

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

N329324645

FACILITY: APC-Jackson, LLC		SRN / ID: N3293
LOCATION: 2400 E HIGH ST, JACKSON		DISTRICT: Jackson
CITY: JACKSON		COUNTY: JACKSON
CONTACT: Debra S. Doyle , Human Resource Manager		ACTIVITY DATE: 03/25/2014
STAFF: Sersena White	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM 208A SYN MINOR CP
SUBJECT: Unannounced targeted inspection conducted. One permit for multiclone on cardboard box production lines. Water based inks used for coating/labeling. Follow-up regarding required recordkeeping required by permit and applicable exemptions. Follow up was received on April 17, 2014.		
RESOLVED COMPLAINTS:		

SMW 5/19/14
OUT P.M.

SRN: N3293

Company Name: Action Packaging

Address: 2400 E. High Street, Jackson, MI 49203

Initial Company Contact: Debra S. Doyle, Human Resource Manager

Initial Company Contact E-mail address: doyled@actionpackaging.com

Initial Company Contact Phone Number(s) Debra Doyle: Work 616 871-5220 Mobile 517 899-3699

Future Company Contact: Brian Rush, EHS Manager (hired 3 weeks ago May 14, 2014)

Future Company Contact E-mail address: brush@actionpackaing.com

Future Company Contact Phone Number Brian Rush: Mobile 517 420-2542

Purpose of the Inspection is determine compliance with Federal and State Air Quality regulations, namely Permit to Install 1235-91B issued on September 22, 2006 to Advance Packaging Corporation

Personal protection equipment: Safety glasses with side shields, Hearing protection when the lines are operating.

I arrived at approximately 1:04 p.m. and I introduced myself to the receptionist and told her my purpose in being there. She told me that she would contact the person I needed to talk to and let them know that I was here. At approximately 1:09 p.m. Debra Doyle introduced herself and we went into a conference room to discuss the purpose of my visit. I gave her a copy of the permit to install, the last inspection report, the inspection brochure and pointed out the link on the back for the survey. I told her that I would send the link to the Exemption Booklet.

Action Packaging purchased Advance Packaging in October of 2013. The business of making corrugated boxes and inserts is still the primary products made at this location. The one part of the business that changed was the computer software Advanced Packaging used to track all of the business activity. As a result, Action Packaging has to develop methods and tools to regain all the record keeping that was owned by Advance Packaging. This record keeping includes all aspects of operations and tracking for a business including environmental requirements.

At approximately 1:47 pm. Debra and I walked to Mr. Mark Kazensky's office to discuss the status of the visible emissions recordings and to discuss whether a permit was still required for the cyclone. Mark is the Maintenance Supervisor and he had recently attended a Permit to Install workshop. He said that he asked the presenter whether they needed a permit since they do not have any emissions and therefore should be able to operate under exemptions. I showed them Rule 285(l)(vi)(C) from the Permit to Install Exemption Handbook and said that it might fit.

Rule 285(l)(vi)(C) – The following equipment and any exhaust system or collector exclusively serving the equipment: Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planning, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper stock, wood, or wood products which meets any of the following: Equipment has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that, for all specified operations with metal, is preceded by a mechanical collector.

I told them that I would check into the possibility of voiding the permit and using an exemption after I returned to the office. We left Mark's office at approximately 2:00 pm. and walked back to the cyclone area. He has installed hour meters for scrap picked up on each of the four lines. He said that the cyclone has been wired so that the lines will not operate without the cyclone running. All of the lines were not operating at the time of inspection due to a scheduled break. Debra said that Advance Packaging made the inks they used, and maybe that was why Rule 290 was required. Mark said that all of their inks are water soluble and air dry rapidly without heat. The inks come in 45 pound pails and are manufactured by CRI or American Ink.

Each of the four lines has its own pick up point for cardboard scrap going to the cyclone and a shoot drawing in outdoor air to reduce the negative pressure in the plant.

At approximately 2:18 p.m. Mark returns to his office and Debra and I return to the conference room to discuss the results of the inspection and determine follow up requirements. I left at approximately 2:25 p.m. I took a few photos of the cyclone while it was operating since the break was over by the time I left. They do not show any visible emissions.

After returning to the office, I e-mailed Debra a copy of the prior inspection report and copies of the most recent records for the ink usage and visible emission readings that were on file from Advanced Packaging. I asked her to evaluate all of the existing operations as they relate to the exemptions to determine whether they are accurate or if the permit can be voided. I included a link to the Permit to Install Exemption Handbook which is an older version than the May 2012 version used during the inspection. I requested that she provide the requested information by April 8, 2014. If she is not able to meet this date, to please let me know.

