

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

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|--|--|----------------------------------|
| <b>FACILITY:</b> Action Packaging                              |  | <b>SRN / ID:</b> N3293           |
| <b>LOCATION:</b> 2400 E HIGH ST, JACKSON                       |  | <b>DISTRICT:</b> Jackson         |
| <b>CITY:</b> JACKSON   |  | <b>COUNTY:</b> JACKSON           |
| <b>CONTACT:</b> Lucas Beitelschies , EHS Coordinator-Jackson   |  | <b>ACTIVITY DATE:</b> 02/01/2024 |
| <b>STAFF:</b> Brian Merle                                      | <b>COMPLIANCE STATUS:</b> Non Compliance | <b>SOURCE CLASS:</b> MINOR       |
| <b>SUBJECT:</b> Self initiated, on site compliance inspection. |  |                                  |
| <b>RESOLVED COMPLAINTS:</b>                                    |  |                                  |

### Facility Contacts

Lucas Beitelschies, EHS Coordinator-Jackson

[lbeitelschies@opuspkg.com](mailto:lbeitelschies@opuspkg.com)

517-917-1259

Cameron Main, Environmental Health & Safety Director

[cmain@opuspkg.com](mailto:cmain@opuspkg.com)

231-720-6211

### Purpose

On February 1<sup>st</sup>, 2024, an unannounced self-initiated inspection was conducted at Opus Packaging, formerly Action Packaging, located at 2400 E High Street, Jackson, Michigan. The purpose of the inspection was to determine the facility's compliance status with applicable federal and state air pollution regulations, particularly with the Michigan Natural Resources and Environmental Protection Act 451 of 1994, Part 55, Air Pollution Control and the administrative rules, and the conditions of Permit to Install (PTI) No. 1235-91B.

### Facility Location

The facility is located in Jackson, Michigan. It is surrounded by other commercial properties on all sides.

### Facility Background

The facility was last inspected on November 16<sup>th</sup>, 2016, and was found to be in compliance with their permit. The facility makes corrugated boxes.

### Regulatory Applicability

PTI No. 1235-91B was issued September 22<sup>nd</sup>, 2006, for a corrugated scrap removal system with cyclone. The facility also has several permit exempt processes that also vent to the cyclone: a Saturn Mini-Flexo Folder Gluer, a McKinley Printer/Slotter/Die-cutter, a Saturn II Flexo Folder Gluer, and a Ward Rotary Die Cutter. These are all operated under a Rule 290 exemption due to their VOC emissions being less than 1000 pounds per month.

## **Arrival**

I arrived at the facility at 10:04 AM and entered the reception area. No visible emissions or odors were noted; however the cyclone exhaust could not be seen from the road. I introduced myself and asked if the previous facility contact, EHS Manager Brian Rush, was available. I was informed that he was no longer with the company and the facility's EHS coordinator, Lucas Beitelschies, could meet with me.

## **Pre-Inspection Meeting**

Lucas brought me to a conference room and I waited while he informed other people in the plant of my presence. When he returned, I explained the purpose of my visit, to inspect the facility in regards to their air permit as well as their permit exempt equipment. I began by asking if there have been any changes to the facility, specifically if their permit exempt process were still there and if they still used water based glues and inks. Lucas confirmed that the exempt equipment from the last inspection was still there, with the addition of an Isowa Die Cutter, operated under the same exemption as the other equipment. Additionally, he confirmed that they still use the same water based glues and inks. I informed him that due to their name change from Action Packaging to Opus Packaging they would have to submit a name change notification to the department. I then asked for a tour of the facility and to see the equipment found under the permit as well as the exempt equipment.

## **Inspection**

To go on the factory floor, safety glasses, safety boots, safety vest, and ear protection was required. Lucas led me over to the equipment, which was all operating. Each piece of equipment had a label over it matching the names from the previous inspection, as well as the new equipment. Lucas led me around the equipment towards the shredder/baler, which was permitted as the corrugated scrap removal system. Everything appeared to be in good working order and no issues were noted. We then went outside to look at the cyclone (Image 1). No visible emissions were reported. We then went back inside to the conference room.

## **Post-Inspection Meeting**

I told Lucas that I didn't see anything of note, and all I would need would be the records listed on the records request I gave him. He then called the company wide EHS manager, Cameron Main, who I informed that I was there in regards to their air permit and would need records required to be kept under said permit as well as records to show Rule 290 compliance. With that finished, I thanked Lucas for his time and left the facility at around 10:45 AM.

## **Recordkeeping Review**

The facility provided a spreadsheet with calculations showing their exemption under Rule 290, operating well under the 1,000 pound per month limit for VOCs (Attachment 1).

The facility also informed me that before my inspection, they were not aware of their air permit and as a result had not been performing visible emission readings on the cyclone. Once informed, the facility has begun to perform visible emission readings in accordance with their air permit

(Attachment 2). Due to not being able to provide past records of visible emission readings, a violation notice will be issued.

#### Compliance Determination

At this time, the facility is in noncompliance with the terms of their air permit in regard to keeping records of visible emission readings. A violation notice will be issued to the facility. All other aspects of the facility, including their permit exempt equipment, are in compliance.



**Image 1: Cyclone found at facility.**

NAME 

DATE 07/26/2024

SUPERVISOR 