

Naulta

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

N571423933

FACILITY: DIXIE CONSUMER PRODUCTS LLC		SRN / ID: N5714
LOCATION: 400 ISLAND AVE, PARCHMENT		DISTRICT: Kalamazoo
CITY: PARCHMENT		COUNTY: KALAMAZOO
CONTACT: Michael Conway , EH&S Leader		ACTIVITY DATE: 12/17/2013
STAFF: Dorothy Bohn	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced inspection		
RESOLVED COMPLAINTS:		

I arrived at 1:30. Mike Conway, EHS Leader, met me. I gave him my card and an inspection pamphlet. Mike is taking over the environmental program from Brad Schuldt who will be retiring this summer. Mike is planning on attending the MAERs training and an upcoming PTI workshop. Brad, Mike and I toured the facility. The facility is Dixie Consumer Products, Epic Plant and they are owned by Georgia Pacific. They operate 24 hr/day, 5 days a week. Their volume has been down since 2008. They primarily make wax paper, hot dog trays and muffin papers.

EUColdCleaner: This unit is in maintenance. The lid was closed and it was posted with a copy of Rule 707 on the side. It was also posted by Safety Kleen. It uses SK's 150 solvent. The unit does agitate the solvent.

FGFlexo: This is for the 2 flexographic printers (#2 & 3). Only #2 was operating. They said #3 hasn't operated in at least 3 years. They have warmed it up to run a couple times but then didn't need it. Basically it is backup to #2. #2 has space for 6 stations (ink) but they only have 4 installed. Each press has gas ovens to dry the ink.

They use all INX waterbased inks. They have about 100 different colors and use them as received except to add some water if needed to adjust the viscosity. They do not mix their own colors. Brad said some of the coatings may contain ammonia but he didn't think they contained any VOC. The ink in use is in an open 5 gallon bucket with a hose running to the station on the machine. A 2<sup>nd</sup> 5 gallon bucket with a watery version of the color was next to it. Brad said this was wash water. They clean and flush hoses with water and that is sent to the city sewer. Nearby was a large parts washer that only uses water. They clean press parts in it like the ink decks, hoses, etc.

The cylinders and plates are cleaned with acetone, cyclohexane, IPA, BKP-1005 and Super C-FinishB. Brad said that 1 gal of acetone will last them about 5 years. The emissions from these cleaners are included in the wash-up solvent records.

FGPaperConverting: This is called RGScrapHandling in MAERs. I asked what the EUBaghouseCleaningMalfunction (EUBCM) was and they did not know. The permit describes EUPaperConverting as 2 cyclones and 2 baghouses. EUBCM is not described. What they have is 2 cyclones and 5 baghouses. The larger cyclone, which sits outside, is called the Compactor exhausts to 3 of the baghouses which are inside the building. It is used exclusively for the wax paper scrap (not recyclable).

The smaller cyclone exhausts to 2 baghouses is called the Baler. This is for non-wax paper scrap that is recyclable. This unit matches the description of EUPaperConverting. Brad said both units were installed at the same time. Since they have the baghouses both processes qualify for the exemption in Rule 285(I)(vi).

The Baler was not operating. The compactor was. Each unit has a magnehelic. The compactor was reading 1.3" pressure drop. They said the allowed range was 0.5 -5. Readings are taken on the 1<sup>st</sup> day of the week. I observed a copy of their weekly records. I reminded them that if the unit isn't operating on Mon. but then operates later in the week they need to do a record for the week.

FGExtruder: The Pillar Corona station was installed 10 years after the Enercon station but the Enercon is the main unit used and it only ran for 3 weeks this year. The units are used to laminate 2 sheets of paper together to make an insulated food wrap. The Pillar station has 2 filters and 1 charcoal unit with a magnehelic over the whole set. The Enercon station has 1 filter and 1 charcoal unit, each with its own magnehelic. LDPE is extruded onto the sheets as the glue and 25kV are applied to the paper to make holes so that the LDPE adheres better. The charcoal is to control ozone that is formed from the electricity.

They record the magnehelic on the first day of the week when the unit is operating. Preventative maintenance includes raking and cleaning the charcoal and changing the filters monthly. Neither unit was operating but the Enercon had the air running. The magnehelic read 0.4.

Other: The wax application lines are exempt as there is no VOC. They exhaust heat and maybe small amounts of wax (they have to clean the ducts out 1/year). The only glue they use is hot melt which is exempt per Rule 287(i). They do not have any generators. They have 2 identical 3.15 MMBtu/hr Cleaver Brooks, gas-fired boilers installed in 11/28/00 (when Crown Vantage closed). Only one boiler operates at a time. They do a little welding but most of it is sent out. Welding is exempt per Rule 285(i).

FGFacility and Records: I looked at the MSDS's for the 4 highest used inks (WF Pantone 032U Red, WFP 259U Purple, WFP PMS 266u Purple and WFSTDP 128u Yellow). The yellow has the highest use. They all said no hazardous ingredients and listed in the back monoethanolamine (141-43-5) ranged from 0.242 to 0.253% by wt. The VOC ranged from 0.38% to 0.47% (wt) & 0.4% to 0.49% (vol). All were 0.09#VOC/gal. % volatiles were around 52.49 % (wt) and 54.7% (vol). These chemicals are emitted per month on the order of  $10^{-6}$  pounds.

Attached is a copy of their latest records. In a calendar year they are emitting around 250# of VOC & 17.5# of HAP from the ink and around 220# VOC and 1# HAP from cleaning. They have their 12 month rolling totals and are way below their limits. In 11/13 their monthly #VOC/hr for FGFlexo was 0.102 and the limit is 27.3 pph.

Wrap-up: After reviewing the records I told them that everything at the facility qualified for an exemption except possibly FGExtruders (the ozone part – the plastic extrusion is exempt per Rule 286) and suggested that they go through Rule 285 and see if they thought any of them might apply. Ozone is not a VOC and per definition is not a toxic air contaminant but it is a criteria pollutant. The PTI does not have an emission limit just requirements for the ozone control device.

Dixie Consumer Products is currently a synthetic minor source with an opt-out permit. I said that from the looks of things they could probably qualify to be a minor source if they wanted to. They would need to do a potential-to-emit analysis and decide. I explained what the benefits would be if they were a minor source.

I left at 3:35. The facility appeared to be in compliance.

NAME Norothy Bohn

DATE 12/18/13

SUPERVISOR MD 12/19/2013