



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 5**  
**77 WEST JACKSON BOULEVARD**  
**CHICAGO, IL 60604-3590**

**ELECTRONIC MAIL ONLY**

Sara Kaltunas  
Corporate Environmental Manager  
Packaging Corporation of America (PCA)  
2246 Udell Street  
Filer City, Michigan 49634  
[skaltunas@packagingcorp.com](mailto:skaltunas@packagingcorp.com)

RE: Approval of Waiver for 2022, 40 C.F.R. Part 61 Subpart E Mercury Testing  
Packaging Corporation of America – Filer City Mill

Dear Sara Kaltunas:

The U.S. Environmental Protection Agency has reviewed Packaging Corporation of America's (PCA's or your) waiver request dated March 7, 2022 (Waiver), submitted in accordance with 40 C.F.R. § 61.13. In the Waiver, PCA is requesting that EPA waive the mercury stack test requirement for the PCA- Filer City Mill Boiler 5 (EUBOILER5) required under 40 C.F.R. Part 61, Subpart E (Subpart E).

In accordance with Subpart E (61.53(d)), "unless a waiver of emission testing is obtained under §61.13, each owner or operator of a source subject to the standard in §61.52(b) shall test emissions [of mercury] from that source. ...Method 29 in appendix A to Part 60 shall be used to test emissions...within 90 days from startup..." According to PCA, EUBOILER5 had an initial startup date of April 17, 2021 and hence emission testing was due July 17, 2021.

40 C.F.R. § 61.13(i) provides that, "emission tests may be waived upon written application to the Administrator if, in the Administrator's judgement, the source is meeting the standard..." In its request, PCA explained that the facility completed mercury performance testing on EUBOILER5 on July 28, 2021, in accordance with 40 C.F.R. Part 63, Subpart DDDDD (2021 stack test). In the 2021 stack test, PCA stated that it utilized EPA Method 30B and demonstrated an emission rate of 1.64 E-07 lbs of Hg/mmbtu (or 5.7E-04 kg of Hg per 24-hour period, if extrapolated). Based on these results, PCA stated that EUBOILER5 is operating at approximately 0.02% of the Subpart E limit.

Since the 2021 stack test results demonstrated that EUBOILER5 is operating consistently below the Subpart E mercury emission limit, in our judgement EUBOILER5 appears to be “meeting the standard” in Subpart E. Please note that we are concerned that this Method E stack test appears to be past due and PCA should have already conducted the stack test or requested a waiver prior to March 2022. Regardless, since PCA appears to be meeting the standard, EPA is willing to approve PCA’s waiver as submitted. Please note that PCA will still be required during each Subpart DDDDD mercury compliance test stack test to also calculate the kg/24-hr period emission rate during each conducted at EUBOILER5 to ensure that future emissions do not exceed any standard contained in 61.52(b).

If you have any further questions, please contact Ethan Chatfield of my staff at (312) 886-5112.

Sincerely,

Sara J. Breneman  
Chief  
Air Enforcement and Compliance Assurance Branch

cc: Jenine Camilleri  
Enforcement Unit Supervisor  
Air Quality Division  
Michigan Department of Environment Great Lakes and Energy (EGLE)  
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