

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

A671425020

FACILITY: Georgia-Pacific Corrugated II LLC		SRN / ID: A6714
LOCATION: 951 COUNTY ST, MILAN		DISTRICT: Jackson
CITY: MILAN		COUNTY: WASHTENAW
CONTACT: Gary Simmons , Environmental Health and Safety Manager		ACTIVITY DATE: 04/23/2014
STAFF: Erik Gurshaw	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: 2014 Targeted Inspection		
RESOLVED COMPLAINTS:		

SRN: A6714

COMPANY: Georgia-Pacific Corrugated II, LLC

COMPANY ADDRESS: 951 County St.; Milan, MI 48160

PURPOSE OF INSPECTION: Targeted

CONTACT PERSON: Mr. Gary J. Simmons, Environmental Health and Safety Manager (Ph: 734-439-4908; Cell: 734-341-3869; Fax: 404-631-5108 E-mail: gjsimmon@gapac.com)

COMPANY PHONE NUMBER: 734-439-4908

INTRODUCTION

On April 23, 2014, AQD staff, Erik Gurshaw conducted an unannounced, targeted inspection at Georgia-Pacific Corrugated II, LLC located at 951 County St. in Milan, Michigan. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) Rules; Permit-To-Install (PTI) # 152-94 for three cyclones controlling particulate emissions from a scrap shredding operation; and PTI #153-94 for a starch adhesive application process.

Upon arriving at the site, AQD staff introduced themselves and stated the purpose of the visit to Mr. Gary J. Simmons, Environmental Health and Safety Manager. Mr. Simmons indicated that Georgia-Pacific Corrugated II employs approximately 116 people and operates 24 hours a day (3 eight hour shifts a day) Monday through Friday and occasionally on Saturday when necessary. Mr. Simmons assisted AQD staff during the inspection.

COMPANY OVERVIEW/PROCESS DESCRIPTION

Georgia-Pacific Corrugated II manufactures corrugated boxes from rolled paper in 3 flexo/folder/gluer lines and 2 die cutting lines. The company has 150 clients including Procter and Gamble, Rexam, and subsidiaries of Kellogg. Once rolled paper is received by the company, it is sent to a corrugator machine where a starch adhesive is applied to the paper and the paper is slit, scored, and cut to customer specifications. The resulting corrugate is then sent to the appropriate flexo/folder/gluer line or die cut line. The flexo/folder/gluer lines slot, score, fold and apply glue and ink to the corrugate. The resulting product is then banded and shipped to the customer. Corrugate sent to the die cutting lines is cut to customer specifications, but boxes fabricated in the die cutting lines consist of several pieces which need to be assembled into a complete box by the customer. The box components fabricated in the die cutting lines are also banded and shipped to the customer after being produced. The flexo/folder/gluer lines are being operated under the Rule 290 exemption which limits VOC emissions from each line to below 1,000 pounds per month. Mr. Simmons indicated that the type of inks and glues used in the flexo/folder/gluer lines have not changed since Diane Kavanaugh-Vetort's February 25, 2008, inspection of the facility. VPC emissions from the die cutting lines are negligible.

In addition to the flexo/folder/gluer lines and die cutting lines, the company also has a starch adhesive application process used in the corrugator line, a 16.329 MMBTU/hour boiler (Cleaver-Brooks Model #CB200400250), a scrap paper pneumatic conveyor system consisting of a shredder, 3 mechanical

