

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

N404725019

FACILITY: MCNAUGHTON & GUNN		SRN / ID: N4047
LOCATION: 960 WOODLAND DR, SALINE		DISTRICT: Jackson
CITY: SALINE		COUNTY: WASHTENAW
CONTACT: Jeff Briegel , Print Operations Manager		ACTIVITY DATE: 04/23/2014
STAFF: Erik Gurshaw	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: 2014 Targeted Inspection		
RESOLVED COMPLAINTS:		

SRN: N4047

COMPANY: McNaughton & Gunn, Inc.

COMPANY ADDRESS: 960 Woodland Dr.; Saline, MI 49456

PURPOSE OF INSPECTION: Targeted

CONTACT PERSON: Mr. Jeff Briegel, Print Operations Manager (Ph: 734-429-8755; Fax: 800-877-2665; E-mail: jeffb@mcnaughton-gunn.com)

COMPANY PHONE NUMBER: 734-429-8755

INTRODUCTION

On April 23, 2014, AQD staff, Erik Gurshaw conducted an unannounced, targeted inspection at McNaughton & Gunn, Inc. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) Rules.

Upon arriving at the site, AQD staff introduced themselves and stated the purpose of the visit to Mr. Jeff Briegel, Print Operations Manager. Mr. Briegel indicated that McNaughton & Gunn employs approximately 150 people and operates 24 hours a day (3 eight hour shifts a day) Monday through Friday and on Saturday when necessary. Mr. Briegel assisted AQD staff during the inspection.

COMPANY OVERVIEW/PROCESS DESCRIPTION

McNaughton & Gunn manufactures books for various book publishers through the use of 7 printing presses and 2 binder presses. The company receives electronic pdf files of books and a mirror image of the file content is imposed onto an aluminum plating device with a laser. The aluminum plating device is then mounted onto a printing press and the imposed image is transferred to rolled paper. The size, font, and appearance of the books are produced to customer specifications. Once the pages of the books are generated, the books are bound in one of the company's 2 binder presses. The books are then shipped to the customer.

In addition to the 7 printing presses and 2 binder presses, the company also has a lathe, 2 belt sanders, a grinder, a table saw, 2 parts washers, 2 welding machines, and a cyclone to control particulate matter emissions after scrap paper is sent through a shredder. The metal working machinery are used for repair purposes, vent to the general plant environment, and are exempt from Permit-To-Install (PTI) requirements pursuant Rule 285(l)(vi)(B). The welding machines also vent to the general plant environment and are exempt from PTI requirements pursuant Rule 295(i). The parts washers are used to wash parts and ink trays from the printing presses. The parts washers use Safety-Kleen Premium Gold Solvent as a cleaning solvent. The MSDS sheet for this product indicates that is 100%, by weight, petroleum distillates and contains no hazardous air pollutants. The parts washers appeared to be properly maintained and operated and are exempt from PTI requirements pursuant Rule 281(h). The cyclone is exempt from PTI requirements pursuant Rule 285(f).

Two of the printing press lines are equipped with "Timson" naturally gas-fired heat set press drying ovens after the printing process. These ovens are typically heated to around 235 degrees Fahrenheit

to quickly dry the ink of pages which need to be folded immediately after being printed. Specifications for the drying ovens indicated that one of them (T-1) is rated at 731,000 BTU/hour and the other (T-2) is rated at 947,000 BTU/hour. Therefore, the ovens are exempt from PTI requirements pursuant Rule 282(b)(i). The remaining five printing presses are not equipped with a drying oven because the pages produced in these presses are allowed to dry for approximately 12 hours prior to being folder.

RULE 290

The company is using the Rule 290 exemption for the 7 printing press lines. Monthly emissions of VOCs from these lines have to be below 1,000 pounds for the lines to qualify for this exemption. Monthly VOC emission records from these lines from January 2013 through March 2014 indicate that they have emitted less than 1,000 pounds per month and, therefore, qualify for the Rule 290 exemption. Hot melt glue containing essentially no VOCs is used in the binder presses. Therefore, VOC emissions from the binder presses are negligible.

COMPLIANCE DETERMINATION

Based on the inspection and the records provided by the company, McNaughton & Gunn appears to be in compliance with all other applicable air rules and regulations. VOC emission records from January 2013 through March 2014 for the 7 printing press lines and the MSDS sheet for the cleaning solvent used in the parts washers are attached to this report.

NAME Erik Huvshaw

DATE 5/1/14

SUPERVISOR 