

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

A240227116

FACILITY: ACCESS BUSINESS GROUP, LLC		SRN / ID: A2402
LOCATION: 7575 E Fulton Rd, ADA		DISTRICT: Grand Rapids
CITY: ADA		COUNTY: KENT
CONTACT: Loretta Campbell Jones , Environmental, Health and Safety		ACTIVITY DATE: 09/04/2014
STAFF: Jenifer Dixon	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: The purpose of this inspection was to complete a scheduled inspection and to determine the facility's compliance with all applicable Air Quality Rules and Regulations and Renewable Operating Permit No. MI-ROP-A2402-2012b.		
RESOLVED COMPLAINTS:		

This was an unannounced inspection. An "Environmental Inspections" brochure was provided at the time of the inspection.

The purpose of this inspection was to complete a scheduled inspection and to determine the facility's compliance with all applicable Air Quality Rules and Regulations and Renewable Operating Permit No. MI-ROP-A2402-2012b.

Access Business Group (Access) manufactures a variety of home and personal care products. Manufacturing departments include Laundry Production, Liquid Production, Pressure Packaging (aerosol) Production, Cosmetics, Nutritional Products, Paper Products Operations and Personal Care Production. Air emissions at the site are primarily the result of volatile organic compounds (VOCs) generated during product batch processing, gassing operations at the pressure packaging department and the use of volatile materials in printing operations. In addition, there are several natural gas fired boilers (with fuel oil back-up) located throughout the complex.

The size of this facility warranted a two day inspection – September 4 and September 8, 2014. On September 8, 2014 Ms. Kelly Orent, AQD Administrative Staff accompanied JD during the inspection. No odors or excess opacity was observed during the time before, during, or after the inspection. Ms. Loretta Campbell-Jones, Environment, Health and Safety, as well as various other Access staff member, provided pertinent information regarding the facility and the operations contained therein during the time of the inspection. Ms. Campbell-Jones, provided operational and record-keeping information after the inspection via e-mail.

There will be some numbers and or letters intentionally skipped in this inspection report. Any headings with conditions associated with them are included and will have an associated evaluation and/or comment. In instances where numbers or letters are skipped, it is to be assumed that no conditions were associated with that section, unless otherwise noted.

Additionally, all reporting for the ROP is completed on a semi-annual and annual basis as required by the permit. This section is intentionally skipped in the report as repeating it would be redundant. All reporting requirements and deadlines have been met by the facility as required by the permit conditions.

SECTION 1

SOURCE-WIDE CONDITIONS

The following conditions address facility wide HAP emissions and the National Volatile Organic Compound Emission Standards for Consumer and Commercial Products.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. HAP	< 9 tpy ²	12-month rolling time period	All	SC VI.1	R 336.1205(3)

(single)		as determined at the end of each calendar month.			
2. HAP (aggregate)	< 22.5 tpy ²	12-month rolling time period as determined at the end of each calendar month.	All	SC VI.1	R 336.1205(3)

Combined HAP emissions for the 12-month rolling time period of August 2013 – July 2014 were less than 1.0 ton per year. Therefore, each individual HAP is also well below the permitted limit.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep the following information on a monthly basis:
 - a. Gallons or pounds of each material used that contains HAPs.
 - b. HAP content, in pounds per gallon or weight percent, of each material used.
 - c. Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
 - d. Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The records shall be kept in a format acceptable to the AQD Supervisor. **(R 336.1205(3))**

Based on records reviewed and discussions with Ms. Campbell-Jones, this is being done as required by the permit condition.

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable requirements of 40 CFR Part 59, Subpart C, the National Volatile Organic Compound Emission Standard (NVOCES) for Consumer and Commercial Products for volatile organic compound content, labeling of containers, record keeping and reporting pursuant to 40 CFR Part 59, Subpart C. **(40 CFR Part 59)**

Based on discussions with Ms. Campbell-Jones, this is being done as required by the permit condition.

2. The permittee shall comply with all applicable standards for volatile organic compound content, labeling of containers, record keeping and reporting for consumer products sold or used in the state of Michigan, pursuant to Rule 336.1660(1). **(R 336.1660, R 336.1661)**

Based discussions with Ms. Campbell-Jones, this is being done as required by the permit condition.

COSMETICS DEPARTMENT

EUCOSMETICS

This includes the cosmetics manufacturing processes with their associated VOC and particulate emissions. Dust Collectors #1 and #2 are used for particulate control with #1 venting internally and #2 externally. VOCs are not controlled. Particulate is controlled by two pulse jet baghouses.

During the inspection, JD observed both dust collectors. The collectors appeared to be operating properly. Access staff appeared to be well versed in how the collectors operated as well as their limitations. At the time of the inspection, toothpaste and foundation were being manufactured. Access can make 75,000 lbs /day of toothpaste at 24,000 lbs /batch.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.01 lb / 1,000 lbs of exhaust gas ^{*2}	Internally vented	Outlet of dust collector #1	SC VI.1, GC 13	R 336.1331(1)(c)
2. Particulate	0.10 lb / 1,000 lbs of exhaust gas ^{*2}	Externally vented	Outlet of dust collector #2	SC VI.1, GC 13	R 336.1331(1)(a) Table 31(j)
3. VOC	6 tpy ²	12-month rolling time period as determined at the end of each calendar month	EUCOSMETICS	SC VI.2	R 336.1225, R 336.1702(a)
*calculated on a dry gas basis					

Compliance with the Particulate limits is dependent on proper operation of the collection equipment. If the equipment is operating properly, then it is assumed to be meeting emission limits as required by the permit. Based on visual observations of the equipment and discussions with the operators, compliance with this condition is assumed.

The highest emissions of VOCs for the time period of August 2013 to July 2014 were in July 2014 at 1.49 tons. This is well below the permitted limit.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Permittee shall not operate EUCOSMETIC unless the (2) Pulse Jet baghouses (Dust Collector #1 and Dust Collector #2) are maintained and operating properly.² (R 336.1331, R 336.1910)

This is being done as required by the permit condition.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall maintain records of preventative maintenance performed, as outlined in Appendix 1-4.² (R 336.1331, R 336.1910)

This is being done as required by the permit condition.

2. The permittee shall calculate the VOC emission rate from EUCOSMETIC monthly, for the preceding 12-month rolling time period, using a method acceptable to the AQD District Supervisor.² (R 336.1225, R 336.1702(a))

This is being done as required by the permit condition.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCOSMETICDC#2PT	17 ¹	58 ¹	R 336.1901

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain an approvable Preventative Maintenance Program. **(R 336.1213(3))**

This is being done as required by the permit condition.

