

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

A040254244

FACILITY: MENASHA PACKAGING COMPANY, LLC - COLOMA PLANT		SRN / ID: A0402
LOCATION: 238 N West ST, COLOMA		DISTRICT: Kalamazoo
CITY: COLOMA		COUNTY: BERRIEN
CONTACT: Allen Chapin , Operations Supervisor		ACTIVITY DATE: 07/09/2020
STAFF: Rachel Benaway	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection of facility to verify compliance with PTI #630-86 and NSPS (40 CFR 60 Subpart Dc).		
RESOLVED COMPLAINTS:		

Due to current EGLE health and safety requirements for COVID-19, all facility inspections are to be announced and scheduled. AQD staff, Rachel Benaway, conducted an announced inspection of Menasha Packaging in Coloma, MI (Berrien county) on July 9, 2020 to verify compliance with state and federal air regulations, NSPS (40 CFR 60 Dc), and AQD permit requirements. Menasha is a minor source of PM and has one air use permit on file. PTI #630-86 is for particulate matter from the corrugated paper waste handling system. Allen Chapin is the Operations Supervisor for the facility and accompanied staff for the inspection. According to current department COVID-19 guidance for inspections, all records were submitted via email prior to the inspection and are included with this report.

The facility has a Cleaver Brooks boiler, installed in 1997 with a nameplate capacity of 16.3 MMBtu/hr that qualifies for an exempt status (R 336.1282(2)(b)(i)) and runs on natural gas only. The boiler is subject to NSPS 40 CFR Part 60 subpart Dc and the facility provided the required monthly fuel use records that show compliance. Maintenance actions and preventative measures are tracked in a consistent manner.

Menasha utilizes a printer for package labeling with a water-based ink. They also use a laminator with a vegetable oil-based glue. Both types of equipment qualify for exempt status (R 336.1290). In accordance with Rule 290 requirements, the facility provided 2 years of records of ink and glue use and calculations demonstrating that the quality, nature, and quantity of emissions meet the Rule 290 limits of 1,000 lbs/month uncontrolled or 500 lbs/month controlled noncarcinogenic VOC emissions. In 2018, the facility emitted a minimum of 4.96 lbs VOC/month to a maximum of 21.33 lbs/month. In 2019, the facility emitted a minimum of 5.58 lbs VOC/month and a maximum of 34.53 lbs/month.

The facility has no emergency generators and one cold cleaner in the maintenance area. The cleaner is not a heated unit, the lid was closed at the time of the inspection.

Pursuant to PTI #630-86 conditions:

(SC.2) No alterations, modifications, expansions, or relocations have occurred since the last inspection.

(SC.6) The facility has not had the need to report an abnormal condition or process malfunction.

(SC. 10) The facility provided emissions calculations from the corrugated paper waste handling system showing compliance with the 0.10 lb per 1,000 lbs of exhaust gas emission limit. In 2018, the facility reported to have baled 6,954,507 lbs of scrap (3,477.25 tons) with total annual PM10 emissions of 2,086.35 lbs. In 2019, the facility reported to have baled 6,404,697 lbs of scrap (3,202.35 tons) with total annual PM10 emissions of 1,921.41 lbs.

(SC.11) The facility has not reported a VE exceedance of a 6-min average of 20% opacity. No visible emissions were observed outside the facility during the inspection.

(SC.13) At the time of inspection, the cyclone was installed and operating properly.

(SC.14) The facility disposes of contaminants in a manner that minimizes introduction of air contaminants.

(SC.15) Exhaust gases are discharged vertically upwards from stack- 4ft x 10ft, 50ft above ground level.

At this time, the facility appears to be in compliance with this air use permit.

NAME Rachel Benaway DATE 7/21/2020 SUPERVISOR RIL 9/9/20

