

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
**ACTIVITY REPORT: On-site Inspection**

B254464614

<b>FACILITY:</b> Graphic Packaging		<b>SRN / ID:</b> B2544
<b>LOCATION:</b> 1957 BEVERLY AVE. SW, WYOMING		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> WYOMING		<b>COUNTY:</b> KENT
<b>CONTACT:</b> Chad Boonyasith , Reliability Manager		<b>ACTIVITY DATE:</b> 08/25/2022
<b>STAFF:</b> Michael Cox	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Scheduled Unannounced Inspection		
<b>RESOLVED COMPLAINTS:</b>		

Air Quality Division (AQD) staff Michael (MTC) arrived at the Graphic Packaging (GP) facility located at 1957 Beverly Avenue, SW, Wyoming, MI at 9:30 am on August 25, 2022, to complete a scheduled, unannounced inspection. Prior to entering the facility, offsite odors and emission observations were completed. No odors or visible emissions were observed.

### Facility Description

Graphic Packaging is a packaging company that utilizes recycled materials in their production processes. Paperboard rolls are received on site and go through several processes including printing and cutting to size to produce freezer food packaging containers before being shipped off site. The facility is a Synthetic Minor source for Hazardous Air Pollutants (HAPs). The facility is in operation with one Opt-Out Permit to Install (PTI) No. 710-92B.

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### Compliance Evaluation:

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Upon arrival, AQD staff MTC met with Mr. Chad Boonyasith, Maintenance Manager, who provided a walk-through of the facility, answered site specific questions, and provided records requested during the inspection.

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### EUDieCutting

This emission unit is for one 63" Bobst and two 50" Bobst slicing machines following printing operations to remove excess paper from the product. The 63" Bobst slicing machine was removed from the facility in 2014. The two remaining 50" Bobst machines are connected to four cyclones. Also, there is a manual cutting area of paper waste from the sheet fed printing press that is connected to the cyclones.

Each cyclone is limited to 0.01 lbs per 1000 lbs of exhaust gases that is calculated on a dry gas basis per test protocol for particulate matter (PM). Additionally, each cyclone is limited to 0.8 lbs per hour per test protocol for PM-10. The roof top was accessed during the site visit to observe the cyclones in operation. A significant quantity of paper debris was noted on the roof top below the cyclones within an enclosure to help contain the debris. Mr. Boonyasith stated that the debris was from a clogged pipe, and they were actively cleaning the debris up. A photo of the roof top and an invoice from MJR Landscape was provided for the clean-up following the inspection. No visible emissions or particulate matter was observed coming from the exhaust of the cyclones while on the roof top.

GP has two bailers which collect all paper waste products from the four cyclones. The balers are inspected daily, which would identify if a cyclone had plugged up and was not operating correctly. The daily observations are not recorded, though Mr. Boonyasith does record maintenance to the four cyclones. Maintenance records were requested and reviewed for the time period of January 2021 through August 25, 2022. No issues were noted during the review. Based on a review of the maintenance records and observations made during the inspection, the four cyclones appeared to overall be working in a satisfactory manner.

Four stacks are listed in association with this emission unit. The stacks appeared to be consistent with the dimensions identified in Opt-Out PTI No. 710-92B.

### **FGOffsetLitho**

This flexible group is for the 50" Roland 6-Color Offset Lithographic Printing Press (EU50ManRoland), the 33" Drent Goebel 7-Color Offset Lithographic Printing Press (EU33DrentGoebel) and the fabrication processes (EUFabrication). EU50ManRoland is limited to a Volatile Organic Compound (VOC) content for the fountain solution to be <5% by weight as applied. VOC content for the fountain solution used by the EU33DrentGoebel is limited to <5% by weight as applied and shall not contain either Isopropyl Alcohol (IPA, CAS # 67-63-0), Propyl Alcohol (CAS # 71-23-8), or Ethanol (CAS # 64-17-5).

Each printing press has an auto mix ratio of fountain solution to water prior to application. Mix ratios for fountain solutions to water were stated by GP

staff to be consistent. The VOC contents for each fountain solution after they are mixed with water were requested and provided with the use of the Appendix A calculations. The highest VOC content of the three fountain solutions after it is mixed with water is 1.0%. Based on this, GP is within the permitted limits. Based on the records reviewed, the fountain solutions used for the EU50ManRoland and EU33DrentGoebel do not contain either Isopropyl Alcohol (IPA, CAS # 67-63-0), Propyl Alcohol (CAS # 71-23-8), or Ethanol (CAS # 64-17-5). Additionally, this flexible group is limited to 21.0 tons per year (tpy) of VOCs per a 12-month rolling total. The highest 12-consecutive month rolling total VOC emission occurred during the 12-month period ending in December 2021, when 10.09 tons of VOC was emitted.

During the site inspection, waste containers as well as VOC/HAP containing materials appeared to be handled in an appropriate manner.

Per Special Condition (SC) 2.4 for FGOffsetLitho, GP shall utilize Test Method 24 to determine the VOC content for all inks, coatings, fountain solution additives and cleaning solvent. Upon approval by the District Supervisor, the facility may utilize manufacturers formulation data sheets instead to determine the VOC content. A request to use formulation data was received from GP on April 3, 2014. For the coating and ink materials used, GP receives a monthly report from each material provider identifying VOC contents for each material used.

Per SC. 2.6 for FGOffsetLitho, GP shall keep records of the category for each material used, compositions, VOC contents, usage and reclaim rates, and 12-month rolling total emissions. Records were requested and reviewed from January 2021 through July 2022. From the records it appears that GP does not reclaim any solvents. Based on the records received, GP is keeping adequate track of each category of materials, chemical composition, VOC contents, usage rates and emissions.

Three stacks are listed in association with this flexible group. The stacks appeared to be consistent with the listed values in the Opt-Out PTI No. 710-92B.

**FGFacility**

GP is subject to a facility wide individual Hazardous Air Pollutant (HAP) limit of 9.0 tpy and an aggregate HAP limit of 22.5 tpy respectively on a 12-month rolling basis. GP receives a monthly usage report for inks and coatings that identify the HAP contents for all materials used. The highest 12-consecutive month individual HAP emission occurred during the 12-month period ending in December 2021, when 126.3 pounds (lbs) of Acrylic Acid was emitted. The highest 12-consecutive month aggregate HAP emissions occurred during the 12-month period ending in May 2022, when 323.78 lbs of HAP was emitted. Based on the records reviewed, GP is keeping track of usage rates, HAP contents, and HAP emission totals as required. GP does not reclaim any HAP containing materials.

### Additional Observations

- One cold cleaner was observed during the inspection and the lid was closed. The cold cleaner was less than 10 square feet and appeared to be exempt per Rule 281(2)(h).
- Coating material storage areas were observed during the site inspection. Containers observed were properly closed.
- One 347,000 Btu natural gas boiler used for building heating purposes was observed at the time of the inspection. The boiler appears to be exempt per Rule 282(2)(b)(i).

### Conclusion

Based on the review of the records provided and the facility walk-through, Graphic Packaging appears to be in compliance with Opt-Out PTI No. 710-92B and all other applicable air quality rules and regulations.

NAME Michael T. Cox

DATE 9/16/2022

SUPERVISOR HH