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

P011149101

FACILITY: MCKAY PRESS INC		**SRN / ID:** P0111
LOCATION: 7600 WEST WACKERLY STREET, MIDLAND		**DISTRICT:** Saginaw Bay
CITY: MIDLAND		**COUNTY:** MIDLAND
CONTACT: Harry Iafrate , Director of Operations		**ACTIVITY DATE:** 03/21/2019
STAFF: Benjamin Witkopp	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Inspection		
RESOLVED COMPLAINTS:		

Ben Witkopp of the MDEQ-AQD met with Corey Christiansen and Rick Goodwin of McKay Press. Corey is the Company President. Rick was formerly the Director of Operations and also responsible for environmental related issues. Rick wants to go back into sales and will not be the environmental contact in the future. The facility is in the printing industry and is part of RR Donnelly. It is engaged in printing quite a variety of products including mailers, brochures, sales display signs etc. The facility is covered by air use permit 107 -10. The permit involves a heatset press, three sheetfed presses, two ink jet printers, and a digital unit. Only the heatset unit exhausts outside. All other units have in-plant emissions.

We discussed overall business outlook and current site operations. They said the heat set press usage is really down. In fact it is scheduled to be gone at some point in 2019. They last purchased two totes in December. They use to purchase 4 totes per month. It wasn't even able to function now. The heat set control unit was struck down approximately two weeks prior due to a power surge. The decline of the heat set press is due to a business consolidation decision to get more utilization at web press plants located in a couple of other States. However, if a rush job came in then that wasn't good for those plants where it could work at this facility.

Ink jet 1 is gone now and ink jet 2, though still there, has been converted to a cartridge unit.

Records were being maintained electronically by the coprorate office.but the person who accesses them at the plant (Jen Miller) was unavailable at the time. I told them the records could be sent via e-mail later.

The heat set press has a VOC limit of 2.5 tons on a 12 month rolling time period, operational requirements and specific record keeping. The unit is equipped with an RTO and has a requirement to maintain a bed temperature of 1450 F. Bed temp records are kept electronically. The records were not checked as the press usage has declined so much. It also has to maintain a negative draft when operating. The company has historically maintained an interlock system which triggers an immediate shutdown if the negative pressure is not maintained. The interlock system is indeed checked and maintained as shown by external contractor service records.

The heat set also has a requirement that blanket and roller washes have vapor pressures that do not exceed 10 mm Hg. Safety data sheet information showed the vapor pressure being 2.8 mm Hg.

There is a flexible group (FG) limit for three sheet fed presses (2 Komori and one envelope jet press, also known as Halm jet press). The VOC content of the fountain solution is required to be less than 5% by weight and the FG has a limit of 16 tons on a 12 month rolling time period. Like the heat press, these presses have the same requirement for vapor pressure of cleaning solvents and the same compliant material is used. The flexible group has a VOC limit of 16 tpy on a 12 month rolling time period. The fountain solution has a VOC content limit of less than 5% by weight.

A flexible group called FGprinters consists of inkjet 1, inkjet 2, and a digital unit. Inkjet 1 is now gone. Inkjet 2 has been converted to a cartridge unit. The digital unit remains intact. The flexible group has a VOC limit of 3.05 tpy on a 12 month rolling time period.

Lastly, there is a flexible group FGfacility which has limits concerning hazardous air pollutants (HAPs). The limits are less than 9.0 tpy for each individual HAP and less than 22.5 tpy for aggregate HAPs. The

limits are based on a 12 month rolling time period.

The records kept by corporate were furnished by Jen Miller in late March and early April. Upon review, some problems were noted. Some of the formulas presented were incorrect. The records also did not appear to be showing 12 month rolling time periods of HAPs for the facility. Lastly, it looked like there were spreadsheet or cell problems in a few areas as things did not line up when a few totals were examined.

An added difficulty arose when the company basically did not have an environmental contact. Mr. Harry Iafrate had just recently been hired as Director of Operations. A portion of his responsibilities included environmental. We discussed the situation and Harry was very deliberate in tracking down problems and seeing they were corrected as time allowed. During the review it was also noted the company had installed 2 presses beyond those found in the permit. The presses appeared to be low use and could use rule 287 c (surface coating use up to 200 gallons per month) as an exemption. It should be noted that in the AQD rules, the definition for surface coating includes ink. I told Harry to determine whether they wanted a permit or felt they could meet the exemption criteria.

Harry, eventually discovered what was wrong in the spreadsheet and corrected them. It should be noted it still used terms like VOC usage which is clearly wrong as VOC are emitted. Harry wanted corporate to handle the requirements for the 12 month rolling time period records. However, time passed and nothing was received. The data present clearly indicated there would not an emission limit violation but the records just weren't present. Eventually corporate was presented with the option of either presenting the records or receive a violation notice. Corporate provided the records.

The records provided by corporate were reviewed. Though the 12 month rolling time period records are truly being calculated correctly they are still presented by "calendar year." This gives the impression the emissions records are just based on a calendar year.

Individual HAPs consisted of Ehtylene glycol and Toluene. Ethylene glycol was about 0.13 tpy on a 12 month rolling time period while Toluene was 0.03. Limits on individual HAPs are less than 9 tpy. Total VOC emissions were around 4 tpy while total HAPs emissions were 0.16 tpy. The limit on total HAPs is less than 22.5 tpy. There is not a limit on total VOC from the facility.

The web heat set press VOCs were mere pounds. This reflected low use and the presence of the RTO.

The VOC emissions from FGsheetfed (2 Komori sheetfed and one Halm jet press) were less than 4 tpy on a 12 month rolling time period. The limit is 16. The limit on VOC content of the fountain solution is 5% by weight. The records have a separate tab for the fountain solution and all solutions were far less than 5% by weight as applied.

The VOC emissions from FGprinters were in mere pounds, even taking into account it did not appear the values presented were on a 12 month rolling time period. Upon a closer look, the formulas in the spreadsheet were correct. It was the supporting data that was missing, being all zero on the particular tab. The limit is 3.05 tpy.

Lastly, the facility has decided to use rule 287c for the Heidelberg and large format press. In the print industry usages are in pounds. For these two presses the conversion to gallons was needed and done. Both presses were well under the 200 gallons per month.

Records aren't being effectively reviewed by the facility or corporate to ensure overall accuracy and meeting the absolute requirements of the permit..They are recognized as being vastly improved from years ago. However, at this point, having spent an inordinate amount of time on records, it is now evident there are no emissions violations.

All things considered, the facility is deemed to be in compliance though needed improvements have been noted.

NAME B. Withrow DATE 9-17-19 SUPERVISOR C. Hare