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

M354932883

FACILITY: CONTINENTAL IDENTIFICATION PRODUCTS		**SRN / ID:** M3549
LOCATION: 140 E AVERILL ST, SPARTA		**DISTRICT:** Grand Rapids
CITY: SPARTA		**COUNTY:** KENT
CONTACT: Denis Fodrocy , Technical Lab Manager		**ACTIVITY DATE:** 01/07/2016
STAFF: Kaitlyn DeVries	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: The purpose of this inspection was to determine compliance with Permit to Install (PTI) Number 143-14 and all other applicable Air Quality Rules and Regulations.		
RESOLVED COMPLAINTS:		

On January 7, 2016 AQD Staff Kaitlyn DeVries (KD) conducted an unannounced, scheduled inspection of Continental Identification Products located at 140 E. Averill St. Sparta, Michigan. The purpose of this inspection was to determine compliance with Permit to Install (PTI) Number 143-14 and all other applicable Air Quality Rules and Regulations.

KD arrived on site at approximately 9:40 am and surveyed the perimeter of the facility for odors and opacity prior to entry. None were observed. KD met with Mr. Denis Fodrocy, Technical Lab Manager, and presented the Environmental Rights and Responsibilities pamphlet, which was briefly discussed. Mr. Fodrocy and KD discussed some construction that was occurring on the north east side of the facility. Mr. Fodrocy explained that this was to accommodate an additional press they will be installing. This press will be similar to two (2) of the existing presses. Further discussion of the new press will commence in the compliance evaluation portion of this report. KD left the facility at approximately 10:45 am.

Facility Description:

Continental Identification Products (CIP) is a silk screening company. CIP primarily prints advertising and marketing materials. The facility also has a screen room where the silk screens are put together and cleaned. An additional room, the dome room, houses a different kind of printing, which utilizes polyurethane and heat. CIP has approximately 50-60 employees and operates three (3) shifts, five (5) days per week.
CIP shares a building with General Formulations, a sister company. A stationary source determination was conducted using Operational Memorandum 11 in 2011, by the previous inspector, and it was determined that General Formulations and CIP are indeed separate stationary sources (please reference e-mails located in the General Formulations plant file for further information on the stationary source determination). KD reviewed the pertinent information, and agrees that these two (2) companies continue to be separate stationary sources.

Regulatory Overview:

CIP is a Synthetic Minor source for Volatile Organic Compounds (VOCs) and a minor source for Hazardous Air Pollutants (HAPs); currently CIP only has one (1) Opt-Out permit: PTI No. 143-14. CIP was formerly a 208a source, and had formerly utilized some of the Rule 201 Permitting Exemptions (IE Rule 290 and Rule 287 (e)). CIP has a potential to emit (PTE) VOC's above the major source threshold, thus requiring CIP to obtain the Opt-Out Permit. Since CIP now maintains the Opt-Out permit, they no longer utilize these exemptions for recordkeeping, but rather account for all emissions in the FG-FACILITY emission calculations.

Per Mr. Fodrocy, the facility does not have any boilers, generators, or parts cleaners.

Compliance Evaluation:

Only the operations in the dome room, the screen room, and one of the silk screen printers were in operation at the time of the inspection.

Equipment Description:

The screen printing operations are exempt from Rule 201 Permitting under Rule 287 (e), and the emissions are accounted for in the FG-Facility emission calculations.

CIP utilizes nine (9) different silk screening machines, which are identified as the following: 1C Sias, 5C Sias, 43 General #1, General #2, General 30, Klem Web press, Pony, and Cameo (portable press). Only the 5C Sias

was operating at the time of the inspection. The Klem Press was partially dismantled, but per Mr. Fodrocy, they are hoping to get this press back operating in the near future. The new press, that is to be installed, is similar to the Sias presses, and will be in addition to the existing presses. Since this is a silk screening press, this unit is exempt under Rule 287 (e) for installation, but will need to be incorporated into the FG-FACILITY emission calculations.

Most of the screening machines utilize UV curable screen inks only; however, CIP does still use some solvent based screen inks. During the inspection, KD noted several open UV curable ink containers throughout the facility. While these inks do have lower VOC contents than the solvent based inks, KD explained to Mr. Fodrocy that for best management of fugitive emissions, these containers should be closed when not in use.

The dome room, as stated above, uses polyurethane to make pieces of the printed material. Isopropyl alcohol is used as a cleaning agent in that room. All emissions are accounted for in the FG-FACILITY emissions calculated below. Some assembly also occurs in this room.

The screen room, where the silk screens are cleaned for future use, utilizes a variety of cleaning products for which SDS's can be found attached to this report. The screens are manually cleaned before being dried and made available for future use. Adhesive is also used in the screen room for adherence of the screens to the screen casing. The cleaning products and the glue emissions are accounted for in the FG-FACILITY emission calculations.

FG-FACILITY:

This flexible group encompasses all of the processes located in the building (including grandfathered, permitted, and exempt equipment). There are no other permitted emission units. CIP is required to comply with several source wide conditions, many of which are listed in the table(s) below. Records were readily available on site and full records can be found attached to this report. Records were collected for the time period of September 2014 through November 2015. The monthly and the 12-month rolling averages are being adequately tracked. The reported emissions are consistent with the most recent MAERS data from 2014.

Table 1: Emission Limits

Pollutant	Limit	Actual[1]	Compliant/Noncompliant
VOC	90 tpy[2]	0.4410 tpy[2]	Compliant
Individual HAP	9 tpy[2]	0.083 tpy[2,3]	Compliant
Aggregate HAPs	22.5 tpy[2]	0.117 tpy[2]	Compliant

[1] The actual emissions are from November 2015
[2] Tons per year – 12-Month Rolling
[3] The individual HAP is Ethylene Glycol Monopropyl Ether

Table 2: Material Limits

Limitation	Limit	Actual[1]	Compliant/Noncompliant
VOC content of Inks	6.5 lbs./gallon	5.70 lbs./gallon[2]	Compliant
Ink Usage[2]	25,100 gallons	12,444 gallons	Compliant

[1] The actual emissions are from November 2015
[2] The highest VOC content – See attached MSDS
[3] Usage is for VOC/HAP containing ink in FG-FACILITY for a 12-Month rolling time period

The top ten (10) UV inks, and the top ten (10) solvent based ink SDS's were requested and reviewed. Upon review, KD noted that a few of the inks contained lead and lead chromate, which were not being tracked as part of the HAP's. While the emission ~~about~~ amount is small (as per calculations done by KD), it shall be noted that CIP should adequately track lead and chromium emissions from the inks moving forward.

Compliance Determination:

Based on the observations made at the time of the inspection and the subsequent review of the records, Continental Identification Products appears to in compliance with PTI No. 143-14 and all other applicable Air Quality Rules and Regulations.

NAME Kaitlyn Reid DATE 1/15/2016 SUPERVISOR PAB