On March 26, 2014, I e-mail Debra telling her that I had found information in the file that discussed the regulatory applicability of the operations there. I attached them to the e-mail. The permit can't be voided because the permitted particulate limits of 0.04 pounds per 1,000 pounds of exhaust gases and 9.0 pounds per hour provide a means to restrict the potential to emit to prevent major source classification for Title V. These limits can only be verified by stack testing, which has not been required to date.

Rule 290 was included in the recordkeeping and the only reason that I can think of as to why it was required in addition to the 200 gallon limit per month per line is that it restricts the VOC emission rate to less than 1,000 pounds per month. Debra said that Advanced Packaging had made the inks they used. I included in the e-mail a link to the instructions on Change in Ownership and Transfer of permit. I asked that she provide an explanation as to why the records had not been kept.

On March 27, 2014, Debra e-mailed me explaining that due to an ISO audit, April 18, 2014 would be a better date to reply by.

On April 17, 2014, I received an e-mail from Debra with an action plan to begin manually capturing the daily visible emission readings of the cyclone while the lines are operating; purchasing new software that will assist them in monitoring/capturing data; and hiring an Environmental, Health and Safety person to assist with permits/compliance. A copy of that e-mail is attached.

The permit for EU-SCRAPREMOSYSTEM has particulate limits that can only be verified by conducting a stack test. To date, this has not been required. As a surrogate, the operation has no visible emissions from the cyclone control device while the emission unit is operating. According to Debra's e-mail, they have started to take and record daily visible emission observations. The other requirement is to not operate the emission unit unless the cyclone is installed, maintained and operated in a satisfactory manner. The interlock system ensures that the lines will not operate without the cyclone in operation. Mark ensures that the cyclone and the capture system are working properly.

The previous inspection report dated June 14, 2010, addressed the individual lines as follows:

Langston Saturn III is the main processing equipment that takes corrugated paper through slotting and bending operations to make finished boxes. This also includes a printing operation with water based inks and gluing. It was originally permitted under 1236-91 which was voided on March 11, 1998 using the Rule 290 exemption. As no HAPS are in the formulations of inks or glues, the focus would be the limit of 1000 pounds per month of VOC emissions.

It is my recommendation that Rule 290 no longer applies since the amount of coatings (inks and glues) fall well below the Rule 287(a) and (c) daily and monthly limits, respectively, and it would simplify record keeping requirements. The gluing quantities have been confirmed to meet the Rule 287(a) by e-mail on May 19, 2014.

McKinley Flexo Printer Slotter is used for cutting and printing on corrugated board. The same evaluation was made as for the Langston utilizing Rule 287(c) and Rule 290. The same recommendation applies to this line for the same reason.

Saturn Mini Press is a smaller printing and box carton assembly operation with no gluing involved. The only exemption that still applies is Rule 287(c).

Ward Press is similar to the Saturn Mini and has the same applicable requirement of Rule 287(c).

Based upon the action plan submitted, Action Packaging is complying with the requirements of the permit and the applicable exemptions.

On May 14, 2014, I followed up with the company by e-mail, to get an explanation of the tubes/ducts attached to the cyclone. I was informed that Brian Rush is now the EHS Manager and he will be providing follow up information. We spoke on the phone today and he said that they have software on site to monitor and record opacity at the cyclone, although it has not been installed yet, they are conducting observations manually and recording them. I told him that the sensor would require calibration and maintenance to demonstrate accurate and reliable tracking.

They are developing recordkeeping tracking forms for the number of gallons of ink and glue used on the separate lines. He explained that sometimes a partial pail is used and that makes tracking difficult when this occurs. We agreed that VOC emission calculations were no longer required since they will be able to demonstrate compliance using Rule 287 rather than including Rule 290 which triggered the calculations. He said that he would provide records after the end of June 2014 to show compliance on a monthly basis. He provided Excel spreadsheets for the current method of the daily V.E. reading record keeping and the daily ink usage tracking on a monthly basis for each line. He said that a flow meter will be installed to track glue usage.

Attachments: E-mail correspondence and information about Action Packaging from the internet. The photos will be attached to the inspection report. The photos show four horizontal tubes that connect to a blower at the horizontal connection that forces the air from the lines into the cyclone. The blower motors and belts are inspected twice a year.



Image 1(Cylone Exhaust 1) : Taken after leaving the plant.



Image 2(Cyclone Photo 2) : This photo shows the ductwork feeding the cyclone. There is a screen covering the rectangle to prevent any large pieces from being exhausted.

NAME Sharon M. White

DATE 5-19-2014

SUPERVISOR [Signature]