

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

A671445257

FACILITY: Georgia-Pacific Corrugated LLC-Milan Container		SRN / ID: A6714
LOCATION: 951 COUNTY ST, MILAN		DISTRICT: Jackson
CITY: MILAN		COUNTY: WASHTENAW
CONTACT: Joe Cyrus , Environmental Safety & Health		ACTIVITY DATE: 07/19/2018
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection of a corrugated container facility.		
RESOLVED COMPLAINTS:		

Minor Source-**Facility Contact****Jacob Dombroski (JD)-Director of Operations****Joe Cyrus (JC)-Environmental Health and Safety Manager**

ph 404-285-5503

Email: herman.cyrus@gapac.com**Purpose**

On July 19, 2018, I conducted an unannounced compliance inspection of Georgia-Pacific Corrugated LLC-Milan Container (Company) located at 951 County Street in Milan. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules and PTI 152-94A.

Facility Location

The facility is located in the town of Milan. A residential area is located just east of the facility. See attached aerial photo.

Facility Background

The facility was last inspected on April 23, 2014 and found to be in compliance.

PTI 152-94A was issued on October 16, 2014. It was for a paper scrap pneumatic conveying system and associated cyclone for control which replaced 3 older cyclones. All other processes at the facility are considered exempt from PTI requirements.

A permitting exemption determination for the installation of a new Rotary die cutter was submitted to the MDEQ on May 21, 2018. (See Attachment (1)). It will replace one of the existing die cutter lines. The process will operate under Rule 290 with VOC emissions expected to be less than 1000 pounds per month. The process will be installed in October 2018.

The Company manufactures corrugated boxes from rolled paper in 3 flexo/folder/gluer lines and 2 die cutting lines. Once rolled paper is received by the Company, it is sent to a corrugator machine where a starch adhesive is applied to the paper and the paper is slit, scored, and cut to customer specifications. The resulting corrugate is then sent to the appropriate flexo/folder/gluer line or die cut line. The flexo/folder/gluer lines slot, score, fold and apply glue and ink to the corrugate. The resulting product is then banded and shipped to the customer. Corrugate sent to the die cutting lines is cut to customer specifications, but boxes fabricated in the die cutting lines consist of several pieces which need to be assembled into a complete box by the customer. The box components fabricated in the die cutting lines are also banded and shipped to the customer after being produced. The flexo/folder/gluer lines are being operated under the Rule 290 exemption which limits VOC emissions from each line to below 1,000 pounds per month. VOC emissions from the die cutting lines are negligible.

In addition to the flexo/folder/gluer lines and die cutting lines, the company also has a starch adhesive application process used in the corrugator line, a 16.329 MMBTU/hour boiler (Cleaver-Brooks Model #CB200400250), a scrap paper pneumatic conveyor system consisting of a shredder, 1 cyclone, and a baler, a starch silo baghouse, 3 drill presses, a welding machine, a band saw, 2 bearing presses, a brake press, 2 grinders, and a ZEP cold cleaner. The Cleaver-Brooks boiler is used to provide heat to the corrugator line and to the starch adhesive production process.

Regulatory Applicability

PTI 152-94A is for a paper scrap pneumatic conveying system and associated cyclone for control.

40 CFR Part 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. This applies to a 16.329 MMBTU/hour boiler (Cleaver-Brooks Model #CB200400250). Requirements are minimal such as maintain natural gas usage records.

Rule 290 PTI exemption rule. Applies to the 3 flexo/folder/gluer lines and will apply to the new rotary die cutting line.

The facility is currently considered a NSPS Cat 2 Fee source/MAERS reporting facility.

Arrival & Facility Contact

Visible emissions or odor were not observed upon my approach to the Company's facility at 9:00 am. I was met by both JD and JC near the front lobby and brought to JD's office. I informed them of my intent to conduct a facility inspection and to review the various records as necessary.

Pre-Inspection Meeting

JD outlined that there are currently 119 employees working 3 shifts a day, 5 or 6 days a week. Business is about the same or slightly down from recent years.

JD indicated that the rotary die cutter project is on schedule to start in October.

I discussed with JC the various records that I would need copies in the near future. He promised to email them to me by no later than the following Monday. See recordkeeping section.

We discussed the NSPS boiler. I pointed out that the NSPS boiler is reason that the Company is fee subject and only because it has an oil back up system. Both gentlemen were new to the facility and were unaware if the boiler had oil back-up capabilities. It was decided to inspect the boiler during the inspection.

Onsite Inspection

Attachment (2) is a diagram of the facility. It shows the 2 current die cutter operations called the United D/C and the Ward D/C. The United D/C is the process that will be replaced in the Fall with the new rotary die cutting process. The diagram shows the 3 flexo lines include the 35 Flexo, the 38 Flexo and the EVOL line. Above the EVOL line on the roof is the approximate location of the cyclone. Also near the EVOL line is the natural gas fired boiler.

