14, 2021, I, Kaitlyn Leffert, visited Pregis Marysville to observe the Relative Accuracy Test Audit (RATA) of the Volatile Organic Compound (VOC) Continuous Emissions Monitoring Systems (CEMS). Pregis Marysville is located at 2700 Wills Street, Marysville, Michigan and has a State Registration Number (SRN) of N6944.

Pregis manufactures foam products which are used for a variety of purposes, including packaging and floor cushioning. The facility is permitted to operate four extruders used for the manufacture of foam, as well as two reclaim units, which are used to recycle leftover foam back into stock material for the manufacturing process. Emissions from Pregis are controlled by an ionization control system (ICS), which is a building-wide control that reduces volatile organic compounds (VOCs) emitted into the general in-plant environment. The emissions from the facility are exhausted through one stack, which is equipped with a CEMS to monitor for VOC emissions. The facility is required to conduct RATA testing at a minimum once every 2 years. The previous RATA test was conducted on July 10, 2019.

I arrived at the facility at 9:15 am and met with Marsha Hicks, Environmental Health and Safety Coordinator, Pregis. Mark Dziadosz, EGLE Air Quality Division, was also present for the test. First, Ms. Hicks walked Mark and I through a brief safety training on the facility. Then, she led us back to the testing area. On the way to the testing area, I also met Collin Ferres, who is the new Plant Manager at the Pregis facility.

The RATA test was conducted by Montrose Air Quality Services. When I arrived to the testing area around 9:30 am, test run #2 (out of nine total runs) was partway through. I was provided information on the production rates that the equipment was operating at during testing, which are shown in the table below. The extruder lines were set at those production rates in the morning were not changed during testing.

Table: Bead Usage and Isobutane Usage in the Extruder Lines During Testing

Line	Bead Usage Rate (lb/hr)	Isobutane Usage (lb/hr)
1 and 2	700	13.2
3	530	21.1
4	1,000	51.0
Total	2,230	85.3

After the sixth run of testing, the relative accuracy was reviewed, and it appeared that the relative accuracy was trending towards compliance. I departed the site after the sixth run.

Conclusion

There were not any compliance issues identified during testing. Full compliance will be determined upon review of the final test report.

NAME *Kaitlyn Jeffert*

DATE 08/09/2021

SUPERVISOR *K. Kelly*