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

FACILITY: Multi Packaging Solutions Westrock		SRN / ID; P0136
LOCATION: 79 Clover Ave, HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT:		ACTIVITY DATE: 02/01/2019
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: fy 2019		
RESOLVED COMPLAINTS:		

Clean Air Act Inspection report for Multi Packaging Solutions (formerly the Printery), Holland, Michigan

Facility Background

Multi Packaging Solutions (MPS) is a package manufacturing facility that specializes in folding, cutting and printing packaging materials. The facility utilizes digital printers and offset printing.

Multi Packaging Solutions is not subject to the Title V program, which is discussed below, in the regulatory analysis section of this report.

Compliance History

The facility has not received any violation notices in the past five years. The facility was last inspected in Fiscal Year 2010 and was found to be in non-compliance with Rule 201. The facility provided records demonstrating compliance with Rule 290 and argued that a Rule 278a request should have been submitted.

Location

Multi Packaging Solutions located at 79 Clover Ave, Holland, Michigan. This area consists of a mix of residential, industrial and commercial properties. The nearest residential structure is approximately 375 feet to the southwest of the facility.

Introduction and purpose of inspection

On 2/1/2019 Tyler Salamasick, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division conducted an unannounced, scheduled inspection of Multi Packaging Solutions. The MDEQ inspected the facility located at 79 Clover Ave, Holland, Michigan. The purpose of the inspection was to determine the facility'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 Rule 201.

Observations and facility processes

AQD staff met with Larry Baum, General Manager, and Ethan Meyer, EHS Supervisor. I presented my identification and informed the representatives of the intent of the inspection. The facility representatives agreed to show the AQD the facility and its processes. Multi Packaging Solutions produces printed products on both digital printers and offset printing presses.

During the inspection AQD staff observed the facility's processes. The facility's main emission sources are the offset presses. The offset presses are used for higher volume jobs. The facility has one six-color

press, one envelope press, and two two-color sheet fed presses. They also have three digital printers. The facility uses these to print different images on blank paper prior to cutting, folding and assembly. Ethan provided me with the applicable Rule 290 records for these processes (see attached).

Regulatory analysis and compliance evaluation Facility emission category

Multi Packaging Solutions is a minor source of volatile organic compounds (VOCs), hazardous air pollutants (HAPs) and particulate matter (PM). The facility does not currently have any air quality permits and operates the emission units under exemptions from Rule 201 (permitting).

The facility utilizes Rule 290 to demonstrate that the emission units are exempt from Rule 201 which would require a permit. The facility's main emission unit is one large press and the small miscellaneous presses. The facility tracks the usages for both and provided records pursuant to Rule 290. For the year of 2018 the facility's highest emitting emission unit was press 74 at 539.25 lbs. This is below the Rule 290 limit of 1000 lbs of air contaminants from uncontrolled sources.

Discussion

Compliance statement: It appears that MPS is in 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 Rule 201.

NAMÈ

DATE 2/19/19

SUPERVISOR