

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

N282974372

<b>FACILITY:</b> Sheridan Publishing Grand Rapids		<b>SRN / ID:</b> N2829
<b>LOCATION:</b> 5100 33RD STREET SE, GRAND RAPIDS		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> GRAND RAPIDS		<b>COUNTY:</b> KENT
<b>CONTACT:</b> Jason Nelson , Manufacturing Manager		<b>ACTIVITY DATE:</b> 10/15/2024
<b>STAFF:</b> April Lazzaro	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Unannounced, scheduled inspection.		
<b>RESOLVED COMPLAINTS:</b>		

Air Quality Division staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Jason Nelson, Manufacturing Manager. Upon arrival at the facility, no odors or visible emissions were observed.

### **FACILITY DESCRIPTION**

Sheridan Publishing prints books and magazines using sheet fed and webfed printing presses. Currently at the facility there are three printing presses. EU-T11, is an uncontrolled ultraviolet web press, EU-T54 and EU-T47 are both Timson heatset webfed offset lithographic printing presses that are controlled by a regenerative thermal oxidizer (RTO). EU-T9 has been removed from the facility.

The facility operates pursuant to Permit to Install No. 114-13A, which includes volatile organic compound (VOC) limits on the presses, as well as limits on individual and aggregate hazardous air pollutants (HAPs).

A new hot melt adhesive binding line has been installed since the last inspection in the space formerly occupied by EU-T9.

### **COMPLIANCE EVALUATION**

#### **FG-OffsetLitho**

##### **Emission Limits**

This flexible group contains all emission units at the facility and contains a VOC limit of 27.3 tons per 12-month rolling time period. During the opening conference, Mr. Nelson stated that Sheridan Publishing does not have any emissions data for 2024. Compliance with the limit cannot be determined at this time.

##### **Material Limits**

The permit limits VOC content of Fountain Solutions to  $\leq 5.0\%$  and limits VOC content of cleaning solvents (blanket and roller washes) to a VOC composite vapor pressure of less than 10 mm Hg at ambient temperature. While there are no records to indicate what is being used, a copy of the safety data sheet (SDS) or environmental data sheet (EDS) was requested and received for all fountain solutions and cleaning solvents currently in use at the facility. This information was provided, and a review found that all materials reviewed are compliant with the limitations in the permit.

#### **Process/Operational Restrictions / Design/Equipment Parameters / Testing/Sampling**

During the facility inspection, we observed material handling and shop towel collection areas. We discussed how lids or covers need to be maintained over open containers of ink or waste ink.

The current malfunction abatement plan was discussed, and we also met with Jason Smith, Maintenance Manager who accompanied us on the visual inspection of the RTO and temperature records. No obvious issues were noted during the visual and olfactory inspection of the unit. We observed the RTO bed change time which seemed to be four minutes and thirty seconds. This seemed long, however the facility stated that they have made no changes to that time since the compliant stack test was conducted. Temperature records were reviewed for 2024 in the maintenance office. The temperature of the RTO at the time of the inspection was 1,615°F. All temperatures observed were above the 1,500°F limit, and the temperatures were steady and uniform. They contracted with a new RTO inspection company recently. No issues were noted during recent inspections and no repairs were recommended. A copy of the inspections was provided and reviewed, and AQD confirmed that the inspections did not identify any concerns with the functionality of the RTO.

No odors of solvent were noted inside the general plant environment, and a visual inspection of the printing presses and the ductwork from the ovens to the RTO did not identify any issues. Stack testing was conducted in 2021 on the RTO and results indicated the destruction efficiency was 99.4%, which is above the requirement of 95%. Approval to use manufacturer's formulation data to determine VOC content of materials was given in 2014.

#### **Monitoring/Recordkeeping**

As previously noted, the facility is not maintaining any records of emissions for the facility. This is a violation of PTI No. 114-13A, FG-OffSetLitho Special Condition No's VI.1, VI.2, VI.3 and VI.5. A Violation Notice will be issued. A request for copies of the annual testing and certification records for the built-in interlock system were requested and provided timely. These records indicated that from 2021-2024 the tests were conducted annually and showed passing results.

#### **FGFACILITY**

This flexible group contains limits of 9.0 tons per individual HAP and 22.5 for aggregate HAPs based on a 12-month rolling time period. As noted above, the facility is not maintaining any records of emissions for the facility. Compliance with the HAP emission limit cannot be determined at this time. The permit also contains recordkeeping provisions for the HAP emissions. Failure to maintain records is a violation of PTI No. 114-13A, FGFACILITY, Special Condition No's VI.1 and VI.2. A Violation Notice will be issued.

Additional exempt equipment at the facility includes two hot melt adhesive binding lines exempt pursuant to Rule 287(2)(i).

The facility also operates two scrap paper systems to collect paper cuttings from the presses as well as from the binding process. One runs periodically and the other runs 24/7. A newer cartridge style fabric filter system was installed, but quickly mothballed due to plugging. A cyclone sits on the roof and all air is redirected into the general plant environment. On the system that operates 24/7, a hanging bag

filtration system is in use to filter the air. The paper collection processes are exempt pursuant to Rule 285(2)(l)(vi). The cyclone was visually observed to be in good condition, there was no visible accumulation of paper scraps outside the facility.

## SUMMARY

Sheridan Publishing Grand Rapids, Inc. was in non-compliance at the time of the inspection.

NAME April Lazzaro

DATE 11/07/2024

SUPERVISOR HH