We walked past all the die cutter lines and the flexo lines. A mild wet cardboard smell permeated the building. No dust noted inside so evidently the pneumatic system was working well. We went past several staging areas of 5-gallon buckets of inks all manufactured by Sun Chemical.

We then arrived at the boiler. See attached photos. There was only a natural gas line going into the boiler. Upon questioning of older Company employees, they noted that oil tanks were removed at considerable expense along with the old boiler(s) when this new boiler was installed in 1997. It has never had an oil firing capability.

We next went up on the roof to look at the cyclone. See attached photo. It is quite large and equipped with a large rain cap. It handles 53,000 CFM of air. No opacity was noted coming out of it. It appears to have been retrofitted in place to replace 3 older cyclones as could see older existing duct work connecting to the new duct work directly adjacent to the cyclone. Very little waste material could be seen under the cyclone. The collected material drops down out of the cyclone to a baler below the roof

line.

The rest of the roof area was clean and free from any smoke or dust.

Visible from the roof was the loading docks. Some dust could be seen when trucks were moving in and out. A residential area is very close to loading dock area. See attached photo. Company personnel indicated that dust suppressant is supplied to gravel road area on the East side of the plant twice a year. I noted that these types of treatments generally only last about a month and to stay vigilant during warm dry periods to prevent the dust from becoming a nuisance to nearby homes.

Recordkeeping Review

Attachment (3) is the MAERS report for 2018. Total emissions were minimal.

Attachment (4) is the Malfunction Abatement Plan for the cyclone-scrap conveying system. Looks fine.

Attachment (5) is a Rule 290 demonstration for the new Rotary Die Cutter. It appears to meet Rule 290.

Attachment (6) are the various Rule 290 usage records/emissions info for 2018. Shows compliance. (Note: 2017 records reviewed and okay but not attached.)

Attachment (7) are boiler natural gas usage records. (Required for NSPS.)

Attachment (8) are particulate emission calculations. Shows compliance with PTI. (Maximum was 11.2 tons 12 month rolling average; limit 25 tons.)

Attachment (9) is an emissions summary sheet. Shows around 300 pounds of VOC emissions in 2018 (through June) along with 5.5 tons of PM-10.

Attachment (10) are emissions from the Corrugator in 2018. Per phone call from Caroline Depp with Georgia Pacific (ph 734-635-7740), the Company has started using new emission factors that came out about a month ago from a corrugating industry group. Emissions are high enough due to the present of HAPs that the Company plans on submitting a PTI application soon. Records in 2018 show compliance with Rule 290 although close to 20 pound per month limitation for acetaldehyde and formaldehyde.

Attachment (11) is an SDS example for the inks. Shows very low VOC and no PFAS.

Post-Inspection Meeting

We discussed PFAS compounds. JD indicated there is some waste water associated with the corrugator and cleaning inks from equipment that it has splattered on. It is pre-treated onsite. He was unaware if any of the inks/dyes contained PFAS type compounds. I requested that they review all their SDS sheets to see if the compounds were present.

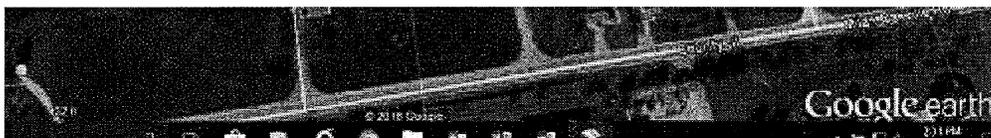
I said I would get back to them regarding whether I could waive fee and reporting requirements since the boiler is not equipped to burn oil.

I noted that I didn't have any other finds and would review the requested records when received to finish my compliance determinations.

I thanked both gentlemen for their time and cooperation and departed the facility at 10:37 am.

Compliance Summary

The facility appears to be in compliance with all applicable requirements.



