



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

December 16, 2020

Mr. John Von Zellen  
Supervisor/Maintenance/Environmental  
Pregis  
2700 Wills Street  
Marysville, MI 48040

SRN: N6944, St. Clair County

Dear Mr. Zellen:

**VIOLATION NOTICE**

On December 9, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) received notification that an excess emissions event had occurred at Pregis Marysville, located at 2700 Wills Street, Marysville, Michigan. The notification was provided as required by Renewable Operation Permit (ROP) number MI-ROP-N6944-2017, General Condition 25.

Based on the notification received, AQD identified the following violations:

Process Description	Rule/Permit Condition Violated	Comments
Facility-wide Emissions	MI-ROP-N6944-2017 FG-FACILITY SC I.2	On December 6, 2020, the facility produced an excess of extruded rolls, resulting in volatile organic compound (VOC) emissions that exceeded the 8-hr VOC emission limit.
Ionization Control System	MI-ROP-N6944-2017 FG-FACILITY SC IV.1 R 336.1910	The excess production of extruded rolls did not allow for adequate air mixing, as is required for proper operation of the ionization control system.

The notification from the facility indicated that due to COVID guidelines, employees could not report to work. As a result of this staffing shortage, employees were moved from other sections of the facility to work on the extrusion lines. This resulted in the production of extruded rolls that were unable to be processed. The accumulation of unprocessed scrap and extruded rolls on the plant floor led to high VOC emissions at the facility. Once employees became aware of the elevated VOC emissions, the extrusion lines were shut down and the excess extruded rolls were processed. Following these changes, VOC emissions returned below permitted amounts.

Based on the information provided by the facility, AQD determined that Pregis exceeded the 476 lb/8-hr facility-wide VOC limit in MI-ROP-N6944-2017. The 8-hr rolling total VOC emissions, calculated each hour, exceeded this limit from 3:00 p.m. on December 6, 2020 to

Mr. John Von Zellen  
Pregis  
Page 2  
December 16, 2020

9:00 a.m. on December 7, 2020. VOC emissions ranged between 484.3 lbs/8-hr and 590.4 lbs/8-hr during this time period.

The information in the notification also indicates that the Ionization Control System was not properly operated. The overproduction and accumulation of foam on the plant floor resulted in inadequate ion distribution and mixing of the ions and room air. This constitutes a violation of MI-ROP-N6944-2017, FG-FACILITY SC IV.1, as well as Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please submit a written response to this Violation Notice by January 6, 2021 (which coincides with 21 calendar days from the date of this letter). Since the facility has already notified the department of the duration and resolution of the violation, the written response should include a summary of the actions that are being taken to prevent a reoccurrence of the violation. The facility should also update its Malfunction Abatement Plan (MAP) to address this type of malfunction event.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Pregis Marysville believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the timely notification of the violation. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Kaitlyn Leffert  
Environmental Quality Analyst  
Air Quality Division  
586-249-6505

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Joyce Zhu, EGLE