DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: On-site Inspection

N496157827

FACILITY: Johnston Lithograph Inc.	SRN / ID: N4961				
LOCATION: 11334 HUNT ST, ROMULUS		DISTRICT: Detroit			
CITY: ROMULUS		COUNTY: WAYNE			
CONTACT: Kurt Johnston , Managing Member		ACTIVITY DATE: 03/01/2021			
STAFF: C. Nazaret Sandoval	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR			
SUBJECT: FY 2021 Scheduled Inspection. See report CA_N496157827					
RESOLVED COMPLAINTS:					

SRN: N4961

Facility Name: Johnston Lithograph, Inc. (Johnston Enterprises)

Address: 11334 Hunt Street, Romulus, MI 48174

Inspection Date: March 1, 2021

DEQ Inspector: Nazaret Sandoval

Personnel Present: Kurt A. Johnston, Managing Member

Phone Number: 734 8917469

FACILITY BACKGROUND AND FORMER OPERATIONS

This family-owned company which was in business at the same location since it opened its doors in 1961 has permanently ceased the operations of the printing press machines at the Romulus location.

Johnston Lithograph Inc., which originated in the home of founder, Lorne C. Johnston, served the printing needs of metropolitan Detroit for over fifty years. The principal business was "high end" specialty color printing. Their products ranged in size from large glossy banners to business cards. The facility had four (4) primary presses, including some state-of-the-art machines that used up to ten colors simultaneously. They also had a one (1) small (one-color) press which was mostly used for their internal printing needs or small jobs.

In 2014, when the facility was last inspected, there were about 40 employees operating out of the spacious five-acre facility in Romulus, Michigan. Johnston Lithograph's expertise ranged from 1 through 10-color, and up to 40" sheet fed projects. The internal bindery operation provided it all, including cutting, folding, saddle stitching, perfect binding, die cutting, drilling, collating and shrink wrapping.

When the facility was in operation they had four main areas:

a. Shipping, Receiving and Staging

- b. Press Room with the following "Sheet-Fed" press machines:
- 28" x 40" Heidelberg -6C (six colors) Perfector
- 28" x 40" Komori Lithrone -6C (six colors) with Console
- 28" x 40" Heidelberg Offset 2/C (two-colors)
- 28" x 32" Akiyama JP 32, 10-Color
- 12"- 18" one-color press (for small office jobs)
- c. Cutting/Sizing and Finishing
- d. Product and Document Folding/Packaging

The printing method used at Johnston Lithograph was offset lithography, which is an indirect printing method; that is, ink is not transferred directly to a substrate. Rather, ink is transferred from the lithographic plate to a rubber-covered, intermediate "blanket" cylinder and then transferred from the blanket cylinder to the substrate. From this type of operations, Volatile Organic Compounds (VOC) emissions are expected to be released into the in-plant environment from offset lithographic printing as a result of the evaporation of components of the inks, fountain solutions, cleaning solvents, and other miscellaneous materials such as varnishes, coatings, and glues.

According to our records Johnson Lithograph, Ins. was exempt from the requirements of R 336.1201(1) to obtain a Permit To Install (PTI) by claiming the exemption listed under R 336.1290 of the Air Quality Division (AQD) Administrative Rules or Rule 290, for emission units with limited emissions. The condition listed on Rule 290(2)(a)(i) was applicable to their operations and it required the facility to demonstrate that the uncontrolled emissions of air contaminants (noncarcinogenic VOC) were not more than 1,000 pounds per month.

INSPECTION NARRATIVE

On March 1, 2021, staff from the Michigan Department of Environment, Great Lakes and Energy (EGLE), AQD, Detroit District Office, arrived at 11334 Hunt Street, Romulus to conduct an unannounced inspection of the facilities at Johnson Lithograph. I arrived at the site at about 5:30 pm and I was greeted by Mr. Kurt Johnston, one of the owners of the business, who was outside of the building. I stated the purpose of my visit, which was to evaluate the facility's compliance with respect to the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), and the AQD Administrative Rules.

