



GRETCHEN WHITMER
GOVERNOR

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



AARON B. KEATLEY
ACTING DIRECTOR

May 15, 2023

VIA E-MAIL AND U.S. MAIL

Colin Ferres
Plant Manager
Pregis, LLC
2700 Wills Street
Marysville, Michigan 48040

SRN: N6944; St. Clair County

Dear Colin Ferres:

VIOLATION NOTICE

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) has reviewed the quarterly excess emission report received on April 28, 2023 and submitted by Pregis, LLC, located at 2700 Wills Street, Marysville, Michigan. The renewable operating permit number MI-ROP-N6944-2022 requires the facility to monitor and record volatile organic compound (VOC) emissions from FGFACILITY on a continuous basis in a manner and with instrumentation acceptable to the AQD. This unit is also subject to Title 40 of the Code of Federal Regulations (40 CFR) Part 64, Compliance Assurance Monitoring.

The VOC excess emissions report indicated that there was an extended period of monitor downtime during the first quarter of 2023. Specifically, the VOC monitor downtime was reported at 15.7 percent of the operating time for the quarter.

During the report review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
FGFACILITY	MI-ROP-N6944-2022, FGFACILITY, IV, 3	Failure to continuously monitor from January 11 through January 25, 2023.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by June 5, 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.

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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, LLC 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. 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,

A handwritten signature in black ink that reads "Andrew Riley". The signature is written in a cursive, flowing style.

Andrew Riley
Environmental Quality Analyst
Air Quality Division
586-565-7379

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jeremy Howe, EGLE
Joyce Zhu, EGLE
Jenine Camilleri, EGLE
Noshin Khan, EGLE