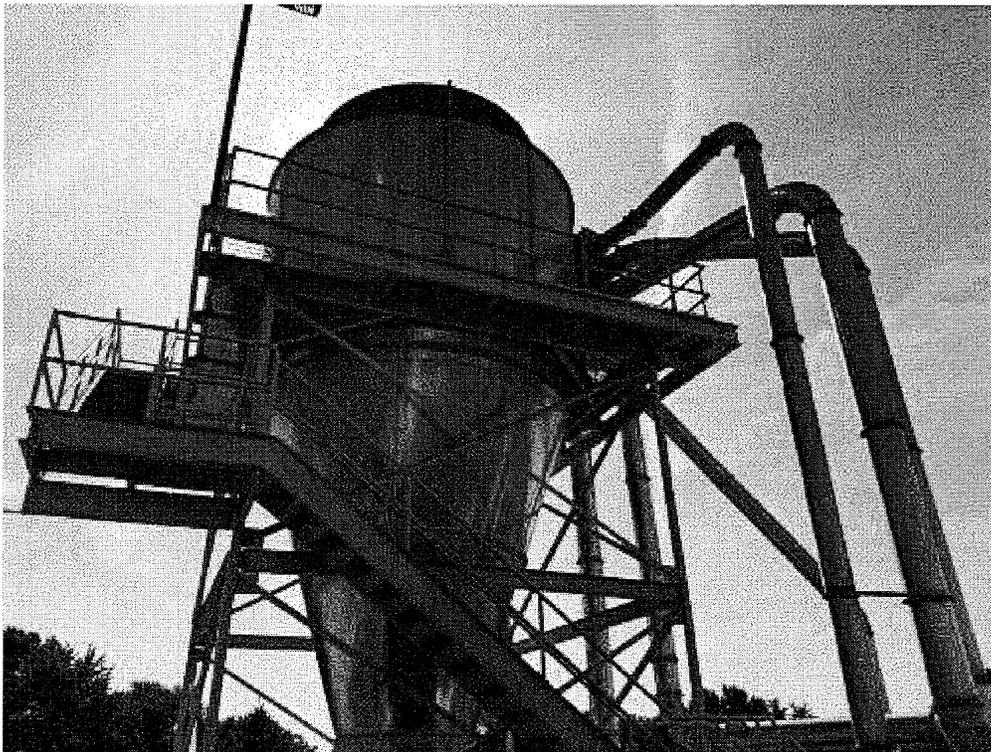


Image 2(Cyclone) : Cyclone

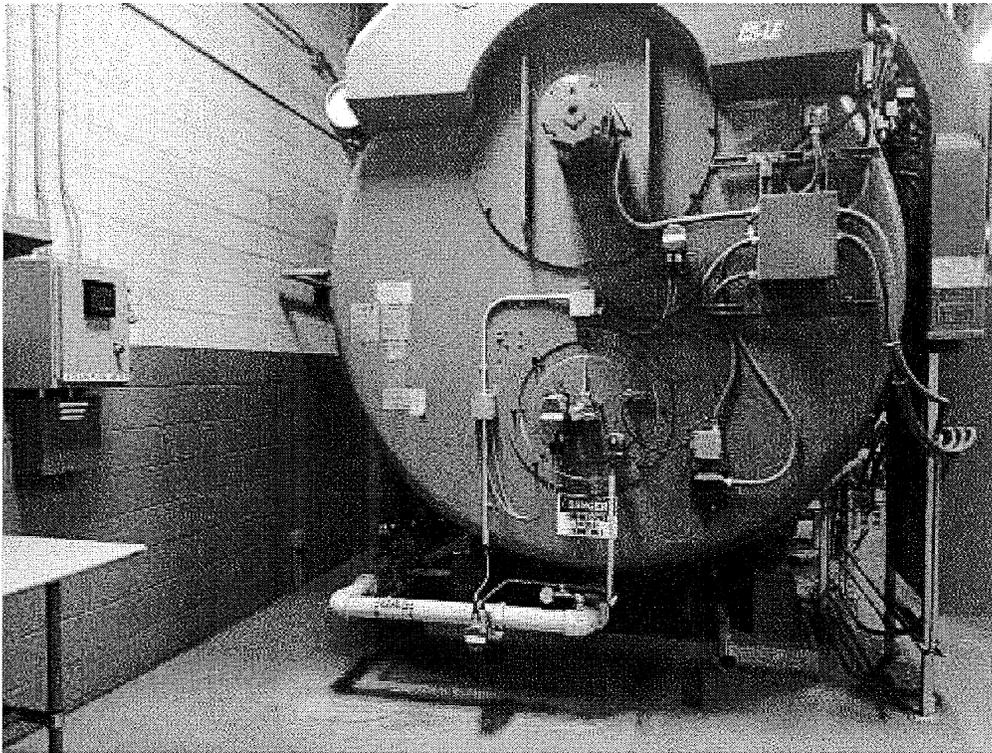


Image 3(Natural gas boiler) : Natural gas boiler

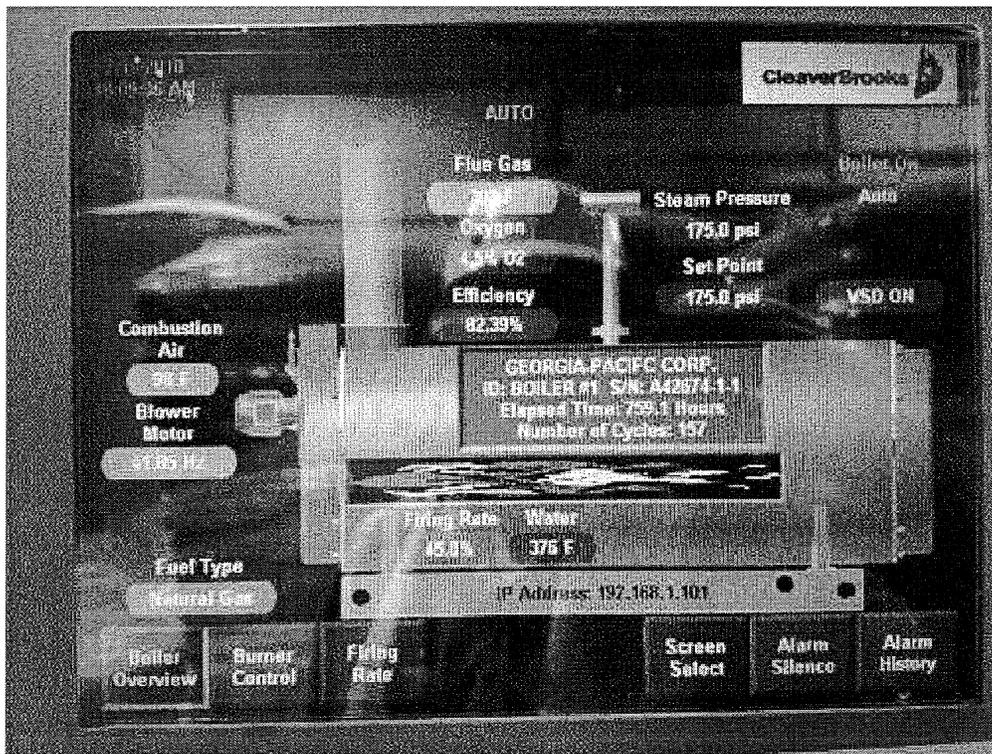


