

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

M354954243

FACILITY: CONTINENTAL IDENTIFICATION PRODUCTS		SRN / ID: M3549
LOCATION: 140 E AVERILL ST, SPARTA		DISTRICT: Grand Rapids
CITY: SPARTA		COUNTY: KENT
CONTACT: Rob Bachholzky , Chemist		ACTIVITY DATE: 07/14/2020
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled unannounced inspection to finish FCE.		
RESOLVED COMPLAINTS:		

A partial compliance evaluation (PCE) was completed by Air Quality Division (AQD) staff Adam Shaffer (AS) for Continental Identification Products (CIP) by completing a scheduled unannounced inspection. On the morning of July 14, 2020, AS was scheduled to meet with Mr. Rob Bachholzky, Chemist, to verify compliance on an item regarding General Formulations, where Mr. Bachholzky is also the environmental contact. Prior to leaving the office, AS spoke with Mr. Bachholzky, and verified that an inspection was possible for CIP that day despite the current coronavirus pandemic. No issues were identified. AS arrived in the area at 8:49 am and completed offsite observations of the CIP site until 8:58 am. The rest of the site inspection was finished at approximately 11:00 am. The weather conditions at the time were sunny skies, temperatures in the middle 60's F and winds from the south / southeast at 0-5 mph. No emissions were observed, and a mild paper odor was noted to the northwest of the site; however, no recent odor complaints have been received regarding CIP.

Facility Description

CIP is a silk-screening company located in Sparta, MI. CIP is an opt-out source for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) and is in operation with PTI No. 143-14.

Compliance Evaluation

Prior to walking onsite, AS and Mr. Bachholzky discussed the current status of the records and the fixes that had been identified from the 2020 PCE records review. Prior to the site inspection CIP staff have been giving updates on the status of providing manufacturers formulation data sheets to AS for several materials. CIP had just obtained the records and they were shown to AS; however, they have not had a chance to update the records with this information. CIP was still working on the format of the records to make them more readable when reviewing. At the time of the inspection and per PTI No. 143-14 records were to be updated through May 2020. CIP staff were still working on completing May 2020 and it was also noted that information for March 2020 had been incorrectly inputted. It was discussed that moving forward CIP shall maintain updated records per PTI No. 143-14.

PTI No. 143-14 FGFACILITY

This flexible group is for all process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

CIP is subject to a facility wide VOC emission limit of 90 tons per year (tpy) per a 12-month rolling time period. Records were requested and provided for May 2020. For the month of May 2020, 0.5194 tons of VOCs were emitted. As of May 2020, 8.7247 tons of VOCs were emitted, which is within the VOC permitted limit. Previous records were reviewed in a report dated April 13, 2020, and also appeared to be within the permitted VOC limit.

CIP is subject to facility wide individual / aggregate HAP emission limits of 9 tpy / 22.5 tpy per a 12-month rolling time period. For the month of May 2020, 0.125 tons of aggregate HAPs were reported emitted. As of May 2020, 1.39 tpy of aggregate HAPs were emitted per a 12-month rolling time period, which is well within both individual and aggregate HAP emission limits. Previous records were reviewed in a report dated April 13, 2020, and emissions also appeared to be within the permitted HAP limits.

Per special condition (SC) II.1, the VOC content of inks used shall not exceed 6.5 lbs per gallon. Safety Data Sheets (SDS) were requested and reviewed for various materials used site wide and reviewed during the April 13, 2020 records review. Based on the SDS reviewed at the time, it appears this limit is being met.

CIP is also subject to a usage limit of 25,100 gallons of VOC/HAP containing ink site wide per a 12-month rolling time period. Monthly and 12-month rolling totals of ink usage were requested and reviewed for May 2020. For the month of May 2020, 265 gallons of ink was used and as of May 2020, 6,681 gallons of ink was used per a 12-month rolling time period which is within the permitted limit. Previous records were reviewed in a report dated April 13, 2020, and also appeared to be within the permitted ink usage limit.

