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

| A235840785 | | |
|---|-------------------------------|---------------------------|
| FACILITY: Spartan Graphics | | SRN / ID: A2358 |
| LOCATION: 200 APPLEWOOD, SPARTA | | DISTRICT: Grand Rapids |
| CITY: SPARTA | | COUNTY: KENT |
| CONTACT: Cory Spencer, Operations Manager | | ACTIVITY DATE: 07/21/2017 |
| STAFF: Adam Shaffer | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MINOR |
| SUBJECT: Scheduled unannou | nced inspection | |
| RESOLVED COMPLAINTS: | | · |

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the facility at 9:45 am on July 21, 2017 to complete a scheduled, unannounced inspection. The weather conditions were partly cloudy, mid 70's°F and a southeast wind at approximately five miles per hour (mph).

Facility Description

Spartan Graphics (SG) is a printing company. At the time of the inspection SG employs approximately fifty employees and operates two shifts five days a week. SG does not operate under a permit, but has used several Part 201 permitting exemptions in the past for all on site equipment and processes. No excess odors or opacity emissions were observed prior to entering the facility.

Upon entering the site AQD staff AS met with Mr. Jeff Murak, President, and explained the purpose for the inspection. Mr. Murak stated that the primary contact would be Mr. Cory Spencer, Operations Manager, who was out of the office that day. AQD staff AS then met with Mr. Neal Hoffman, Maintenance Facility representative, who assisted with the facility walk through and provided pertinent on site information. Mr. Spencer was contacted following the inspection and provided all requested documents.

In the 2013 inspection SG was in operation with three printers which were the 540 Heidelberg, 640 Heidelberg, and the 640 Komori. Mr. Murak had stated that the 640 Komori is no longer in operation and this was verified during the course of the facility inspection. The 540 Heidelberg utilizes ultra violet (UV) inks and the 640 Heidelberg utilizes regular inks. Both printers are vented externally and utilize several cleaning materials during cleaning operations on the printing presses. SG had in the past utilized the Rule 290 exemption for the two Heidelberg printers. This was verified with Mr. Spencer following the inspection. Monthly records were requested for both printing presses back to June 2016. The 640 Heidelberg printer is the only printer that reclaims waste and this is limited to their auto wash cleaning solvent. While reviewing the records provided the 540 Heidelberg printer appears to be exempt per Rule 290(2)(a)(i). However, while reviewing the records for the 640 Heidelberg printer two months (August 2016 and June 2017) were identified to be over the 1,000 lbs of total monthly uncontrolled VOC emissions. While speaking with Mr. Spencer regarding the 640 Heidelberg records it was identified that reclaim of solvent was being applied to the total monthly VOC emissions incorrectly. The correct method to apply reclaimed waste to monthly emissions was stated to Mr. Spencer and monthly records were resubmitted. Additionally, it was verified via email that 100 percent of reclaim picked up by Univar is solvents, specifically the Prisco Autowash 6000. After review of the corrected records, the monthly emissions for the 640 Heidelberg printer were deemed acceptable and this unit appears to be exempt per Rule 290(2)(a)(ii).

A digital press (Jeti Titan HS) was observed during the course of the inspection. Mr. Hoofman stated this press utilizes UV inks. Mr. Spencer verified they will use the Rule 290 exemption for this particular press and monthly total emission records were provided back to June 2016. Based on the records reviewed, the Jeti Titan HS appears to be exempt per Rule 290(2)(a)(i).

Additional Observations

- A chemical storage area was observed for all waste solvents/inks and rag storage. A small vent was observed in the chemical storage area that vents externally. AQD staff AS recommended to SG that in the future to try and keep containers sealed to limit the amount of fugitive emissions.
- An ink storage room was observed where all ink is stored prior to use.
- No emergency generators are utilized on site. One 1.2 mmBtu/hr boiler was observed on site that was constructed in 2004. The boiler utilizes natural gas. Based on the size, this boiler is not subject to New

Source Performance Standards and appears to be exempt per Rule 282(2)(b)(i). Additionally, the last inspection of the boiler was on July 23, 2014.

- A press area was observed that contained five printers. Three smaller printers (Epson) are used to run proofs and utilize aqueous based inks. The three Epson printers were determined to not be subject to Rule 702. The two larger printers (Mutoh) are used for batch jobs. Purchase records were provided by SG for all of 2016 and through July 2017 for the two Mutoh printers. It was also stated in a phone conversation on August 8, 2017 that ink purchased each month is used. Based on the records provided for the combined two Mutoh printers a total of 72.65 gallons of ink were purchased in 2016, and from January through July 2017 a total of 39.63 gallons of ink were purchased. This is well within the 200 gallons of coating materials used per month and therefore the two Mutoh printers appear to be exempt per Rule 287(2)(c).
- Several cutting machines / die cutting machines were observed throughout the facility and appear to be exempt per Rule 285(2)(I)(vi)(B).
- Two adhesive machines were observed on site. One was a hot melt adhesive machine that appears to be exempt per Rule 287(2)(i). The other adhesive machine is not heated during operation. Purchase records were provided from January 2016 through early August 2017. After further discussion regarding total monthly adhesive usages, it appears that the non-heated adhesive machine is exempt per Rule 287(2) (c).

Conclusion

A final discussion was completed with AQD staff and Mr. Hoffman. Based on the records reviewed and the facility walk through, SG is in compliance with all applicable air pollution rules and regulations.

NAME_UMM F. Mulp

DATE 08/2M1)7 SUPERVISOR