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

N368756656

FACILITY: ServiScreen, Inc.		**SRN / ID:** N3687
LOCATION: 0-1765 Chicago Drive, JENISON		**DISTRICT:** Grand Rapids
CITY: JENISON		**COUNTY:** OTTAWA
CONTACT: Jamie Wynsma , Controller		**ACTIVITY DATE:** 01/11/2021
STAFF: Chris Robinson	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: FY'21 inspection to determine the facility's compliance status with applicable air quality rules and regulations including PTI no. 133-04.		
RESOLVED COMPLAINTS:		

An offsite inspection of ServiScreen was initiated on January 11, 2021. This inspection was conducted by AQD staff Chris Robinson (CR) and the contact for this facility was Mr. Jamie Wynsma, Controller. This inspection consisted of a records review which was requested on January 11, 2021, a phone conversation on January 26, 2021, and observations of the exterior of the facility conducted on February 9, 2021. Records were received on time and complete and no visible emissions or odors were observed during the offsite observations.

ServiScreen (SRN N3687) is located at 0-1765 Chicago Drive in Jenison (Ottawa County), Michigan. The purpose of this inspection was relayed to Mr. Wynsma during the initial records request which was to determine ServiScreen's compliance with respect to Permit to Install (PTI) 133-04 and any other applicable air quality rules and regulations.

Once records were reviewed a follow up call was conducted between Mr. Wynsma and CR. Mr. Wynsma indicated that there have been no equipment modifications or additions since the last inspection conducted, which was on February 16, 2017. Nor has there been any issues or major changes.

During the February 9, 2021 offsite observations of the facility weather conditions were light snow, approximately 14^{o}F with northerly winds at 6mph (www.weatherunderground.com). No visible emissions or odors were observed at any time.

FACILITY DESCRIPTION

ServiScreen is an industrial printing and finishing company that does a variety of different processes including screen printing, pad printing, laser marking, digital printing, piston coating, spray finishing, and i-cote. These processes are located throughout the three (3) buildings that comprise the facility. ServiScreen operates one (1) shift, typically five (5) days per week.

Regulatory Evaluation

ServiScreen is a Synthetic Minor Opt-out source for Hazardous Air Pollutants (HAP's) and currently holds one (1) permit, PTI No. 133-04 limiting HAP emissions to below Title V thresholds. The equipment at this facility is operated under Rule 201 permitting exemptions.

CR and Mr. Wynsma discussed applicability to 40 CFR 60 Subpart VVV for Polymeric coating of substrates. Sources are exempt from this subpart (60.740.d.2) if the process is for "Web coating operations that print an image on the surface of the substrate or any coating applied on the same printing line that applies the image". The facility believes this includes silk screening which is the only potential operation that uses a Polymeric coating. However, upon review of the Safety Data Sheet for the one potential coating used in this process, it does not appear to contain any elastomers, or natural or synthetic rubber used in Polymeric coatings. Therefore, it does not appear that the facility uses any coatings subject to this standard.

Compliance Evaluation

The source is comprised of three (3) buildings. The first building houses the pad printing, silkscreen printing, and laser marking printing operations. The second building houses some of the digital printing operations, CNC machines and spare equipment. Lastly, the third building houses spray finishing, and the i-core operations. The piston marking operations is part of the silk-screening operations.

A) Rule 201 Permitting Requirements

As has been noted in the past and reconfirmed with the facility during the phone conversation on January 26, 2021, the facility is claiming that the Pad printing operations are exempt from Rule 201 permitting requirements per Rule 285(2)(l(ix), silk screening (including piston coating) is exempt per Rule 287(2)(e), CNC machines are exempt per rule 285(2)(l)(vi)(B), laser marking is exempt per Rule 285(2)(l)(vi)(B), spray finishing operations are exempt per Rule 287(2)(c) and the use of acetone for cleaning is exempt per Rule 290.

Monthly i-coat emission and paint usages were provided. There are currently four (4) booths in the i-coat area, but the facility only calculates the total emissions for all 4 booths combined. CR discussed with Mr. Wynsma the importance of separating out the emissions per booth since Rule 290 applies to each emission unit. Based on these records the total maximum monthly emissions from December 2019 through November 2020 were 953.59 lbs. for the month of September, which is less than the 1,000 lb. per month per emission unit limit allowed by Rule 290. Since the maximum emissions were under 1,000 lbs. the facility appears to be meeting this limit. However, CR discussed with Mr. Wynsma that if this had been over 1,000 lbs. it would be impossible to determine compliance based on totals. Mr. Wynsma indicated that he would modify the records to show totals for each booth.

The spray finishing area has five (5) booths all equipped with filters which according to Mr. Wynsma are replaced as needed. No visible emissions or odors were observed on during the facility observations conducted on February 9, 2021. Paint usage records indicate that the facility is operating well under the 200 gallon per month limit allowed by Rule 287(2)(c). The maximum monthly amount used from December 2019 through November 2020 was 57.15 gallons in September 2020.

B) PTI No. 133-04

This PTI contains facility-wide emission limits keeping the facility from being a Title V source by limiting HAP emissions to below 9.0 tpy for each individual HAP and 22.5 tpy for any combination of HAPs (SC 1.1a & 1.1b). Calculations must include HAP contents that were determine by use of manufacturer's formulation data, or by EPA Test Method 311 if requested by the AQD (SC 1.2). At this time Method 311 is not being requested. Mr. Wynsma indicated that Manufacturer's formulation data and safety Data Sheets are being used. The Safety Data Sheets used only contain an exact percentage rather than a range. CR reviewed this requirement in the permit and has requested that the company switch to using only Manufacturer's Formulation Data, which Mr. Wynsma agreed to do. Emission and usage records were provided, as required in SC 1.4, for the time period of December 1, 2019 through November 31, 2020. The maximum total HAPS emitted was 0.71 tons for December 2019. The total emissions emitted is less than both the individual and combined limits which demonstrates compliance with both requirements. The maximum HAP emitted each month was xylene.

C) MAERS

This facility's 2020 submission, for 2019 emissions, was not selected for audit during FY'20. The facility's 2021 submission, for 2020 emissions, was not available, nor due, by the time this inspection was conducted. Therefore, in order to meet the requirements of an FCE CR conducted a cursory review of their 2019 data on January 13, 2021. The facility is using MAERS & Mass Balance equations to calculate emissions. Documentation supporting the mass balance calculations were not provided. CR discussed this requirement with Mr. Wynsma informing him that this information must be included if anything other than MAERS emission factors are being used. The 2019 emissions appear consistent with past submittals, accurate and complete. Source totals reported are summarized in the table below.

Pollutant	Amount (tons)
Ammonia	0.001
CO	0.08
NOx	0.26
PM	0.02
SO2	0.002
VOC	2.25
Acetone	4.35
Meth Eth KET	0.34

Conclusion

Based on the information provided by the facility, phone conversations, and offsite observations ServiScreen appears to be in compliance with applicable air quality rules and regulations including the requirements established in PTI No. 133-04.

NAME _____ DATE 2/9/2021 SUPERVISOR _____