

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

P088273173

FACILITY: Wynalda Packaging		SRN / ID: P0882
LOCATION: 8221 Graphic Drive NE, BELMONT		DISTRICT: Grand Rapids
CITY: BELMONT		COUNTY: KENT
CONTACT: Jim Malkewitz , Technical Compliance Coordinator		ACTIVITY DATE: 06/09/2024
STAFF: Laura Martin	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled, unannounced on-site inspection.		
RESOLVED COMPLAINTS:		

On July 9, 2024, Air Quality Division (AQD) staff, Laura Martin (LM), conducted an unannounced, scheduled inspection of Wynalda Packaging located at 8221 Graphic Drive NE and 2775 Montana Trail in Belmont. The purpose of the inspection was to determine the facility's compliance with state and federal air pollution regulations. AQD staff was accompanied on the inspection by Gar Allison, Supply Chain Manager and Jim Malkewitz, Technical Compliance Coordinator.

Facility Description

Wynalda Packaging is a packaging and commercial printing company. The main production facility, at 8221 Graphic Drive, consists of sheet-fed lithographic printing machines, sheet cutting, foil embossing, assembly and paper handling. The production facility at 2775 Montana Trail consists of lithographic printing machines and paper folding machines. The Montana Trail plant is contiguous to the main site with a street separating the two pieces of property; the two plants are considered one stationary source.

This stationary source is considered a true minor source of emissions, and all equipment is exempt from air use permitting.

LM arrived on-site at approximately 1:50 PM and left around 3:10 PM. Prior to the on-site inspection, LM made visible emission (VE) and odor observations in the surrounding area. None were observed.

Compliance Evaluation

AQD staff toured both the Graphic Drive and Montana Trail manufacturing facilities. Between both facilities there are five sheet fed non-heat set printing presses. The two web-fed heat set printing presses and the associated regenerative thermal oxidizer (RTO) have been removed completely as of July 2021. All printing units are uncontrolled and considered exempt from air use permitting under Rule 290.

The following table identifies the current lithographic printing equipment and corresponding emissions data based on company records. Volatile organic compounds (VOCs) and toxic air contaminant (TAC) emissions are being recorded by Wynalda daily to show compliance with Rule 290.

ID	Equipment	Plant Location	Installation Date	Comments	Highest monthly T emissions in lbs/n
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					Highest monthly VOC Emissions in lbs/month	
K1	20" Komori 6/6 color web fed	Montana Trail	12/1/01	Removed July 2021	N/A	N/A
K2	20" Komori 6/6 color web fed	Montana Trail	3/15/05	Removed July 2021	N/A	N/A
MR706M	Manroland 40" 6 color sheet fed	Montana Trail	8/1/07		462.6	2.1
MR707	Manroland 40" 7 color sheet fed	Montana Trail	7/1/04	Removed July 2018	N/A	N/A
MR706M2	Manroland 40" 6 color sheet fed	Montana Trail	6/1/2015	Removed September 2015	N/A	N/A
MR906	Manroland 64" 6 color sheet fed	Graphic Drive	4/1/07	Removed May 2024	N/A	N/A
U1	Man Roland Ultima	Graphic Drive	6/1/2015		476.1	0.0
U2	Man Roland Ultima	Graphic Drive	6/1/2015		753.6	0.0
EVO700	Man Roland Ultima	Graphic Drive	August 2019	New since last inspection	861.3	0.0
EVO900	Man Roland Ultima	Montana Trail	March 2021	New since last inspection	710.6	7.7

During the time period of July 2023 to June 2024, total facility-wide VOC emissions were 8.5 tons per year (tpy). The company is considered a minor source of VOCs because potential VOC emissions are limited by the thresholds in Rule 290 to below the major source thresholds. A review of the compounds in the inks showed the toxic air contaminants (TACs) with ITSL's between 0.04 and 2 micrograms per m³ were less than 20 lbs./month uncontrolled from each printer. No TACs with ITSL's or IRSL's less than 0.04 micrograms per m³ were being used. Combined uncontrolled emissions are less than 1000 lbs/month from each printer.

Miscellaneous

The facility also consists of a paper sheet cutting and die cutting equipment which are exempt from air use permitting under Rule 285(2)(l)(vi); an embossing or foil stamping machine which is exempt under Rule 285(2)(l)(i); adhesive application which is exempt under Rule 287(2)(i) and a scrap paper handling system, with four internally vented baghouses, which are exempt under Rule 285(2)(l)(vi).

Lastly, there is a 1,000-kilowatt emergency diesel generator that according to company records was installed in 1998. A 1,000-kilowatt unit would have a heat input rating of 3.5 million Btu/hour. This unit would be considered exempt from permitting under Rule 285(2)(g) because the heat input capacity is less than the 10 million Btu/hour threshold in the rule.

In addition, this unit is not subject to the New Source Performance Standard (NSPS) under 40 CFR Part 60, Subpart IIII for Compression Ignition Internal Combustion Engines because the unit was manufactured and installed prior to July 11, 2005. A specification sheet can be found in the file with the previous inspection.

Compliance Determination

Wynalda Packaging appears to be in compliance with the air pollution regulations evaluated. Records obtained during the inspection will be placed in AQD files.

NAME



DATE

8/22/24

SUPERVISOR

