

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

A421632525

FACILITY: Rogers Printing Inc		SRN / ID: A4216
LOCATION: 3350 Main St, RAVENNA		DISTRICT: Grand Rapids
CITY: RAVENNA		COUNTY: MUSKEGON
CONTACT: Jeff Raap, Manufacturing Manager		ACTIVITY DATE: 12/01/2015
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: The purpose of this inspection was to determine compliance with Permit to Install (PTI) Number 114-01C, Consent Order AQD-29-2013, and all other applicable Air Quality Rules and Regulations.		
RESOLVED COMPLAINTS:		

On Tuesday December 1, 2015 AQD Staff Kaitlyn DeVries (KD) conducted an unannounced, scheduled inspection of Rogers Printing Incorporated located at 3350 Main Street, Ravenna Michigan. The purpose of this inspection was to determine compliance with Permit to Install (PTI) Number 114-01C, Consent Order AQD-29-2013, and all other applicable Air Quality Rules and Regulations.

KD arrived at the facility at approximately 9:30 am; no visible emissions or odors were detected prior to entry to the facility. KD met with Mr. Jeff Raap, Manufacturing Manager. The Environmental Rights and Responsibilities pamphlet was presented and briefly discussed. Records were also requested at that time, and sent via e-mail on a later date.

#### Facility Description:

Rogers Printing Incorporated (RPI) is a printing facility that primarily prints newspaper pull-out ads, magazines, and other mail distribution items. RPI normally operates five (5) days per week, but may increase to six (6) or seven (7) days during busy times.

#### Regulatory Overview:

RPI is a synthetic minor source for HAPs and VOC's. RPI currently has one (1) permit, PTI No. 114-01C, and is still under Consent Order AQD-29-2013. At this time, RPI is not subject to 40 CFR Part 63 Subpart KK for the printing and publishing industry.

#### Compliance Evaluation:

The regulatory aspects of PTI No. 114-01C are for three (3) flexible groups, and one (1) separate emission unit. The permit was recently revised in August 2015 due to the addition of EU-HEIDELBERG03. RPI does not have any boilers or parts cleaners. RPI does have one (1) dust collector that is used for paper shredding and subsequent baling operations which is vented into the in-plant environment. This operation is exempt from Rule 201 permitting under Rule 285 (I)(vi)(B). KD noted particulate located below the baghouse, and recommended continued housekeeping in the area to prevent re-entry of the particulate into the atmosphere.

#### *EU-HEIDLEBERG03*

This unit is a Heidelberg M-600 heatset webfed offset lithographic printing press with an integrated recuperative thermal oxidizer as part of the dryer, with an automatic wash system. This unit was the new emission unit added to the most recent permit modification in August 2015. At the time of the inspection, this unit was not yet operational. Per Mr. Raap, RPI expects this unit to be functioning in January or February of 2016. KD and Mr. Raap noted

that in special condition V.2, testing will be required to verify the destruction efficiency within 180 days of commencement of operations. Since this unit was not operational during the time of the inspection, there will be no further evaluation of this emission unit.

#### *FGOFFSET1*

This flexible group encompasses three (3) emission units – EUHEIDELBERG01, EUCHIEF, and EUMISCELLANEOUS. Per Mr. Raap, eventually EUHEIDELBERG03 will replace EUCHIEF, but that is not likely to be soon. Volatile Organic Compounds (VOC's) are limited to 10 tons per year (TPY), 12-month rolling. As of October 2015, the 12-month rolling emissions were 2.01 TPY. KD did not observe any open containers while touring the facility, thus VOC containing materials appeared to be properly stored, handled, and disposed of. Additionally, no inks or solvents are reclaimed. RPI has requested, and AQD approved, use of manufacturers formulation data for verification of VOC content for all coatings used at the facility. Per the attached MSDS's, the VOC content of the Blue #2 ink is 37.30%, and the VOC content of the Yellow ink is 39.70%.

#### *FGOFFSET2*

This flexible group encompasses two (2) heatset webfed lithographic printing presses, controlled by a shared regenerative thermal oxidizer (RTO), with each being manually washed with a blanket wash. The two associated emissions units are EUHEIDELBERG02, and EUHARRIS. VOC's for FGOFFSET2 are limited to 4.3 pph, based on test protocol, and 17.8 TPY, 12-month rolling. As of October 2015, the 12-month rolling average is 4.41 TPY. No inks or solvents are reclaimed.

All VOC containing materials appeared to be properly stored, handled, and disposed of. The partial vapor pressures are also included on the attached MSDS's. RPI has previously submitted a malfunction abatement plan (MAP), and there have been no changes to the MAP since submittal.

The RTO is equipped with a continuous temperature recording device, and was operating at a temperature of 1508°F during the time of the inspection. This is above the permitted 1500°F minimum temperature. Per a review of the temperature records, see attached, the RTO appears to be properly operating at temperatures above the 1500°F minimum. However, RPI was unable to produce RTO temperature records from July 21, 2015 through September 27, 2015. This is a violation of FGOFFSET2 Special Condition (SC) VI.4. A Violation Notice will be sent.

Destruction efficiency testing was completed in October, 2013 and was deemed acceptable by AQD's Technical Programs Unit.

As previously mentioned, RPI is allowed to use manufacturers formulation data for VOC content verification of all materials used at the facility in lieu of Method 24. The VOC content for Blue and Yellow Inks are noted above.

While the stack dimensions were not explicitly measured, there appeared to be no changes.

#### *FGFACILITY*

The facility maintains its opt-out status for Hazardous Air Pollutants (HAPS). Individual HAP's are limited to 9.0 tpy, 12-month rolling and aggregate HAP's are limited to 22.5 tpy, 12-month

rolling. As of October 2015 the aggregate HAP 12-month rolling average was 0.696 TPY. The highest individual HAP was Ethylene Glycol, and as of October 2015 the 12-month rolling average of 0.28 TPY. Emissions data in the records appears to be consistent with what was reported in the 2014 MAERS report. Additionally, RPI is properly tracking the pounds of material used, as required. No inks or solvents are being reclaimed.

**Compliance Determination:**

Based on the observations made at the time of the inspection and a subsequent records review, RPI is not in compliance with PTI No. 114-01C. A Violation Notice will be sent for the failure to maintain RTO temperature records as per Special Condition VI.4.

NAME

Karley D. O'Neil

DATE

12/17/15

SUPERVISOR

PAR