LIQUIDS DEPARTMENT

EULIQUIDSYSTEM

This emission unit represents the dust collector equipment for particulate emissions, during charging and mixing operation. Particulate is controlled by a baghouse.

During the inspection, JD observed the dust collector. The collector appeared to be operating properly. Access staff appeared to be well versed in how the collector operated as well as the limitations the unit has.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.10 lbs / 1,000 lbs. of gases * ²	Test protocol	Outlet of dust collection system	SC VI.1, GC 13	R 336.1331(1)(a) Table 31(j)
* calculated on a dry gas basis					

Compliance with the Particulate limits is dependent on proper operation of the collection equipment. If the equipment is operating properly, then it is assumed to be meeting emission limits as required by the permit. Based on visual observations of the equipment and discussions with the operators, compliance with this condition is assumed.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the process unless the dust collection system is installed, maintained and operating properly.² **(R 336.1910)**

This is being done as required by the permit condition.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain records of preventative maintenance performed, as outlined in Appendix 1-4. **(R 336.1213(3))**

This is being done as required by the permit condition.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVLIQUIDDCSYSTEM	24 ¹	34 ¹	R 336.1225

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain an approvable Preventative Maintenance Program. **(R 336.1213(3))**

This is being done as required by the permit condition.

FGLIQUIDPROCESS2

Liquids Department process equipment for the mixing process and vapor ventilator system.

Emission Units: EULIQMIXPROCESS and EULIQVAPORVENT

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	10.6 pph ²	On a monthly basis as determined at the end of each calendar month	Mixing process and vapor ventilator system	SC VI.1	R 336.1225, R 336.1702(a)
2. VOC	31.8 tpy ²	12-month rolling time period as determined at the end of each calendar month	Mixing process and vapor ventilator system	SC VI.1	R 336.1225, R 336.1702(a)
3. Formaldehyde	876 lbs / year ¹	12-month rolling time period as determined at the end of each calendar month	Mixing process and vapor ventilator system	SC VI.1	R 336.1225

Based on records reviewed the pph VOC emissions are well below 10.6 pph, with the highest emitting month having emissions of 2.32 pph. The highest 12-month rolling for the time period of August 2013 to July 2014 was August 2013 with 8.91 tons.

There were no formaldehyde emissions reported for the time period of August 2013 to July 2014.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain records of the following²: **(R 336.1225, R 336.1702(a))**
 - a. Number of batches (one batch = 4000 gallons) per month;
 - b. VOC emission calculations (per hour and per 12-month rolling time period) on a monthly basis, and
 - c. Annual formaldehyde emission calculations on a monthly basis.

This is being done as required by the permit condition.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (Inches)	Minimum Height Above Ground	Underlying Applicable Requirements
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		(feet)	
1. SVLSTAKVAPORVENT	27 ¹	36 ¹	R 336.1225

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

LAUNDRY DEPARTMENT

During the inspection, JD observed the dust collectors controlling the Laundry Department. The collectors appeared to be operating properly. Access staff appeared to be well versed in how the collectors operated as well as their limitations.

The laundry has several mixing and blending stations as well as 7 packaging lines. These lines package products in tubes, bag-in-box, kegs, and various sizes of bottles.

EUPMOD1ENZYMERH

The Laundry Department produces a variety of home care products including powder detergents, soaps, fabric bleach, and cleaners. This emission unit/process group represents Modifier #1 Enzyme Refill Hopper Process with a dust collector system which is a cartridge type filter

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.002 lb / 1,000 lbs of exhaust gases* ²	Test protocol	Outlet of dust collection system	SC VI.1, GC 13	R 336.1331(1)(c)
2. Particulate	0.00165 pph ²	Test protocol	Outlet of dust collection system	SC VI.1, GC 13	R 336.1331(1)(c)
* calculated on a dry gas basis					

Compliance with the Particulate limits is dependent on proper operation of the collection equipment. If the equipment is operating properly, then it is assumed to be meeting emission limits as required by the permit. Based on visual observations of the equipment and discussions with the operators, compliance with this condition is assumed.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the process unless the fabric filter baghouse is maintained and operating properly.² (R 336.1910)

Based on observations made at the time of the inspections as well as discussion with baghouse operators, this is being done as required by the permit.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain the fabric filter baghouse with a pressure drop indicator.² (R 336.1910)

Based on observations made at the time of the inspections as well as discussion with baghouse operators, this is being done as required by the permit.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVPOWDER6-03-DC (horizontal)	8 ²	49 ²	R 336.1201(3)

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain an approvable Preventative Maintenance Program. (R 336.1213(3))

This is being done as required by the permit condition.

EUPMOD2ENZYMERH

The Laundry Department produces a variety of home care products including powder detergents, soaps, fabric bleach, and cleaners. This emission unit represents Modifier #2 Enzyme Refill Hopper Process with a dust collector system, which is a fabric filter baghouse.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.10 lb / 1,000 lbs of exhaust gases* ²	Test protocol	Outlet of dust collection system	SC VI.1, GC 13	R 336.1331(1)(a) Table 31(j)
2. Particulate	0.4 pph ²	Test protocol	Outlet of dust collection system	SC VI.1, GC 13	R 336.1331(1)(a)

* calculated on a dry gas basis

Compliance with the Particulate limits is dependent on proper operation of the collection equipment. If the equipment is operating properly, then it is assumed to be meeting emission limits as required by the permit. Based on visual observations of the equipment and discussions with the operators, compliance with this condition is assumed.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the process unless the fabric filter baghouse is maintained and operating properly.² (R 336.1910)

Based on observations made at the time of the inspections as well as discussion with baghouse operators, this is being done as required by the permit.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall maintain records of preventative maintenance performed, as outlined in Appendix 1-4. (R 336.1213(3))

Based on records reviewed as well as discussion with Ms. Campbell-Jones, this is being done as required by the permit.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVPOWDER8-03-DC (gooseneck down)	8 ²	59 ²	R 336.1201(3)

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain an approvable Preventative Maintenance Program. (R 336.1213(3))

This is being done as required by the permit condition.

