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

M354972275		
FACILITY: CONTINENTAL IDENTIFICATION PRODUCTS		SRN / ID: M3549
LOCATION: 140 E AVERILL ST, SPARTA		DISTRICT: Grand Rapids
CITY: SPARTA		COUNTY: KENT
CONTACT: Rob Bachholzky, Chemist		ACTIVITY DATE: 05/14/2024
STAFF: Laura Martin	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled, unanno	bunced on-site inspection.	
RESOLVED COMPLAINTS:		

On May 14, 2024, AQD Staff Laura Martin (LM) conducted an unannounced, scheduled inspection of Continental Identification Products located at 140 E. Averill St., Sparta, Michigan. The purpose of this inspection was to determine compliance with Permit to Install (PTI) Number 143-14 and all other applicable Air Quality Rules and Regulations.

Weather conditions were cloudy and 60 DegF with winds 10 mph out of the east/ northeast per data collected from <u>www.weatherunderground.com</u>.

LM arrived on site at approximately 10:15 am and surveyed the perimeter of the facility for odors and opacity prior to entry. None were observed. LM met with Rob Bachholzky (RB), Quality Manager. RB and LM discussed the intent of the inspection and explained the inspection process prior to reviewing opt-out PTI No. 143-14 and a facility walk-through. During the facility walk through we started in the laminating/cutting area and moved past the dome room, into the printing room, then the screen room and finally to the ink storage room. LM left the facility at approximately 11:25 am.

Facility Description:

Continental Identification Products (CIP) is a screen-printing company that has 3 screen printing lines, a UV curing process, and one general printer that does both UV cured and solvent based printing. CIP primarily prints advertising and marketing materials. The facility also has a screen room where the silk screens are assembled and cleaned for reuse. The wastewater from the cleaning process is collected and shipped out for treatment by a third party. An additional room, the dome room, houses a different kind of printing, which utilizes polyurethane and heat. CIP has approximately 50-60 employees and operates three (3) shifts, five (5) days per week.

CIP shares a building with General Formulations, a sister company. A stationary source determination was conducted using Operational Memorandum 11 in 2011, and it was determined that General Formulations and CIP are separate stationary

sources (please reference e-mails located in the General Formulations plant file for further information on the stationary source determination).

Regulatory Overview:

Currently CIP has one (1) Opt-Out PTI No. 143-14. CIP is an opt-out source for Volatile Organic Compounds (VOCs) and a minor source for Hazardous Air Pollutants (HAPs). CIP had a potential to emit (PTE) of VOCs above the major source threshold, thus requiring CIP to obtain the Opt-Out Permit. Since CIP now maintains the Opt-Out permit, all source-wide emissions are included in the FG-FACILITY emission calculations.

Per Mr. Bachholzky, the only change the facility has implemented since the previous inspection is shifting to using primarily UV cured inks. There was a concern during the previous inspection about some of the inks containing lead and chromate, but Mr. Bachholzky stated that these inks have been removed from use. CIP does not have any boilers, generators, or parts cleaners.

Compliance Evaluation:

Most of the processes were in operation at the time of the inspection including those in the dome room, the screen room, and all but one of screen-printing lines were in operation at the time of the inspection.

Equipment Description:

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The screen-printing operations are exempt from Rule 201 Permitting under Rule 287 (e).

Most of the screening machines utilize UV curable screen inks only; however, CIP does still use some solvent based screen inks. Containers noted during the inspection did have lids in place to reduce fugitive emissions.

The dome room, as stated above, uses polyurethane to make pieces of the printed material. Isopropyl alcohol is used as a cleaning agent in that room. Some assembly also occurs in this room. This room operates under permit exemption Rule 290(2)(a) (ii) which limits uncontrolled emissions of air contaminants to 1,000 lbs./month. The highest emissions from the Dome room were in June 2023 at 796.49 pounds. Based

on the record keeping data provided, CIP is operating in compliance with this exemption.

The screen room also operates under permit exemption Rule 290(2)(a)(ii). In this room the screens are cleaned for re-use and utilize a variety of cleaning products. Adhesive is also used in the screen room for adherence of the screens to the screen casing. The highest uncontrolled emissions of air contaminants in this room were also in June 2023 at 796.49 pounds which is less than the exemption limit of 1,000 lbs./month. This exemption also limits uncontrolled toxic air contaminants with an initial risk screening level (IRSL) of greater than or equal to 0.04 micrograms/cubic meter to 20 lbs./month. CIP uses one product in this room that contains a toxic air contaminant which they are adequately tracking. The highest emissions from this product were in November 2023, at 0.034 pounds. Based on the record keeping data provided, CIP is operating in compliance with this exemption.

FG-FACILITY:

This flexible group encompasses all processes located in the building (including grandfathered, permitted, and exempt equipment). There are no other permitted emission units. CIP is required to comply with several source wide conditions including less than 90 tons per year (tpy) of VOC emissions, less than 9 tpy of individual HAP emissions and less than 22.5 tpy of aggregate HAP emissions. Records were readily available on site and were requested electronically for the time period of March 2023 through March 2024. The monthly and the 12-month rolling averages are being adequately tracked. The reported emissions are consistent with the most recent SLEIS data submission for 2023.

VOC emissions as of March 2024 were 5.716 tpy based on a 12-month rolling time period. The highest monthly VOC emissions were 1.0349 tons in March 2023. The highest individual HAP emissions as of March 2024 was carbitol acetate at 0.28 tpy based on a 12-month rolling time period. Aggregate HAP emissions as of March 2024 were 0.317 tpy based on a 12-month rolling time period and the highest 12-month rolling time period HAP emissions were 0.525 tpy in April 2023.

CIP has a VOC content limit of 6.5 lbs/gallon and a material limit of 25,100 gallons of VOC/HAP containing ink based on a 12-month rolling time period. As of March 2024, none of the inks used contained more than 6.5 lbs/gal of VOCs. A total of 6,431 gallons of ink were used based on a 12-month rolling time period and the monthly average usage was 536 gallons of ink per month.

Manufacturer Formulation Data from the top twenty (20) inks used were requested and reviewed. All emissions are being accounted for in FG-FACILITY.

Compliance Determination:

Based on the observations made at the time of the inspection and the subsequent records review, Continental Identification Products appears to be in compliance with PTI No. 143-14 and all other applicable Air Quality Rules and Regulations.

NAME Rangellati DATE 1/18/24 SUPERVISOR