

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

P046962557

FACILITY: ACCESS BUSINESS GROUP-SPAULDING PLAZA		SRN / ID: P0469
LOCATION: 5101 SPAULDING PLAZA, ADA		DISTRICT: Grand Rapids
CITY: ADA		COUNTY: KENT
CONTACT: Ben Preston , Supervisor, Environmental, Health, & Safety		ACTIVITY DATE: 02/23/2022
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: The purpose of this inspection was to determine compliance with Permit No. 144-13A and all other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

On February 23, 2022, Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) Staff Kaitlyn DeVries (KD) conducted an inspection of Access Business Group – Nutrilite Spaulding Plant (NSP) located at 5101 Spaulding Plaza, Ada Michigan. The purpose of this inspection was to determine compliance with Permit No. 144-13A and all other applicable air quality rules and regulations.

KD arrived on site and met with Mr. Ben Preston, Supervisor, Environmental, Health, & Safety, and Lisa, Site lead, who accompanied KD on the inspection of the facility. Prior to entering the facility, odor and opacity observations were made; none were noted.

Facility Description:

The facility manufactures and packages dietary supplements for human consumption in the form of soft-gel capsules, granules and tablets. Currently only soft-gel capsules are being manufactured, and all other products at the facility are packaged or re-packaged. However, Mr. Preston indicated that Access is considering installing additional packaging lines as well as a tableting line. KD reminded Mr. Preston of the requirement for a permit to install, unless an exemption can be identified. Mr. Preston indicated he has already been looking through the AQD's requirements.

Compliance Evaluation:

NSP currently has one (1) permit for the entire soft-gel production process and relies on Rule 201 permit exemptions for other equipment. The permit is for EU-SoftGel, which is the emission unit that manufactures dietary supplements for human consumption in soft gel capsules. The permitted equipment includes weigh stations, mixers/dissolver tanks, portable tanks, encapsulation machines, sorters, inspection tables, laser and ink jet coders, dryers, conveying systems, packaging systems, and one (1) dust collection system. The raw materials include powders and low volatility oils, with solvents used for cleaning and sanitizing purposes.

NSP is a Good Manufacturing Process (GMP) certified facility, thus the rooms housing the various steps in the production process are kept extremely tidy. The internally vented dust collection system collects fugitive emissions from several points in the production process including the powder weigh out room, the liquid mixing room, and the drying room.

The powder weigh out room and the liquid mixing room are where some of the raw materials are portioned and prepped for use in the final, encapsulated product. The drying room allows for the soft-gels to tumble dry, using warm air, before sorting and packaging.

The dust collection system is an 18 cartridge 5,000 cfm Torit Donaldson baghouse equipped with a HEPA filter that is exhausted into the in-plant environment. At the time of the inspection the dust collector had a pressure drop of 0.42 inches Water Column, and the area around the collection hopper for the dust collector was clean. Mr. Preston supplied KD with an updated PM plan for the dust collector, which NSP appears to be properly following. The most recent PM done on the unit occurred on February 8, 2022.

NSP has Volatile Organic Compounds (VOC) and Particulate Matter (PM) emission limits. PM is limited to 0.01 lbs./1,000 lbs. exhaust gas, on a dry gas basis, while VOCs are limited to 12.1 tons per year (tpy), based on a 12-month rolling time period. As of December 2021, the 12-month rolling VOC emissions were 3.5 tons.


NSP has an electric pallet washing process that uses 140°F potable water and diluted potassium hydroxide. The pallet washing process is externally vented. This process is exempt from Rule 201 permitting under Rule 281(2)(e).

The NSP facility has two (2) Generac natural gas fired emergency generators rated at 268 HP (North Generator) and 355 HP (South Generator), installed in 2014. These are EPA certified engines that are subject to the New Source Performance Standards (NSPS) promulgated under 40 CFR Part 60 Subpart JJJJ for Stationary Spark Ignition Reciprocating Internal Combustion Engines. These engines are also subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) promulgated under 40 CFR Part 63 Subpart ZZZZ for area sources. Compliance with 40 CFR Part 63 Subpart ZZZZ is demonstrated via compliance with 40 CFR Part 60 Subpart JJJJ. These engines are exempt from Rule 201 permitting under Rule 285(2)(g). Each generator is equipped with an hour meter, and in the last 12 months have operated less than 60 hours, each.

Additionally, NSP has two (2) identical natural gas only steam boilers rated at 9.954 million btu/hr. capacity. Since these boilers are natural gas only and are less than 10 million btu/hr., they are not subject to NSPS 40 CFR Part 60 Subpart Dc or the NESHAP Subparts 5D and 6J. Rather, these boilers are exempt from Rule 201 permitting under Rule 282(2)(b)(i).

Compliance Determination:

Based on the observations made at the time of the inspection and the review of the records, Access Business Group – Nutrilite Spaulding Plant (NSP) appears to be in compliance with PTI No. 144-13A and all applicable Air Quality Rules and Regulations.

NAME 

DATE 3/15/22

SUPERVISOR 