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

FACILITY: Day International, Inc. a Flint Group Company		SRN / ID: B2014
LOCATION: 111 Day Dr, THREE RIVERS		DISTRICT: Kalamazoo
CITY: THREE RIVERS		COUNTY: SAINT JOSEPH
CONTACT: James Cotton, QA & Environmental - records		ACTIVITY DATE: 07/16/2020
STAFF: Chance Collins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled Inspectio	n for FCE	
RESOLVED COMPLAINTS:		

On July 16, 2020, AQD staff traveled to St. Joseph County to perform an inspection of Day International, a Flint Group Company. The purpose of this inspection was to determine the facility's compliance with MI-ROP-B2014-2016 and applicable state and federal air pollution control regulations 40 CFR Part 63 Subpart OOOO and 40 CFR Part 63 Subpart GGGGG. The facility manufactures lithographic printing blankets.

AQD staff arrived on site at 11:35 a.m. to cloudy conditions with a temperature of 72°F, and a NNW wind at 6 mph. There were no noticeable odors or visible emissions upon arrival.

AQD staff met with Jim Cotton who answered all questions and escorted staff around the site. In April of 2020, Flint Group announced that the Three Rivers, MI facility would be shutting down effective 5/29/2020. All blanket manufacturing after this date would be moved to a facility in North Carolina. Clean up of the facility to include dismantle of all equipment would begin on June 1, 2020. At the time of inspection, the only permitted equipment on site and operational were EUBOILER and EU-SVE. The CEMS system is still on-site, but the facility plans to ship this to the facility in North Carolina.

The remainder of all equipment (permitted and exempt) have either been removed or in the process of removal.

The following discusses the results of the on-site inspection and review of records:

SOURCE-WIDE CONDITIONS

The facility has a source wide VOC emission limit of 175 tons per year on a 12-month rolling time period. In the most recent 12-month rolling time period the VOC emission ranged from 25.52 tons to 56.95 tons.

EUBOILER

The boiler is a Cleaver Brooks CB-400-500, 20.9 MMBTU, 500HP boiler. It is natural gas-fired and subject to 40 CFR Part 63 Subpart DDDDD.

The boiler is not planned to be removed from the building. It will remain on-site to provide heat during winter months. The boiler was shut down at the time of inspection.

FG-PTECONTROL

Emission units within the PTE include: EUCLEANING, EUCOATING, EUROSS200, EUWINKWORTH, EUCEMENTPREP, EUCURING.

Pollution control equipment include the PTE and solvent recovery system (SRS) – carbon adsorption.

All equipment has either been removed or currently in process of being removed from the facility.

Records were reviewed for the most recent 12-month rolling time period. The records were up to date with the shut-down of the facility.

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Emission units include EUCLEANING, EUCOATING, EUROSS200, EUWINKWORTH, EUCEMENTPREP, EUCURING, EUAST, EURULE287K.

Pollution control equipment includes the PTE and SRS – carbon adsorption.

All equipment has either been removed or currently in process of being removed from the facility.

Day is using the organic HAP emission rate with add on controls method found in 40 CFR 63.4341(e)(7). In this method each month they divide the 12-month rolling HAPS by the 12-month rolling solids and compare it to 0.12. The most recent 12-month rolling time period are below this number ranging from 0.0071 to 0.0069.

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Emission unit includes EU-SVE. The pollution control equipment is the SRS – carbon adsorption.

FGFABFILTER1

Emission units include EUCOMPOUNDING and EUMILLING. The pollution control equipment is the Pulse Jet baghouse.

All equipment has either been removed or currently in process of being removed from the facility. The exception to this would be the baghouse. The facility is unsure whether or not the baghouse will be removed depending on terms of the sale of the property.

Records were reviewed for the most recent 12-month rolling time period. The records were up to date with the shut-down of the facility. The facility kept daily records of differential pressure readings and visible emission observations for FGFABFILTER1.

FGRULE290

Emission units including but not limited to: EUINKJET2 and EU-SVE. The pollution control equipment includes EU-SVE, SRS – carbon adsorpotion.

All equipment (minus EU-SVE) has either been removed or is in the process of being removed from the facility.

Records were reviewed for the most recent 12-month rolling time period. The records were up to date with the shut-down of the facility.

FGCOLDCLEANER

The parts cleaner was on-site but was empty of all liquid and/or cleaning solution.

WASTEWATER

Steam that is used to desorb the carbon adsorbers passes through a condenser. There is a water separator where the toluene is skimmed off the top layer. This toluene goes to the used red toluene tank. The water layer goes through a stripper. The air stream goes back in the solvent recovery system. The wastewater goes to the Three Rivers POTW. The stripper has been removed from the building.

There is a 4,500-gallon tank for toluene. The remaining toluene on-site will be shipped to the North Carolina facility.

NAME

B/17/2020

SUPERVISOR RIL 10/5/20