

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Pregis	SRN : N6944
Location : 2700 Wills Street	District : Warren
	County : SAINT CLAIR
City : MARYSVILLE State: MI Zip Code : 48040	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Kaitlyn Leffert
FCE Begin Date : 10/1/2019	FCE Completion Date : 3/10/2021
Comments : During records review of the most recent inspection, Pregis was found to have exceeded the 8-hr VOC emission limit in January 2020.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
02/10/2021	On-site Inspection	Non Compliance	FY2021 Scheduled Inspection. Pregis was found to have exceeded the 8-hr VOC emission limit in January 2020.
01/29/2021	Excess Emissions (CEM)	Compliance	4th Quarter 2020 Emissions Report. There were a total of 69.17 hours of downtime this quarter, which were attributable to monitor equipment malfunctions, (66.35 hours), non-monitor equipment malfunctions (.82 hours), and quality assurance calibration (2 hours).
01/29/2021	ROP SEMI 2 CERT	Compliance	Semi-Annual report. A total of six deviations were reported over the compliance period, including the violation of the 8-hr VOC emission limit, which was previously reported on December 10, 2020. All deviations have been corrected.
01/29/2021	ROP Annual Cert	Compliance	Annual ROP certification. A total of 11 deviations were reported over the course of 2020, all of which were promptly corrected.

Activity Date	Activity Type	Compliance Status	Comments
12/11/2020	Excess Emissions (CEM)	Non Compliance	ROP excess emissions report. Pregis reported that 8-hour VOC emissions had exceeded the permitted level due to an excess of foam in the plant.
11/06/2020	Excess Emissions (CEM)	Compliance	3rd Quarter 2020 Emissions Report. 56.85 hours of downtime (2.65% downtime) The causes of the downtime were monitor equipment malfunctions (47.95 hours), quality assurance calibration (2.90 hours), and corrective maintenance (6.00 hours).
07/31/2020	Excess Emissions (CEM)	Compliance	2nd Quarter 2020 Emissions Report. Total of 2.12 hours of downtime, which were attributable to non-monitor equipment malfunctions and quality assurance calibration.
07/31/2020	ROP Semi 1 Cert	Compliance	1st Half 2020 Monitoring, Deviation, and Emissions Report. A total of five deviations were reported, all for ROP Condition No. IV.3. All deviations were corrected promptly.
06/12/2020	Excess Emissions (CEM)	Compliance	1st Quarter 2020 Emissions Report. Reported 1 hour of monitor downtime, due to quality assurance calibration.

Activity Date	Activity Type	Compliance Status	Comments
05/04/2020	MAERS	Compliance	MAERS Report Submission. Updated throughput to show tons of isobutane rather than tons of emissions. Reported emissions are based on CEMS data and appear to be accurate.
01/24/2020	ROP Annual Cert	Compliance	A total of nine deviations were reported for 2019. The majority of these violations related to the FID analyzer going out of span gas calibration. The issues have since been corrected. Most deviations occurred in May-June and only one happened from June through the end of the year.
01/24/2020	Excess Emissions (CEM)	Compliance	4th Quarter 2019 Emissions Report. Total of 25 hours of downtime reported for the quarter, which were attributed to monitor equipment malfunctions.
01/24/2020	ROP SEMI 2 CERT	Compliance	One deviation reported. From 11/30/19 to 12/01/2019, the analyzer went of nominal span reading. The cause of the issue is unknown but was corrected.
11/08/2019	Excess Emissions (CEM)	Compliance	3rd Quarter 2019 Emissions Report. Total downtime for this quarter was 75.65 hours, or 3.4% down time. The facility is in compliance, but down time has been increasing for each quarter over the last year.

Name: *Kaitlyn Toffert* Date: 05/25/2021

Supervisor: *K. Kelly*
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