

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

B153450222

|   |                               |                           |
|---|-------------------------------|---------------------------|
| FACILITY: GRAPHIC PACKAGING INTERNATIONAL, LLC  |                               | SRN / ID: B1534           |
| LOCATION: 79 EAST FOUNTAIN STREET, BATTLE CREEK |                               | DISTRICT: Kalamazoo       |
| CITY: BATTLE CREEK                              |                               | COUNTY: CALHOUN           |
| CONTACT: Anitra Collins , Mill Manager          |                               | ACTIVITY DATE: 08/01/2019 |
| STAFF: Monica Brothers                          | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MAJOR       |
| SUBJECT: Unannounced scheduled inspection       |                               |                           |
| RESOLVED COMPLAINTS:                            |                               |                           |

This was an unannounced scheduled inspection. Staff, Monica Brothers and Rachel Benaway, arrived on-site at 10:30 am and met with Anitra Collins, Mill Manager. We first went into a conference room to go over the inspection process and discuss some preliminary questions before taking a tour of the facility. In the conference room we also met with Richard Johnson, Plant Manager. Brock Mollitor is the new EHS manager, but he was not at the facility that day. Anitra said that he was the only one with access to the air quality records and that I should contact him after the inspection to have him email me what I needed. The facility is considered to be a major source for nitrogen oxides (NOx) and is currently operating under MI-ROP-B1534-2016. The facility was last inspected on June 8, 2017 and was determined to be in compliance at that time.

Graphic Packaging is a 100% recycled paperboard plant that produces both 6-ply and 7-ply paper roll stock on two paper machines for consumer packaging. The majority of what they make is the paperboard for beer cartons and 12-packs of soda. They employ about 215 people who work two 12-hour shifts, seven days a week. Richard said that the facility commenced operations in 1923 under a different name and was originally used to make only Kellogg cereal boxes. The facility has four 3.5 MMBtu/hr natural gas space heaters, which are considered exempt under Rule 282(2)(b)(i), and a paper rewind machine, a core cutter machine and a small sand blaster, which are all considered exempt under Rule 285(2)(l)(vi)(B). The facility has one boiler and two cold cleaners.

**EUBLR001:**

This emission unit is for a 185 MMBtu/hr boiler that has a maximum steam output of 140,000 lbs/hr. It is a Babcock and Wilcox unit that uses only natural gas and has waste heat recovery and low NOx burners. Richard said that they did some work on the burners in 2016 and that they usually do boiler maintenance during the site-wide maintenance shut down that happens once per year. There is also a steam-driven generator near the boiler that supplies about 16-17% of the plant's electricity.

Records for the boiler were reviewed. They have a NOx limit of 95.3 TPY on a 12-month rolling timescale, and their records showed that they are consistently under this limit. The highest number I saw for 2019 was 62 TPY in January, and it is usually around 60 TPY. They are also limited to using no more than 1,589 MMscf/year of natural gas on a 12-month rolling timescale. Their records show that they are consistently under this limit, with the highest number in 2019 being 1,040 MMscf/year in January. During the inspection, no visible emissions were seen from the boiler.

**EUSTARCHSILO:**

This emission unit is for a starch storage silo. Their ROP requires that they perform visible emissions checks during filling operations. Brock Mollitor sent me copies of the facility's daily chemical inventory reports, which have a section for visible emissions readings for the silo baghouse. They are required to stop filling if visible emissions are observed and put in a maintenance request to fix the unit before filling continues. I viewed records for 2018 and 2019, which showed only one event of visible emissions. On January 23, 2018, the baghouse was seen to be leaking. The filling operations were stopped, and a maintenance request was logged. The baghouse was fixed the same day. This complies with the requirements in their ROP. The silo was not being loaded at the time of inspection, so I did not observe any visible emissions from the silo.

**FGPAPERMACH12:**

This flexible group is for EUPAPERMACH1 and EUPAPERMACH2. There are two paper machines, which make 6 and 7 ply paperboard stock, respectively. Each paper machine has a dedicated coater and drying

oven. Both machines were operating at the time of inspection. No visible emissions, except steam, were observed from either machine.

Their ROP requires that they keep track of hours of operation each calendar month, and they are keeping these records. They are required to keep a listing of each coating that contains VOC, the usage rate each month, and are limited to a VOC content of no more than 0.05 lbs/gallon. I viewed these records, and they are under this VOC content limit. The monthly VOC content is around 0.022 lbs/gallon minus water. They are keeping track of the usage rates of all coatings, cleaning solvents, acetaldehyde, and other VOC-containing products on a daily, monthly, and 12-month rolling timescale. They are calculating daily, monthly and 12-month rolling VOC emissions, and monthly and 12-month rolling acetaldehyde emissions. They have a limit of 0.25 pph and 1.08 TPY 12-month rolling for acetaldehyde, and their records show that they are consistently under these limits. They are usually around 0.10 lbs/day and 0.8 TPY. They have a limit of 173.74 lbs/day and 31.71 TPY 12-month rolling for VOC, and their records show that they are consistently under these limits. The highest numbers I saw for the past couple of years was 160.3 lbs/day and 17.84 TPY.

They are also keeping records of HAPs usage and emissions. They maintain a list of HAPs, HAPs-containing materials they use, and the HAP content in each of these materials. They are limited to emitting no more than 3.77 TPY on a 12-month rolling timescale for each individual HAP, and no more than 4.85 TPY 12-month rolling for any combination of HAPs. Their records show that they are consistently under these limits. The highest total HAPs emissions for 2019 was in July, with 2.29 TPY being emitted. The individual HAP with the highest emissions is Vinyl Acetate, which had the highest emission rate in July 2019 of 1.1 TPY.

#### FGCOLDCLEANERS:

This flexible group is for any cold cleaner that is grandfathered or exempt from Rule 201. The facility has two cold cleaners that use Crystal Clean 142 Mineral Spirits, which does not contain any halogenated compounds. The units are not heated or agitated. I viewed both cold cleaners during the inspection, and the lids were closed, and the rules were posted. I gave Richard a couple of EGLE's cold cleaner stickers to put on the units, since they appeared to be a bit worn.

The facility appeared to be in compliance at the time of inspection.

NAME 

DATE 9/27/19

SUPERVISOR RIL 9/30/19