



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: JUN 04 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
LSC Communications, Inc. (LSC), Pontiac, Illinois

FROM: Eleanor Kane, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Chief
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: LSC Communications, Inc. (LSC)

Facility Location: 1500 North Main Street, Pontiac, Illinois

Date of Inspection: May 7, 2019

EPA Inspectors:

1. Eleanor Kane, Environmental Engineer
2. Victoria Nelson, Environmental Engineer

Other Attendees:

1. Danny Buck, Operations Manager, LSC
2. Bill Stefanski, Maintenance Supervisor, LSC
3. Bryan Bannister, Regional Environmental Health and Safety, LSC (by phone)

Contact Email Address: bryan.a.bannister@lsc.com

Purpose of Inspection: Evaluate compliance with the Clean Air Act, including the facility's synthetic minor limits for the Title V program and otherwise-applicable NESHAPs

Facility Type: Magazine Printing

Arrival Time: 9:15am

Departure Time: 11:00am

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Mr. Buck or Mr. Stefanski:

Company Ownership:

The facility was acquired by LSC Communications in October 2016. Prior to that it was owned by R.R. Donnelly & Sons.

Process Description:

The facility prints a variety of short-run magazines on eight printing lines, five of which are double web and three of which are single web. At each line, ink is applied to the paper in several stages and the ink is dried in a series of ovens. Volatile Organic Compound (VOC) emissions from the printing areas and the ovens from seven of the lines are all routed to a single regenerative thermal oxidizer (RTO). The eighth line has a dedicated RTO controlling ink application and ovens. The printed papers are folded, bound and trimmed in the bindery either on stitching machines (no adhesive) or patent binding machines (with adhesive).

Staff Interview:

Staff reported that the printing lines cannot be operated unless the associated RTO is at temperature. Staff did not recall the last time the RTO was tested, since regular emissions testing is not required under the facility's FESOP. Monthly usage of inks and solvents is tracked to demonstrate compliance with facility-wide emission limits.

TOUR INFORMATION

EPA toured the facility: Yes

Photos and/or Videos: were taken during the inspection.

An optical gas imaging camera was used to evaluate the capture and control of VOC emissions. One video was taken at the RTO stack.

CLOSING CONFERENCE

Requested documents:

- Most recent stack testing at the RTO
- RTO temperature records for 2019
- 12 months of HAP/VAC tracking
- MSDS/TDS for highest volume inks and solvents

SIGNATURES

Report Author:

Deana Kane

Date:

6/3/19

Section Chief:

Sam McCall

Date:

6/4/19

Facility Name: LSC Communications, Inc. (LSC)
Facility Location: 1500 North Main Street, Pontiac, Illinois
Date of Inspection: May 7, 2019

APPENDIX A: DIGITAL VIDEO LOG

1. Photographer Name: Victoria Nelson	2. Date of Inspection: May 7, 2019
3. Company/Facility Name: LSC Communications, Inc. (LSC)	4. Street Address, City, State: 1500 North Main Street, Pontiac, Illinois
5. Number of Videos: 1	6. Archival Record Location: C:\Users\Vnelson\OneDrive - Environmental Protection Agency (EPA)\Targeting and Inspections\LSC Communications\ FLIR Videos

Video Number	File Name	Date	Description of Video
1	MOV_2423.mp4	5/7/2019	RTO Stack