

7 October 2016

Matt Deskins, Environmental Quality Analyst
MDEQ – Kalamazoo District Air Quality Division
7953 Adobe Road
Kalamazoo, MI 49009-5025



RE: Walsworth Publishing Company – Violation Notice Response
Permit Number 232-97F

Dear Mr. Deskins:

This letter is in response to your violation notice dated September 20, 2016 regarding special condition IV.6 which requires a temperature monitoring device in the combustion zone of the EUM-2000 ECOCOOL system. We believe we are and have been in compliance with special condition IV.6 as the temperature in the combustion zone is continuously monitored by the computer system. While you were on site for stack testing activities September 20, 2016 we observed this temperature monitoring device which provides a real-time reading for the upper and lower burner units. At that time, however, it was discovered the temperatures have not been recorded since the press was installed in June 2015.

Walsworth has been in contact with the press manufacturer regarding data recording systems to automatically store the burner temperatures so they may be observed historically. Though we are unable to provide historical burner temperatures, these temperatures were recorded at 15 minute intervals during stack testing and maintained at approximately 770°C, give or take 2°C. This coincides with the ECOCOOL Spec book which states on page 5 "To comply with specified standards for emission of hazardous substances, the solvent-containing air is burnt in the burner unit at a temperature of approximately 770-820°C (1418-1508°F)."

One potential issue we foresee with a continuous recording device is this will not identify when the press is shut down (resulting in low burner temperatures). Therefore, if these records are viewed at a later date it may appear temperatures were out of compliance when the press was, in fact, not running. The potential recording systems are also quite costly.

We would like to discuss the possibility of modifying the permit to remove or amend special condition VI.5 which requires temperature data recording for the EUM-2000. The temperature monitoring system is an integral part of EUM-2000 and the press cannot run without it. Page 19 of the ECOCOOL Spec book discusses Stack Test Emissions Performance and states if the burner chamber temperature drops below 700°C (1292°F) the burner will shut down and the machine

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will stop. There is no way to override or bypass this setting. We have included the ECOCOOL Spec book for your reference.

We hope you will consider our request to revisit the permit terms, taking into consideration the extremely low emissions observed during stack testing and the press specifications. If the terms of special condition VI.5 are non-negotiable, we will continue our research to find a data recording system that will meet our needs and attempt to have it installed and operational by mid November 2016.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee Myers". The signature is fluid and cursive, with a long horizontal stroke at the end.

Lee Myers, Fulfillment & Logistics Manager
Walsworth Publishing Company

LM:jc