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

N709726634

FACILITY: NTVB MEDIA, INC.		**SRN / ID:** N7097
LOCATION: 209 PARK STREET, TROY		**DISTRICT:** Southeast Michigan
CITY: TROY		**COUNTY:** OAKLAND
CONTACT: Jack Thomsen , Plant Engineer		**ACTIVITY DATE:** 08/27/2014
STAFF: Robert Elmouchi	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

On August 27, 2014, I conducted a scheduled inspection of NTVB Media, Inc. (NTVB), located at 209 Park Street, Troy, Michigan. This facility is uniquely identified by the Air Quality Division with the State Registration Number (SRN) of **N7097**. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules, and Permit to Install (PTI) number 15-02A.

NTVB prints high volumes of weekly television guides and newspaper inserts. The FG-OldLitho flexible group is dedicated to printing television guides. The FG-NewLitho flexible group is used to print television guides or newspaper inserts.

I entered the facility, identified myself, presented AQD photo identification and explained the purpose of the inspection to Mr. Jack Thomsen, Plant Engineer.

I began the inspection with a review of permit required records. Having reviewed the permittee's records in 2008 and in 2011, I was familiar with their recordkeeping format. During the inspection, I performed a hand written calculation to determine if the NTVB fountain solution calculated emissions were valid. My calculation result matched NTVB's value when rounded to significant digits and therefore appeared valid. NTVB's emission calculations appeared to demonstrate compliance with the permitted emission limits.

With regards to recordkeeping, I observed that NTVB failed to meet the requirement of completing the required calculations by the 15th day of the calendar month, for the previous calendar month as specified in PTI 15-02A, special conditions 1.7, 2.10 and 3.4. I discussed this permit recordkeeping requirement with Mr. Thomsen and was informed that NTVB's failure to comply with the permitted recordkeeping schedule was due to NTVB's accounting department's internal schedule. I informed Mr. Thomsen that NTVB will either have to complete the recordkeeping in accordance with the permit specified schedule or submit a request for a permit modification that authorizes NTVB's unique calculation schedule; otherwise a violation notice will be issued. Mr. Thomsen committed to discussing this noncompliance with the head of accounting and follow up with me regarding a course of action.

On August 28, 2014, I received an email message from Mr. Thomsen (see attached), which stated,"... [NTVB] will comply with the permit by keeping the records up to date as specified." Because data collection had been maintained on a continual basis, and because the permitted emission limits had not been exceeded, per this response the AQD has elected to defer issuing a violation notice. This determination applies to only to this inspection and a repeat failure by NTVB to comply with the permit required recordkeeping schedule may result in the issuance of a violation notice.

Mr. Thomsen escorted me throughout the inspection of the production facility. We began the inspection in the FG-NewLitho room. We discussed the emissions capture and control system. From an environmental compliance perspective, the printing process in FG-NewLitho consists of two steps; surface coating and drying. The dryers operate between 350 and 500°F, which results in the paper exiting the dryer at 165 to 225 °F. All inks are used as received; no solvents are used to dilute the printing inks. Mr. Thomsen pointed to the emissions collection system and described how inactive drying ovens are closed-off from the collection system.

We proceeded to the thermal oxidizer where I observed a Magnehelic pressure differential gauge, which

displayed 4.5 inches of water column pressure drop. Records of the thermal oxidizer were reviewed (one record attached), which appear to demonstrate compliance with the permit requirement of maintaining a minimum temperature of 1450°F.

Mr. Thomsen introduced me to Mr. Norman Wallace, Maintenance Engineer, who is responsible for maintaining the thermal oxidizer. During my previous inspection, Mr. Wallace described the operation of the thermal oxidizer. The thermal oxidizer uses two oxidizing beds that alternate between saturation and destruction modes. I observed the thermal oxidizer, its electronic display panel and recorded the following:

- Run Mode: Gas Off
- Inlet: 179 °F
- Exhaust: display varied from 252 to 270 °F
- Chamber average: 1504 °F
- Bed #1: 1425 °F
- Bed #2: 1408 °F.

I interpreted the chamber average temperature as indicating that the combustion chamber temperature was 1504 °F, which appears to indicate that the thermal oxidizer was operating in compliance with special condition 2.6.

I observed that the containers for the solvent-containing cleaning towels were not completely covered; the covers were missing a self-closing flap. This appeared to be a failure to comply with PTI 15-02A, Special Conditions 1.4g and 2.4g. Upon notice of this noncompliance, Mr. Thomsen took immediate corrective action and provided proof of correction via email on August 29, 2014 (email and photos attached). Because Mr. Thomsen took immediate corrective action and because this is the first noncompliance regarding this permit condition, the AQD has elected to defer issuing a violation notice. This determination applies to only to this inspection and a repeat failure by NTVB to comply with the permit required process/operational limit may result in the issuance of a violation notice.

I then inspected the FG-OldLitho room. No heat set is required for black ink printed paper that only contacts another sheet of black ink printed paper. All printing on glossy paper requires heat set. I asked Mr. Thomsen how NTVB maintains negative pressure differential in each dryer as required per special condition 1.3. Mr. Thomsen showed me a custom monitoring system called the "Protectifyer", which is used to monitor multiple equipment parameters including an exhaust fan differential switch. All of the parameters monitored by the Protectifyer must be within established ranges otherwise the printing presses in the FG-OldLitho room will not operate.

CONCLUSION

NTVB Media, Inc. appears to be in compliance with all evaluated permit conditions.

NAME Matt Chrouch DATE 9/9/14 SUPERVISOR CJE