EUPPREMIUMTRANDC

The Laundry Department produces a variety of home care products including powder detergents, soaps, fabric bleach, and cleaners. This emission unit represents the Premium Transfer Belt Process with Dust Collector System, which is a fabric filter baghouse.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.10 lb / 1,000 lbs of exhaust gases*2	Test protocol	Outlet of dust collection system	SC VI.1, GC 13	R 336.1331(1)(a) Table 31(j)
2. PM-10	2.25 pph ²	Test protocol	Outlet of dust collection system	SC VI.1, GC 13	40 CFR 52.21 Subparts (c) & (d)

* calculated on a dry gas basis

Compliance with the Particulate limits is dependent on proper operation of the collection equipment. If the equipment is operating properly, then it is assumed to be meeting emission limits as required by the permit. Based on visual observations of the equipment and discussions with the operators, compliance with this condition is assumed.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUPPREMIUMTRANDC unless the fabric filter baghouse is installed, maintained and operated in a satisfactory manner.² (R 336.1225, R 336.1331, R 336.1901, R 336.1910, 40 CFR 52.21 (c) and (d))

Based on observations made at the time of the inspections as well as discussion with baghouse operators, this is being done as required by the permit

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall maintain records of preventative maintenance performed, as outlined in Appendix 1-

4.² (R 336.1331, R 336.1910, R 336.1911)

This is being done as required by the permit condition.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVPPREMIUMTRANDS (gooseneck down)	16 ²	56.75 ²	R 336.1225, R 336.1901 40 CFR 52.21(c) and (D)

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

IX. OTHER REQUIREMENT(S)

1. The permittee shall not operate EUPREMIUMTRANDC unless a preventative maintenance plan as described in Appendix 1-4 is implemented and maintained.² (R 336.1331, R 336.1910, R 336.1911)

This is being done as required by the permit condition.

EUPVBLENDERMIXDC

This emission unit is a V-Blender Mixer Process Dust Collector.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.04 lb / 1,000 lbs of exhaust gases* ²	Test protocol	Outlet of dust collection system	SC VI.1, GC 13	R 336.1331(1)(c)
2. Opacity	10 % ²	6-minute average	Outlet of dust collection system	SC VI.1, GC 13	R 336.1301(1)(c)

* calculated on a dry gas basis

Compliance with the Particulate limits is dependent on proper operation of the collection equipment. If the equipment is operating properly, then it is assumed to be meeting emission limits as required by the permit. Based on visual observations of the equipment and discussions with the operators, compliance with this condition is assumed.

No opacity was observed during the time of the inspection.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the process unless the associated dust collection systems are installed and operating properly.² (R 336.1910)

Based on observations made at the time of the inspection as well as discussions with baghouse operators the facility is in compliance with the permit condition.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(iii))

1. The permittee shall maintain records of preventative maintenance performed, as outlined in Appendix 1-4. (R 336.1213(3))

This is being done as required by the permit condition.

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain an approvable Preventative Maintenance Program. (R 336.1213(3))

This is being done as required by the permit condition.

FGLAUNDRYDEPT

Numerous powder production and handling processes and control devices, refer to Emission Unit Summary Table for more specific information. Controlled by various baghouses, cyclones, and filters.

Emission Units: EUPMIXER#4WHBV, EUPMARIONMIXER#4, EUPCDBWEIGHHBV, EUPPKGHOOPER#5BV, EUPPKGHOOPER#6BV, EUPFLUIDBEDDRYER, EUPMODIFIER#1DC, EUPAGER#1DC, EUPMODIFIER#2DC, EUPAGER#2DC, EULAUNDRYSILOS, EUPRDHOPPERDC, and EUPR&DHOPPERBV

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.10 lb / 1,000 lbs of exhaust gases* ²	Test protocol	Outlet of appropriate dust collection system	SC VI.1, GC 13	R 336.1331(1)(a) Table 31 (j)
* calculated on a dry gas basis					

Compliance with the Particulate limits is dependent on proper operation of the collection equipment. If the equipment is operating properly, then it is assumed to be meeting emission limits as required by the permit. Based on visual observations of the equipment and discussions with the operators, compliance with this condition is assumed.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the process unless the associated dust collection systems/scrubber are installed and operating properly.² (R 336.1910)

Based on observations made at the time of the inspection as well as discussions with baghouse operators the facility is in compliance with the permit condition.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall maintain records of preventative maintenance performed, as outlined in Appendix 1-4. (R 336.1213(3))

This is being done as required by the permit condition.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVPOWDER6-04-SC	42 ²	56 ²	R 336.1331(1)(c)
2. SVPOWDER9-05-BV (gooseneck down)	8 ²	58 ²	R 336.1331(1)(c)
3. SVPOWDER9-06-BV (gooseneck down)	8 ²	58 ²	R 336.1331(1)(c)
4. SVPOWDER7-01-BV	5 ²	49 ²	R 336.1331(1)(c)

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain an approvable Preventative Maintenance Program. **(R 336.1213(3))**

This is being done as required by the permit condition.

FGMARIONMIX12DC

Flexible group contains Marion Mixer #1 & #2 Dust Collector System and Static Tank. "A" controlled by two pulse jet baghouses.

Emission Units: EUPMARIONMIX#1DC, EUPMARIONMIX#2DC and EUPSTATICTANKA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.10 lb / 1,000 lbs of exhaust gases*2	Test protocol	Outlet of dust collection system	SC VI.1, GC 13	R 336.1331(1)(a) Table 31(j)
2. Particulate	2.0 pph ²	Test protocol	Outlet of dust collection system	SC VI.1, GC 13	R 336.1331(1)(a)
3. VOC	1.2 x 10 ⁻³ pph ²	Test protocol	FGMARIONMIX12DC	GC 13	R 336.1702(a)
* calculated on a dry gas basis					

Compliance with the Particulate limits is dependent on proper operation of the collection equipment. If the equipment is operating properly, then it is assumed to be meeting emission limits as required by the permit. Based on visual observations of the equipment and discussions with the operators, compliance with this condition is assumed.

VOC limits are based on stack testing through GC 13 of the ROP, which states "The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1)."

No stack testing is being requested at this time.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the process unless the associated dust collection systems are installed and operating properly.² (R 336.1910)

Based on observations made at the time of the inspection as well as discussions with baghouse operators the facility is in compliance with the permit condition.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall maintain records of preventative maintenance performed, as outlined in Appendix 1-4. (R 336.1213(3))

This is being done as required by the permit condition.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVPOWDER2-01-DC	12 x 24 ²	32 ²	R 336.1201(3)

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain an approvable Preventative Maintenance Program. (R 336.1213(3))

This is being done as required by the permit condition.

