

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

B585364067

FACILITY: Gannett Publishing Services		SRN / ID: B5853
LOCATION: 6200 METROPOLITAN PARKWAY, STERLING HTS		DISTRICT: Warren
CITY: STERLING HTS		COUNTY: MACOMB
CONTACT: John Morey , Senior Regional Director Manufacturing & Distribut		ACTIVITY DATE: 08/16/2022
STAFF: Shamim Ahammod	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Conducted an onsite scheduled inspection of Gannet Publishing Services to determine the company's compliance with the requirements of Permit to Install (PTI) No. 212-06 for the six non-heat-set web-fed offset lithography printing press.		
RESOLVED COMPLAINTS:		

On August 16, 2022, the Michigan Department of Environment, Great Lakes and Energy (EGLE) - Air Quality Division (AQD) staff, I (Shamim Ahammod) conducted an onsite scheduled inspection of Gannett Publishing Services (SRN: B5853) located at 6200 Metro Parkway, Sterling Heights, Michigan. The purpose of the inspection was to determine the company's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) No. 212-06 for the six non-heat-set web-fed offset lithography printing press.

Permit History

On October 10, 2006, PTI No. 212-06 was issued to Detroit Newspaper Partnership—North Plant Facility for the six non-heat-set web-fed offset lithography printing presses.

Source Description

The facility has six non-heat-set web-fed offset lithography printing presses. Each press has nine towers, and each tower has four blanket wash systems. The blanket wash system is an automatic system, but some manual wash will still be utilized.

Inspection Arrangement

I prearranged this announced inspection for August 16, 2022.

Onsite Inspection

On August 16, 2022, at 11:30 AM, I arrived at the facility and was greeted by William Stoneburgh, Chief Engineer, and John Morey, Senior Regional Director of Manufacturing & Distribution, Gannett Publishing Services. I introduced myself, provided credentials, and stated the purpose of the inspection.

REGULATORY ANALYSIS

The following conditions apply to: FG-GEOMANPRESSES

Emissions Limits

Pollutant	Equipment	Emissions	Limit
VOC	Each emission unit	Per SC 1.1.a and SC 1.7, the VOC content of the fountain solution was 2.54% according to the permittee records.	5% by Weight as applied shall not contain any Prop alcohol, Ethanol and/or I
Content of Fountain Solution	(printing press) within FG-GEOMANPRESSES		
VOC	Blanket and Manual wash portions of FG-GEOMANPRESSES	Per SC 1.1.b and SC 1.7, The highest VOC emissions were 6.35 tons from the blanket and manual wash portions of FG-GEOMANPRESSES per 12-	60.0 tpy

Pollutant	Equipment	Emissions	Limit
VOC	Non-blanket/manual wash (i.e. ink, etc.) emissions from FG-GEOMANPRESSE.	Per SC 1.1.c and SC 1.7, The highest VOC emissions were 0.032 tons from the non- blanket and manual wash (ink) portions of FG-GEOMANPRESSES per 12-month rolling time period as determined at the end of each calendar month.	10.0 tpy

Process/Operational Limits

Per SC 1.2, The permittee shall not use more than 17,647 gallons of blanket wash solvent in FG-GEOMANPRESSES per 12-month rolling time period as determined at the end of each calendar month.

- In FG-GEOMANPRESSES, the highest blanket wash solvent usage was 5112 gallons (June 2021) per 12-month rolling time period as determined at the end of each calendar month.

Per SC 1.3, The permittee shall capture all waste inks, fountain solutions, and cleanup solvents and store them in closed containers. The permittee shall dispose of all waste inks, fountain solutions, and cleanup solvents in an acceptable manner in compliance with all applicable state rules and federal regulations.

- At the time of inspection, I observed, waste inks, fountain solutions, and clean-up solvent materials are stored in closed containers. According to William Stoneburgh, waste materials are collected and processed by Usher Oil Company.

Per SC 1.4, The permittee shall implement the following listed pollution prevention techniques for FG-GEOMANPRESSES:

a. All press-related cleaning solvents (blanket and roller washes) shall have composite partial vapor pressures that do not exceed 10 mmHg at 20°C (68°F).

- The vapor pressure of the cleaning solvents is less than 1 mmHg at 20C according to the SDS sheet provided by the permittee.

b. All containers of new and used VOC-containing press-related cleaning materials (blanket and roller washes, and solvent-containing cleaning towels) shall be kept closed at all times that they are not in use.

- At the time of inspection, I observed, all containers of new and used VOC-containing press-related cleaning materials (blanket and roller washes, and solvent-containing cleaning towels) are kept closed that they are not in use.

Testing

Per SC 1.5, The permittee shall determine the VOC content of any material, as received and as applied, using federal Reference Test Method 24 (inks, coatings, fountain solutions additives, and cleaning solvents) pursuant to Rule 1040(5). Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from the manufacturer's formulation data. If Method 24 and the formulation values should differ, the permittee shall use Method 24 results to determine compliance.

- Solvents have not been tested via EPA Reference Method 24 in the last couple of years. The permittee is planning to conduct a test by next year. Currently, the permittee is using Safety Data Sheet (SDS) to determine the VOC content of any material.

