

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

A669541500

<b>FACILITY:</b> UNIVERSITY LITHOPRINTERS		<b>SRN / ID:</b> A6695
<b>LOCATION:</b> 4150 VARSITY DR, ANN ARBOR		<b>DISTRICT:</b> Jackson
<b>CITY:</b> ANN ARBOR		<b>COUNTY:</b> WASHTENAW
<b>CONTACT:</b> Mark Sulkowski , V.P. of Operations		<b>ACTIVITY DATE:</b> 09/11/2017
<b>STAFF:</b> Mike Kovalchick	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Inspection of a lithographic printing company.		
<b>RESOLVED COMPLAINTS:</b>		

**Minor Source-****Facility Contacts**

Mark Sulkowski – Vice President, Operations

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**Purpose**

On September 11, 2017, I conducted an unannounced compliance inspection of University Lithoprinters (Company) located at 4150 Varsity Drive, Ann Arbor, Michigan. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules.

**Facility Location**

The facility is located in an industrial park just outside of Ann Arbor. See attached aerial photo of facility.

**Facility Background**

The facility was last inspected on 6/25/2013 and was found to be in compliance. The Company has been in business since 1991.

**Regulatory Applicability**

N/A.

**Arrival & Facility Contact**

No visible emissions or odors were observed upon my approach to the Company's facility. I arrived at 2 pm, proceeded to the facility office to request access for an inspection, provided my identification and spoke with Mark Sulkowski (MS) Vice President of Operations. I informed him of my intent to conduct a facility inspection and to review the various records as necessary.

MS extended his full cooperation and fully addressed my questions.

**Pre-Inspection Meeting**

MS outlined that there are 41 employees and they operate 5 days per week, 1 press operates 3 shifts and the other operates 1-2 shifts. A third press is an older style unit (referred to as ZP) that continues to be used primarily for making perforations in paper.

They are operating 2 nonheat-set, sheet fed lithographic printers. They also operated a Kodak NexPress ZX3300 Digital Production Color press that is taking over an increasing amount of their printing business. Similar to an office copy machine that uses toner; it generates very low VOC emissions.

### **Onsite Inspection**

MS gave me a tour of the facility. Upon entering the main printing room, I noticed moderately strong ink/solvent odors throughout the main section of the facility.

The Company operates two Komori Lithrone printers. One is a L-640-III, 28" x 40" six color offset printing press and the other is a 40" X 40". Ink application process involves sealed applicator units and computer controls. Dryers are built into the unit. 2 different collection hoods for each press captures emissions and a fan located in the stack directs emissions out small vertical stacks on the roof. See attached photo. Odors coming out the stack could expect to be significant based on the odors inside the facility although there are no residential homes nearby to impact. (A roof inspection was not conducted.) An additional hood on each press collects particulate emissions that is directed to a cartridge type collector that vents horizontally outside. Collected particulates fall into a 55 gallon drum. See attached photo. The particulates are generated from the application of corn starch on the paper which is uses to keep the pages of paper from sticking together. Everything seemed to be clean and operating properly.

Adjacent to the 2 printers is a shelf where they store the inks/solvents. See attached photo. Ink generally comes in 5 pound pails.

We next looked at water based system that is used to keep the printing plates clean. The solution is recirculated and nothing appears to be emitted.

Finally, we went into a separate room that houses the newer digital printer. There was an exhaust ventilation pipe that was attached to the printer that exhausted at another point in the building on the mezzanine level. Its purpose was simply exhaust heat out of the digital room.

No other observations.

### **Applicable Rules/Recordkeeping Review**

In order for the Company to be exempt from PTI requirements, the Company needs to meet the requirements of Permit Exemption Rule 290. This requires emissions of no more than 1000 pounds of VOC's per month per line and monthly records to demonstrate this. Furthermore, any compounds that are carcinogen must be less than 20 pounds per month.

Records provided by the Company a couple days after the inspection showed the following:

Attachment (1) are the MSDS's for the inks/coating used at the facility.

Attachment (2) are the Rule 290 calculation sheets for the period August 2016 and July 2017. They combined both lines on 2 one sheet.

Calculations show VOC emissions of 4.615 tons/year or 769 pounds/month average from 2 separate lines. (They are allowed up to 1000 pounds/month for each line.) By far, most of the VOC's are coming from a compound used to clean the press roller's with which is nearly 100% volatile.

PTE calculations show about 5.015 tons/years of VOC's. HAP emissions are no more than a few pounds per month.

### **Post-Inspection Meeting**

I held a brief post-inspection meeting with MS. We discussed what he needs to provide me to demonstrate compliance with Rule 290. He promised to forward the required records to me by Wednesday, September 13, 2017. I indicated to him that I no other concerns.

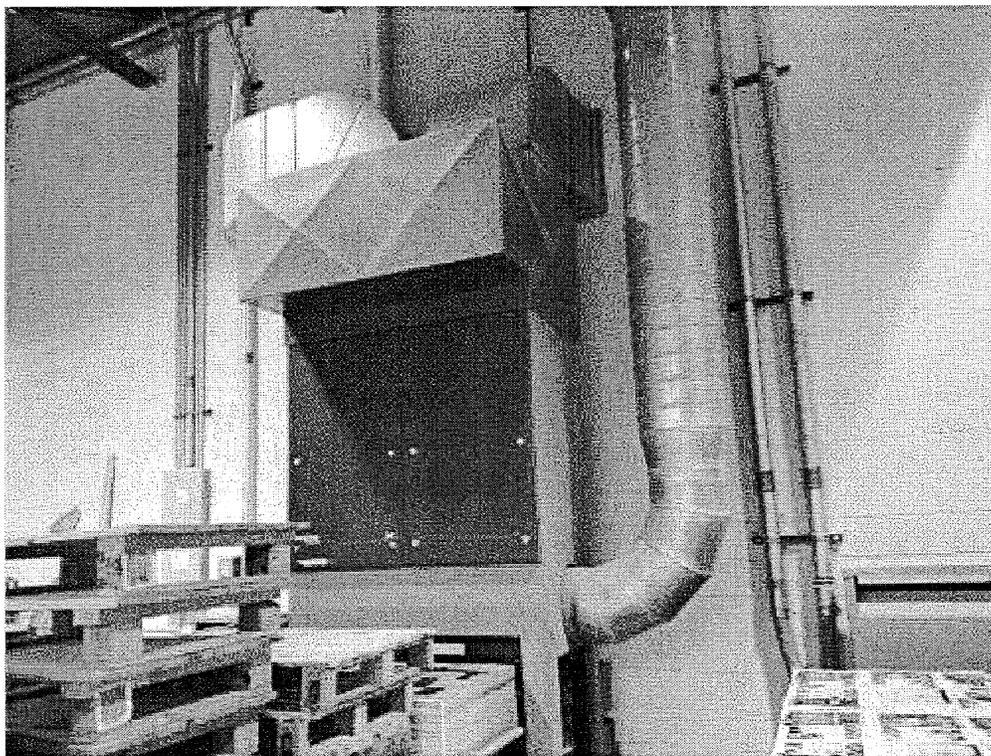
I thanked MS for his time and cooperation, and I departed the facility at approximately 3:30 pm.

### **Compliance Summary**

The Company is in compliance with applicable air regulations.



**Image 1(Aerial photo) :** Aerial photo.



**Image 2(Dust collector) :** Dust collector that collects corn starch particulates from the 2 lithographic printers.



Image 3(Lithographic printer) : Hood collection system from one of the lithographic printers.



Image 4(Ink storage) : Ink storage.

NAME M. Kovalchuk

DATE 9/18/2017

SUPERVISOR [Signature]