

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

U4110031429269

| | | |
|------------------------------------------------------------|-------------------------------|---------------------------|
| FACILITY: Wynalda Litho, Inc | | SRN / ID: U41100314 |
| LOCATION: P.O. Box 370 8221 Graphic Dr. NE, Belmont | | DISTRICT: Grand Rapids |
| CITY: Belmont | | COUNTY: KENT |
| CONTACT: Cheryl Sopcak , Human Resources and Recordkeeping | | ACTIVITY DATE: 02/09/2015 |
| STAFF: Denise Plafcan | COMPLIANCE STATUS: Compliance | SOURCE CLASS: |
| SUBJECT: | | |
| RESOLVED COMPLAINTS: | | |

Denise Plafcan (DP) conducted an unannounced scheduled inspection to determine compliance with state and federal Air Quality rules and regulations and Rule 290 exemptions. DP drove around the area prior to entering the facility. There were no odors and no fugitive emissions from either plant. No one was available to conduct the inspection since the production was at reduced levels. DP contacted Cheryl Sopcak, Human Resources. DP met with Cheryl Sopcak and after a brief introduction and discussion, DP explained the purpose of the inspection and reviewed the Environmental Inspection brochure. At the close of the meeting Jim Malkewitz joined the discussion and DP provided an additional Environmental Inspection brochure.

Prior to the actual inspection, DP spoke with Cheryl and requested their Rule 290 records for the 2014 calendar year. Cheryl said Jim Malkewitz is now responsible for the records but that she would remain the key contact person. Cheryl agreed to get the records sent electronically as soon as possible. She also requested a call before the physical inspection so that she could make sure that Jim would be at the plant. DP made a second attempt to conduct a scheduled inspection and no one was in the office. The third time a message was left with Cheryl that the inspection would be conducted that morning and to please make sure someone would be available. During this inspection the company was still unable to produce any records. Cheryl stated they would be available in the next few days, however, they were still not submitted. On February 11, 2015, DP informed Cheryl that the company would receive a Violation Notice (VN) for failing to maintain any records to demonstrate compliance with the use of a Rule 290 exemption. On February 17, 2015, the required records were received electronically. A VN was not issued since the VOC emissions at the company are so low but random records requests will be made throughout the year to confirm that the records are being maintained.

Wynalda is a lithographic printer that employs 120 staff that work two ten hour shifts five days a week. They operate six sheet fed non-heatset presses, four are 700mm or 27 inches and two are 900 mm or 35 inches. Some of the equipment uses both heatset and non-heatset. The majority of inks are a thick paste or grease like consistency and are dispensed automatically by being pressed out, plunger style, of a four inch round cardboard tube, this ink is not poured into the presses or manually added (see attached MSDS). They have recently switched the majority of both plants to water-based inks. Some water-based printing orders also require a water-based coating over the surface of the printed item.

Additional equipment documented during this inspection included the following: Sheet Cutter which is used to cut the bulk rolls into smaller sheets that are then placed into the individual presses, die cutters that are used to cut specific shapes that can then be

formed into boxes and machines used for plastic printing, embossing or foil printing. The foil is added to the embossing and is applied or melted onto the substrate with heat.

The facility has a 1 megawatt emergency diesel generator that was installed to pump the water through the fire sprinkler system. The generator is run once a week for 30 minutes, twice a year at full load test for 2 hours and then about once a year for an actual emergency situation. One megawatt is less than 3.5 million BTU per hour which is exempt from Rule 201 requirements by Rule 282(b)(i).

All scrap paper is recycled by source or type of paper scrap, the highest price is for white with ink, then paper with metal and the lowest level is the brown. Other scrap at the plant is landfilled. The facility also has a unit that is used to recycle VOC containing materials.

During the inspection only one of the printing presses was operating at the Main Plant and one press that is controlled was operating at the Montana Trail Plant.

