DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

| FACILITY: White Pigeon Paper Company | | SRN / ID: B2024 |
|---|-------------------------------|---------------------------|
| LOCATION: 15781 River St., WHITE PIGEON | | DISTRICT: Kalamazoo |
| CITY: WHITE PIGEON | | COUNTY: SAINT JOSEPH |
| CONTACT: Paul Stofer , Mill Mgr | | ACTIVITY DATE: 11/30/2016 |
| STAFF: Dennis Dunlap | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MAJOR |
| SUBJECT: Scheduled inspecti | on. | |
| RESOLVED COMPLAINTS: | | |

This was not an announced inspection. Dennis Dunlap was the inspector for AQD. Paul Stofer is the contact person. Kerri Kahlmorgan was also there for the facility. The paper machine was operating. The paper produced is coated recycled boxboard. It is shipped to printers to be made into packaging. Boiler #2 is not operational. It has not operated for over a year.

Records

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The records were reviewed first.

HAPs

Monthly and 12-month rolling time period calculations of individual HAP and aggregate HAP are being done. The facility was in compliance with the emission limits. Methanol was the most used HAP at 3.54 tons/yr.

EUPAPERMACHINE

VOC from coatings and VOC from additives (retention aids, dyes, defoamer, etc) are calculated separately. The 12-month rolling total (from Oct. 2016) for coatings was 8.33 tpy. For additives it was 20.14 tpy. The permit limits for VOCs for the paper machine are 35 tpy and 9.1 pph. The facility is in compliance with these limits. The ROP specifies that the VOC limits are for retention aids and pulp additives, It appears that coatings are not included with this. For the pounds per hour VOC calculation, the facility uses the monthly VOC emissions from retention aids and pulp additives (not coatings) and divides by the facility operating hours for that month.

It appears that 4 kinds of coatings may be used on the paper machine. These are: top coat; precoat; top calander box coating; and back calander box coating. The pounds of VOC per gallon of coating, minus water, as applied calculations were provided. The coatings meet the VOC limit of 2.9 # VOC/gal. The coating with the most VOCs is made with polyvinyl alcohol (Elvanol 90-50) which contains some methanol.

BOILER #3

Boiler #3 is the only boiler that can operate. Monthly and 12-month rolling time period calculations for CO and NOx are being done. The emission factors from the 3/1/16 stack test are being used (0.00304 lb/mmbtu for CO and 0.0466 lb/mmbtu for NOx). The boiler is in compliance with the permit CO and NOx limits. Natural gas usage is monitored based on a calendar day basis, month, and 12-month rolling time period. Records of yearly inspections were provided which includes an inspection of internal components and auxiliary equipment. A record of repair work and maintenance activities was also provided.

Cold Cleaner

The lid was closed and rules were posted for the cold cleaner in the maintenance shop.

EURICEMACT

This includes the fire pump which is subject to 40 CFR Part 63 Subpart ZZZZ. White Pigeon Paper is an area source in regards to HAPs. AQD does not have, then, regulatory authority. However, some

records were reviewed. A yearly inspection was done on 8/15/16. This included changing the oil and filter and checking the air cleaner, hoses, and belts. Hours of operation is recorded (33 hours in 2015). The fuel that is used contains sulfur by weight at 15 ppm or less.

WALKTHROUGH

The beater room contains 4 pulpers. There are 4 stock chests (3 machine and one broke). The stock is usually used up at two hour intervals. It is not kept for more than one day. The paper machine has 7 formers to make 7-layered paper. The top contains 2 layers, the filler has 4 layers, and the back has one layer. The top layer uses white paper, the filler uses old corrugated box cuts and newspaper, and the back uses newspaper and corrugated clippings. There is a back area where the pulp additives are added to the system. There are also caustic and acid belt wash materials.

The coating that uses polyvinyl alcohol (solution coating) is mixed up downstairs at 180-190 degrees F. This coater is located before the other two coaters. This coating also contains starch. There are 2 pigment coaters that use latex and titanium dioxide. There are 3 infrared dryers and 2 gas dryers. The pigmented coatings are mixed upstairs where there are two larger mixers and one small mixer for sodium carboxy methyl cellulose. Liquid starch, defoamer, and biocide may also be part of the coating.

One cold cleaner was seen with the lid closed and rules posted. This cold cleaner uses a water-based material.

There are no dust collectors in the plant and no particulate emissions were seen.

NAME Danies Dunlas DATE 12/1/16 SUPERVISOR MA 12/1/2016