

# FINAL REPORT



## PACKAGING CORPORATION OF AMERICA

FILER CITY, MICHIGAN

### 2023 NON-CONDENSABLE GAS CLOSED VENT SYSTEM SOURCE TESTING REPORT

RWDI #2303319

June 16, 2023

#### SUBMITTED TO

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## TABLE OF CONTENTS

<b>1</b>	<b>INTRODUCTION</b> .....	<b>1</b>
1.1	Overview.....	1
1.2	Test Date .....	1
1.3	Test Program Organization.....	1
<b>2</b>	<b>SOURCE DESCRIPTION</b> .....	<b>1</b>
2.1	Plant Overview .....	1
2.2	Overview.....	2
<b>3</b>	<b>TEST PROGRAM</b> .....	<b>2</b>
3.1	Description of Testing Methodologies.....	2
3.1.1	USEPA Method 21.....	2
3.2	Applicable Regulations.....	2
<b>4</b>	<b>SUMMARY OF RESULTS</b> .....	<b>3</b>

## LIST OF APPENDICES

<b>Appendix A:</b>	Copy of Source Testing Plan and EGLE Correspondence
<b>Appendix B:</b>	Summary of Results
<b>Appendix C:</b>	Field Notes and Calibration Gases
<b>Appendix D:</b>	Figures



# 1 INTRODUCTION

## 1.1 Overview

RWDI USA LLC (RWDI) was retained by Packaging Corporation of America (PCA) to complete testing on the non-condensable closed vent system (CVS) identified as FGMACT\_SUBPART\_S in Permit No. 209-18A at their facility located at 2246 Udell Street in Filer City, Michigan. The test program was conducted to identify any leaks that may be present along the CVS that comes off the digester and evaporative system to where it exits the building and is transferred and introduced into the flame zone of an on-site boiler.

## 1.2 Test Date

RWDI conducted the testing program on April 25<sup>th</sup>, 2023.

## 1.3 Test Program Organization

Details with respect to the key individuals involved with the stack sampling survey are provided below:

<b>Company Name:</b>	<b>Packaging Corporation of America</b>
<b>Company Address:</b>	2246 Udell St, Filer City, Michigan
<b>Environmental Contact:</b>	Zeb Jones
<b>Cellular No:</b>	231-510-6390
<b>E-mail:</b>	Zebjones@packagingcorp.com

<b>Sampling Company:</b>	<b>RWDI USA LLC</b>
<b>Project Manager:</b>	Steve Smith
<b>Telephone Number:</b>	971-940-5038
<b>Fax No:</b>	519-823-1316
<b>Email:</b>	Steve.Smith@rwdi.com

# 2 SOURCE DESCRIPTION

## 2.1 Plant Overview

The low volume, high concentration (LVHC) Collection System at PCA's Filer City Mill includes various equipment (hoods, vents, ductwork, gas movers) that collect the LVHC gases from the digester and evaporator systems and conveys the gases to Boilers 1, 2, or 4 for destruction. In addition, the mill collects gases from the pulp washers using LVHC Collection System and conveys these gases to Boilers 1, 2, or 4 for destruction.

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- d) Each bypass line in the closed-vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in 63.443, 63.444, or 63.445 shall comply with either of the following requirements:
  - 1) On each bypass line, the owner or operator shall install, calibrate, maintain, and operate according to the manufacturer's specifications a flow indicator that is capable of taking periodic readings as frequently as specified in 63.454(e). The flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line
  - 2) For bypass line valves that are not computer controlled, the owner or operator shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal.

## 4 SUMMARY OF RESULTS

Testing was conducted on April 25<sup>th</sup>, 2023. All sampling locations were under the 500 ppm limit.