

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

U41190152147860

FACILITY: Our Daily Bread Ministries (RBC)		SRN / ID: U411901521
LOCATION: 3000 Kraft Ave SE, Grand Rapids		DISTRICT: Grand Rapids
CITY: Grand Rapids		COUNTY: KENT
CONTACT:		ACTIVITY DATE: 02/05/2019
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: FY 2019 Unannounced inspection.		
RESOLVED COMPLAINTS: C-19-01350, C-19-01353		

Clean Air Act Inspection report for Our Daily Bread, Grand Rapids, Michigan

Facility Background

Our Daily Bread is a printing facility. The facility utilizes heat set printing for the primary process, but also utilizes digital printing for smaller scale projects.

Our Daily Bread is not subject to the Title V program, which is discussed below, in the regulatory analysis section of this report.

Location

Our Daily Bread located at 3000 Kraft Ave, Grand Rapids, Michigan. This area is composed of a mix of residential, industrial and commercial facilities. The nearest residential structure is approximately 1000 feet to the southeast of the facility.

Introduction and purpose of inspection

On 2/5/2019 Tyler Salamasick, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division conducted an unannounced self-initiated inspection of Our Daily Bread. The MDEQ had recently received two complaints regarding blue smoke being emitted from the facility, with an associated burnt odor. The MDEQ inspected the facility located at 3000 Kraft, Grand Rapids, Michigan.

The purpose of the inspection was to determine the facility's compliance with 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); the Air Pollution Control Rules; and to investigate complaint C-19-01350. The complaints alleged that there was a significant amount of blue smoke being emitted from Our Daily Bread Ministries. The complaints also indicated that the odor was noxious associated with the smoke.

Observations and facility processes

Prior to inspecting the facility, AQD staff made observations in the area on February 1, 2019 and again on February 5, 2019. On February 1, I made observations of the facility, but it did not appear that the printer was operating at that time. I did not observe evidence of any emission being emitted from the facility's stack. I conducted a follow up inspection on February 5th and made additional observations. Upon arrival it was evident that the facility was operating and that their pollution control device was not working properly. The facility had high levels of opacity being emitted from the south east corner stack on the roof of the building. I made observations of the smoke and it continually exceeded 20% for at least 15 minutes. I continued making observations and while downwind of the facility I detected

moderate, level 3 persistent, oily, waxy plastic odors.

After making observations, AQD staff met with Bob Baars, Facility Manager, Doug Bekkering, Production Manager and Jonathan Titus, Lead Maintenance Technician. I presented my identification and informed the representative of the intent of the inspection. I also informed them of the complaint and that I observed excessive smoke being emitted from the facility.

While discussing the complaint, as well as my observations, they indicated that the heat set ink press had an associated RTO (regenerate thermal oxidizer) which was not properly operating. They indicated that the RTO had some malfunction and that they had a service company inspect it and order parts for repair. They also mentioned that the RTO had not been fully functional for approximately 1 week.

The facility representatives agreed to show the AQD the facility and its processes. Our Daily Bread produces printed materials including pamphlets and booklets. The facility's main printer is a heat set ink press. They also have a smaller digital printing operation for lower volume printing.

Regulatory analysis and compliance evaluation

Facility emission category

Our Daily Bread appears to be a minor source of air pollutants, including volatile organic compounds (VOCs) and particulate matter (PM). The facility provided a Rule 290 exemption demonstration for the heatset ink printing process, indicating that the press did not require a permit pursuant for air emissions. The since the equipment utilizes air pollution control equipment to meet the requirement, the equipment is limited to 500 lbs of total air emissions per month. The potential air emissions from the main process total 6 tons per year. I did not require the facility to provide a facility wide demonstration of the air emissions, but they should evaluate all exempt equipment and sources of air contaminants to have an inventory of their potential to emit.

After the inspection the facility discussed the heatset ink printing process and informed me that it met the Rule 290 exemption. They indicated that the RTO has a 95% control efficiency and that the process emitted an average high of approximately 122lbs of VOCs. This is below the 500 lb limit as set by the Rule 290 exemption from requiring a permit.

The digital printer was not externally exhausted and did not appear to be a significant source of air contaminants. The digital printer did not appear to be subject to Rule 201, which would require an air permit.

Discussion

Compliance Assistance: During the inspection I discussed permitting and exemption requirements. The facility worked through the exemption demonstration and provided me with updates as the corrected the RTO malfunction.

Concerns: I informed the facility that the malfunction of the RTO was a violation of Rule 910 and that they would be issued a violation notice.

Compliance statement: It appears that Our Daily Bread is not in compliance with 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 Air Pollution Control Rules. The facility's pollution control malfunction is a violation of Rule 910 and the facility will be issued a violation notice seeking a resolution. The opacity observed being emitted from the facility was in exceedance of 20% and is a violation of Rule 301. This opacity exceedance will also be included in the violation notice. The facility has already provided the MDEQ with some updates on the progress of the correction.



Image 1(Opacity) : View from the road of opacity emitted from Our Daily Bread.

NAME

DATE

2/19/19

SUPERVISOR