FGPMWH1-3VACH1-2

Weigh Hoppers 1-3 Process with Bin Vents for Marion Mixers 1-3 and Vacuum Weigh Hoppers 1-2 Process with Bin Vents controlled by five (5) pulse jet baghouses.

Emission Units: EUPVACUMWHOP#1BV, EUPVACUMWHOP#2BV, EUPWHOPPER#1BV, EUPWHOPPER#2BV, and EUPWHOPPER#3BV,

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.10 lb / 1,000 lbs of exhaust gases* ²	Test protocol	Outlet of each dust collection system	SC VI.1, GC 13	R 336.1331(1)(a) Table 31(j)
2. Particulate	1.7 pph ²	Test protocol	Outlet of all (5) collection systems combined	SC VI.1, GC 13	R 336.1331(1)(a)
* calculated on a dry gas basis					

Compliance with the Particulate limits is dependent on proper operation of the collection equipment. If the

equipment is operating properly, then it is assumed to be meeting emission limits as required by the permit. Based on visual observations of the equipment and discussions with the operators, compliance with this condition is assumed.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the process unless the associated dust collection systems are installed and operating properly.² (R 336.1910)

Based on observations made at the time of the inspection as well as discussions with baghouse operators the facility is in compliance with the permit condition.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall maintain records of preventative maintenance performed, as outlined in Appendix 1-4. (R 336.1213(3))

This is being done as required by the permit condition.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVPOWDER2-02-BV (gooseneck down)	8 ²	58 ²	R 336.1201(3)
2. SVPOWDER3-01-BV (gooseneck down)	8 ²	58 ²	R 336.1201(3)
3. SVPOWDER4-01-BV (gooseneck down)	8 ²	58 ²	R 336.1201(3)
4. SVPOWDER5-01-BV (gooseneck down)	8 ²	58 ²	R 336.1201(3)
5. SVPOWDER5-02-BV (gooseneck down)	8 ²	58 ²	R 336.1201(3)

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain an approvable Preventative Maintenance Program. (R 336.1213(3))

This is being done as required by the permit condition.

FGPPKGHOPPERS1-4

Flexible group contains packaging hoppers 1-4 with are controlled by four (4) pulse jet baghouses.

Emission Units: EUPPKGHOOPER#1BV, EUPPKGHOOPER#2BV, EUPPKGHOOPER#3BV and EUPPKGHOOPER#4BV

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating	Equipment	Monitoring/ Testing Method	Underlying Applicable
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		Scenario			Requirements
1. Particulate	0.10 lb / 1,000 lbs of exhaust gases ⁻²	Test protocol	Outlet of each dust collection system	SC VI.1, GC 13	R 336.1331(1)(a) Table 31(j)
2. Particulate	0.35 pph ²	Test protocol	Outlet of each dust collection system	SC VI.1, GC 13	R 336.1331(1)(a)
* calculated on a dry gas basis					

Compliance with the Particulate limits is dependent on proper operation of the collection equipment. If the equipment is operating properly, then it is assumed to be meeting emission limits as required by the permit. Based on visual observations of the equipment and discussions with the operators, compliance with this condition is assumed.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the process unless the associated dust collection systems are installed and operating properly.² (R 336.1910)

Based on observations made at the time of the inspection as well as discussions with baghouse operators the facility is in compliance with the permit condition.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall maintain records of preventative maintenance performed, as outlined in Appendix 1-4. (R 336.1213(3))

This is being done as required by the permit condition.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVPOWDER9-01-BV (gooseneck down)	8 ²	58 ²	R 336.1201(3)
2. SVPOWDER9-02-BV (gooseneck down)	8 ²	58 ²	R 336.1201(3)
3. SVPOWDER9-03-BV (gooseneck down)	8 ²	58 ²	R 336.1201(3)
4. SVPOWDER9-04-BV (gooseneck down)	8 ²	58 ²	R 336.1201(3)

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain an approvable Preventative Maintenance Program. (R 336.1213(3))

This is being done as required by the permit condition.

FGPPKGSLYDC

Packaging Sly Process with a Dust Collector, Line #7 Process with a Dust Collector, Packaging Line #7 with Bin Vent, Isolated Mixer Process with a Dust Collector and Extruder Transfer Process with a Dust Collector.

Controlled by four (4) pulse jet baghouses and a bin vent dust collector.

Emission Units: EUPEXTRUDERTRADC, EUPPKGSPLYDC, EUPISOLATEDMIXDC, EUPLINE#7TORITDC, and EUPPKGHOPPER#7BV

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.01 lb / 1,000 lbs of exhaust gases* ²	Test protocol	Outlet of dust collection system	SC VI.1, GC 13	R 336.1331(1)(c)
2. Enzymes (alpha amylase and bacillus subtilis)	0.0003 pph ¹	Test protocol	FGPPKSLYDC	SC VI.1, GC 13	R 336.1224, R 336.1225

* calculated on a dry gas basis

Compliance with the Particulate limits is dependent on proper operation of the collection equipment. If the equipment is operating properly, then it is assumed to be meeting emission limits as required by the permit. Based on visual observations of the equipment and discussions with the operators, compliance with this condition is assumed.

In the case of this equipment, proper operation of the baghouses also assures compliance with the Enzymes (alpha amylase and bacillus subtilis) limit in the permit. The baghouses appear to be operating properly.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the process unless the associated dust collection systems are installed and operating properly.² **(R 336.1910)**

Based on observations made at the time of the inspection as well as discussions with baghouse operators the facility is in compliance with the permit condition.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain the dust collection systems with pressure indication devices.² **(R 336.1910)**

Based on observations made at the time of the inspection as well as discussions with baghouse operators the facility is in compliance with the permit condition.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain records of preventative maintenance performed, as outlined in Appendix 1-4. **(R 336.1213(3))**

This is being done as required by the permit condition.

2. The permittee shall maintain records of production times. **(R 336.1225, R 336.1331, R 336.1901)**

This is being done as required by the permit condition.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVPOWDER9-07-BV	6 (Horizontal) ¹	55 ¹	R 336.1225, R 336.1901
2. SVPOWDER9-22-DC	16 (Horizontal) ¹	30 ¹	R 336.1225, R 336.1901
3. SVPOWDER9-20-DC	30 ¹	22.75 ¹	R 336.1225, R 336.1901
4. SVPOWDER12-02-DC	14 X 17 (Horizontal) ¹	42.8 ¹	R 336.1225, R 336.1901
5. SVPOWDER12-01-DC	10 X 10 (Horizontal) ¹	42.8 ¹	R 336.1225, R 336.1901

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

IX. OTHER REQUIREMENT(S)

The permittee shall implement and maintain an approvable Preventative Maintenance Program. **(R 336.1213 (3))**

This is being done as required by the permit condition.

