

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

N298638659

FACILITY: Tecumseh Packaging Solutions, Inc		SRN / ID: N2986
LOCATION: 707 S EVANS STREET, TECUMSEH		DISTRICT: Jackson
CITY: TECUMSEH		COUNTY: LENAWEE
CONTACT:		ACTIVITY DATE: 02/16/2017
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Unannounced compliance inspection. No findings.		
RESOLVED COMPLAINTS:		

Minor Source**Facility Contacts**

Jeff Robideau: General Manager

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Website: <http://www.akers-pkg.com/tecumseh-packaging-solutions-inc/>

Purpose

On February 16, 2017, I conducted an unannounced compliance inspection of Tecumseh Packaging Solutions, Inc. (Company) located in Tecumseh, Michigan in Lenawee County. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules and their Permit to Install (PTI) # 707-91.

Facility Location

The facility is located near an industrial area just to the East with residential areas just to the West and North of the plant within the town of Tecumseh. See aerial photo dated October, 2016.

Facility Background

The Company was issued PTI #707-91 on April 1, 1993 for manufacturing finished corrugated boxes equipped with a cyclone dust collector. It was not clear from the files if the facility had ever been inspected before.

Regulatory Applicability

PTI 707-91 is applicable to various cardboard processes that generate dust & debris.

The application of ink and glue were looked at during the inspection for potential regulatory applicability. It appears that the processes are exempt per Rule 290 since monthly VOC emissions are minimal.

The facility does not have any boilers, emergency generators or other processes that might be subject to federal air requirements.

Arrival & Facility Contact

Visible emissions or odors were not observed upon my approach to the Company's facility. I arrived at 8:20 AM, proceeded to the facility office to request access for an inspection, provided my identification to Diane the secretary, and spoke with Jeff Robideau (JR) via conference call who handles any environmental issues at the facility among other duties. I informed him of my intent to conduct a facility inspection and to review the various records as necessary. JR extended his full cooperation and fully addressed my questions. He suggested that the floor supervisor Chuck Scott (CS) could give me a facility tour after the call.

Pre-Inspection Meeting

JR outlined that the Company has 35 employees and operates from 6:30 AM to 5:00 PM 5 to 6 days a

week. Business has been up and down recently. JR outlined the various process equipment currently located at the plant. I indicated to him that I would want to inspect the cyclone and that I was also interested in records related to the ink and glue usage. He indicated that everything is water based and he would be happy to email me the records in the near future after the inspection.

Onsite Inspection

CS then conducted a brief tour of the facility. Overall, the facility looked well maintained. A moderate cardboard type odor was prevalent throughout the plant. I did not smell any glue or ink. The plant environment was fairly loud and hearing protection was necessary.

CS outlined that the facility had the following process equipment:

- 1) 2 Flexo's Folders....to apply glue/ink and to make the boxes
- 2) 2 Folder/glueers...to apply glue and to make the boxes
- 3) Double Header Stitcher....a process that staples the boxes
- 4) 1 glue machine
- 5) 1 bailer...used to collect the discharge from the cyclone and press into bails for reuse.

He first showed me where the ink was stored. I observed a couple dozen 40 pound pails of ink. CS did not know how much ink was being used on a regular basis. Next he showed me the glue. It was 2 large totes stacked on top of each other that were approximately 200 to 300 gallons in size. One of them was mostly full. He said a tote lasted months.

Next we walked by some of the process equipment. I observed the ventilation system around the various pieces of process equipment. Any pieces of cut cardboard were being quickly sucked up and sent to the cyclone. There appeared to be 4 different fans. 2 of the fans are on all of the time, 1 on occasionally and 1 that had no equipment hooked up to it. All were located in or adjacent to the production area. The fans that were running were of unknown size but appeared well sized to handle the ventilation requirements. (See attached photo.)

