

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

N521462165

FACILITY: WestRock		SRN / ID: N5214
LOCATION: 13 W 4TH ST, HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT: Sandra Schoeb , EHS Manager		ACTIVITY DATE: 03/16/2022
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY '22 on-site inspection to determine the facility's compliance status with PTI 101-17 and any other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

On March 17, 2022, AQD staff Chris Robinson (CR) conducted an unannounced inspection of WestRock (SRN N5214) located at 13 West 4th Street in Holland, Michigan. The purpose of the inspection was to determine the facility's compliance status with respect to Permit to Install no. 101-17 and any other applicable air quality rules and regulations. CR met with Mr. Mark Holland, Maintenance Manager. Identification was provided and Mr. Holland was informed of AQD's purpose for the visit. Mr. Holland provided a walk-through of the facility and pertinent information regarding the equipment. Ms. Sandra Schoeb is the new Environmental Health and Safety Manager, however Ms. Schoeb was not able to be present during the inspection. CR followed up with Ms. Schoeb on March 18th by phone. Records were also requested at that time.

The Weather conditions were cloudy with a temperature of approximately 38°F with south-southeast winds at approximately 0 - 5 mph. No visible emissions or odors were observed while surveying the perimeter of the facility.

A) Facility Description

WestRock is an offset lithographic printing facility that specializes in folding, die cutting and printing packaging primarily for over-the-counter medication. WestRock is in a primarily industrial area with a commercial area located approximately 500 feet south of the facility.

B) Compliance Evaluation

WestRock is currently operating under Permit to Install (PTI) no 101-17 and Rule 201 Permitting exemptions.

1. PTI No. 101-17

Flexible Group FG-PrintingPakMfg includes four (4) printing presses (EU-Press1-4), three (3) die cutters (EU-DieCutter1-4), four (4) gluers (EU-Folder-Gluer1-4) and two (2) ink-jet labelers (EU-Digital1&2). According to Mr. Holland EU-Press-04 was removed in 2021. Also, EU-Folder-Gluer-02 and EU-Folder-Gluer-03 have been removed and replaced with new Bobst units. EU-Folder-Gluer-03 was reinstalled at the 48th Street Max Warehouse location while EU-Folder-02 is no longer being used. During a conversation with Ms. Schoeb and Mr. Bockstruck on March 28, 2022, CR was informed that printing press EU-Press3 was replaced with a new unit, EU-Press5.

FG-PrintingPakMfg is subject to a VOC emission limit of 34.8 tpy and the material limits in the table below. Based on the records provided by Ms. Schoeb, 2021 VOC emissions were 7.38 tons and thus far in 2022 are approximately 1.15 tons. The records required to be maintained and provided in SC VI1-5 were provided and are attached.

Material	Limit	Equipment	Actual Content/Usage
VOC Content of the Fountain Solution	5.0% by weight as applied (instantaneous)	EU-Press 1-4	33.7% by weight as purchased & 1.1% as applied.
VOC Content of Glue	2.9% by weight, as applied (instantaneous)	EU-Folder-Gluer 1-4	HM6106PI = *Negligible R70906 = < 0.39% R70940 = < 0.39%
Fountain Solution	1,400 lbs. per month	FG-PrintingPakMfg	991.39 lbs. (See note below)
ECURE140 LVTR	7,500 lbs. per month	EU-Press03	Stopped using ~Feb 2021

** All three adhesives are manufactured by the same company. Since VOC contents have been provided for the R70906 and R70940 adhesives of < 0.39% it is being assumed that the "negligible" listed for HM6106PI is less than that. In addition, this adhesive is a hot melt adhesive which is expected to have very little VOC's.

Based on observations waste was being stored in closed containers as required by SC III.1 and III.2. CR reviewed Safety Data sheets for all the cleaning solvents and the vapor pressures for all of them used on the printing presses are less than 10 mmHg @ 20 degrees Celsius as required by SC III.3.

WestRock is an opt out source for hazardous air pollutants (HAPs). PTI No. 101-17 establishes a facility wide (FG-Facility) aggregate HAP limit of 22.4 tons per year (tpy) and a single HAP limit of 8.9 tpy. Total HAP emissions for 2021 were 0.29 tons and thus far in 2022 they are 0.01 tons, which are both well below the aggregate and individual limits.

The HAP content is required to be determined using Manufacturer's Formulation Data per SC V.1. Based on a records review and discussions with Ms. Schoeb these are based on technical data sheets which appears to be accurately reflected in the records. Currently the AQD is not requesting EPA Test Method 311 verification of the manufacturer's formulation data. Records required by SC VI.2.a-e are being tracked and have been provided.

2. Rule 201 Permitting Exemptions

Emission Unit EU-Press5 was installed under Rule 290. Records were provided as requested and appear to be complete. Based on a screening level analysis Press 5 is subject to a 1,000 lb./month VOC emission limit. During the month of March 2021 this was exceeded by 31.1 pounds. However, usage, which is the basis for the emission calculations, is based on purchase orders and the facility purchases material for inventory not on an as needed basis. Therefore, not all the material purchased was used during that month. Actual emissions are expected to be less than 1,000 pounds. CR discussed the issue with tracking usage from purchase orders. Prior to and after March of 2021 emissions have been within the limit. Prior to this inspection the facility contracted an environmental consultant to modify the PTI which is in process and should be submitted soon. CR will follow-up with the facility to confirm that the application has been submitted.

The new Bobst units use a hot melt adhesive which is exempt from Rule 201 permitting requirements per Rule 287(2)(i).

3. MAERS

WestRock's 2021 emissions were reported to Michigan's Air Emissions Reporting System (MAERS) on March 25, 2022 and reviewed on April 7 2022. The facility is using mass balance to calculate emissions and proper documentation was provided. No changes were made to the database as submitted. A summary of these emissions is provided below.

Pollutant	Amount (Tons)
VOC	7.38
Diethanolamine	0.04
Glycol Ether	0.21
Naphthalene	0.02

C) Compliance Determination

Based on the observations and discussions made during the inspection and a subsequent records review WestRock appears to be in compliance with PTI no. 101-17 and other applicable air quality rules and regulations.

NAME



DATE

4/7/2022

SUPERVISOR

