

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

N512852184

FACILITY: Alpha Packaging		SRN / ID: N5128
LOCATION: 1236 Watson Avenue, YPSILANTI		DISTRICT: Jackson
CITY: YPSILANTI		COUNTY: WASHTENAW
CONTACT: Glen Lindemann, Maintenance Manager		ACTIVITY DATE: 01/17/2020
STAFF: Stephanie Weems	COMPLIANCE STATUS: Compliance	SOURCE CLASS: ✓
SUBJECT: Scheduled inspection. ✓		
RESOLVED COMPLAINTS:		

Facility Contacts:

Contact: Glen Lindemann – Maintenance Manager

Phone: 734-481-1373 ext 139

Email: Glen.Lindemann@alphap.com

Website: <http://www.alphap.com/>

Purpose

On January 17, 2020, I conducted an unannounced compliance inspection of Alpha Packaging located at 1236 Watson Avenue in Ypsilanti, MI. 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.

Facility Location

The facility is located in Ypsilanti. It is immediately surrounded by commercial and industrial operations, with residential areas located across the freeway to the west. See Image 1 and 2 for aerial photos.

Facility Background

Alpha Packaging manufactures plastic bottles and jars for the nutritional, pharmaceutical, personal care, housewares, consumer chemical, and niche food and beverage markets.

As one of their eight manufacturing plants, the Ypsilanti facility produces bottles made from high-density polyethylene (HDPE). According to the company's website, the facility is 100,000 square feet, with 18 machines using extrusion blow molding and injection blow molding processes.

Regulatory Applicability

There are no active permits on file with AQD.

Arrival & Facility Contact

Upon my approach to the facility I observed steam coming from the cooling towers, otherwise no other visible emissions or odors were observed. I arrived at approximately 9:19 AM, proceeded to the facility office to request access for an inspection, provided my identification, and met with Glen Lindemann, Maintenance Manager, and Jesse Nelson, Lead Mold Technician.

A pre-inspection discussion was held with Glen and Jesse. I informed them of my intent to conduct a facility inspection and to review the various records as necessary. They extended their full cooperation during the inspection and fully addressed my questions. Jesse accompanied me during the full duration of my inspection.

Pre-Inspection Meeting

I began by asking Glen about the processes that are located at this facility. He explained that they have no emergency generators, no boilers, 1 parts washer (serviced by Safety Kleen), cooling towers, 18 blow molding machines, and a small maintenance shop that contains welding equipment.

I then asked Glen a few questions about the blow molding process and cooling towers. First, I asked if they use a chromium-based water treatment for the cooling towers. He said that they don't. Next, I asked what kind of gas is used in the blow molding process. He explained that they use compressed air.

The plant has approximately 38 employees. They run 3 shifts, 7 days a week, with a limited crew working on the weekend.

Glen stated that only about 30% of the facility is used for production, the rest is used for warehousing.

Onsite Inspection

Jesse accompanied me during the facility tour portion of the inspection.

Note: Safety glasses, steel-toed boots, safety vest, Supra-Aural headband earplugs, and a hairnet must be worn to enter the production area.

We began by observing the blow molding machines. Jesse explained that there are 18 machines total – 3 injection blow molding machines and 15 extrusion blow molding machines. All production at the facility is FDA approved, as some of the bottles they produce will go on to contain things for human consumption. I asked what kind of plastics the facility uses, and Jesse stated they use polyethylene and polypropylene.

We then viewed the water treatment area. This is where the heated water goes for cooling. The evaporated water exits through the cooling towers.

As we walked, Jesse explained that their waste materials are handled and taken off-site by a third party.

Next, we observed the maintenance area. Jesse showed me the parts washer, and I was able to see that the lid was closed. We looked at the small welding area. Jesse explained that the facility now sends out most of their parts for repair, so the welding equipment doesn't get used very often.

We then walked over to the mold shop. This is where they house the molds for the different types of bottles.

Lastly, we viewed the air compressors that supply the air to the molding machines as part of the blow molding process.

I was able to see that most of the facility is used for warehousing.

Post-Inspection Meeting

I held a brief post-inspection meeting with Glen and Jesse. I provided Glen with a copy of the Permit to Install (PTI) Exemption Handbook, and we discussed some of the exemptions that appear to fit the facility's processes.

I told Glen if I had any further questions that I would be in contact.

I thanked Glen and Jesse for their time and cooperation, and I departed the facility around 10:10 AM.

Recordkeeping/Compliance Review

After arriving back at the office, I emailed Glen for follow-up information related to their cooling towers. See email correspondence attached to this report in the paper file.

The blow molding process appears to be exempt under Rule 286(2)(c)(i).

The parts washer appears to be exempt under Rule 281(2)(h).

The welding equipment appears to be exempt under Rule 285(2)(i).

The water-cooling towers appear to be exempt under Rule 280(2)(d).

The facility is not subject to 40 CFR Part 63, Subpart Q – National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers because the cooling towers are not operated with chromium-based water treatment chemicals and they are not major sources or integral parts of a major source facility.

Compliance Summary

Based upon the facility inspection and review of the records, it appears that this facility is in compliance at the time of this inspection.



Image 1(1) : Aerial view



Image 2(2) : Aerial view

NAME Stephen Weir

DATE 1-23-2020 SUPERVISOR [Signature]