Next we went outside to observe the cyclone. (See attached photo.) It was operating. No fallout was noted outside near the cyclone. There were no visible emissions. Next we went back and side to a separate room containing the bailer. The bailer is located directly under the cyclone. (See attached photo.) There was a fair amount of dust on the wall of the room and in/around the bailer. However, for the most part, it appeared that the dust was being well contained to that room only and wasn't making it back outside. This concluded the tour.

Recordkeeping/Permit Requirements Review

JR sent an email to me with the records I requested. See Attachment (1).

Total glue(hot melt adhesive) usage in 2016 was 11,061 pounds. The total VOC content is less than 0.1% of the 11,061 pound total.

Total ink usage in 2016 was 6200 pounds. The ink contains little or no VOC's as well.

Review of the permit conditions of PTI #707-91 shows that the Company is in compliance with their permit.

Post-Inspection Meeting

I held a brief post-inspection meeting with CS as I was walking out the door. I indicated that I didn't have any findings but would be sending out an email to JR to request ink/glue records. I thanked CS for his time and cooperation, and I departed the facility at approximately 9:10 AM.

Compliance Summary

Based upon the facility inspection, review of the records, and review of applicable requirements, the Company is in full compliance with their PTI.



Image 1(aerial photo) : aerial photo

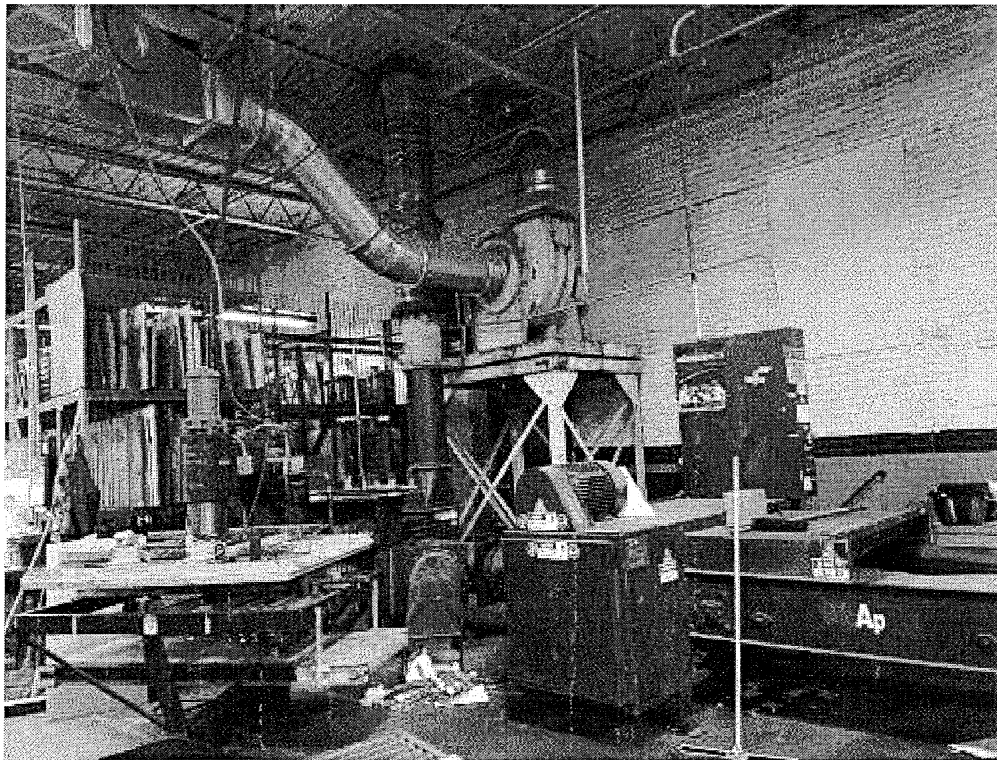


Image 2(2 fans) : 2 of the fans that discharge to the cyclone. The one on top runs all the time.

