DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

B407241318

FACILITY: WestRock California, Inc.		**SRN / ID:** B4072
LOCATION: 177 Angell St., BATTLE CREEK		**DISTRICT:** Kalamazoo
CITY: BATTLE CREEK		**COUNTY:** CALHOUN
CONTACT: Paula Batey-VanDorsten , Safety/Environmental Manager		**ACTIVITY DATE:** 08/24/2017
STAFF: Rex Lane	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Self Initiated Inspection		
RESOLVED COMPLAINTS:		

On August 24, 2017, Air Quality Division (AQD) staff (Rex Lane) arrived at WestRock California, Inc. (hereafter "facility") located at 177 Angell Street, Battle Creek, Michigan at 9:15 am to conduct an unannounced air quality inspection. The facility was last inspected by the AQD on 6/16/15 and was compliant at that time. The facility is a 100% recycled paperboard plant and produces paper stock for consumer packaging products and shipping envelopes. The facility does not currently have any paperboard printing or converting operations. The facility is a major source for sulfur oxides (based on 1.5% sulfur in fuel oil content limit and no restriction on oil usage), nitrogen oxides and volatile organic compounds; a synthetic minor source for hazardous air pollutants and is permitted under ROP Permit MI-ROP-B4072-2014a. The facility's ROP renewal application is due on or before 8/7/18.

Staff signed the visitor log in the reception area and then attempted to phone Ms. Paula Batey-VanDorsten, Safety and Environmental Manager and her voice mail message indicated she was out of the office until 8/28/17. Staff attempted to call other contacts listed in Paula's voice mail message without success and then finally got in touch with the office administrative assistant and stated the purpose of the visit. Staff was taken to a conference room and was provided with a Visitor/Contractor safety pamphlet (attached). Staff was joined shortly thereafter by Mr. Tom Crockett, General Manager and staff again stated the purpose of the visit. We were then joined by Mr. Tom Shannon, Plant Manager and Mr. Rick Rumsey, Powerhouse Manager.

Staff asked a few general questions and then was given a tour of the facility. Required personal protective equipment includes a safety vest, steel toed boots, ear plugs and safety glasses (hard hats optional). Information provided below is based on observations and discussions during the inspection and records requested and provided during and following the inspection:

EU-FIRE-PUMP-ENGINE:

Emergency fire pump engine used to provide power to pump water for fire suppression or protection. The facility provided a copy of the 110 HP John Deere diesel fired emergency fire pump engine certification of conformity for federal emission standards during the 2015 AQD inspection. The fire pump engine is equipped with a non-resettable hour meter and the current reading is 154.7 hours. The fire pump engine undergoes readiness testing on a weekly basis. Staff reviewed the engine operation log that is kept in the fire pump house building. The facility outsources annual inspection and maintenance of the engine and the last inspection was done on 7/21/17. The engine oil, oil and air filters were replaced at that time. Staff requested fuel sulfur analysis records and was provided with the sample results taken on 7/18/17. The total sulfur content was less than 0.0015% by weight which demonstrates compliance with the 15 ppm fuel sulfur content limit in Condition II.1.

EU-COATING:

Following the dryer section of the paper machine, the paperboard is coated with a latex adhesive that helps and binds the subsequent and final white coatings. The coatings are applied with application rollers in a coating reservoir and excess coating is removed with a doctor blade or air knife system. The coatings are dried using infra-red gas fired ovens and a starch is applied to the back side (brown) of the paperboard to prevent curling. Kaolin usage in the paper coating process has a separate exhaust system for particulate that vents to a large concrete silo which serves as a settling chamber with a small gooseneck down stack located at the top of the silo. Staff reviewed VOC 12-month rolling average emission records and for July 2017, the facility reported 5.21 tons/year which is 76% of the allowable limit. Staff reviewed the records for weekly visible emission checks of the silo stack during daylight hours for March through July 2017. No visible emissions were noted during the period of records reviewed. No visible emissions were observed from the kaolin gooseneck down stack during the inspection.

EU-REW-0001:

A rewind machine that performs the winding of final products on to rolls for shipment located in Building 23. The facility is required to perform and record the results of weekly visible emission checks during daylight hours while the process is in operation. Staff reviewed the weekly visible emission records for June and July 2017 and no visible emissions were noted during the period of records reviewed by staff. The process was not operating during the inspection.