Per SC VI.2.a-e, CIP shall keep track of usage rates, VOC contents, reclaim if applicable of materials and monthly / 12-month rolling time periods of VOC emissions. Records were requested and reviewed for May 2020. Isopropyl alcohol (IPA) is the only material that is reclaimed onsite. It was determined that a pot unit located on the General Formulations site is used to separate out waste from IPA being reclaimed. Records were requested and provided for May 2020. Based on the records reviewed, CIP appears to overall be keeping track of usage rates, VOC contents and monthly / 12-month rolling time periods of VOC emissions.

Per SC VI 3.a-e, CIP shall keep track of usage rates, HAP contents, reclaim if applicable of materials and monthly / 12-month rolling time periods of HAP emissions. Records were requested and provided for May 2020. The previously mentioned HAP manufacturers formulation data recently obtained by CIP for several materials used in EUSCREENROOM was also requested and provided. Upon review of the HAP information mentioned above, two components were listed as HAPs (CAS #112-15-2 and CAS # 2807-30-9). Reviewing the HAP list on the EPA database, these two materials are not included in the HAPs list, therefore, would not need to be included in the total HAP emissions. No reclaim is calculated for any HAP emissions. Overall, it appears that CIP is keeping track of usage rates, HAP contents and monthly / 12-month rolling time periods of HAP emissions.

Site Observations

A walk-through inspection of the site was completed with observations discussed below.

- The decal doming process (EUDOMERROOM) and the screen cleaning and reclamation area (EUSCREENROOM) were both observed during the course of the site inspection. Both units were previously determined to be exempt per Rule 290 during the April 13, 2020 record review. Records for May 2020 were requested for each emission unit and reviewed. As stated previously, materials for both emission units are not heated.
 - o EUDOMERROOM – For the month of May 2020, 192 lbs of VOCs were emitted, which is well within the 1,000 lb monthly emission limit per Rule 290(2)(a)(ii). Previous monthly emission totals reviewed during the April 13, 2020 records review also appeared to meet the permit exemption. Based on this, the

EUDOMEROOM still appears to be exempt per Rule 290(2)(a)(ii).

- o EUSCREENROOM – For the month of May 2020, 380.98 lbs of VOCs were emitted, which is well within the 1,000 lb monthly emission limit per Rule 290(2)(a)(ii). The components for materials previously identified to potentially contain HAPs were reviewed to identify any potential issues. One material (ICC858) contained two components of potential concern (CAS # 1119-40-0 and CAS # 100-52-7) and was discussed with CIP staff. Since January 2019, the highest usage monthly total for ICC858 was 14.9 lbs which, based on the manufacturers formulation data equals 3.17 lbs of combined emission from the two components and is well within emission limits per Rule 290(2)(a)(ii)(A-B). Previous monthly emission totals reviewed during the April 13, 2020 records review also appeared to meet the exemption. Based on this, the EUSCREENROOM still appears to be exempt per Rule 290(2)(a)(ii). Moving forward it was discussed to keep track of these specific components mentioned above in the records to demonstrate continued compliance.
- The silk screen operations were observed during the inspection that consist of five units (43 General #1, Cameo, Press A 5C Sias Large, Press B 5C Sias Small, and Press C 5C Sias Large). The silk screen processes appear to be exempt per Rule 287(2)(e).
 - No emergency generators or cold cleaners are located on site. During the inspection, several open containers were noted. CIP was advised to keep containers closed when not in use to prevent any fugitive emissions.
 - Several laminators were noted during the inspection that utilize pressure sensitive adhesive and CIP staff stated there are no emissions from these specific operations. After review this appears to be acceptable.
 - Several cutting machines were observed during the inspection that are used for cutting products like paper. The cutting machines appear to be exempt per Rule 285(2)(l)(vi)(B).

Conclusion

Based on the facility walk through, a review of the records provided, and the previous records review report dated April 13, 2020, CIP appears to be in compliance at this time with PTI No. 143-14 and applicable air pollution control rules.

NAME Adam Shaffer

DATE 09/25/2020

SUPERVISOR HH