

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

N329337621

FACILITY: Action Packaging		SRN / ID: N3293
LOCATION: 2400 E HIGH ST, JACKSON		DISTRICT: Jackson
CITY: JACKSON		COUNTY: JACKSON
CONTACT:		ACTIVITY DATE: 11/16/2016
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced targeted inspection conducted. One permit for multicloner on cardboard box production lines. Water based inks used for coating/labeling.		
RESOLVED COMPLAINTS:		

Minor Source Inspection**Facility Contact**

Phil Smith (PS), Maintenance Mechanic ph. 517-788-9800

Brian Rush-EHS Manager brush@actionpackaing.com (Not available during inspection but was post-inspection contact)

Purpose

On November 16, 2016, I conducted an unannounced inspection of Action Packaging (Company) in Jackson. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules and Permit to Install (PTI) 1235-91B.

Facility Location

The facility is located in the city of Jackson. It is surrounded by commercial establishments on all sides. See attached photo. Note the five different ventilation pipes feeding into the roof top cyclone control device.

Facility Background

The facility was last inspected on March 25, 2014 with no violations found. Action Packaging purchased Advance Packaging in October of 2013. They are in the business of making corrugated boxes and inserts at this location. The Company's only permit (PTI 1235-91B) was issued on September 22, 2006. It is for an existing corrugated scrap removal system with a cyclone.

Regulatory Applicability

Active Permits: PTI 1235-91B for an existing corrugated scrap removal system with cyclone.

Saturn Mini-Flexo Folder Gluer Process; Controlled by cyclone. VOC emissions exempt per Rule 290; less than 1000 pounds of VOC emissions per month.

McKinley Printer/Slotter/Die-Cutter Process; Controlled by cyclone. VOC emissions

exempt per Rule 290; less than 1000 pounds of VOC emissions per month.

Saturn III Flexo Folder Gluer Process; Controlled by cyclone. VOC emissions exempt per Rule 290; less than 1000 pounds of VOC emissions per month.

Ward rotary Die Cutter Process; Controlled by cyclone. VOC emissions exempt per Rule 290; less than 200 gallons per month.

Shredder Process: Controlled by cyclone per PTI 1235-91B.

Arrival & Facility Contact

Visible emissions or odors were not observed upon my approach to the Company's facility. I arrived at approximately 9:30 AM, proceeded to the facility office to request access for an inspection, provided my identification, and met with Phil Smith (PS) who is the Maintenance Mechanic; he was chosen in for Brian Rush; the EHS Manager who was out of the office. A pre-inspection conference was held with PS and provided a copy of the MDEQ brochure: *Rights and Responsibilities Environmental Regulatory Inspections*. I informed PS of my intent to conduct a facility inspection and to review the various records as necessary. PS extended his full cooperation during the inspection, accompanied me during the full duration of the inspection, and fully addressed my questions.

Pre-Inspection Meeting

PS outlined that the Company is currently operating 1 shift (8 hours) per day, 5 days a week. We discussed PTI 1235-91B and the various records required by the permit. There have been no significant changes at the facility since it was last inspected in 2014. We then moved on to the facility tour/inspection.

Onsite Inspection

I asked PS to show me all the processes in the facilities that have dedicated exhausts. There is a total 5 different process that have dedicated exhausts that all are vented to the cyclone which is located on the roof and is easily visible from the side of the building.

The Langston Saturn III is the main processing equipment that takes corrugated paper through slotting and bending operations to make finished boxes. This also includes a printing operation with water based inks and gluing. It was originally permitted under 1236-91 which was voided on March 11, 1998 using the Rule 290 exemption. Subsequent to the 2014 inspection, it was determined that the process was exempt per Rule 287(c) as less than 200 gallons of coating/ink were being used per month. (Glues exempt per Rule 287(a)) There are no HAPS in the formulations of inks or glues. (Note: After reviewing records from this inspection, using Rule 290 is the appropriate exemption to use.)

The McKinley Flexo Printer Slotter is used for cutting and printing on corrugated board. The same evaluation was made as for the Langston utilizing Rule 287(c) and Rule 290.

Saturn Mini Press is a smaller printing and box carton assembly operation with no

gluing involved. Exempt per Rule 290.

Ward Press is similar to the Saturn Mini and has the same applicable requirement of Rule 290.

