DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

N521424102

FACILITY: Multi Packaging Solutions		SRN / ID: N5214
LOCATION: 13 W 4TH ST, HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT: Ralph Shelner , QA, Safety, Green Sustainability Coord.		ACTIVITY DATE: 01/16/2014
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro, conducted an unannounced scheduled inspection at the facility. Staff met with Ralph Shelner Quality Assurance Manager, Safety Coordinator and Green Sustainability Coordinator who conducted the facility tour and provided information. Staff informed Mr. Shelner that a compliance inspection would take place and provided him with the DEQ Environmental Inspections: Rights and Responsibilities brochure and discussed its contents.

FACILITY DESCRIPTION

This company operates four lithographic printing presses, three gluing lines and four "die cutting" operations. They currently operate under Opt-out Permit to Install No. 563-96 which limits the emissions of Hazardous Air Pollutants (HAPs) and requires monthly and 12-month rolling recordkeeping. The emission units with VOC emissions operate under the Rule 290 exemption individually. All four have been replaced since the last inspection. Staff and Mr. Shelner conducted a visual inspection of the press room.

COMPLIANCE EVALUATION

Three die cutters stamp out the shapes of the paperboard printed Folding Cartons for ensuing finishing steps. The company does not design the images that they print onto the boxes, however sometimes they do have to make suggestions as to how they can make it work. Two, six-color and two eight-color lithographic presses are located in the press room. All of the presses are basically the same. The color is applied at the color applicators, and then the paperboard goes through a hot air or "infrared" heater. Each press has an internal "wash pit" which uses about 2 gallons of solvent per day. The facility is still using the PM325 which is comprised of aliphatic petroleum distillates (up to 87%) and dipropylene glycol monopropyl ether (up to 17%) and 1.0% xylene. This form of glycol ether is not considered a HAP. At the paperboard chisel area, the boxes are separated manually. The scrap paperboard is sucked into the cyclone which separates it and sends it to the baler. The boxes then go to the gluers which apply a liquid adhesive to form the beginning of a box. Here, security tape is placed inside of the box in the flat or "chicklet" form. Two small exempt boilers are located in the upstairs portion of the building.

The company also prints shoe tags, brochures and other printed materials for many local companies. Staff requested recordkeeping for calendar year 2013. Mr. Shelner currently maintains records on a monthly basis and has initiated internally that he has them compiled by the 15th of every month. The consulting firm ERM is still assisting them with data review, and he indicated he would e-mail the data. The data was received on January 21st 2014. Review of these records indicated compliance with the permit as follows.

Special Condition (S.C.) 13 requires HAP emissions below 9 individual and 22.5 combination based on a 12-month rolling average.

The current reported 12-month HAP totals for Jan-December 2013 are 0.063 tons individual

(vinyl acetate) and 0.12 combination HAP.

S.C.14.A.1-4: all required records are maintained. (see attached example)

S.C.15: There has been no change.

EVALUATION SUMMARY

The facility appeared to be in compliance at the time of the inspection.

NAME FAIL TOWNSON DATE 1-28-14 SUPERVISOR PAB