

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N190841073

FACILITY: GRANDVILLE PRINTING CO		SRN / ID: N1908
LOCATION: 4719 IVANREST AVE, GRANDVILLE		DISTRICT: Grand Rapids
CITY: GRANDVILLE		COUNTY: KENT
CONTACT: John Gorter , Plant Manager		ACTIVITY DATE: 08/01/2017
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with John Gorter, Plant Manager and Don Carra, Safety and Training Coordinator.

FACILITY DESCRIPTION

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 assists with the recordkeeping for air quality regulations. The facility operates pursuant to Opt-out Permit to Install No. 38-16. The permit provides Opt-out limits to Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP).

The facility utilizes a blanket wash and a roller wash, and ink on the various presses to generate the printed product.

The facility currently operates 23 emission units and 13 of these are included in FG-Heatset portion of the Opt-out permit. Emissions from the 13 heatset webfed offset lithographic printing presses are controlled by one of two regenerative thermal oxidizers (RTO). There is also a FG-Facility that contains facility-wide limits on potential to emit (PTE) of the VOC and HAP.

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. This area has been cleaned up and storage of solvent laden rags here has been eliminated. Employees use the solvent with rags to wipe down equipment as necessary, and the used rags are placed in a covered can. This was observed at each press.

COMPLIANCE EVALUATION

FG-Heatset

The thirteen heatset webfed offset lithographic printing presses are limited to 50.0 tons per 12-month rolling time period as determined at the end of each month. Reported VOC emissions for the thirteen presses for the time period of July 2016 through June 2017 are 1.54 tons. The permit also limits emissions from kerosene to 20.8 tons per 12-month rolling time period as determined at the end of each month. Reported kerosene emissions for the time period of July 2016 through June 2017 are 1.02 tons. The permit has errors where it references the CAS No. for the kerosene on page 11. The correct CAS number as listed in the emission limit table is CAS No. 64742-81-0.

During the inspection, it was confirmed that there has been no changes in the blanket wash or roller cleaner since the time of permitting.

The Malfunction Abatement Plan was received within the timeframe the permit required and is considered acceptable at this time.

During the inspection, we met with Ken from Maintenance who showed me in detail the location of the dwyer gauges that are on each oven and how they are used to monitor the differential pressure. These are set to shut down the entire line if the pressure goes positive. A close up inspection of the ovens and gauges was conducted, and no solvent odor of note was identified. Once a year, Megtec comes out and verifies that the interlock on the ovens is functioning, and the pressure drop gauges are operational.

During the last inspection, all equipment was fully operational and no replacements were needed. The last inspection was conducted in August 2016 and required annually.

During the annual inspection of the primary RTO (RTO #1= Megtec unit), RTO #2 (Airex unit) is utilized. At that time, only 8 web presses can be in operation. This was verified by the web schedule records which were observed. The company is going to make a new version of this tracking because this information needs to be in a format that can be made part of the public record. The schedule in the current format is confidential business information. At the time of the inspection, the RTO #1 was in operation and the temperature was 1,653°F, which is above the required temperature of 1,525°F. Temperature charts are attached for the first week of June 2017.

The facility was keeping track of emissions on two different spreadsheets. One was in the old format using Rule 290 and one was with the web presses in the permitted format. The consultant was under the impression that the company did not have to change recordkeeping formats officially until there was 12-months of data. I informed her that this is incorrect, and the expectation is to update the records immediately following receiving a permit. Fortunately, the updated records were available for review.

Grandville Printing Company is required per the PTI to determine VOC content of any ink or coating using federal Reference Test Method 24 or 24A, unless prior approval to use manufacturer's formulation data has been received. The company had not requested to utilize formulation data at the time of the inspection. AQD staff allowed them the opportunity to submit a letter requesting approval. The original letter only included a request to use formulation data for VOC's and did not include HAP as required in FG-Facility and discussed below. The second request asked permission to utilize Safety Data Sheets until Formulation Data is obtained. AQD district staff cannot approve something that is contrary to the permitted requirements. Therefore, the request will be approved in part and denied in part.

FG-Facility

Grandville Printing also operates an internally vented 23,000 CFM Donaldson/Torit baghouse for paper scraps. At some of the presses, the edges are cut off and routed to one of two cyclones for baling. There is some dust generation associated with this and the air leaves the cyclones and goes into the baghouse. The baghouse provides building recirculation air 100% of the time. This baghouse appears exempt per Rule 290(2)(a)(3) based on the size and the fact that the air contaminant is paper.

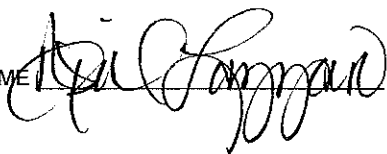
The facility wide emissions are limited for individual HAP to less than 9.0 tons per 12-month rolling time period. The facility wide aggregate HAP emissions are limited to less than 22.5 tons per 12-month rolling time period. The highest reported individual HAP emitted is cumene at 0.12 tons. Aggregate HAP emissions are 0.14 tons.

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CONCLUSION

Grandville Printing Company was in compliance at the time of the inspection.

NAME



DATE

8-30-17

SUPERVISOR

