

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

B282573290

FACILITY: Fabri-Kal Corporation		SRN / ID: B2825
LOCATION: 4141 Manchester Rd., KALAMAZOO		DISTRICT: Kalamazoo
CITY: KALAMAZOO		COUNTY: KALAMAZOO
CONTACT:		ACTIVITY DATE: 08/20/2024
STAFF: Michael Cox	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Unannounced Inspection		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Michael Cox (MTC) completed a scheduled unannounced inspection of Fabri-Kal Corporation, dba. Pactiv Evergreen (FKC) at 1:30 PM on August 20, 2024, located at 4141 Manchester Road, Kalamazoo, Michigan. The purpose of the inspection was to verify compliance with state and federal air pollution regulations as well as compliance with Permit to Install (PTI) No. 63-23. Visible emissions and odor observations were taken prior to entering the facility. No visible emissions or odors were noted.

Facility Description

FKC manufactures food grade plastic containers, such as cups and yogurt containers, by utilizing extruders and thermoform lines. The facility prints labels on their containers by utilizing 6 dry offset printers. The facility also shrink-wraps labels to containers via their shrink-body label line.

Regulatory Analysis

FKC is a minor source for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). The facility is currently operating under PTI No. 63-23, which covers the 6 dry offset printers and clean-up materials. The facility is also subject to 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Compliance Evaluation

Upon entering the facility, AQD staff MTC met with Mr. Brad Metzger, Plant Manager, and explained the purpose of the inspection. Rob from the maintenance department provided a walkthrough of the facility and answered site-specific questions. Mr. Jared Glover, EHS Manager, provided records following the inspection.

PTI No. 63-23:

PTI No. 63-23 covers the facility's 6 dry offset printers used to print on plastic parts. The printers utilize ultraviolet cured inks with natural gas flame or corona pre-treatment processes. The PTI also covers the solvent-based clean-up materials. All the emission units are contained under flexible group FGPRINT.

FGPRINT has a VOC emission limit of 10.5 tons per year (tpy) per a 12-month rolling basis. This flexible group also has a VOC material limit of 10 mmHg at 68°F composite vapor pressure for each cleaning solvent (blanket or roller wash). Records of VOC emissions, coating usage, Material Safety Data Sheets, as well as method 24 testing results used to calculate the VOC emissions were requested and

reviewed for the time-period of January 2023 through July 2024. The highest 12-consecutive month VOC emission occurred during the 12-month rolling time-period ending in January 2023 when 4.62 tons of VOC was emitted. After reviewing the records, the vapor pressure for the clean-up materials was less than the maximum 10 mmHg at 68°F.

During the facility walkthrough, all waste coatings and clean-up materials were noted to be kept in closed containers. Coatings and clean-up materials not in use were also noted to be stored in closed containers.

One stack is listed in association with FGPRINT. The stack appeared to be consistent with the dimensions listed in PTI No. 63-23

Additional Observations:

- The facility is in operation with 9 extruders and 8 thermoform lines, with 3 other smaller thermoform lines in their research and development area. These processes appear to be exempt from Rule 201 permitting per Rule 286(2)(a) and (d)
- Two identical boilers were noted on-site serving 2 shrink-wrap lines called Shrink-Body-Label by the facility. The boilers were noted to be Johnson Boiler Company boilers with a total combined MMBtu rating of 4.9 MMBtu which is below 40 CFR 60, Subpart Dc limits and are not subject to the NSPS. These boilers appear to be exempt from Rule 201 permitting per Rule 282(2)(b). The 2 Shrink-Body-Label lines utilize steam to shrink plastic wrapping around the container and vent to the in-plant environment. This equipment appears to be exempt from Rule 201 permitting per Rule 286(2)(d).
- Seven silos were observed on site for storage of the plastic beads used on the thermoforming/extrusion lines. The silos appear to be exempt from Rule 201 permitting per Rule 286(2)(a).
- One 100 kW emergency generator is on-site and is subject to 40 CFR 63, Subpart ZZZZ, however AQD does not have delegated authority to ensure compliance with this subpart for minor area sources of HAP.

Compliance Determination:

Based on the observations made during the inspection and review of the required records, Fabri-Kal dba. Pactiv Evergreen appears to be in compliance with PTI No. 63-23 as well as all other State and Federal Air Pollution rules and regulations.

NAME Michael T. Cox

DATE 8/30/2024

SUPERVISOR Monica Brothers