Recordkeeping / Reporting / Notification

Per SC 1.7, The permittee shall keep the following information on a monthly basis for FG-GEOMANPRESSES:

- a. The type, and amount (in gallons or pounds), of each material used. This includes but is not limited to inks, fountain solutions, blanket wash/press wash or cleaning solvents, adhesives, ink-jet inks, makeup solvents, UV coatings, purge, and clean-up solvents.
 - I received and reviewed the records (attached to the report) that demonstrate the type, and amount (in gallons or pounds), of each material used in the facility from January 2016 to June 2022.
- b) The VOC content of each material, with water, (in percent by weight or pounds per gallon), as received and as applied.
 - The permittee has provided the records (attached to the report) that demonstrate the VOC content of each material used in the facility from January 2016 to June 2022.
- c) The amount (in pounds) of blanket wash reclaimed.
 - The permittee does not reclaim any blanket wash.
- d) The amount of blanket wash used for manual cleaning operations.
 - Gannett cleaning operations are automatic.
- e) Manufacturer's information confirming that the blanket and roller washes used have composite partial vapor pressures that do not exceed 10 mmHg at 20°C (68°F)
 - According to Safety Data Sheet (SDS) sheet, it appears the blanket and roller washes used have composite partial vapor pressures is 0.32 mmHg at 20°C.
- f) VOC emission calculations determining the blanket/manual wash annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
 - I received and reviewed the last 12 months (July 2021 -June 2022) VOC emission calculations records ((attached to the report) determining the blanket/manual wash annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

g) VOC emission calculations determining the non-blanket/manual wash annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

- I received and reviewed the last 12 months (July 2021 -June 2022) VOC emission calculations records ((attached to the report) determining the non-blanket/manual wash annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

Per SC 1.8, The permittee shall maintain a current listing from the manufacturer of the chemical

composition of each ink, fountain solutions, blanket wash/press wash or cleaning solvents, adhesives, ink-jet inks, makeup solvents, UV coatings, purge and clean-up solvents as applicable,

including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make

them available to the Department upon request.

- I received and reviewed the SDS sheets for the inks, fountain solutions, blanket wash, and press room chemicals.

Stacks/Vents Restrictions

Per SC 1.9, The exhaust gases from any press within FG-GEOMANPRESSES shall not be discharged to the ambient air at any time.

- The permittee gases are Vented inside the building.

The following conditions apply to: FGFACILITY

Emissions Limits

	Pollutant	Emission	Limit
2.1a	Each Individual HAP	Per SC 2.1.a and SC 2.6, each individual HAP emission was less than 1 ton from the FGFACILITY during the period of July 2021 through June 2022 per 12-month rolling time period as determined at the end of each calendar month.	Less than 9.0 tpy
2.1b	Aggregate HAPs	Per SC 2.1.b and SC 2.6, aggregate HAPs emissions were less than 1 ton from the FGFACILITY during the period of July 2021 through June 2022 per 12-month rolling time period as determined at the end of each calendar month.	Less than 22.5 tpy
2.1c	VOCs	Per SC 2.1.c and SC 2.7, the highest VOC emissions were 6.66 tons from the FGFACILITY during the period of July 2021 through June 2022 per 12-month rolling time period as determined at the end of each calendar month.	Less than 90.0 tpy

Testing

2.3 The permittee shall determine the HAP content of any material, as received and as applied, using the manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. [R336.1205(3)]

- I received a record that demonstrated the HAP content of the materials. The records are attached to this report.

2.4 The permittee shall determine the VOC content, water content, and density of any ink, fountain solution and cleanup solvent, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.

- The permittee is planning to determine the VOC content, water content, and density of any ink, fountain solution, and cleanup solvent, as applied and as received, using federal Reference Test Method 24. The permittee will send a request to the AQD District Supervisor. Currently, the permittee is using Safety Data Sheet (SDS) to determine the VOC content of any material.

Recordkeeping/Reporting/Notification

2.6 The permittee shall keep the following information on a monthly basis for FGFACILITY:

- a) Gallons or pounds of each HAP containing material used.
- b) Where applicable, gallons or pounds of each HAP containing material reclaimed.
- c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.
- d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
- e) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. [R336.1205, R336.1224, R336.1225, R336.1901]

- I received a record that demonstrated the HAP content of the materials and individual and aggregate HAP emission calculations. The records are attached to this report.

2.7 The permittee shall keep the following information on a monthly basis for FGFACILITY:

- a) Gallons or pounds of each VOC containing material used.
- b) Where applicable, gallons or pounds of each VOC containing material reclaimed.
- c) VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used.
- d) VOC emission calculations determining the monthly emission rate in tons per calendar month.
- e) 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.

- I received and reviewed the records (attached to the report) that demonstrate the type, and amount (in gallons or pounds), VOC content, and VOC emissions (monthly and annual emission rate) of each material used in the facility from January 2016 to June 2022.

Conclusion

Based on the on-site inspection and review of the records, it appears Gannet Publishing Services does comply with the requirements of PTI No. 212-06.

NAME Shamim Ahammod

DATE 9/30/2022

SUPERVISOR *K. Kelly*