Image 4(Natural gas boiler) : Natural gas boiler screen shot of operating conditions.

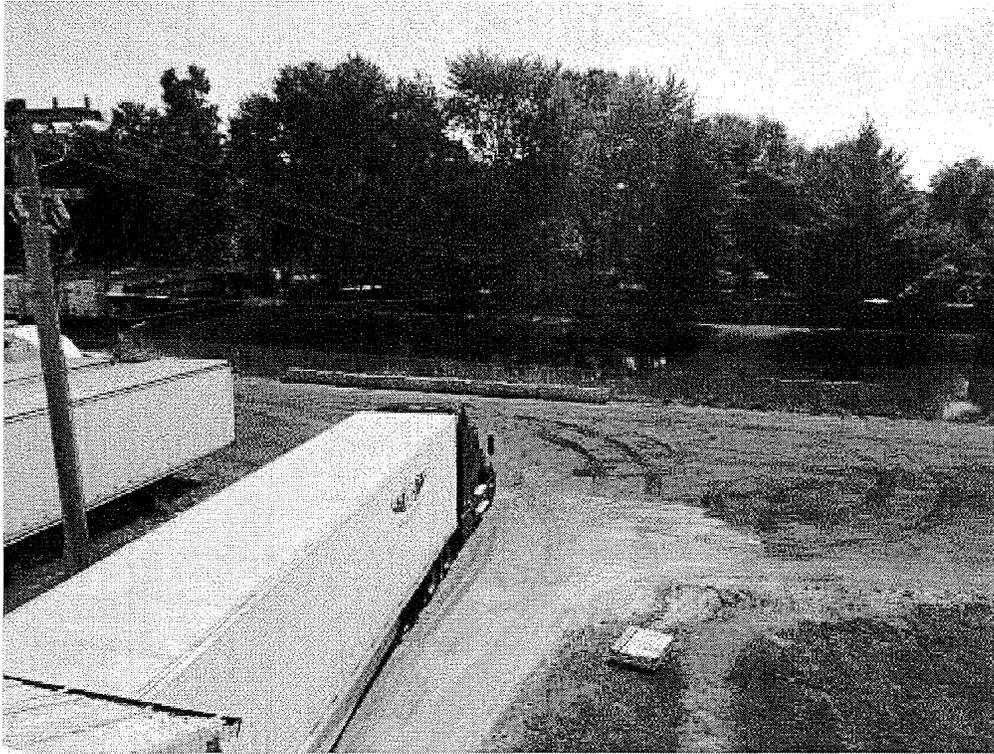


Image 5(Loading dock) : Loading dock area near residential homes.

NAME M. Kovalchuk

DATE 7/25/2018

SUPERVISOR [Signature]