DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

B857465617

FACILITY: Pactiv Evergreen		**SRN / ID:** B8574
LOCATION: 2315 MILLER RD, KALAMAZOO		**DISTRICT:** Kalamazoo
CITY: KALAMAZOO		**COUNTY:** KALAMAZOO
CONTACT: Dok Stevens Dehring , EHS Manager		**ACTIVITY DATE:** 10/25/2022
STAFF: Monica Brothers	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Unannounced scheduled inspection		
RESOLVED COMPLAINTS:		

This was an unannounced scheduled inspection. Staff (Monica Brothers and Sharon Espinosa) arrived at Pactiv Evergreen at 10:00am and called Dok Stevens Dehring, the EHS Manager, from the reception phone. Upon arrival, I did not observe any visible emissions or odors coming from the facility. Dok met us in the waiting area and led us to a conference room where I briefly explained the inspection process and asked a few initial questions about the facility. Dok said that they currently have about 155 employees and run 24 hours/day (3 8-hour shifts), usually 5 days/week. They commenced operations in 1952 and print on various types of milk and juice cartons. They have 8 flexographic printing presses and 9 sealers that use abhesives. They also have ink jet printers, which they include in their VOC calculations. They have two small boilers and one cold cleaner. They are currently operating under PTI #102-07B. They also have a consent order, AQD No. 5-2016, for non-submittal of their MAERS report. They have since been compliant with the requirements of the consent order.

We then took a tour of the facility. The company requires hearing protection, safety glasses, steel -toed boots, a hairnet, and a safety vest inside the production areas. Also, no jewelry is allowed above the waist.

Flexographic Printing Presses A,B,D,F,G,H,L,M: Pactiv Evergreen uses flexographic printing presses to print on various types of cartons, but still primarily milk cartons. They operate five presses, at most, at a time, and usually only run three at a time in the summer because school is out, and their production demands decrease. They use all water-soluble inks in the presses. They are all grouped together in one large room except for press L, which is in a smaller room by itself. They have nine sealers that fold the carton and uses natural gas to heat the poly and melt the seams together. Product can come from any of the printing presses and be sealed in any of the sealers. All of the presses and sealer lines were labeled and looked to be functioning properly. Waste ink is put into a machine called the "ALAR" that extracts the solids, which are landfilled, and the remaining liquid gets discharged to the city. Leftover ink is simply thrown into the black ink. There are various gas heaters in the presses that heat the paper throughout the process. They keep track of how much natural gas they use, including in the two boilers.

FGScrap: They have two paper trim collection balers that cut and compact the waste paper material. They sell the bales to recyclers. The emissions from this process are then sent to cyclone collectors to capture any fugitive paper scrap. We went up onto the roof to take a look at the cyclone collector system and the stacks from all of the presses. The roof looked clean during the inspection, and Dok said that they do daily roof checks to make sure no debris is coming from the unit.

Exempt Equipment: **The facility has two 840 MBH, gas-fired boilers, which are located together in the same room and are both Pacific, Model: PGA05-C85H, 8 MMBtu. They are currently using only Boiler 2. Boiler 1 hasn't been operated in years. The boilers can be considered exempt under Rule 282(2)(b)(i). They do not have any emergency generators on-site.**

They also have two parts washers, but only one is considered a cold cleaner. There is a ZEP cold cleaner that was installed in 2005. It uses Safety-Kleen Premium Solvent (Virgin and Recycled), which is 100% VOC. This lid was closed, and the rules were posted during the inspection. The other parts washer is an Omega Sonics Pro Plus, and it is heated. It is rarely used. Because the solvent in the unit (ID-55) is less than 5% VOC, it is not considered a cold cleaner.

Recordkeeping: Dok sent me a couple of spreadsheets in an email containing their recordkeeping requirements. The emissions from each press are tracked separately. The spreadsheet shows each VOC and HAP-containing material used on each press during each month, what the VOC and HAP content of each of those materials are, and how much of the material was used. The monthly total VOC and HAP emissions are calculated from this information. Each press has a 12-month rolling VOC limit of 7.3 TPY. Their records show that they have been consistently under this limit, but both Press D and Press G get very close to this limit at times. Their PTI limits these inks to having less than 25% VOC by volume of the total volatile fraction as applied, and all of the inks are below this limit.

On March 17, 2021, EPA conducted an inspection of Pactiv Evergreen and determined the facility to be out of compliance for not including VOC emissions from clean-up materials like IPA and the inkjet printers in their VOC calculations. They were also out of compliance for not conducting the required Method 24 VOC testing on their inks. The facility has since fixed these issues. They have conducted Method 24 testing for all of their inks and are now including all clean-up products and inkjet printer emissions in their calculations.

They also have facility-wide limits for HAPs. They are limited to less than 8.9 TPY (12-month rolling) of individual HAPS, and 22.0 TPY (12-month rolling) of aggregate HAPS. Their records show that they are under these limits.

Their PTI also requires them to keep monthly records of visible emissions from FGSCRAP. They are conducting visible emissions observations once per week and are keeping the appropriate records.

The facility seemed to be in compliance at the time of inspection.

NAME Monica Brothers DATE 12/6/2022 SUPERVISOR RAL 12/6/22