cyclones, and a baler, a starch silo baghouse, 3 drill presses, a welding machine, a band saw, 2 bearing presses, a brake press, 2 grinders, and a ZEP cold cleaner. The starch adhesive application process is permitted under PTI #152-94, but the company is in the process of having this PTI voided since it claims that the products used to manufacture the starch adhesive contain no VOCs. Mr. Simmons showed AQD staff a letter that the company is planning to send to the AQD to demonstrate that the compounds used to make the starch adhesive emit no VOCs. In this letter, the company states that it intends to use the Rule 290 exemption for the starch adhesive operation, but AQD staff told Mr. Simmons that if no VOCs are emitted from the process that the company would have no emissions to record to demonstrate that the process meets the Rule 290 exemption. Mr. Simmons said that he was going to speak with Cathy Hawk, the company's Senior Environmental Health and Safety Manager about this issue and redraft the letter if necessary. Since the PTI for the starch adhesive application process was not voided at the time of AQD staff's inspection, AQD staff evaluated compliance with the existing PTI to determine the company's overall level of compliance. The scrap paper pneumatic conveyor system and its associated cyclone are permitted under PTI #152-94. Mr. Simmons said that the company is planning to replace the existing cyclone system with a new/more efficient cyclone by the middle of the summer. He said that the new cyclone will control 99% of the particulate emissions from the scrap paper pneumatic conveyor system. Correspondence between Diane Kavanaugh-Vetort and Ms. Cathy Hawk indicates that the proposed new cyclone could be exempt under Rule 285(h) or Rule 285(f) assuming that potential emissions of particulate matter from the cyclone do not exceed 15 tons per year. Once again, since the new cyclone had yet to be installed, AQD staff evaluated compliance with this system based on the conditions of PTI #152-94. The Cleaver-Brooks boiler is used to provide heat to the corrugator line and to the starch adhesive production process. It is subject to New Source Performance Standard (NSPS) Subpart Dc for Small Commercial and Industrial Boilers because it has the capability of burning either natural gas or fuel oil #2. It is exempt from PTI requirements pursuant Rule 282(b)(ii). Mr. Simmons said that this boiler has not used fuel oil since it has been installed and that the company is evaluating whether the dual fuel option is even necessary. Since the company has not used fuel oil #2 in the boiler since it was installed, no compliance evaluation with respect to NSPS Subpart Dc could be made. NSPS Subpart Dc makes Georgia-Pacific a fee source facility, however. The metal working machines in the company's maintenance area are used for repair purposes, vent to the general plant environment, and are, therefore, exempt from PTI requirements pursuant Rule 285(l)(vi)(B). The welding machine also vents to the general plant environment and is exempt from PTI requirements pursuant Rule 285(i). The ZEP cold cleaner uses a cleaning solvent consisting of more than 78% water and no hazardous air pollutants. The cold cleaner is exempt from PTI requirements pursuant Rule 281(h).

PERMIT EVALUATION

PTI #152-94-Scrap Paper Pneumatic Conveyor System and Associated Cyclones

This permit sets an opacity limit of 20% from the stack of the cyclones. AQD staff and Mr. Simmons went outside during the inspection and did not observe any visible emissions. The permit also sets a 24.83 tons per year particulate emission limit from the cyclones. Emission records E-mail from the company from January 2013 through March 2014 indicate that between 15 to 20 pounds of particulate matter were emitted monthly from the cyclones during the reporting period.

PTI #153-94-Starch Adhesive Application Operation

This permit sets a VOC emission limit from the starch adhesive application process of 2.83 tons per year. As previously discussed, the company is making the case that the starch adhesive used in the corrugator line contains no VOCs. No VOCs emissions were reported from the starch adhesive application process from January 2013 through March 2014. The permit also states that no visible emissions should be produced by the adhesive application process. No visible emissions were observed from the adhesive application process during the inspection.

RULE 290

The company is using the Rule 290 exemption for the following flexo/folder/gluer lines: Koppers 130; S&S 131; and EVOL 136. Monthly emissions of VOCs from these lines have to be below 1,000 pounds for the lines to qualify for this exemption. Monthly VOC emission records from these lines from January 2013 through March 2014 indicate that highest monthly emission of VOC from them was 141.08 for the EVOL 136 line in January 2014.

COMPLIANCE DETERMINATION

Based on the inspection and the records provided by the company, Georgia-Pacific Corrugated II appears to be in compliance with its permits and all other applicable air rules and regulations. The following records are on a CD attached to this report: Material usage summary for the processes in the plant from January 2013 through March 2014; VOC emission records from January 2013 through March 2014 for the Koppers 130, S&S 131, and EVOL 136 lines; VOC emission records from January 2013 through March 2014 from the starch adhesive application process; Particulate Matter emission records from January 2013 through March 2014 from the cyclones; Emissions of criteria pollutants, lead, carbon monoxide, and lead from the NSPS Subpart Dc subject boiler; and a yearly summary of emissions from the plant's processes. A hardcopy of the MSDS sheet for the cleaning solvent used in the parts washer is also attached to this report.

NAME Erik Gresham

DATE 5/1/14

SUPERVISOR 