

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection**

A708424981

FACILITY: PACKAGING CORPORATION OF AMERICA		SRN / ID: A7084
LOCATION: 936 SHELDON RD, PLYMOUTH		DISTRICT: Detroit
CITY: PLYMOUTH		COUNTY: WAYNE
CONTACT: Stan Jogodzinski , Plant Superintendent		ACTIVITY DATE: 03/21/2014
STAFF: Usama Amer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Inspection of a Minor Source		
RESOLVED COMPLAINTS:		

On March 21, 2014, I attempted to conduct a Self-Initiated Inspection at Packaging Corporation of America (PCA), which is located at 936 Sheldon Rd, Plymouth, Wayne County. The purpose of the inspection was to determine whether the source was present and operating at the said location. The inspection was also to determine the PCA's compliance status with the State and Federal Air Quality Rules & Regulations and the conditions of Wayne County Permit No. C-3075.

Wayne County Permit No. C-3075 was issued, on 9/24/1973, to PCA for the installation and operation of a Scrap Collection System (Baghouse).

PCA is a corrugated box manufacturer. It specializes in conventional shipping containers, custom-printed corrugated boxes, and custom packaging retail visual displays.

INSPECTION & COMPLIANCE STATUS

- PCA has 2 natural gas-fired boilers with a maximum rated heat capacity of 10.042 MMBtu/hour for each boiler. The boilers were installed in July 1973, which pre-dated the Michigan permit to install program. Additionally, the boilers fall under the permit to install exemption rule R 282(b)(i). The boilers are used for indirect heating, burn sweet natural gas, and each has a rated input capacity of not more than 50 MMBtu/hour.

Additionally, although the boilers meet the size threshold (greater than or equal to 10 MMBtu/hr) for 40 CFR Part 60, Subpart De, small industrial-commercial-institutional steam generating units, the Subpart De provisions do not apply because the boilers were installed prior to the applicability date of June 9, 1989 (40 CFR Section 60.40c).

- PCA has the following emission sources:

- • Corrugator - Installation Date: July, 1973
- • 75" Flexo Folder Gluer - Installation Date: July, 1973
- • 66" Die Cutter - Installation Date: July, 1975
- • 50" Flexo Folder Gluer - Installation Date: July, 1981
- • Scrap Cyclone (C-3075) - Installation Date: Sept, 1985
- • Scrap Baling Machine - Installation Date: July, 1988
- • 86" Flexo Printer/Slotter - Installation Date: Sept 2008
- • Stitcher/Gluer - Installation Date: Sept, 2008

- PCA uses adhesives and inks, which contain and emit VOCs & HAPs. Attachment A shows the chemical types, usages and emissions data. The VOC emission rates fall under the permit to install exemption rule R 290. Additionally, the HAPs emission rates are well below the thresholds for a major source. Attachment B is a copy of a MSDS for printing ink.

CONCLUSION

PCA appears to operate in compliance with the State and Federal Air Quality Rules & Regulations and the conditions of Wayne County Permit No. C-3075. However, Permit No. C-3075 should be voided, as PCA's equipment and operations are exempt from the requirements of R 201, as discussed above.

NAME Sam Amer

DATE 4/24/14

SUPERVISOR W.M.