PRESSURE PACKAGING DEPARTMENT

Pressure Packaging has different types of product packaging made on 4 lines; bag-on-valve, through the valve and under the cap. The products made in this department are all aerosol spray cans. This department uses three types of propellants depending on the product being manufactured and the needs of the customer.

EUPPGASHOUSE68P

Pressure Packaging Gashouse 68 includes gassing of propellant, mixing and charging of products.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	1.6 pph ²	On a monthly basis as determined at the end of each calendar month	Pressure Packaging Gashouse 68	SC VI.1	R 336.1702(a)
2. VOC	4.0 tpy ²	On a calendar year basis	Pressure Packaging Gashouse 68	SC VI.1	R 336.1702(a)

The highest hourly emission rate for the time period of August 2013 to July 2014 was in May 2014 with 1.03 pph. The highest 12-month rolling time period emissions of VOCs for the same time period were in August 2013 at 0.07 tons. This is below the permitted limit.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain records of hourly and calendar year VOC emission calculations based on the number of cans processed per month and hours of operation. **(R 336.1213(3))**

Based on records reviewed this is being completed as required by the permit condition.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust	Minimum Height Above Ground	Underlying Applicable
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	Dimensions (inches)	(feet)	Requirements
1. SVGASHOUSE68	NA	29 ²	R 336.1201(3)

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

EUBAGINCAN5

A conveyORIZED line (bag in can line 5) for filling aerosol cans. This process consists of two parallel filling heads, each equipped with four filling lines, a hot water test bath, a "tipper" station and a banding station. This line is in building number 4.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	20 tpy ²	12-month rolling time period as determined at the end of each calendar month	Bag-in-a-can Line 5	SC VI.1 & VI.2	R 336.1225 R 336.1702(a)

The highest 12-month rolling time period emissions of VOCs for the time period of August 2013 to July 2014 were in August 2013 at 6,375 pounds or 3.2 tons. This is below the permitted limit.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall monitor and record, in a satisfactory manner, the amount of ethanol used in EUBAGINCAN5 on a monthly basis and 12-month rolling time period basis as determined at the end of each calendar month.² (R 336.1225, R 336.1702(a))

Based on records reviewed, this is being done as required by the permit condition.

2. The permittee shall keep, in a satisfactory manner, records of the monthly and 12-month rolling time period calculations of VOC emissions from filling the cans, filling failures and cleanup for EUBAGINCAN5.² (R 336.1225, R 336.1702(a))

Based on records reviewed, this is being done as required by the permit condition.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVEF-1	14 ¹	39 ¹	R 336.1225

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

PERSONAL CARE DEPARTMENT

This department specializes in hair and body care, such as shampoo and hand-sanitizer. The Personal Care Department has 7 packaging lines with package products in various types and sizes of containers.

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVDUSTCOLLECTOR1	26 ²	36 ²	R 336.1331(1)(c)

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain an approvable Preventative Maintenance Program. **(R 336.1213(3))**

This is being done as required by the permit condition.

PAPER PRODUCT DIVISION AND LITHOGRAPHIC PRESS OPERATIONS

Access has both Paper Products East and Paper Products West. Each of these have different printing presses that are used to print things such as catalogs, inserts, and paperboard cartons. Based on conversations with Ms. Campbell-Jones and department leadership, several changes are set to take place in this department. As these changes get closer, Ms. Campbell-Jones will be in communication with JD.

The other operations that occur in this Department are screen printing, binding, and poly-bagging. At the time of the inspection most of the presses were not in operation.

EUOMETFLEXO

20" Omet eight (8) units Packaging Flexographic in-line Printing Press equipped with eight dryers located in Building 44 (Folding Carton Department). This line uses aqueous inks, aqueous coatings, UV coatings, and cleaning solutions (materials).

Flexible Group ID: FGRULE624

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	10.7 tpy ²	12-month rolling time period as determined at the end of each calendar month	Omet flexographic in-line printing press and dryers in Bldg. 44	SC VI.1, VI.2 and VI.3	R 336.1225, R 336.1702(a)

The highest 12-month rolling time period emissions of VOCs for the time period of August 2013 to July 2014 were in August 2013 at 1.26 tons. This is below the permitted limit.

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC Content	≤ 25%, by volume, of the total volatile fraction, as applied OR non-volatile fraction must be ≥ 60% by volume, as applied, minus water. ²	Instantaneous basis	Inks and coatings in Omet printing press in Bldg. 44	SC V.1, VI.2 & VI.3	R 336.1225, R 336.1702(a)

* The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. [R 336.1602(4)]

Based on discussions with Ms. Campbell-Jones and operators on the line, the inks have not changed and are in compliance with this material limit.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials and store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.² (R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)

This is being done as required by the permit condition.

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall determine the VOC content of any material, as received and as applied, using federal Reference Test Method 24 or 24A pursuant to Rule 1040(5) or manufacturer's formulation data. If the Method 24 or 24A and the formulation values should differ, the permittee shall use the Method 24 or 24A results to determine compliance.² (R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))

This condition was not assessed during this inspection.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall complete all required calculations and records in a format acceptable to the AQD District Supervisor and make them available by the 25th day of the calendar month, for the previous calendar month.² (R 336.1224, R 336.1225, R 336.1702(a))

Based on records reviewed, this is being done as required by the permit condition.

2. The permittee shall keep a written record of the following for the EUOMETFLEXO on a calendar month basis:² (R 336.1225, R 336.1702(a))
 - a. The identification and VOC content of each VOC containing material used.
 - b. The usage rate (in pounds or gallons) of each VOC containing material.
 - c. If applicable, the amount (in pounds or gallons) of each VOC containing material reclaimed.
 - d. VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

Based on records reviewed, this is being done as required by the permit condition.

3. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor.² (R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)

Based on records reviewed, this is being done as required by the permit condition.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVOMETFLEXO	24 ²	39 ²	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

EUFCHDELBERG44

This emission unit is a 40" Heidelberg Six-Color non-heatset Sheetfed Offset Lithographic Printing Press with IR and UV curing system.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	22.3 ² tpy (See Appendix 1-7 For applicable emission factors)	12-month rolling time period as determined at the end of each calendar month.	One printing press system	SC VI.1, VI.2 & VI.3	R 336.1702(a)

The highest 12-month rolling time period emissions of VOCs for the time period of August 2013 to July 2014 were in September 2013 at 4.65 tons. This is below the permitted limit.

II. MATERIAL LIMIT(S)

1. The VOC content of the fountain solution of the printing press system shall be less than 5% by volume, as applied.² **(R 336.1702(a))**

Based on discussions with Ms. Campbell-Jones and operators on the line, the inks have not changed and are in compliance with this material limit.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. All waste inks and cleaning solvents shall be captured and stored in closed containers and shall be disposed of in an acceptable manner in compliance with all applicable state rules and federal regulations.² **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**

This is being done as required by the permit condition.

2. The permittee shall implement the following listed pollution prevention exercise for the EUFCHEIDELBERG44:² **(R 336.1225, R 336.1702(a), R 336.1901)**
 - a. All VOC containing press related cleaning solvents (blanket and roller washes) shall have composite partial vapor pressures that do not exceed 10 mmHg@20°C.
 - b. All containers of new and used VOC-containing press related cleaning materials (blanket and roller washes, and solvent-containing cleaning towels) shall be kept closed at all times that they are not in use.

This is being done as required by the permit condition.

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The VOC content of any material, as received and as applied, shall be determined using federal Reference Test Method 24 (inks, coatings, fountain solution additives and cleaning solvents). Upon prior written approval by the AQD District Supervisor, VOC content may be determined from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the Method 24 results shall be used to determine compliance.² (R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040 (5))

This was not assessed during this inspection.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall maintain all required calculations and records in a format acceptable to the AQD District Supervisor and made available by the 25th day of the calendar month, for the previous calendar month.² (R 336.1205(3), R 336.1224, R 336.1225, R 336.1702(a))

This is being done as required by the permit condition.

2. The permittee shall keep written record of the following for the EUFCHDELBERG44 on a calendar month period:² (R 336.1225, R 336.1702(a))
 - a. Identification of the category (e.g. ink, coating, blanket wash) of each VOC containing material used.
 - b. The VOC content of each VOC containing materials as received and the as-applied VOC content (percent by volume) of each press ready fountain solution.
 - c. The usage (in pounds or gallons) of each VOC containing material.
 - d. Record to demonstrate compliance with Special Condition II.1 and III.2.
 - e. VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

Based on records reviewed, this is being done as required by the permit condition.

3. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each VOC containing material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor.² (R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)

This is being done as required by the permit condition.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVFCHEIDELBERG44-01	16.0 ²	31.0 ²	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)
2. SVFCHEIDELBERG44-02 (not required to be "discharged unobstructed vertically upwards")	16.0 ²	23.0 ²	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

EUPPWEBPRESSM600

This emission unit represents a web printing press (M600) with a recuperative thermal recuperative oxidizer. The recuperative thermal oxidizer is subject to 40 CFR 64 (CAM).

Flexible Group ID: FGRULE290

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUPPWEBPRESSM600 unless the thermal oxidizer is installed and operating properly. **(R 336.1910)**

Based on visual observations at the time of the inspection, the unit is installed and operating properly as required.

2. The permittee shall not operate EUPPWEBPRESSM600 unless a temperature indicator for the press afterburner is installed, calibrated, maintained and operated in a satisfactory manner. **(R 336.1910)**

Based on visual observations at the time of the inspection, the indicator is installed and operating properly as required.

3. The permittee shall not operate EUPPWEBPRESSM600 unless the press dryer maintains a negative static pressure relative to the pressroom. **(R 336.1910)**

This was not assessed at the time of the inspection.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall monitor the combustion chamber temperature of the EUPPWEBPRESSM600 thermal oxidizer on a continuous basis and equip the emission unit with an alarm that shall sound when the temperature is below 600° Celsius, or over 820° Celsius indicating an excursion. In addition to the alarm, control software shall stop press operation when the afterburner is below 600° Celsius or over 820° Celsius. **(40 CFR 64.6(c)(1)(i and ii), 40 CFR 64.6(c)(2))**

Based on visual observations and discussions with the line operators and Ms. Campbell-Jones, at the time of the inspection, this is being done as required.

2. The permittee shall perform inspections, alarm tests and calibrations of the temperature indicator as indicated in the preventative maintenance plan and maintain records, in an acceptable manner, **(40 CFR 64.6(c)(1)(iii))**

PM records indicate these are done at prescribed intervals as required.

3. The permittee shall utilize a fan on the dryer of EUPPWEBPRESSM600 on a continuous basis and equip the emission unit with programming that shall shut down EUPPWEBPRESSM600 in the event the fan is not operating. **(40 CFR 64.6(c)(1)(iii))**

Based on information received from Ms. Campbell-Jones on the operation of this unit, this is being done as required.

4. The permittee shall initiate the preventative maintenance plan if the temperature exceeds 820° Celsius or drops below 600° Celsius, based on instantaneous readings. **(40 CFR 64.7(d))**

Based on information received from Ms. Campbell-Jones on the operation of this unit, this is being done as required.

5. Upon detecting an excursion or exceedance the owner or operator shall restore operation of EUPPWEBPRESSM600 (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and

prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown). **(40 CFR 64.7(d))**

Based on information received from Ms. Campbell-Jones on the operation of this unit, this is being done as required.

6. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation at all times that the EUPPWEBPRESSM600 is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR part 64, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, in frequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 64.7(c))**

Based on information received from Ms. Campbell-Jones on the operation of this unit, this is being done as required.

7. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**

Based on information received from Ms. Campbell-Jones on the operation of this unit, this is being done as required.

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**

This appears to be being completed as required by the permit condition.

2. The permittee shall promptly notify the AQD if a modification to the CAM Plan is needed because the existing plan is found to be inadequate and shall submit a proposed modification to the ROP if necessary. **(40 CFR 64.7(e))**

This has not been necessary.

NUTRITIONAL PRODUCTS DEPARTMENT

During the inspection, JD observed the dust collectors. The collectors appeared to be operating properly. Access staff appeared to be well versed in how the collectors operated as well as their limitations. Each of the dust collectors in this area serve a different production floor.

There are several types of packaging that takes place on the three packaging lines; sticks, pouches, and canisters.

EUNUTRPROD31

Nutritional Products Plant, located in building 31. The process produces a variety of powdered drink mixes for dietary supplements. The process includes raw material transfer, mixing/blending and packaging. The equipment consists of blenders, weigh hoppers, mixers, pneumatic conveying systems and three dust collection systems with HEPA filters that will be vented to the in-plant environment.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. No later than 60 days after issuance of this permit, the permittee shall submit to the AQD District Supervisor, for review and approval, a preventative maintenance / malfunction abatement plan (PM /

MAP) for EUNUTRPROD31. After approval of the PM / MAP by the AQD District Supervisor, the permittee shall not operate EUNUTRPROD31 unless the PM / MAP, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. At a minimum the plan shall include:

- a. Identification of the equipment and, if applicable, air-cleaning device and the supervisory personnel responsible for overseeing the inspection, maintenance, and repair;
- b. Description of the items or conditions to be inspected and frequency of the inspections or repairs;
- c. Identification of the equipment and, if applicable, air-cleaning device, operating parameters that shall be monitored to detect a malfunction or failure, the normal operating range of these parameters and a description of the method of monitoring or surveillance procedures;
- d. Identification of the major replacement parts that shall be maintained in inventory for quick replacement;
- e. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If the plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the plan within 45 days after such an event occurs and submit the revised plan for approval to the AQD District Supervisor. Should the AQD determine the PM / MAP to be inadequate, the AQD District Supervisor may request modification of the plan to address those inadequacies.² (R 336.1224, R 336.1225, R 336.1331, R 336.1910, R 336.1911, R 336.1912)

An acceptable plan has been submitted approved and implemented. This condition is being met as required by the permit condition.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate any process in EUNUTRPROD31 unless the associated dust collection system and HEPA filter is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes but is not limited to following all maintenance and operational procedures for each of the dust collection systems and HEPA filters as specified by the manufacturer. The maintenance and operational procedures specified by the manufacturer for the dust collection systems and HEPA filters shall be included in the preventative maintenance/malfunction abatement plan, required by SC III.1.² (R 336.1224, R 336.1225, R 336.1331, R 336.1910)

Based on visual observations at the time of the inspection as well as discussions with operators and Ms. Campbell-Jones, the unit is installed and operating properly as required.

VIII. STACK/VENT RESTRICTIONS

1. The exhaust gases from any process equipment in EUNUTRPROD31 shall not be discharged to the ambient air at any time.² (R 336.1224, R 336.1225, R 336.1331, R 336.1901)

No exhaust gases are being emitted as required by the permit condition.

INK JET CODER OPERATIONS

Ink jet coders are used throughout the facility to print the product codes on the packages. These coders are exempt from permitting under Rule 287(c), but still have some conditions that must be adhered to, as further discussed below.

FGRULE287(c)

All of the inkjet coder operations in the facility are contained in the Rule 287(c) flexible group and include, but are not limited to the following emission units: EULINKJETCODERS, EUCOSVIDEOJETVOC,

EUPVIDEOJETCODE, EUPPVIDEOJETCODE, EUPCAINKJET, EUFVIDEOJETCODER, EUDURINKJETCODER, EUPLASTICJETCODER, and EUNPPVIDEOJET.

The following conditions apply to each emission unit:

II. MATERIAL LIMIT(S)

1. Coatings are limited to 200 gallons per month, as applied, minus water, per emission unit. **(R 336.1287(c)(i))**

Based on records reviewed, all of the emission units that are qualified to utilize the Rule 287(c) exemption are well below this usage limit.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Any exhaust system that serves only coating spray equipment shall be equipped with a properly installed and operating particulate control system. **(R 336.1287(c)(ii))**

Where applicable, this is being done.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 287(c), Permit to Install Exemption Record form (EQP 3562) or an alternative format that is approved by the AQD District Supervisor. **(R 336.1213(3))**
 - a. Volume of coating used, as applied, minus water, in gallons. **(R 336.1287(c)(iii))**
 - b. Documentation of any filter replacements for exhaust systems serving coating spray equipment. **(R 336.1213(3))**

Where applicable, this is being done as required by the permit condition.

FGRULE290

Various operations in the facility are contained in the Rule 290 flexible group and include, but are not limited to the following emission units: : EUPSA8RADICALH6B, EUPMOD#1PREMIXDC EUPPWEBPRESM1000, EUPPNWTNLPETER, EUPPWEBPRESSM600, EUPPGPMIEHLE4C#1, EUPPGPMIEHLE4C#2, EUPPFCFOLDERGLUE, EUPPNWTARPECO, EUFPOLYBAGGING and EUNPPCLEAN.

I. EMISSION LIMIT(S)

1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(i))**

Based on records reviewed, all of the emission units that are qualified to utilize the Rule 290 exemption are well below this emission limit.

2. Each emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: **(R 336.1290(a)(ii))**
 - a. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(ii)(A))**

- b. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(B))**
- c. For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(C))**
- d. The emission unit shall not emit any air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. **(R 336.1290(a)(ii)(D))**

Based on records reviewed, all of the emission units that are qualified to utilize the Rule 290 exemption are well below this usage limit.

- 3. Each emission unit that emits only noncarcinogenic particulate air contaminants and other air contaminants that are exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), if all of the following provisions are met: **(R 336.1290(a)(iii))**
 - a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(a)(iii)(A))**
 - b. The visible emissions from the emission unit are not more than five percent opacity in accordance with the methods contained in Rule 303. **(R 336.1290(a)(iii)(B))**

No opacity was observed during the time of the inspection.

- c. The initial threshold screening level for each particulate air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(a)(iii)(C))**

Based on records reviewed, all of the emission units that are qualified to utilize the Rule 290 exemption are well below this usage limit.

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. **(R 336.1290)**

This is understood.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or an alternative format that is approved by the AQD District Supervisor. **(R 336.1213(3))**
 - a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**
 - b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**
 - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**

- d. Records identifying the ITSL and IRSI, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). **(R 336.1213(3))**
- e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. **(R 336.1213(3), R 336.1290(c))**

Records for these emission units were reviewed. Records appeared to coincide with operations and were in accordance with the limitations above.

2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**
 - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(b), R 336.1213(3))**
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290 (a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**

Records for these emission units were reviewed. Records appeared to coincide with operations and were in accordance with the limitations above.

3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**

This is being done as required by the permit condition.

