

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

N581245305

FACILITY: THOMSON SHORE INC		SRN / ID: N5812
LOCATION: 7300 JOY RD, DEXTER		DISTRICT: Jackson
CITY: DEXTER		COUNTY: WASHTENAW
CONTACT: Lori Minnick , Executive Director of People		ACTIVITY DATE: 07/25/2018
STAFF: Brian Carley	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced scheduled inspection		
RESOLVED COMPLAINTS:		

Facility Contact: Lori Minnick, Executive Director of People
Email: lorim@tshore.com
Phone: 734-426-3939

Purpose

This was an unannounced targeted inspection of Thomson Shore. This facility is operating under permit exemption Rule 290 (2)(a)(i) and is a true-minor source for emissions. I arrived at Thomson Shore and met with Lori Minnick and explained the purpose of my visit.

Background

This facility was founded in 1972 and is a book manufacturing, printing, publishing, production, and distribution company. This is their only printing facility in the country. They use different types of presses to print the books. They have a UV line, a web press line, 2 HP inkjet color printers, 2 HP inkjet black and white printers, and 6 non-heat set press lines that are used to print the books. The HP inkjet printers are exempt from the requirements of getting a permit under Rule 201 per Rule 285(2)(l)(vii). The remaining printing presses are exempt per Rule 290(2)(a)(i).

This facility was also listed as a potential site for use of PFAS in their process. After discussing this with Lori, she told me that they do not do any waterproofing of their products. The closest to this would be that they do laminate some of the covers using a roll of laminate and applying it to the cover with heat.

Compliance Evaluation

Most the presses were in operation at the time of the inspection. As Lori was taking me through the facility to show me the different presses, we were joined by Bill Dulisch, Maintenance Tech/Environmental Lead. They also have a parts cleaner in their maintenance shop that was not in use, but the lid was open. Bill immediately closed it and I was able to see that they had the cold cleaner operating procedures stickers on it. Bill and Lori said that they would speak to their maintenance staff about the cold cleaner operating procedures. Since my last inspection in 2014, they have added the two HP inkjet black and white printers mentioned before and they also meet the requirements of Rule 285(2)(l)(vii).

After we returned to Lori's office, we went over their emissions, their compliance with Rule 290, and looked at the MSDS for the inks that they use the most of. They use a consulting firm to generate their MAERS submittal and I brought out the spreadsheet summary that they included in their MAERS submittal this year (see attached). They told me that they send their monthly totals to their consultant who was keeping the required records in accordance with Rule 290. Each unit was well under the 1,000 pounds per month limit for uncontrolled noncarcinogenic VOC's, averaging around 152.26 pounds per month. The inks that we looked at the MSDS of had very low VOC content (<1.5%). I also did not see anything in the MSDSs that indicated that these inks contained any PFAS.

Compliance Determination

Based on the information I gathered during my inspection and my audit of their MAERS submittal, I determined that they are complying with Rules 285(2)(l)(vii) and 290(2)(a)(i). I then thanked them for their time and left.

NAME

Brian Carley

DATE

8/8/18

SUPERVISOR

[Signature]