Mr. Johnston agreed to show me the installations and as we walked into the building, I made a comment about the big volume of cars that were parked out in the parking areas adjacent to the building. Mr. Johnston indicated that after Johnston Lithograph, Inc. ceased the printing operations, about two years ago, they leased one section of their parking lot (the south lot) and part of their building space (the warehouse area) to a car repair shop. However, they are still in business, but they implemented a change in the business operations; from being a lithography company to become a printing broker company. In other words, as print brokers they provide a managed service to their customers. As print managers, they act as a liaison between a company and a wholesale printer and are responsible for assisting their customers with producing high quality jobs as efficiently and cost effectively as possible. They act as manufacturing reps, representing the capabilities of their partner print and bindery facilities, coordinating, and managing the entire printing project. The new company is registered as "Johnston Enterprises, LLC" and operate from one of the offices in the same building at the same address. He handed out to me a copy of the business registration form, which shows a registration with the City of Romulus dated 10/02/2020. The form is attached to this report as a reference.

In addition to the printing broker business, Mr. Kurt Johnston runs "Johnston Leasing, LLC" at the same location. The cars parked outside in the parking area north of the building are for lease and/or sale.

Once in the building, Mr. Johnston showed me each one of the areas. It was difficult to walk inside the building because most of the rooms, at the time of my visit, were used for storage. Mr. Johnston explained to me that they had to move everything from the warehouse to the rest of the areas in the building, so that they could lease the large space to the car repair shop. He opened the door leading to the car repair shop and I could see that there were cars parked to be repaired. There was also one person repairing a car in the workshop.

In conclusion, except for the two office-areas at the building entrance, and the "old" meeting room space (which at the time of my visit was filled with boxes of customers' orders to be picked up); the rest of the building is functioning as storage for the remnants of the printing operations still to be sold. Most of the areas in the building which were originally occupied with the printing equipment identified earlier in this report were crammed with minor miscellaneous equipment and surplus supplies. Mr. Johnston confirmed that all major equipment and printing presses have been sold, except for the Japanese printing press, which he pointed out to me. The printing press was dusty and tucked in a corner showing signs of not having been used in a long time. Mr. Johnston confirmed that they are selling everything that is left at the facility from their printing business because they will not restart lithography again at that location. They will keep renewing the Johnston Enterprises LLC license with the City of Romulus.

It appears as if none of the cited operations that are functioning at the site emit air contaminants requiring federal or state regulatory oversight.

I left the building at about 6 PM.

CONCLUSION

The observations conducted at the building located at 11334 Hunt Street, Romulus, MI 48174, on March 1, 2021 confirmed that the lithography company ceased operations permanently. Operational records were not requested because the facility shut down in 2019. According to the Department of Licensing and Regulatory Affairs (LARA) Johnston Lithograph, Inc. was formally dissolved on 5/21/2019. A copy of the Certificate of Dissolution is attached for reference. The printing company ceased operations to make way for three new businesses operating at the same location. None of the operations appear to emit a substantial amount of air pollutants, and at this time they appear to not be subject to EGLE-AQD Administrative Rules or federal air regulations.

I searched LARA to find out the business name for the Car Repair Shop, but I could not find it. Instead, I found out that the business entities are listed under three different addresses, which coincides with the business cards Mr. Kurt Johnston handed to me on the day of the inspection, as follow:

- Johnston Leasing and Sales, INC.
 Hunt St., Romulus, MI 48174
 - Kurt Johnston Director, President and Treasurer.
- Johnston Enterprises, LLC
 11376 Hunt St., Romulus, MI 48174
 Kurt Johnston Managing Member and Resident Agent.
 Other Managing Members, brothers: Kevin Johnston and Keith Johnston
- James Enterprises, LLC (Registered as Johnston Enterprises LLC in Romulus) 11374 Hunt St., Romulus, MI 48174 Kurt Johnston – Resident Agent James Enterprises, LLC is a 30-years LLC signed on 6/28/2000

The former "Johnston Lithograph, INC" is registered in LARA with this address: 11374 Hunt St., Romulus, MI 48174

NAME	Nazaret Sandoval	DATE _	5/11/2021	SUPERVISOR_	Jeff Korniski	