

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : GRAPHIC PACKAGING INTERNATIONAL LLC	SRN : B1678
Location : 1500 N. PITCHER ST.	District : Kalamazoo
	County : KALAMAZOO
City : KALAMAZOO State: MI Zip Code : 49007	Compliance Status : Compliance
Source Class : MAJOR	Staff : Monica Brothers
FCE Begin Date : 8/1/2019	FCE Completion Date : 8/28/2020
Comments : 	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/28/2020	Scheduled Inspection	Compliance	Announced scheduled inspection
07/31/2020	Excess Emissions (CEM)	Compliance	Excess emissions report for Boiler 9. Monthly SO2 emissions and % sulfur in fuel oil. Summary report for gaseous and opacity excess emission and monitoring system performance satisfies NOx and O2 CEMS quarterly reporting for Boiler 9. They reported no excess emissions and a total of 6 hours of CEMS downtime for NOx and 4 hours of downtime for O2.
07/27/2020	ROP Tech Review Notes		ROP Technical Review Notes
07/27/2020	Telephone Notes		Telephone notes for discussion with complainant Brandi Crawford.
05/19/2020	Excess Emissions (CEM)	Compliance	Monthly SO2 emissions and % sulfur in fuel oil for Boiler 9. Summary report for gaseous and opacity excess emission and monitoring system performance satisfies NOx and O2 CEMS quarterly reporting for Boiler 9. Includes cylinder gas audit. They report no excess emissions, and had 2 hours of CEMS downtime for other known causes.
04/10/2020	MAERS	Compliance	
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03/17/2020	ROP Annual Cert	Compliance	The company reports compliance with all requirements for the period.

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03/17/2020	ROP SEMI 2 CERT	Compliance	The company reports compliance with all requirements for the period.
03/16/2020	Excess Emissions (CEM)	Compliance	Summary of full 2019 Excess Emissions. See quarterly submissions for details on CEM downtime and cylinder gas audits.
03/16/2020	ROP Annual Cert	Compliance	The facility reports one deviation. An alleged Rule 901 violation occurred on May 1, 2019. Graphic Packaging International, LLC received a violation letter on May 14, 2019. GPI provided a detailed response in a letter dated June 3, 2019 to the Michigan EGLE Kalamazoo District Office; Air Quality Division.
03/16/2020	ROP SEMI 2 CERT	Compliance	The company reports compliance with all requirements for the period.
02/11/2020	Stack Test Observation	Compliance	Boiler 9 NOx and NMOC Tests
01/31/2020	Excess Emissions (CEM)	Compliance	Monthly SO2 emissions and % sulfur in fuel oil for Boiler 9. Summary report for gaseous and opacity excess emission and monitoring system performance satisfies NOx and O2 CEMS quarterly reporting for Boiler 9. Includes cylinder gas audit. They reported zero hours of CEMS downtime for this quarter.
01/08/2020	Stack Test		Boiler 9 re-test plan submitted
11/20/2019	Meeting Notes		Odor Task Force Joint Meeting between the Kalamazoo Wastewater Treatment Plant and Graphic Packaging.
11/08/2019	Complaint Investigation	Compliance	Investigation of an odor complaint that was called in at about 8:00am.
11/04/2019	Excess Emissions (CEM)	Compliance	Monthly SO2 emissions and % sulfur in fuel oil for Boiler 9. Summary report for gaseous and opacity excess emission and monitoring system performance satisfies NOx and O2 CEMS quarterly reporting for Boiler 9. Includes cylinder gas audit. They report no excess emissions, and had 6 hours of CEMS downtime for unknown causes.
10/29/2019	Complaint Investigation	Compliance	Investigation of an odor complaint that was received at 1:30pm.

Activity Date	Activity Type	Compliance Status	Comments
09/18/2019	ROP Semi 1 Cert	Compliance	The facility reports one deviation. An alleged Rule 901 violation occurred on May 1, 2019. Graphic Packaging International, LLC received a violation letter on May 14, 2019. GPI provided a detailed response in a letter dated June 3, 2019 to the Michigan EGLE Kalamazoo District Office; Air Quality Division.
09/18/2019	Excess Emissions (CEM)	Compliance	Excess emissions report for EUBOILER#9, quarters 1 and 2. Summary report for gaseous and opacity excess emission and monitoring system performance satisfies NOx and O2 CEMS quarterly reporting. Includes cylinder gas audit. They reported zero CEM monitor equipment malfunctions or downtime.
09/13/2019	ROP Semi 1 Cert	Compliance	The company reports compliance with all requirements for the period.
09/04/2019	Stack Test		EUBOILERS#9 Preliminary testing for NOx and TGO emissions. Per ROP NO: MI-ROP-B1678-2015 Section V. No. 4 and 5. Boiler 9 test on April 18th was suspended because boiler load could not be maintained above the required 90%. A re-test will be scheduled for the fall or winter.
09/04/2019	Stack Test		EUBOILER#9 Preliminary testing for NOx and TGO emissions. Per ROP No: MI_ROM_B1678-2015 Section V. No. 4 and 5. Boiler 9 test on April 18th was suspended because boiler load could not be maintained above the required 90%. A re-test will be scheduled for the fall or winter.
08/23/2019	Complaint Investigation	Compliance	Investigation of an odor complaint that was called into EGLE at about 8:45 am.
08/12/2019	CEM RATA	Compliance	2019 RATA report for boiler 9 NOx, CEMS. The test was conducted and completed on April 17, 2019.

Activity Date	Activity Type	Compliance Status	Comments
08/02/2019	Excess Emissions (CEM)	Compliance	Excess emissions report for Boiler 9. Monthly SO2 emissions and % sulfur in fuel oil. Summary report for gaseous and opacity excess emission and monitoring system performance satisfies NOx and O2 CEMS quarterly reporting for Boiler 9. They reported a total of 0 ours of CEMS downtime.

Name: Morgan Burt Date: 9/29/2020 Supervisor: RIL 9/30/20