

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

B254424789

FACILITY: Caraustar Custom Packaging		SRN / ID: B2544
LOCATION: 1957 BEVERLY SW, WYOMING		DISTRICT: Grand Rapids
CITY: WYOMING		COUNTY: KENT
CONTACT: Larry Howard , Maint. Superintendent/Environmental Coordinator		ACTIVITY DATE: 03/31/2014
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Larry Howard, Maintenance Superintendent and Environmental Coordinator. Mr. Howard was presented with the DEQ Environmental Inspections: Rights and Responsibilities brochure and its contents were discussed.

**FACILITY DESCRIPTION**

Caraustar Custom Packaging is a lithographic paper board printing facility. Due to manufacturing packaging for the food industry, this facility is SQF Certified and utilizes only food safe inks. The facility operates pursuant to Opt-out Permit to Install No. 710-92B REVISED February 5, 2010. There have been some equipment changes since the last inspection which do not affect the permit status. Current equipment is as follows: 1 50" Roland 6-color press and one 33: Drent Goebel 7-color press. There are 5 gluing lines and one window line. There are two 50" die-cutting lines which are controlled by four cyclones. Only two cyclones are in use at any one time. The facility does not use any heat set inks, it is all non-heat set. Mr. Howard and I discussed the use of formulation data and the need to send a request. Also, discussed is the requirement to label equipment and notify the District Supervisor. Mr. Howard indicated he would do that immediately. The request and notification was received on April 3, 2014 and an approval letter will be sent. We discussed the MAERS submittal with regard to adhesive use and Mr. Howard indicated that his previous inspector told him he no longer needed to report usage since emissions are so low. Mr. Howard believes that the cyclone emissions are grandfathered and the previous inspector indicated that emissions did not need to be reported. This is not entirely consistent with AQD MAERS reporting requirements, but no change to the method of reporting will be requested at this time due to low emissions and the fact that the facility is not fee subject.

710-92B

EUDieCutting

Staff was able to gain access to the roof and observe the four cyclones that control EUDieCutting. There was quite a bit of scrap paper board observed on the roof. Mr. Howard indicated that occasionally the cyclones will plug and access through a side hatch will be done to unplug the units. Mr. Howard stated that the accumulation of paper board observed was the accumulation of the entire winter and now that the snow has mostly melted it will be cleaned up. Staff indicated that if it was accumulation from a shorter duration, the quantity would be considered unacceptable. This will be observed again during a future inspection. Emission limits have not been verified through stack testing and are based on proper operation. There was no immediate concern over the maintenance of the units themselves. No stack changes were obvious.

FGOffsetLitho

This FG regulates the two lithographic printing lines. The Roland is a sheet fed unit and the Drent is a web fed unit. VOC limits apply to the fountain solution of which two are used. Mr. Howard provided MSDS's for both as well as the mix ratio. The units are constantly monitored and the mix ratio is important for proper operation.

Emission Limits

A VOC content of < 5% by weight is required and the current usage indicates compliance with this

requirement. Total VOC limit of 21.0 tons. Current reported emissions are 6.18 tons. Both fountain solutions have actual VOC content less than 5%, so a calculation of the mix ratio is unnecessary.

**Process/Operational Limits**

Staff did not observe any waste material being stored improperly. The inks come in canisters which minimizes any fugitive emissions.

**Testing**

Mr. Howard has requested the use of written approval of the use of manufacturer's formulation data which will be approved.

**Recordkeeping/Reporting/Notification**

Staff and Mr. Howard observed that he was maintaining records monthly as required which he keeps in his office. January 2014 recordkeeping was requested and received promptly. Staff observed the information he receives from the supplier which contains coating specifics. This data was not requested as it was acceptable and on file on-site.

The monthly recordkeeping requirements contained in Special Condition (SC) 2.6 are being maintained. VOC emission calculations are attached. VOC emissions from the two lines for a 12-month rolling time period are limited to 21.0 tons. Carastar utilizes a 95% retention rate of VOC for non-heatset inks as detailed in the permit. Data regarding the fountain solution calculations appear correct.

**Stacks/Vents Restrictions**

There have been no reported stack changes at the facility.

**FGFacility**

HAPs limits include 9 tons of individual and 22.5 aggregate over a 12-month rolling time period. January total HAP emissions were 9.45 pounds and the 12-month rolling total was 88.23 pounds. This recordkeeping is attached.

**SUMMARY**

Carastar Custom Packaging was in compliance at the time of the inspection.

NAME Aspil Langford

DATE 4-7-14

SUPERVISOR PAB