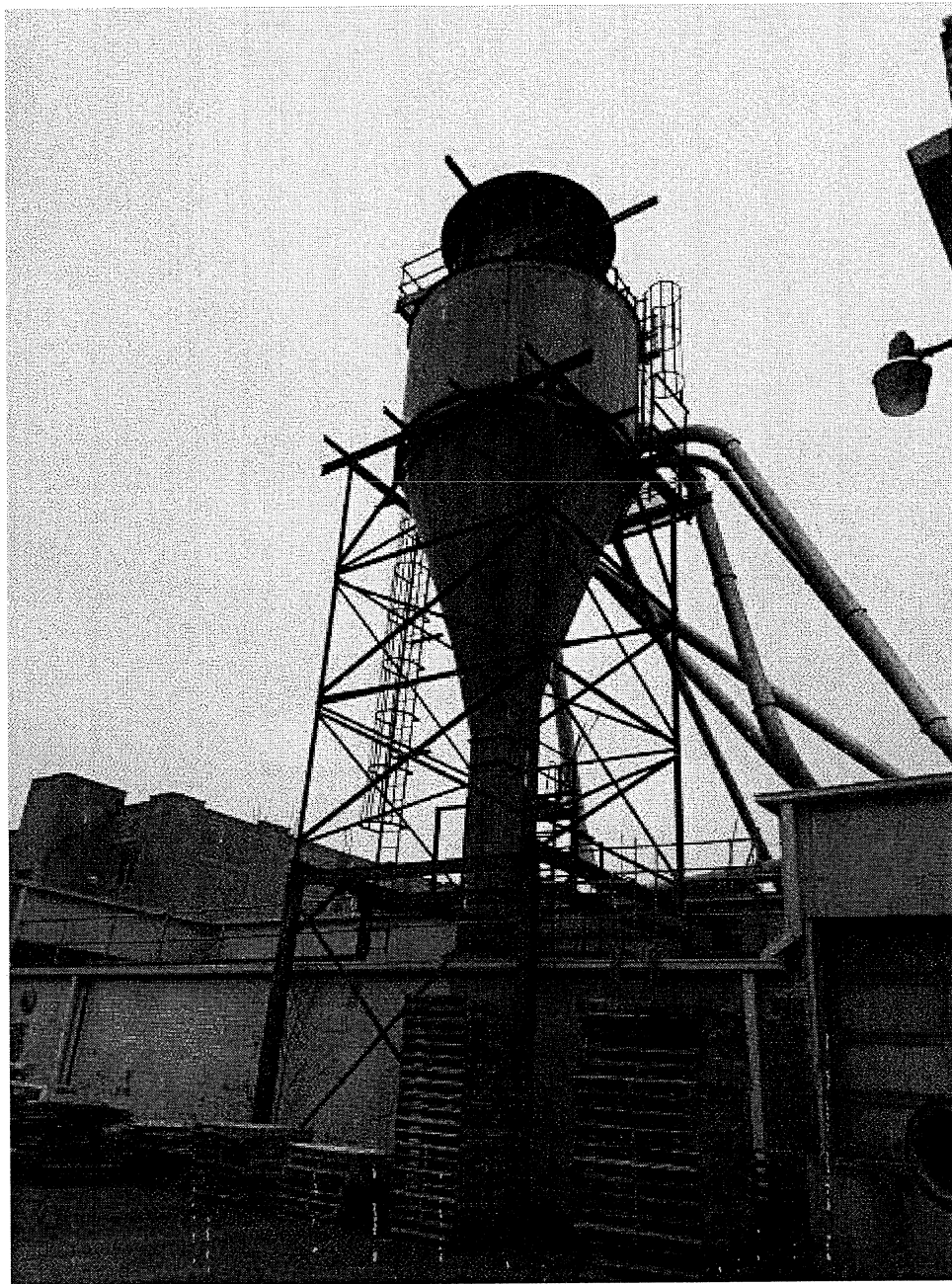


Image 3(Cyclone) : Cyclone



Image 4(Bailer) : Bailer

NAME M. Kowalchuk

DATE 2/27/2017

SUPERVISOR [Signature]