FG-COLD CLEANERS:

The facility has a small parts washer in their maintenance area. The facility continues to utilize a product called Ozzy Juice SW-3 that was evaluated during the 2015 inspection. The product MSDS states that it contains 0 grams VOC/liter. On December 20, 2016, the Part 1 rule definition for "cold cleaner" under R336.1103(aa) was amended to mean a tank containing organic solvent with a VOC content of 5% or more, by weight. Since the parts washer does not currently meet the definition of a cold cleaner under R336.1103(aa) and the organic solvent does not contain any VOC, the parts washer is not subject to Part 7 rules or the requirements of this flexible group table. If the facility were to switch to another cleaning product that contains VOC, the Part 7 rules and associated flexible group conditions will apply again.

FG-BOILERS:

The facility has two natural gas fired boilers that are each rated at 107 MMBtu/hour and 63,000 lbs. steam/hour. The boilers are also permitted and capable of firing No. 2 or yellow grease. The facility has never fired yellow grease as a boiler fuel. The facility last fired fuel oil in the boilers in November 2014. The facility has two 35 kgal above ground fuel oil storage tanks that are double walled with interstitial leak monitoring and secondary concrete containment structures. The tanks are exempt from 40 CFR Part 60, Subpart Kb under 40 CFR 60.110(b)(b) and are exempt from air use permitting requirements under Rule 284(2)(d).

During the inspection, both boilers were running on natural gas at 42,500 lbs. steam/hour and 43,000 lbs. steam/hour respectively. Staff looked through the boiler sight glass near the burner tube for each boiler and flame color looked good. Staff briefly observed the boiler stacks and no visible emissions were noted. The facility is required to conduct daily visible emission checks when firing fuel oil or yellow grease in the boilers. The facility has never fired yellow grease and last fired fuel oil in 2014, therefore, staff did not ask to see the 2014 records since they were evaluated during the 2015 AQD inspection. The facility has one backpressure steam turbine (Elliot) that was operating during the inspection at approximately 1.0 Mw.

Staff requested fuel sulfur analysis records and was provided with the sample results taken on 7/18/17. The total sulfur content was less than 0.0015% by weight which is 0.1% of the allowable limit in Condition II.1.

The boilers are subject to 40 CFR Part 63, Subpart JJJJJJ (area source boiler MACT). MACT Subpart JJJJJJ subject sources are required to complete a one-time energy assessment report (completed 02/14) and undergo an initial boiler tune-up (completed 3/20/14) with biennial tune-ups thereafter. The facility is required by their insurance carrier to complete an annual boiler inspection (completed 6/23/17) and copies of this report were obtained during the inspection. Post inspection, staff requested a copy of the most recent biennial tune-up report for each boiler and this information was submitted via email on 8/30/17 (see attached). Per 8/30/17 phone discussion with Ms. Batey-VanDorsten, the facility will include the annual MACT Subpart JJJJJJ report listed in Condition VII.5 beginning with their next annual ROP certification report.

FG-PAPERMAKING:

This flexible group covers boxboard production including pulping and the wet end process on the paper machine including felt wash. The facility has three hydro pulpers; two pulp mixed papers and the third one pulps white paper only to reduce the amount of coating that needs to be applied to the top side of the boxboard paper. At the time of the inspection, the paper machine was operating and producing 12 point paper. Staff reviewed material and pulping, wet end and felt wash chemical usage records and emission records based on National Council of Air and Stream Improvement (NCASI) derived emission factors for the previous twelve months. The currently used felt wash chemicals do not contain any VOCs which demonstrates compliance with Condition I.2. The 12-month rolling time period for pulping and wet end portion of FG-PAPERMAKING for July 2017 was 19.89 tons which is about 66% of the allowable limit in Condition I.1. The maximum allowed paper production rate allowed is 219,000 tons/year on a 12-month rolling time period basis and the reported value for July 2017 is about 72% of the allowable limit. Stack vent dimensions for FG-PAPERMAKING were not evaluated during this inspection.

FG-FACILITY:

This flexible group covers all process equipment at facility source-wide including equipment covered by other permits, grandfathered and exempt equipment. FG-FACILITY limits individual and combined Hazardous Air Pollutants (HAPs) to less than 9.0 tons/year for individual HAP and less than 22.5 tons/year for aggregate HAPs on a 12-month rolling time period respectively. For July 2017, the reported individual and combined HAPs was 2.3 tons (25.5% of allowable) and 10.68 tons (47% of allowable), respectively.

Staff thanked Mr. Crockett for his time and left the facility at 11:40 am.

At the time of the inspection and based on a review of required records provided following the inspection, the facility appears to be in compliance with the terms and conditions of MI-ROP-B4072-2014a and all applicable state and federal air regulations. -RIL

NAME RIL DATE 8/31/17 SUPERVISOR MAS/2017