

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

N686663809

FACILITY: Georgia Pacific Corrugated LLC		SRN / ID: N6866
LOCATION: 916 Burstein Drive, ALBION		DISTRICT: Kalamazoo
CITY: ALBION		COUNTY: CALHOUN
CONTACT: Michael Haire , Environmental Health & Safety Manager		ACTIVITY DATE: 07/19/2022
STAFF: Rachel Benaway	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: On-site inspection to determine compliance with all state and federal air use regulations.		
RESOLVED COMPLAINTS:		

AQD staff (Rachel Benaway) completed an unannounced air quality inspection of Georgia-Pacific Corrugated, LLC (N6866), a corrugated box manufacturer located in Albion, MI, on 7/19/2022. The purpose of this inspection was to verify Georgia-Pacific is in compliance with their Permit to Install (PTI) #88-00F and all state and federal air use regulations. Georgia-Pacific is considered a synthetic minor source of particulate matter (PM) emissions. The facility has a boiler that is subject to New Source Performance Standard (NSPS) 40 CFR 60 Subpart Dc. Michael Haire is the Environmental Health and Safety Manager for the facility responsible for submitting requested records and was present for the on-site inspection. Personal protection equipment includes safety glasses, ear plugs, and safety shoes. No jewelry may be worn in the plant area.

The facility produces custom corrugated packaging products. The operation runs 3 shifts per day, 5 days a week, and employs approximately 70 people.

#	Equipment at Facility
1	Johnson Boiler- 21MMBtu/hr (natural gas) (EU-BOILER1)
	Shredder and baler w/ trim waste cyclone separator control device (EU-SHRED-BALE)
	98" Corrugator (EU-CORRUGATOR)
1	Cummins diesel fire pump (Rule 285(2)(g) exempt)
1	Cold cleaner (Rule 281(2)(h) exempt)

A previous inspection was completed on 4/5/2011. The facility was issued a revised PTI in 2019 that updated the emission limits for EU-CORRUGATOR, designated SV-CYCLONE as the exhaust point for the corrugating process and created a flexible group that incorporates all units of the corrugating process. The PTI update also restricts EU-BOILER1 to natural gas usage since the Cleaver Brooks model burner was replaced in 2011 and the unit can no longer use No. 2 fuel oil. The Johnson boiler has a 17,250 lb steam/hr (20.49MMBtu/hr) rated heat capacity.

To produce the custom corrugated packaging sheets, rolls of liner are assembled with a starch resin adhesive. The adhesive is mixed on site in the "starch kitchen." The facility no longer uses any formaldehyde component in the adhesive but this change in materials was not addressed in the PTI modification. Previously, the corrugator pneumatically conveyed scrap material to a cyclone and baghouse system. The process has since upgraded to an integrated scrap paper collection system that includes a shredder and baler for compaction and recycling and has a trim waste cyclone separator for PM control.

The following is a list of special conditions listed in the PTI for each emission unit and flexible group of which staff was able to make a compliance determination.

## FGCORRUGATOR

Description: All equipment associated with the 98" corrugator, including a shredder and baler, a 21MMBtu/hr natural gas-fired boiler, and the starch adhesive mixing process (EU-CORREGATOR, EU-SHRED-BALE, EU-BOILER1).

SC	Condition	COMPLIANT?
I.1	PM emissions from corrugator: 0.004lb/1000lb exhaust gases	N/A
I.2	PM emissions 1.05pph	N/A
I.3	PM10 emissions 0.81pph	N/A
I.4	PM2.5 emissions 0.38pph	N/A
I.5	Visible emissions 5% opacity- based on 6-min average	N/A
II.1	Formaldehyde emissions 360 lb/year based on 12-month rolling time period	Yes
II.2	Shall only burn natural gas in EU-BOILER1	Yes
III.3	Shall not operate FGCORRUGATOR unless trim waste cyclone collector is installed and operating properly	Yes

General Condition (GC) 13 of PTI #88-00F requires the permittee to conduct an acceptable performance test upon the request of the Department. Since no performance test has been requested, Staff was unable to make a compliance determination for the PM emission limits listed in Special Conditions (SC) I.1-4. The process was down for repair at the time of the inspection. Since no visible emission observations could be made, Staff was unable to make a compliance verification for SC I.5.

### Monitoring/Recordkeeping:

SC	Condition	COMPLIANT?
VI.1	Keep monthly and previous 12-month total formaldehyde usage for FGCORRUGATOR. Include % formaldehyde for starch resin used	Yes
VI.2	Keep monthly natural gas usage records for EU-BOILER1, indicating amount of natural gas used, in cubic feet, on a calendar month basis, calculated to a 12-month rolling time period	Yes

Records of formaldehyde and natural gas usage were requested and received for the previous two-year period. Even though the facility no longer uses an adhesive that contains formaldehyde, records of formaldehyde usage are still being diligently kept and demonstrated an annual usage rate of 0 lb.

The facility submitted an MSDS for the Tekusolv II Red, MM cleaning solvent used in the parts washer that is exempt per Rule 281(2)(h). The facility also submitted a monthly summary of VOC and HAPs for all constituents of the starch resin adhesive mix. The reports demonstrated no monthly emissions of VOCs or HAPs from these materials.

The facility appears to be in compliance with all federal and state air use regulations at this time.

NAME Rochel Seraway

DATE 7/28/2022

SUPERVISOR RIL 8/1/22