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

B202446453

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:** 10/02/2018
STAFF: Dennis Dunlap	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

This was an unannounced inspection. White Pigeon produces coated and uncoated paperboard for the packaging industry. It operates 3 shifts per day 7 days per week. There are about 100 employees.

White Pigeon takes in recycled paper in the form as corrugated, white ledger, news, of DLK (new double-lined kraft corrugated). The paper machine manufactures the paperboard in seven layers. One layer is back liner, four layers are filler, and two layers are top liner. The top liner layer uses white ledger, the filler uses corrugated and news, and the back liner uses DLK and news.

Each paper layer has its own pulper. There is a fourth backup pulper. Recycled paper is placed into a conveyor that goes to each pulper. From the pulper the slurry goes to a chest. From the chest the slurry is screened to remove plastic and metal then to a machine chest. From the machine chest the slurry goes through one of three refiners. There is one backup refiner. From the refiner the slurry goes to the paper machine by way of seven head boxes. The wet end of the paper machine has several additives. The use of the additives is tracked on recordkeeping sheets.

The paper machine has 5 cylinders, 2 presses, and a dryer section. On the dry end there are two starch calendar boxes for starch coating. One is for the top liner and one is for the back liner. There are two coaters for the top liner. One is for pre-coat and the other is for top coat. The coating is made upstairs in two mixing tanks. Addition of the ingredients is automated. On the floor below are two holding tanks for starch and CMC that will be added to the coating mixing tanks. After mixing the coating is conveyed downstairs to holding tanks. There are 4 holding tanks. The coatings are meeting the 2.9 pounds of VOC per gallon of coating minus water as applied limit.

Boiler #2 is not being used. Boiler #3 is natural gas-fired. Gas usage is one of the daily parameters recorded in the control room. Monthly gas usage is taken from a meter for the # 3 boiler. An annual inspection is performed on the boiler. A stack test was done on March 1, 2016. This was for NOx and CO. The result for NOx was 0.047 lb/MMBtu, and the result for CO was 0.003 lb/MMBtu. These are in compliance with the permit limits. The facility is using this data in the monthly and 12-month rolling time period emissions calculations. The facility is in compliance with the tons per year limits.

The fire pump is subject to 40 CFR Part 63 Subpart ZZZZ. Every week the fire pump is operated for 20-30 minutes for readiness testing. It has an hour meter. Annual maintenance is performed which includes an oil change and checking the belts. The last maintenance was done on 9/14/18. Hours of operation so far in 2018 were 17.1. For 2017 the hours were 24.7. A fuel delivery takes place about every 4 months. This is ultra-low sulfur diesel.

A parts washer is in the shop area. The lid was closed, and rules were posted.

For wastewater there is a clarifier, a storage tank, and lagoons. The lagoons discharge to groundwater. Storm water goes to the river.

In the ROP there is a source-wide table to limit HAPs. White Pigeon is calculating monthly and 12-month rolling time period emissions of individual and aggregate HAP. For the time period Sept. 2017 through August, 2018 the aggregate HAP was 3.66 tons. Methanol was the maximum individual HAP at 2.02 tons. Other HAPs include vinyl acetate and acrylamide. Methanol is a component of DuPont Elvanol 90-50, which is used in the top liner starch coating. The SDS lists methanol at < 1 %. White Pigeon is using 3.2%.

For the paper machine there is a 9.1 pound per hour VOC limit and a 35.0 tons per year VOC limit for wet end additives. This does not include coatings which are added at the dry end. For the period Sept. 2017 through August 2018 the wet end VOC total was 24.6 tons and the coating total was 5.82 tons. The pounds per hour VOC is calculated from the wet end VOC each month and facility operating hours. White Pigeon was in compliance with the pounds per hour limit.

White Pigeon has other record keeping sheets which include the monthly totals in pounds of products used and VOCs and other chemicals found in the products. The SDS for Nalco 7648 was checked to see if the isopropanol on the record keeping sheet (10%)matched the isopropanol concentration on the SDS. The SDS also listed isopropanol as 10%.

NAME Dennis Dunlap DATE 10/3/18 SUPERVISOR MD 10/3/2018