

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Records Review (In office)

M354953708

FACILITY: CONTINENTAL IDENTIFICATION PRODUCTS		SRN / ID: M3549
LOCATION: 140 E AVERILL ST, SPARTA		DISTRICT: Grand Rapids
CITY: SPARTA		COUNTY: KENT
CONTACT: Rob Bachholzky, Chemist		ACTIVITY DATE: 04/13/2020
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2020 Partial FCE, Records Request/Review		
RESOLVED COMPLAINTS:		

A partial compliance evaluation (PCE) was completed by Air Quality Division (AQD) staff Adam Shaffer (AS) for Continental Identification Products (CIP) by requesting applicable records on April 13, 2020 to verify compliance with Permit to Install (PTI) No. 143-14 and applicable air pollution control rules. A site inspection to verify onsite compliance will be completed at a later date.

Facility Description

CIP is a silk-screening company located in Sparta, MI. CIP is an opt-out source for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) and is in operation with PTI No. 143-14.

Records Compliance Evaluation

A phone call with Mr. Rob Bachholzky, Chemist, of CIP was held on April 13, 2020, to verify the company was still in operation due to the current coronavirus pandemic, and records were accessible. CIP was in operation and a request for applicable records related to PTI No. 143-14 was made. Additionally, while speaking with CIP staff, it was determined that two onsite processes are potentially exempt from air permitting per Rule 290 and they are the Dome Room and Screen Room emission units. Records to verify that the two emission units are exempt were also requested.

PTI No. 143-14 FGFACILITY

This flexible group is for all process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

CIP is subject to a facility wide VOC emission limit of 90 tons per year (tpy) per a 12-month rolling time period. Records were requested and provided back to January 2019. For the month of February 2020, 0.70 tons of VOCs were emitted. As of February 2020, 9.30 tpy of VOCs were emitted, which is within the VOC permitted limit. Previous 12-month rolling time periods reviewed were also within the permitted VOC limit.

CIP is subject to facility wide individual / aggregate HAP emission limits of 9 tpy / 22.5 tpy per a 12-month rolling time period. For the month of February 2020, 0.127 tons of aggregate HAPs were emitted. As of February 2020, 1.372 tons of aggregate HAPs were emitted per a 12-month rolling time period, which is well within both individual and aggregate HAP emission limits. Previous 12-month rolling time periods reviewed were also within the permitted limits. CIP does keep track of individual HAPs with the most emitted HAP for February 2020 appearing to be glycol ether. It was noted that there may be some materials listed as HAPs but are not necessarily HAPs in the records reviewed.

Per special condition (SC) II.1, the VOC content of inks used shall not exceed 6.5 lbs per gallon. Safety data sheets (SDS) were requested of various materials used site wide and reviewed. Based on the SDS provided, this limit appears to be being met.

CIP is also subject to a usage limit of 25,100 gallons of VOC/HAP containing ink site wide per a 12-month rolling time period. Monthly and 12-month rolling totals of ink usage were requested and reviewed back through 2019. For the month of February 2020, 739 gallons of ink was used and as of February 2020, 7,088 gallons of ink was used per a 12-month rolling time period which is within the permitted limit. Previous 12-month rolling time periods of ink used also appeared to be within the permitted limit.

Per SC VI.2.a-e, CIP shall keep track of usage rates, VOC contents, reclaim if applicable of materials and monthly / 12-month rolling time periods of VOC emissions. Records were requested and reviewed back through 2019. Isopropyl alcohol (IPA) is the only material that is reclaimed onsite. CIP staff stated that they have a pot still that is used to separate out the waste from the used IPA being reclaimed. Errors were noted in the recordkeeping; however, it appears that overall CIP is keeping track of usage rates, VOC contents and monthly / 12-month rolling time periods of VOC emissions.

Per SC VI 3.a-e, CIP shall keep track of usage rates, HAP contents, reclaim if applicable of materials and monthly / 12-month rolling time periods of HAP emissions. Records were requested and reviewed back through 2019. No HAP materials appear to be reclaimed based on the records reviewed. Minor errors were noted upon reviewing the records and several SDS for the Screen Room indicated that there appeared to be some HAPs not recorded, but the exact HAPs were not identified in the composition section. Based on how low CIP's HAP emissions are, it is highly unlikely there are any emission exceedances. The errors were discussed with CIP staff and will be corrected as needed. Overall, the remaining records reviewed appeared acceptable.

Additional Items

- While speaking with CIP staff, it was determined that the decal doming process (EUDOMEROOM) and the screen cleaning and reclamation area (EUSCREENROOM) are potentially exempt from air permitting per Rule 290. Additional information for each emission unit is discussed further below. It was also noted while speaking about EUDOMEROOM and EUSCREENROOM that materials used for both units are not heated.
 - EUDOMEROOM – Monthly records were reviewed back through 2019. Copies of SDS for all materials used in EUDOMEROOM were requested and reviewed. For the month of February 2020, 56 lbs of VOCs were emitted, which is well within the 1,000 lb monthly emission limit per Rule 290(2)(a)(ii). Previous monthly emission totals reviewed also appeared to be within the applicable emission limit.
 - EUSCREENROOM – Monthly records were reviewed back through 2019. Copies of SDS for all materials used in EUSCREENROOM were requested and reviewed. For the month of February 2020, 872 lbs of VOCs were emitted, which is below the 1,000 lb monthly emission limit per Rule 290(2)(a)(ii). Previous monthly emission totals were reviewed. For the month of January 2020, 1,309 lbs of VOCs were emitted. The remaining months reviewed appeared to be within the applicable limit. After further review, it

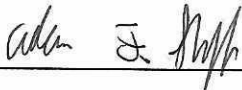
was determined that since CIP had exceeded the applicable emission limit for one month with all remaining months appearing to be within the limit. It was discussed with CIP staff moving forward that if monthly emissions are not able to meet Rule 290(2)(a)(ii) requirements, then CIP may have to apply for a PTI for the applicable unit. No violation notice will be issued at this time. Additionally, moving forward changes were discussed on the formatting of records provided for better readability.

MAERS

- Due to the timing of the records review, the 2019 Michigan Air Emissions Reporting System (MAERS) Report had been previously received and reviewed. Minor errors had been noted and overall, the 2019 MAERS Report had appeared acceptable. Following the PCE records review, errors were noted when compared to the MAERS Reported emissions. Speaking with CIP staff the report was later failed, corrected, and resubmitted. Upon review, the resubmitted MAERS Report appeared to be acceptable.

After review of the records provided, CIP appears to be in compliance with the emission limits and recordkeeping requirements in PTI No. 143-14 as well as select air pollution control rules. As stated earlier in this report, a follow up site inspection will be conducted later to verify the facility's compliance status and potentially review any additional records.

NAME



DATE

07/01/20

SUPERVISOR