MAIN PLANT

56" 8 colors sheet fed non-heatset plus waterbased coater
64" 6 colors sheet fed non-heatset plus waterbased coater
2- 40" 6 colors sheet fed non-heatset plus waterbased coater

MONTANA TRAIL PLANT

2 40" 7 colors sheet fed non-heatset plus waterbased coater
2-20" 6/6 colors web fed heatset both units are controlled by a direct thermal oxidizer that they are claiming it has a 99% control efficiency. One of these two printing units is up for sale.

Automated blanket wash system where the blanket wash is pumped from the storage room to the presses. Reservoirs at the press are not manually filled.

Parts cleaner 28" by 48" (2.3'X4' total square footage is 9.23') in the maintenance area that uses a Safety Kleen Aqueous waterbased automatic washer. The unit can also be used as a manual soak tray that is automated agitation or by hand.

Water-based liquid form automated application of adhesive. Currently five adhesive applicators but one is up for sale.

The Montana Trail NE plant is contiguous to the main site with only a street separating the two pieces of property, raw materials are shared between the two sites and the same management oversees both plants. Based on the criteria set forth in Op-memo 11, the two plants are considered one facility. The MR G1 press is being relocated to the Montana Trail Plant and will not be connected to the control equipment, it will be stacked directly to the outdoor air. The cement foundation for the press being moved from the Main Plant over to Montana Trail Plant had been poured and was dry.

The Montana Plant runs 2 shifts five days per week. There is one RTO for both lines located outside in the back of the plant on the north side of the building. The control equipment is inside on the north wall of the building. The maximum temperature set point was at 1550°F. This building also has a solvent reclaim/recycle system similar to

the unit at the main plant. Only one line was operational at the Montana plant at the time of the inspection.

Below is a final accounting of equipment and emissions based on the detailed records submitted and the attached e-mail.

| | Equipment | Plant Location | Installation Date |
|---------|----------------------------------|--------------------------------------------------|-------------------|
| K1 | 20" Komori 6/6 colors web fed | Montana Trail Plant | 12/1/01 |
| K2 | 20" Komori 6/6 colors web fed | Montana Trail Plant | 3/15/05 |
| MR 706M | Man Roland 40"6 color sheet fed | Montana Trail Plant | 8/1/07 |
| MR 707 | Man Roland 40"7 color sheet fed | Montana Trail Plant | 7/1/04 |
| MR 906 | Man Roland 64" 6 color sheet fed | Graphic Drive | 4/1/07 |
| MR 908 | Man Roland 56"8 color sheet fed | Graphic Drive | 9/1/03 |
| MR G1 | Man Roland 40" 6 color sheet fed | Graphic Drive being moved to Montana Trail Plant | 6/1/03 |
| MR G2 | Man Roland 40" 6 color sheet fed | Graphic Drive | 9/1/08 |

| | RULE 290 VOC emission limit | VOCs highest emissions in pounds | Month/Year |
|-----------------------|-----------------------------|----------------------------------|----------------|
| K1 Controlled | 500 lbs VOC/month | 13.3 | March 2014 |
| K2 Controlled | 500 lbs VOC/month | 9.3 | September 2014 |
| MR 706M | 1000 lbs VOC/month | 654.5 | September 2014 |
| MR 707 | 1000 lbs VOC/month | 737.8 | January 2014 |
| MR 906 | 1000 lbs VOC/month | 682.3 | October 2014 |
| MR 908 | 1000 lbs VOC/month | 476.7 | October 2014 |
| MR G1 | 1000 lbs VOC/month | 590.3 | March 2014 |
| MR G2 | 1000 lbs VOC/month | 599.2 | September 2014 |
| Highest MONTHLY TOTAL | 1000 lbs VOC/month | 3364.3 | October 2014 |

Based on the records submitted and the physical inspection conducted at the facility the company appears to be in compliance with state and federal Air Quality rules and regulations. The use of a Rule 290 exemption appears appropriate based on the records provided, however, the company must maintain adequate records to demonstrate Rule 290 compliance. Random record checks will be conducted throughout the calendar year to confirm that the required Rule 290 records are being maintained.

NAME *Devin Dwyer*

DATE *4-30-15*

SUPERVISOR *PAB*