

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

N190833084

FACILITY: GRANDVILLE PRINTING CO		SRN / ID: N1908
LOCATION: 4719 IVANREST AVE, GRANDVILLE		DISTRICT: Grand Rapids
CITY: GRANDVILLE		COUNTY: KENT
CONTACT: Don Carra , Safety and Training Coordinator		ACTIVITY DATE: 01/07/2016
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, self-initiated inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, self-initiated inspection and met with Don Carra, Safety and Training Coordinator and Rick Durham, VP of Operations. They were presented the DEQ Environmental Inspections: Rights and Responsibilities brochure and its contents were discussed.

FACILITY DESCRIPTION/REGULATORY OVERVIEW/COMPLIANCE EVALUATION

Grandville Printing conducts printing of various media utilizing web, sheetfed and digital operations and currently operates three shifts with around 300 employees. This facility currently works with Jill Koebbe of the Air & Water Compliance Group, LLC an environmental consulting firm who does the recordkeeping for air quality regulations.

At the onset of the inspection, Mr. Carra and I waited for Mr. Durham to join us, so he began retrieving and printing copies of Safety Data Sheets (SDS's) in order for me to check the calculations with the current VOC and toxic air contaminant contents. I informed Mr. Carra that my expectation was to receive the recordkeeping from Ms. Koebbe. In the future, all recordkeeping should be up-to-date and available at the facility at the time of the inspection. Generally, John Gorter, the Plant Manager would be a contact during inspections, however he was off on leave for the day. See attached for various SDS's.

The facility utilizes several washes, and many different types of inks. Based on the initial discussions, the recordkeeping was not likely up-to-date with current SDS information. This initial consideration turned out to be true, and Ms. Koebbe asked for additional time to provide the AQD with records, as the ones originally provided were not accurate. For example the facility had changed wash materials to one that contains a HAP (cumene) and it was not included in the records. Additionally, there are many individual components to the materials used on-site that are not being tracked based on CAS number as required by the Rule 290 exemption.

The facility currently operates solely on the Rule 290 exemption with 23 emission units. Prior to 2011, the facility operated pursuant to Rule 208a, with emissions less than 50% of the major source thresholds. The previous AQD inspector had written by hand on the 2011 Rule 208a submittal "Denied. Not eligible. PTE <100 tons". There was no information in the file in the form of a Potential to Emit (PTE) demonstration to verify how this conclusion was reached. In a phone conversation with Ms. Koebbe, she stated that the prior AQD inspector and his supervisor approved the following scenario as a legally enforceable limit to the PTE. Due to the facility having installed a Regenerative Thermal Oxidizer (RTO) that included an interlock component that would not allow the web presses to operate unless the RTO was on, she stated it was a legally enforceable method to restrict the PTE. This basis is incorrect.

The AQD and furthermore the Environmental Protection Agency does not allow the installation of an interlock to count as a legally enforceable restriction. In fact, the only way a control system can be used to limit PTE would be to have a permit to install that requires it. During the inspection, I learned that the facility has two RTO's and when the new one is down for maintenance or repairs, they hook up to the old unit. The old unit has not been tested in any recent years, and if the interlock were legally enforceable, they would not just be able to switch back and forth without specific requirements. The records do not reflect a different control efficiency during the switch either. Without a legally enforceable permit requiring the use of the RTO, it appears as though this facility would be a major source of VOC's. The company is working on a revised PTE document, as well as a permit application.

Following the receipt and review of the revised information from the company, which occurred on February 19th,

2016 this facility has a PTE of 105 tons of VOC from the printing operations. The breakdown is as follows: Digital Press Department 4 tons VOC, Web Department 78 tons VOC, Sheetfed Department 23 tons VOC. The facility has the PTE of VOC greater than the Title V threshold of 100 tons and therefore is a major source. The facility has been a major source of VOC since at least February of 2014 with the installation of the 13th web press. This is a violation of Rule 336.1210.

The company provided upon request the most recent inspection report of the RTO as provided by Megtec, the manufacturer of the unit. The date of the report was 9/18/2015. The report (attached) details the items inspected and suggested repairs. It was identified that there is a crack in exhaust stack structure and ongoing insulation issues on the ceiling. Mr. Carra indicated that they have been working with Megtec continuously on these, and was told it is a design flaw. The Megtec technician indicates that they will follow-up on a semi-annual basis to ensure there are no further issues. This should take place sometime in March, and AQD hereby requests to be present at this inspection. Also, the facility reported in an e-mail that the doors were completely regasketed.

The current records also list that the web presses utilize 1,000 lbs/month for the uncontrolled wash use and an additional 500 lbs/month for the controlled emissions of the RTO. This use of Rule 290 is incorrect. AQD does not allow for the "double counting" of Rule 290 and it is documented as far back as 2004. This is historically how the company has been allowed to calculate records. Additionally, the records do not include a breakdown of toxic air contaminant emissions as required by Rule 290, and these incorrect records have been included in past AQD reports as attachments. This method of recordkeeping is non-compliant, however it appears as though actual ink and cleaning emissions combined would be less than 500 pounds per month. Therefore, a violation citation is not advised. However, as noted above, the constituents are not being individually tracked based on CAS #, and is therefore in violation.

At the onset of the inspection, I informed Mr. Carra and Mr. Durham that I was concerned about the fact that the facility did not have a permit that restricted the facility emissions below major source thresholds. They both are not very familiar with AQD regulations, and this was discussed on very broad terms. I suggested that they obtain an Opt-out or "umbrella" permit for the entire facility.

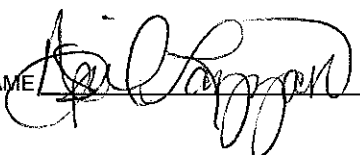
During the physical inspection of the facility all departments were observed in some form of operation or another. The Web Press area has a large elevated tote with a "tap" where the ABC Wash can be accessed by all employees at any time. I recommended that the facility limit access or limit volume of solvent that can be taken as a cost savings measure. There were also open buckets of solvent below the tote. The facility recognized that this was not acceptable practice. Employees use the solvent with rags to wipe down equipment as necessary, and the used rags are placed in a covered garbage can.

Following a recordkeeping request, Ms. Koebbe asked for additional time to correct the current records, and to add in the information that is missing due to not being updated. In the same correspondence, she indicated that the facility plans to submit an application for a Permit to Install, with Opt-out conditions to legally limit the facility PTE of VOC to <100 tons. At the time of this report, the application has not yet been received.

A historical file review indicates that only 4 of the 13 existing heatset web presses were ever permitted. All facility permits were voided in 2000. There is no information on installation dates of any additional equipment at the facility, except for the dates listed in the MAERS database, which are as follows for unpermitted installation dates: 1995, 1996, 1997, 1998, 2010, 2010, 2010, 2010, 2014. Due to a lack of file information, there is no indication as to whether or not the facility conducted an evaluation of each new press as part of a larger project, also known as the "Rule 278 Test". This test is necessary to determine if a part or an entire project is exempt from having to obtain a Permit to Install. The AQD will request that the company provide a historical evaluation of equipment installation. Once that information is received it will be evaluated. This information was received and evaluated. It appears as though the equipment permitted under PTI 468-88 was replaced and not re-permitted. Additionally, equipment was installed in anticipation of Rule 290 promulgation. Due to the age of these issues, they are not being cited as violations.

CONCLUSION

Grandville Printing is in violation of Rule 201 and Rule 210. A Violation Notice will be issued.

NAME 

DATE 7-22-16

SUPERVISOR 