

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

U6111020047731

FACILITY: DOBB Printing, Inc.		SRN / ID: N2193
LOCATION: 2431 South Harvey Street, MUSKEGON		DISTRICT: Grand Rapids
CITY: MUSKEGON		COUNTY: MUSKEGON
CONTACT: Kristi Monette, Inside Sales		ACTIVITY DATE: 02/05/2019
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY'19 on-site inspection to determine the facility's compliance status with applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

AQD staff, Chris Robinson (CR), conducted an on-site scheduled unannounced inspection of Dobb Printing (Dobb) located at 2431 South Harvey Street, in Muskegon, Michigan on February 5, 2019. CR met with Ms. Kristi Monette, Inside Sales, providing AQD identification and announcing intent to conduct an inspection of the facility in order to determine current compliance status with respect to any applicable air quality rules and regulations. Ms. Monette provided pertinent information and a tour of the facility.

Weather conditions were cloudy approximately 26°F with northerly winds at approximately 12mph with no precipitation (www.weatherunderground.com). CR surveyed the perimeter of the facility, upon arrival, for odors and visible emissions, none were observed.

FACILITY DESCRIPTION

Dobb is a printing facility that prints such things as calendars, catalogs, brochures, menus, reports, and post cards. Operating schedule is two shifts normally five (5) days per week, increasing to six (6) or seven (7) days during busy times.

COMPLIANCE EVALUATION

Dobb operates four (4) Heidelberg sheet fed offset lithographic printing presses. Emissions are exhausted vertically through individual stacks to ambient air. The facility has opted to exempt these presses from Rule 201 permitting requirements per exemptions, Rule 290(2)(i) and Rule 290(2)(ii)(B). Records are included in **Attachment A**.

- One (1) Heidelberg 72VP 4-color press
- One (1) Heidelberg 102VP 4-color press
- One (1) Heidelberg 102F+L 5-color press
- One (1) Heidelberg CD102-6+LX 6-color press with filters for recovering offset powder used to prevent individual sheets from sticking together.

Dobb also operates two small Chief presses (Chief No. 15 & 17) and a Kompac Kwik Finish 32 Coater used for applying a finish/coating to products. The chief presses were manufactured sometime prior to 1967. Equipment installed, and not manufactured, prior to August 15, 1967 is considered to be "grand-fathered" and not subject to Rule 201 permitting requirements. However, based on correspondence with Ms. Monette by email on 2/13/2019 (**Attachment B**) and by phone on 2/13/2019, both presses (15 & 17) were installed at this facility after 1967, therefor subject to Rule 201 permitting requirements.

Dobb calculates monthly emissions based on purchase orders and the maximum hours a press may operate per shift. Based on records provided for August 2018 through January 2019, the maximum calculated VOC's were 929.46 pounds during the month of September 2018 for Press 10, which is less than the 1,000 lb/month limit allowed in Rule 290(2)(i). Carcinogenic VOC emissions are also being calculated. Records indicate that the highest calculated carcinogenic VOC was 4.41 pounds for press 10 during September 2018, which is less than the limit allowed by Rule 290(2)(ii)(B) of 10 pounds per month.

The facility's records don't specifically call out emissions from the two (2) Chief presses and the Kompac Kwik Finish 32 Coater, only the four (4) Heidelberg presses. CR contacted Ms. Monette on 2/13/2019 who confirmed that emissions are based on purchase records and the materials purchased are used in all of the presses. Since VOC's are calculated for all materials purchased for the month, Dobb is inadvertently tracking emissions for this equipment. CR discussed this with Ms. Monette and Dobb will be contacting their environmental consultant to add this equipment to their 290 records. Based on Dobb's methodology for calculating emissions per press, the monthly per press emissions are expected to decrease with the addition of the missing equipment, however overall total source emissions should remain the same.

Safety Data sheets (**Attachment C**) were provided for all used blanket and fountain solutions, the yellow ink and one of the coatings used in the coaters discussed above. Review of these records indicated that not all toxic and/or carcinogenic material is accounted for in Dobbs records. However, CR estimated emission based on the safety Data sheets and Dobbs methodology for calculating Toxic material and emission are not expected to increase above the 10 lb/month limit specified in 290(2)(ii)(B). CR discussed this with Ms. Monette which she will also discuss with their environmental consultant who will review all SDS's and update the records as necessary.

Other Rule 201 exempt equipment/processes consist of:

- Cold cleaner, non-heated & non-agitated with an air/vapor interface of less than 10 square feet. Exempt per Rule 281(2)(h).
- Konica Minolta LD-6500 digital printer that uses toner cartridges and infrared light. Emissions are vented to the in-plant environment. Exempt per Rule 285(2)(l)(vii)(B).
- Direct to Plate Machine used to laser cut images onto steel plates for the presses. Exempt per Rule 285(2)(l)(vi)(B).
- Bindery Room consisting of folding, cutting, stitching, trimming, scoring/perforating, drilling, shrink wrapping and paper binding (gluing) operations. Gluing is done by hand and is minimal, per Ms. Monette, well under two (2) gallons per day (approximately 2-gallons per year actual use) with emissions vented to the in-plant environment. Therefore, exempt per Rule 287(2)(a).

All presses are manual wash. All blanket, roller washes and used shop towels are stored in closed containers and eventually sent to a laundry facility for cleaning.

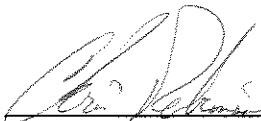
COMPLIANCE DETERMINATION

Based on observations, discussions and a records review, Dobb Printing appears to be in compliance with applicable air quality rules and regulations.

Attachments

- A - Emission Calculations
- B - Correspondence
- C - Safety Data Sheets

NAME



DATE

2/19/2019

SUPERVISOR

