

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

P010440848

FACILITY: Grand Rapids Press		SRN / ID: P0104
LOCATION: 3100 Walker Ridge Dr, WALKER		DISTRICT: Grand Rapids
CITY: WALKER		COUNTY: KENT
CONTACT: Aaron Phipps , Manufacturing Plant Manager		ACTIVITY DATE: 07/24/2017
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled unannounced inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the facility at 1:45 pm on July 24, 2017 to complete a scheduled, unannounced inspection. The weather conditions were partly cloudy, mid 70s°F and a northeast wind at 10-15 miles per hour (mph).

### Facility Description

The Grand Rapids Press (GRP) is mainly a newspaper printing company for several titles in the surrounding areas. The facility is in operation with permit to install (PTI) No. 98-10. Prior to entering the facility odor observations were completed. No odors were identified leaving the facility. No stacks are listed in association with this permit.

### Compliance Evaluation

Upon arriving on site AQD staff AS met with Mr. Aaron Phipps, Manufacturing Plant Manager with Advance Central Services Michigan. It was later identified by Mr. Phipps that GRP had, on February 2, 2012, become two companies which are MLive Media Group and Advance Central Services. MLive Media Group handles the advertising sales and editorial operations and Advance Central Services handles the manufacturing and distribution. Based on this AQD staff advised the company to contact AQD Permits section to change the name of the company on the permit. For the sake of simplicity, the company in this inspection report will be identified as GRP. The purpose of the inspection was explained to Mr. Phipps and included a facility walk through and closing discussion. The facility layout consisted of two building structures. The northern structure consisted of offices. The southern structure is where all printing related operations are completed. GRP operates two shifts a day seven days a week. All details described below are for the southern structure.

### EU-GRP-001

GRP operates one Web-fed nonheat-set offset lithographic printing press in operation on site. The press consists of two folding units and eight towers which can operate in a number of different sequences and can print on both sides of the material. Approximately twelve paper reels which transport the paper to the printing press are located in the basement level beneath the press. The press during operation can print 75,000 copies an hour and will use approximately 900 rolls of paper a month. The printing inks used are the four basic colors (cyan, magenta, black and yellow). For the printing press the volatile organic compounds (VOCs) are limited to 23 tons per year (tpy) and the VOC content shall be <5% by weight as applied and shall not contain Isopropyl Alcohol (IPA, CAS#67-63-0), Propyl Alcohol(CAS#71-23-8), or Ethanol (CAS#64-17-5). Records were requested and reviewed from June 2016 through June 2017. During the inspection it was concluded that GRP was using Material Safety Data Sheets (MSDS) to verify their VOC content of all materials. Additionally, it appeared that MSDS for incorrect months were used in determining VOC contents. Per SC.V.1, the company must use Test Method 24 or upon approval Manufacturers Formulation Data Sheets. In the future GRP shall use Test Method 24, or upon approval, Manufacturers Formulation Data Sheets to determine the VOC content when calculating emission totals. After reviewing records, as of June 2017 the 12-month rolling total of VOCs was 8.0 tpy which is well within GRPs permitted limit of 23 tpy. Mr. Phipps stated that the fountain wash used does not contain Isopropyl Alcohol (IPA, CAS#67-63-0), Propyl Alcohol(CAS#71-23-8), or Ethanol (CAS#64-17-5). A MSDS for the fountain wash solution was requested and this was verified to be correct. In the PTI No. 98-10 Appendix A it shows a method in calculating the VOC weight percent for the fountain solution. Per the calculations in Appendix A for the month of June 2017 the VOC weight percent for the fountain solution was 2.263% which is within the limit of 5%. Previous records back to June 2016 also verify that the VOC weight percent is less than 5%.

During the inspection all containers for materials including used shop towels, waste inks, and cleaning solvents were properly stored in closed containers. Mr. Phipps stated that Safety-Kleen collects the waste ink and used solvent rags are collected by Aramark. All press-related cleaning solvents must have a vapor pressure that does

not exceed 10 mmhg@20°F (68°C). This was identified to be a typo during the creation of the permit and should be read as 10 mmhg@20°C (68°F). This was brought to the attention of GRP and the AQD Permits Section. Two solvent cleaning materials were stated to be used by GRP and MSDS were requested to verify that vapor pressures do not exceed this limit. The blanket wash cleaning solvent was below the allowable vapor pressure limit. Based on the MSDS for the second solvent, no VOC containing components were identified; therefore, this cleaning material was concluded to be acceptable. AQD staff AS during the inspection observed the areas where GRP collect the blanket wash to be reused/recycled.

Per SC.VI.2.a-d GRP must keep monthly records of the following: identification of the category (e.g. ink, coating, blanket wash) of each VOC containing material used, VOC contents of each VOC containing material as received and applied, the usage (in pounds or gallons) of each VOC containing material, and total VOC emissions per monthly/12-month rolling time period. Records were requested and reviewed back to June 2016. It was concluded that GRP is keeping adequate records.

Per SC.VI.3 GRP must use the prescribed methods located in Appendix A or an alternate method approved by the AQD District Supervisor to determine the VOC content of the fountain solution. Records provided show that GRP is using the prescribed method in Appendix A to determine the VOC content of the fountain solution.

### **Additional Observations**

- Two 10,461 MBH (10.461 MmBtu/hr) natural gas only boilers were observed in the second level of the facility. Mr. Phipps stated that the two boilers were constructed in approximately 2003. Based on this the two boilers are subject to New Source Performance Standards (NSPS) Subpart Dc. GRP was made aware of the additional requirements for the two boilers. An initial notification form was requested to be completed by GRP and resubmitted to the EPA and MDEQ AQD. Also GRP will now be required to keep track of and record their monthly fuel usage for each boiler. Since GRP is subject to NSPS Subpart Dc they will now be required to report to the Michigan Air Emissions Reporting System (MAERS).
- Two chiller units were observed in the second level of the facility.
- One 40,000 lb capacity (5,800 gallon) tank for black ink storage and one 15,000 lb capacity (1,500 gallon) tank for yellow, magenta, and cyan respectively were observed on site. The five tanks appear to be exempt per Rule 284 (2)(i).
- One 240 KW Base Rate emergency generator was observed on site and is potentially subject to 40 CFR Part 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants (HAPs) for Stationary Reciprocating Internal Combustion Engines. Since GRP is an area source of HAPs, this standard applies. However, the MDEQ AQD has not been delegated enforcement of this standard by the EPA.
- Two waste compactors for recycling purposes of non-printed and printed paper respectively were observed.
- A water treatment system was observed that is used to remove all necessary components from water before the fountain solution is added. The fountain solution is later used in the printing process.
- The blanket wash system area where cleaning solvents are recollected to be reused/recycled for the printing press was observed. It was stated that once or twice a shift socks used to wash rollers are soaked in the blanket wash and applied to the rollers.
- Approximately ten ink jet printers were observed on site and are used to mark the wrapping of paper bundles prior to delivery. The printers use self-contained cartridges for inks and concluded to not be subject to Rule 702 or Rule 201.

### **Conclusion**

A final discussion was completed with AQD staff and Mr. Phipps. Based on the review of the records provided and the facility walk through, GRP is in compliance with PTI No. 98-10 and all other applicable air pollution rules and regulations.

