



GRETCHEN WHITMER
GOVERNOR

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



DANIEL EICHINGER
ACTING DIRECTOR

February 3, 2023

VIA E-MAIL AND U.S. MAIL

Colin Ferres
Pregis LLC
2700 Wills Street
Marysville, MI 48040

SRN: N6944, St. Clair County

Dear Colin Ferres:

VIOLATION NOTICE

On December 20, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed a smoke test at Pregis LLC located at 2700 Willis Street, Marysville, Michigan. The purpose of this inspection was to determine Pregis's compliance with Renewable Operating Permit (ROP) number MI-ROP-N6944-2022 conditions Source-Wide Special Condition IV.2 and V.1.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|------------------------|--|--|
| Non-fugitive enclosure | Source-Wide Special Condition IV.2; R 336.1910 | During the smoke test, leaks were observed at one of eleven natural draft openings (NDOs). |

During the smoke test, AQD staff observed smoke leaking through tears in the roll-up door between the lamination and extrusion zones. Portions of this door were covered with tape to seal tears, but not all tears were sufficiently covered.

Source-Wide Special Condition IV.2 requires that the permittee not operate any portion of FGFACILITY unless the non-fugitive enclosure is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires that the non-fugitive enclosure is operating at a pressure lower than all adjacent areas so that air flows into the non-fugitive enclosure through all NDOs. NDO is defined as any opening that is not connected to a duct in which a fan or blower is installed.

The leaks observed through the roll-up door indicate that the non-fugitive enclosure was not maintained and a pressure lower than adjacent areas, in violation of Special Condition IV.2.

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During this test observation the AQD staff observed operation of polyethylene extrusion lines while the non-fugitive enclosure was not operating at a pressure lower than all adjacent areas.

This constitutes a violation of 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 initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 24, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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

If Pregis 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 cooperation that was extended to me during my test observation at Pregis. 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,



Noshin Khan
Environmental Engineer
Air Quality Division
586-536-1197

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE