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

P011137437

FACILITY: MCKAY PRESS INC		**SRN / ID:** P0111
LOCATION: 7600 WEST WACKERLY STREET, MIDLAND		**DISTRICT:** Saginaw Bay
CITY: MIDLAND		**COUNTY:** MIDLAND
CONTACT: Bob Dzurka , Director of Operations		**ACTIVITY DATE:** 11/01/2016
STAFF: Sydney Bruestle	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: Inspection to verify compliance with PTI 107-10 and all other applicable state and federal air quality regulations.		
RESOLVED COMPLAINTS:		

On November 1, 2016 I (Sydney Bruestle) conducted an onsite inspection of McKay Press located at 7600 W. Wackerly Street, Midlan Michigan. I met with Bob Dzurka, Director of Operations. He was able to give me a site tour and retrieve records required by Permit to Install (PTI) 107-10.

McKay Press is a commercial printing facility that currently employs around 90 people full time. The facility operates 24/7 (3 shifts) and prints a wide range of products for clients across the US.

There are currently 7 printers permitted onsite. I inspected the following emission units and reviewed the emission records onsite. Som of the records are attached to this report.

EU-HEATSET-01

Description: 7C 26" Harris Heatset Webfed Offset Lithographic printing press (Web Press).

Control Device: Regenerative Thermal Oxidizer (RTO)

**The Facility plans to submit a MAP within 60 days from November 1, 2016. They are also repairing the continuous temperature recorder on the RTO. There is an interlock installed on the RTO, this shuts down the printer if the RTO drops below 1450 Degrees F while in operation. This was last tested in July 2016. The RTO is inspected by the Tann Corporation annually, the last inspection was performed on June 20, 2016 (see attached report). The facility appears to be in compliance with all of the PTI conditions for EU-HEATSET-01 (outlined in the table below). Emissions records are attached.

Emission Unit	Emission Limits	Process/Operational Restrictions	Design/Equipment Parameters	Testing/Sampling	Monitoring/Record keeping	Records Reviewed/Compliance Status
	VOC 2.5 tpy 12 mo rolling **Actual: 0.29 tpy (September 2016)**	shall recover and reclaim, recycle, or dispose of all inks, fountain solutions, and blanket/roller wash (materials)	shall not operate EU-HEATSET-01 unless the associated dryer is installed, maintained and operated in a satisfactory manner	shall annually test and certify the built-in interlock system	shall monitor and record, in a satisfactory manner, the bed temperature of the thermal oxidizer, on a continuous basis, during operation of EU-HEATSET-01. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval.	The RTO has the ability to record temperature every 60 seconds while operating and it appears it was in the past. However, It was not working at the time of the inspection when EU-HEATSET-01 was operating. The Facility is working with the maufacturer to fix the problem.
			The permittee	The permittee		

		capture all waste materials and store them in closed containers	shall not operate EU-HEATSET-01 unless the RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO requires a minimum VOC destruction efficiency of 95 percent (by weight), and maintaining a minimum temperature of 1450 °F and a minimum retention time of 0.5 seconds Actual Temp: 1467 Degrees F (inlet) and 1531 degrees F (outlet)	shall determine the VOC content of any material, as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's VOC formulation data using federal Reference Test Method 24 (inks, coatings, fountain solution additives and cleaning solvents) or 24A (only applies to solvent-borne inks and related coatings used in the publication rotogravure industry).	Monthly Records of the following:	Compliance
		minimize the generation of fugitive emissions	a. Collected solvents and solvent saturated towels or wipes shall be managed in a manner that minimizes emissions and will be disposed in accordance with applicable regulations.	shall verify the destruction efficiency of the RTO ducted to EU-HEATSET-01	The type (ink, fountain solution, cleanup solvent such as blanket/roller wash, thinning, etc.) of each material used.	Compliance
		shall not operate EU-HEATSET-01 unless a malfunction abatement plan (MAP) as described in Rule 911(2), for the RTO, has been submitted within 60 days of RTO installation, and is implemented and maintained	b. All press related cleaning solvents (blanket and roller washes) shall have composite (individual) partial vapor pressures that do not exceed 10 mmHg@20oC (68oF).		The VOC content of each VOC containing material as received and as applied (in percent by weight or pounds per gallon).	The Facility did not submit a MAP within 60 days of RTO implementation. They will submitt a MAP within the next 60 days.
EU-HEATSET-			c. All containers of new and used VOC-containing press related cleaning materials (blanket and roller washes,		The usage rate (in pounds or gallons) of each	Compliance

			shall be kept closed at all times.		applied.	
					The amount (in pounds or gallons) of each material reclaimed.	Compliance
					VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.	Compliance
					shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both	Compliance
					The permittee shall keep annual testing and certification records of the built-in interlock system	Compliance

FG-SHEETFED

Description: Two Sheetfed offset lithographic printing presses and one sheetfed envelope press

Emission Unit	Emission Limits	Process/Operational Limits	Testing/Sampling	Monitoring/Record Keeping	Records Reviewed/Compliance Status
FG-SHEETFED	VOC content of fountain solution: Less than 5% by weight as applied **Actual 1.05% (greatest VOC content)**	The permittee shall properly dispose of VOC-containing used shop towels	The permittee shall determine the VOC content of any material, as received and as applied, using manufacturer's formulation data.	The permittee shall keep written record of the following for the FGSHEETFED on a calendar month period:	Yes/Compliance
	VOC 16 tpy **Actual: September 2016 4.41 TPY**	All printing press-related cleaning solvents shall have composite partial vapor pressures that do not exceed 10 mmHg@20oC(68oF).		The type (ink, fountain solution, cleanup solvent such as blanket/roller wash, thinning, etc.) of each material used.	Yes/Compliance
				Chemical composition of fountain solution, including weight percent of each component	Yes/Compliance
				The VOC content of each VOC containing material as received and as applied	Yes/Compliance
				The usage rate (in pounds or gallons) of each material as applied	Yes/Compliance
				The amount (in pounds or gallons) of each material reclaimed.	Yes/Compliance
				VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month	Yes/Compliance

FG-PRINTERS

Description: Two Ink Jet label printing systems and a HP 5500 Indigo digital printing press

Emission Unit	Emission Limits	Process/Operational Restrictions	Testing/Sampling	Monitoring/Record Keeping	Other Requirements	Records reviewed/ Compliance Status
	VOC 3.05 TPY **Actual September 2016 0.3 tpy**	Shall recover and reclaim, recycle, or dispose of all inks in accordance with all applicable regulations	The permittee shall determine VOC content of any material, as received and as applied, using manufacturers	Shall keep written record of the following for FG PRINTERS on a calendar month period:	Label each emission unit	Yes/Compliance

			formulation data.			
FG PRINTERS		Capture waste materials in closed containers		a) Type (Ink and Coatings)		Yes/Compliance
		Shall handle all VOC and/or HAP containing materials in a manner to minimize the generation of fugitive emissions.		b) VOC content of each VOC containing materials received and as applied		
				c) usage rate of each material as applied		
				d) The amount of each material reclaimed		
				e) VOC emission calculations determining the annual emission rate in tons/12 mo rolling time period (determined each month)		
				MSDS, SDS Formulation Data		

FG-Facility

Description: RTO for EU-HEATSET-01, all other emission units are fugitive in plant emissions

Emission Unit	Emission Limits	Testing/Sampling	Monitoring/Record keeping	Records Reviewed/Compliance Statu
	Individual HAP less than 9.0 TPY **Actual: greatest individual HAP: Ethylene Glycol Spetember 2016= 0.05 tpy**	HAP content of any material as applied and as received	Permittee shall maintain a current listing from the manufacturer of the chemical composition of each material	Yes/Compliance
	Aggregate HAPs Less than 22.5		Shall keep the following information on a monthly	Yes/Compliance

FACILITY	**0.05 tpy (September 2016)**		basis for FG FACILITY:	
			a) Gallons used of each material	Yes/Compliance
			b) Gallons reclaimed of each material	Yes/Compliance
			c) HAP content in lbs./gallon	Yes/Compliance
			d) Individual and Aggregate HAPs emission calculations determining in the monthly emission rate of each in tons per month	Yes/Compliance
			e) Individual and aggregate HAP emission calculations determining the yearly emission rate of each in tons per 12 month rolling time period	Yes/Compliance

At the time of my inspection it appeared McKay press was in compliance with PTI 107-10 as well as all other applicable state and federal air quality regulations.

NAME [signature] DATE 11/14/16 SUPERVISOR C. Hare