

Monika

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

N123951588

FACILITY: STEWART SUTHERLAND INC		SRN / ID: N1239
LOCATION: 5411 EAST V AVENUE, VICKSBURG		DISTRICT: Kalamazoo
CITY: VICKSBURG		COUNTY: KALAMAZOO
CONTACT: Kristina Jackson , Quality Manager		ACTIVITY DATE: 11/21/2019
STAFF: Monica Brothers	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced scheduled inspection		
RESOLVED COMPLAINTS:		

Staff, Monica Brothers, arrived at Stewart Sutherland at about 11:00 am and met with Kristina Jackson, Quality Manager. I introduced myself, briefly explained the air quality inspection process, and asked some preliminary questions about the facility operations. Stewart Sutherland prints, waxes, glues, and folds various types of paper and foil food wrappers for the food industry. They began operations around 1959 and currently have about one-hundred employees. They typically work five days per week, with some Saturdays, if needed, and work three shifts per day.

The last inspection at this facility was conducted in 2009, at which time, they were operating under the Rule 290 exemption. I asked Kristina for the Rule 290 records during the inspection, but she did not know that she was supposed to be keeping those records. There had been some employee turnover since the last inspection, and it seems that the recordkeeping for Rule 290 was lost amidst all of the changes over the years. Kristina was able to provide me with a spreadsheet that showed some VOC and HAP information about their basecoats and inks, but this spreadsheet did not contain any Rule 290 calculations. Kristina also gave me copies of the SDSs for their basecoats, inks, and cleaning solvents that they use at the facility. I briefly explained the Rule 290 exemption and let her know that, going forward, Stewart Sutherland would have to be able to show that they are complying with an exemption or would need to apply for a permit from the Air Quality Division.

After discussing recordkeeping, we took a tour of the facility. They currently have 18 print lines, which are all electric and vented internally. Fourteen of these print lines are considered bag machines, which can cut, print, and glue, with 6 of them also having the capability to wax. The other 4 printing lines just cut and print only. They have one small gas-fired boiler that is used to heat the wax. It is a 650 MBH Bryan Boiler, model # 650-W-6. There is also a rubber plate washer and two cleaning tanks for trays and lids. Kristina provided the SDSs for the detergents used in those washing tanks. The Yellow Magic detergent is used to wash the plates, and the S-722 Foaming is used in the cleaning tanks. Because the S-722 contains VOC, the cleaning tanks cannot be considered exempt under Rule 281(2)(e). The facility will have to get these tanks permitted if they cannot comply with another exemption. They also use IPA and Fantastic 11 – Scent Safety Solvent for cleaning, which are very high in VOC content.

After the facility tour, I gave Kristina an overview of my findings and let her know that I would be sending a Violation Notice for the lack of exemption records and not having a permit. This facility will either need to show compliance with an exemption or apply for an air quality permit for their printing lines and cleaning tanks.

NAME Monika Brothers

DATE 12/16/19

SUPERVISOR RIL 12/7/19