These are the active permitted processes at the facility:

Emission Unit ID	Emission Unit Description	Stack Identification
EU- SCRAPREMOVSYSTEM	An existing corrugated scrap removal system with a cyclone. The cyclone has a 4 ft. by 8 ft. rectangular discharge and is equipped with a 1/8 inch screen.	SV-CYCLONE
Changes to the equipment described in this table are subject to the requirements of R336.1201, except as allowed by R336.1278 to R336.1290.		

The following permit conditions for EU-SCRAPREMOVSYSTEM were reviewed:

All conditions under the following Permit Sections: Emission limits, Visible Emission Limits, Equipment, Monitoring, Recordkeeping/Reporting/Notification, and Stack/Vent Restrictions.

The Company appeared to be in compliance with all the Permit requirements reviewed. Particulate and VOC emissions from this facility are very low. The Permit limits the process to 9 pounds/hour or just less than 40 tons of PM-10 if it was operating 24 hours a day year. Actual particulate emissions are probably less than 1 ton. The Company could void their permit if they choose to follow the requirements under Rule 290 (a) (ii) but there is no easy way to demonstrate that they are less than the 500 pounds per month of controlled air contaminant limitation without doing a stack test. Their current Permit does make state enforceable the requirement to use a control device which prevents any questions about whether or not the potential to emit exceeds major source thresholds.

The cyclone appeared to be operating in a satisfactory manner. (See attached photo.) There were no visible emissions coming from its horizontally oriented exhaust and no indication of any particulate fallout in the general vicinity. There was 5 different ventilation pipes/ducts being directed into the cyclone.

Attachment (1) is a copy of the required Daily Cyclone Check for Visible Emissions for the month of November, 2016.

Recordkeeping Review

I requested MSDS's for the inks and glue.

Attachment (2) is the MSDS for the one type of glue they use. It appears to contain nothing volatile or hazardous.

Attachment (3) is the MSDS for an example type of ink they use. It had a VOC content of 0.14 lbs VOC/gallon which was highest VOC content I could find looking through the various MSDS for the large number of different type of water based inks they use.

Immediately following the inspection, I followed up with the Company per the following email since PS did not have access to the ink/glue usage records:

"Brian,

I conducted an air quality compliance inspection this morning. As a follow-up, I would like to request some records.

I would like Monthly ink usage records(or emission calculations) for the following processes:

Saturn Mini, the McKinley, the Saturn III, and the Ward.

As you know, you can use either Rule 287(c) or Rule 290 to show that these processes are exempt from permitting.

Please provide all necessary monthly records(to show compliance with either Rule 287 (c) or Rule 290) going back to January 2015 and ending October 31, 2016.

Please email these records as soon as possible but no later than Monday, November 21st by 9 AM.

Let me know if you have questions. Thanks!"

Brian Rush called me later to discuss my request. He indicated that when it was determined that the Company was exempt from Rule 290 around the time of the last AQD inspection and the coating usage was not even close to the 200 gallon per month limit, the Company stopped keeping detailed usage records. However, they do keep purchase invoices of all the inks and promised to send them to me on short order.

On November 16, 2016, the Company forwarded the following requested documents:

Attachment (4) is the total pounds of ink used to date for the whole facility from January 1, 2015 to December 31, 2015. Annual VOC emissions were only 250 pounds and HAP emissions were calculated to be 10 pounds.

Attachment (5) is the total pounds of ink used to date for the whole facility from January 1, 2016 to October 31, 2016. VOC emissions were only 187 pounds and HAP emissions were calculated to be 11 pounds. Because this includes 4 separate emission units, the Company appears to easily meet the 1000 pound per month per emission unit limitation of Rule 290.

Post-Inspection Meeting

I held a brief post-inspection meeting with PS. I reviewed my findings that the Company appeared to be in compliance with their Permit. However, I also indicated that I would send an email requesting various records that I would review shortly to determine compliance. I thanked PS for his time and cooperation, and departed the facility at approximately 10:30 AM.

Compliance Summary

Based upon the facility inspection, review of the records, and review of applicable requirements, the Company appears to be in compliance with Permit 1235-91B.



Image 1(Cyclone) : Cyclone



Image 2(Aerial Photo) : Aerial Photo showing roof. Note the five exhaust lines feeding into roof top cyclone control device.

NAME M. Kamleh

DATE 11/16/2016

SUPERVISOR [Signature]