

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

P088245596

FACILITY: Wynalda Litho Inc.		SRN / ID: P0882
LOCATION: 8221 Graphic Drive NE, BELMONT		DISTRICT: Grand Rapids
CITY: BELMONT		COUNTY: KENT
CONTACT: Jim Malkewitz , Technical Compliance Coordinator		ACTIVITY DATE: 08/14/2018
STAFF: David Morgan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

At 1:15 P.M. on August 14, 2018, Air Quality Division (AQD) staff, Dave Morgan, conducted an unannounced scheduled inspection of Wynalda Packaging located at 8221 Graphic Drive NE and 2775 Montana Trail in Belmont. The purpose of the inspection was to determine the facility's compliance with state and federal air pollution regulations. Accompanying AQD staff was Jim Hulbert, Plant Engineer; Jim Malkewitz, Technical Compliance Coordinator; and Mike Ottenwess, Operations Manager.

FACILITY DESCRIPTION

Wynalda Packaging is a packaging and commercial printing company. The main production facility, at 8221 Graphic Drive, consists of sheet-fed lithographic printing machines, sheet cutting, foil embossing, assembly and paper handling. The production facility at 2775 Montana Trail consists of lithographic printing machines and paper folding machines. The Montana Trail plant is contiguous to the main site with a street separating the two pieces of property; the two plants are considered one stationary source.

This stationary source is considered a true minor source of emissions and all equipment is exempt from air use permitting.

COMPLIANCE EVALUATION

AQD staff toured both the Graphic Drive and Montana Trail manufacturing facilities. Between both facilities there are six sheet fed non-heatset printing presses and two web fed heatset printing presses. All printing units are considered exempt from air use permitting under Rule 290.

The following table identifies the current lithographic printing equipment and corresponding emissions data based on company records.

ID	Equipment	Plant Location	Installation Date	Comments	Highest VOC Emissions in lbs (Month/year)	Highest Aggregate HAPs in lbs (Month/year)
K1	20" Komori 6/6 color web fed	Montana Trail	12/1/01	Vented to RTO	7.7 (4/2018)	0.0
K2	20" Komori 6/6 color web fed	Montana Trail	3/15/05	Vented to RTO	18.6 (7/2017)	0.0
MR706M	Manroland 40" 6 color sheet fed	Montana Trail	8/1/07		814 (2/2018)	5.3 (2/2017)
MR707	Manroland 40" 7 color sheet fed	Montana Trail	7/1/04	Due to be removed in Sept 2018	433 (8/2017)	6.5 (4/2018)
MR706M2	Manroland 40" 6 color sheet fed	Montana Trail	6/1/2015	Moved from Graphic Drive	319 (8/2017)	4.6 (9/2017)
MR906	Manroland 64" 6 color sheet fed	Graphic Drive	4/1/07		383 (10/2017)	4.0 (9/2017 & 4/2018)
U1	Man Roland Ultima	Graphic Drive	6/1/2015		703.3 (8/2017)	7.3 (9/2017)
U2	Man Roland Ultima	Graphic Drive	6/1/2015		469 (3/2018)	8.7 (8/2017)

For the period from July 2017 to June 2018, total facility-wide VOC emissions were 8.2 tons and total aggregate HAP emissions were 255 pounds. The company is considered a minor source of emissions because potential VOC and HAP emissions are limited by the thresholds in Rule 290 to below the major source thresholds.

At the Montana plant, the K1 and K2 units are controlled by a regenerative thermal oxidizer (RTO) which is located on the northside of the building. At the time of the inspection, only one of these lines was operating; the RTO was operating at a temperature of 1,525°F. No visible emissions were observed from the process.

Miscellaneous:

The facility also consists of a paper sheet cutting and die cutting equipment which are exempt from air use permitting under Rule 285(2)(l)(vi); a embossing or foil stamping machine which is exempt under Rule 285(2)(l)(i); hot melt adhesive application which is exempt under Rule 287(2)(i) and a scrap paper handling system, with three internally vented baghouses, which is exempt under Rule 285(2)(l)(vi).

The company uses solvent reclamation units which are exempt from permitting under Rule 285(2)(u).

Lastly, there is a 1,000 kilowatt emergency diesel generator that according to company records was installed in 1998. A 1,000 kilowatt unit would have a heat input rating of 3.5 million Btu/hour. This unit would be considered exempt from permitting under Rule 285(2)(g) because the heat input capacity is less than the 10 million Btu/hour threshold in the rule.

In addition, this unit is not subject to the New Source Performance Standard (NSPS) under 40 CFR Part 60, Subpart IIII for Compression Ignition Internal Combustion Engines because the unit was manufactured and installed prior to July 11, 2005. A specification sheet of the generator is attached.

EVALUATION SUMMARY

Wynalda Packaging appears to be in compliance with the air pollution regulations evaluated. Records obtained during the inspection will be placed in AQD files.

NAME  DATE 7/4/18 SUPERVISOR 