SECTION 2

SOURCE-WIDE CONDITIONS

The following conditions address facility wide HAP emissions and the National Volatile Organic Compound Emission Standards for Consumer and Commercial Products.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. HAP (single)	< 9 tpy ²	12-month rolling time period as determined at the end of each calendar month.	All	SC VI.1	R 336.1205(3)
2. HAP (aggregate)	< 22.5 tpy ²	12-month rolling time period as determined at the end of each calendar month.	All	SC VI.1	R 336.1205(3)

Combined HAP emissions for the 12-month rolling time period of August 2013 – July 2014 were less than 1.0 ton per year. Therefore, each individual HAP is also well below the permitted limit.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep the following information on a monthly basis:

- a. Gallons or pounds of each material used that contains HAPs.
- b. HAP content, in pounds per gallon or weight percent, of each material used.
- c. Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
- d. Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The records shall be kept in a format acceptable to the AQD Supervisor. ² **(R 336.1205(3))**

Based on records reviewed and discussions with Ms. Campbell-Jones, this is being done as required by the permit condition.

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable requirements of 40 CFR Part 59, Subpart C, the National Volatile Organic Compound Emission Standard (NVOCES) for Consumer and Commercial Products for volatile organic compound content, labeling of containers, record keeping and reporting pursuant to 40 CFR Part 59, Subpart C. **(40 CFR Part 59)**

Based on discussions with Ms. Campbell-Jones, this is being done as required by the permit condition.

2. The permittee shall comply with all applicable standards for volatile organic compound content, labeling of containers, record keeping and reporting for consumer products sold or used in the state of Michigan, pursuant to Rule 336.1660(1). **(R 336.1660, R 336.1661)**

Based on discussions with Ms. Campbell-Jones, this is being done as required by the permit condition.

EUFUELOILTANKS

This emission unit covers storage tanks for No. 2 fuel oil/diesel.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain the following records: **(40 CFR Part 60.116b(b))**
 - a. number of storage vessels;
 - b. dimensions of the storage vessels;
 - c. analysis showing storage capacity of vessels.

Based on records reviewed, this information is being kept as required by the permit condition.

IX. OTHER REQUIREMENT(S)

1. The permittee shall not operate the fuel oil tanks unless all the applicable requirements of the Federal Standards of Performance for New Stationary Sources as specified in 40 CFR, Part 60, Subparts A and Kb are met.² **(40 CFR Part 60, Subparts A and Kb)**

This is being done as required by the permit condition.

EUBOILERS800B30A

This emission unit covers a 800 horsepower / 32.5 MMBTU natural gas and No. 2 fuel oil fired firetube boiler to provide backup steam and heat for the facility. This boiler is located in Building 30A.

II. MATERIAL LIMIT(S)

1. When firing No.2 fuel oil, the permittee shall maintain a maximum sulfur content of 0.1% by

weight.² (R 336.1201(3))

Based on records reviewed, this information is being kept as required by the permit condition.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall only fire natural gas and /or No.2 fuel oil.² (R 336.1201(3))

This is being done as required by the permit condition.

2. The permittee shall limit the use of No. 2 fuel oil to periods of gas curtailment, gas supply emergencies, or periodic testing. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year. (R336.1213(2)(d), 40 CFR 63.11195(e), 40 CFR 63.11237)

This is being done as required by the permit condition.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall maintain the following records for each fuel oil shipment:² (40 CFR 60.48c (f))
 - a. name of the supplier;
 - b. certification statement regarding sulfur content of fuel oil from the supplier according to the specifications under 60.41c for distillate oils;
 - c. quantity of fuel oil received.

This is being done as required by the permit condition.

2. When fuel oil is fired, the permittee shall maintain a record of the reason for using the fuel oil and the duration it was used. (R 336.1213(3)(c))

This is being done as required by the permit condition.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBLRSTAK800B30A	28 ²	37 ²	R 336.1201(3)

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

IX. OTHER REQUIREMENT(S)

1. The permittee shall not operate the boiler unless all the applicable requirements of the Federal Standards of Performance for New Stationary Sources as specified in 40 CFR, Part 60, Subparts A and Dc are met.² (40 CFR Part 60, Subparts A and Dc)

This is being done as required by the permit condition.

FGBOILERS

All non-NSPS boilers in operation at the plant. All use #2 fuel oil as a back-up fuel to natural gas. They vary in size from 14.7 MMBTU to 67 MMBTU and contain the following emission units: EUBOILER#6B67,

EUBOILER#1EB30, EUBOILER#2MB30, EUBOILER#3WB30, EUBOILER#4B4 and EUBOILER#5B4

II. MATERIAL LIMIT(S)

1. When firing No. 2 fuel oil, permittee shall maintain a maximum sulfur content of 0.1%, by weight. **(R 336.1201(3))**

Based on records reviewed, this information is being kept as required by the permit condition.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall only fire natural gas and /or No.2 fuel oil in FGBOILERS.² **(R 336.1201(3))**

This is being done as required by the permit condition.

2. The permittee shall limit the use of No. 2 fuel oil to periods of gas curtailment, gas supply emergencies, or periodic testing. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year, per boiler. **(R336.1213(2)(d), 40 CFR 63.11237, 40 CFR 63.1195(e))**

This is being done as required by the permit condition.

V. TESTING/SAMPLING

1. Once during each calendar year that any of the boilers are fired with fuel oil for any purpose other than testing of the boilers, the permittee shall provide a fuel oil analysis by having a grab sample analyzed in accordance with the appropriate test protocol. **(R 336.1213(3))**

This may be requested in the future, but was not requested at this inspection.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain records of the following:
 - a. fuel oil analysis, as supplied by the vendor, for each new shipment of oil received;² **(R 336.1201(3))**
 - b. testing results as required in SC V.1. **(R 336.1213(3))**

This is being done as required by the permit condition.

2. When fuel oil is fired, the permittee shall maintain a record of the reason for using the fuel oil and the duration it was used. **(R 336.1213(3)(c))**

This is being done as required by the permit condition.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBLRSTACK#6B67	54 ²	50 ²	R 336.1201(3)
2. SVBLRSTACK#4B4	40 ²	28 ²	R 336.1201(3)
3. SVBLRSTACK#5B4	40 ²	28 ²	R 336.1201(3)
4. SVBLRSTACK#1EB30	24 ²	31 ²	R 336.1201(3)
5. SVBLRSTACK#2MB30	24 ²	33 ²	R 336.1201(3)
6. SVBLRSTACK#3WB30	24 ²	33 ²	R 336.1201(3)

Based on visual observations, these dimensions appear accurate. The stacks were not physically measured.

FGRULE287(c)

All of the paint booth operations in the facility are contained in the Rule 287(c) flexible group and include, but are not limited to the following emission units: EUFMPAINTBOOTH, EUB56-2BPAINTBOOTH, EUB31DPAINTBOOTH.

These units were not visually inspected during the physical inspection of the facility. The following conditions apply to each emission unit:

II. MATERIAL LIMIT(S)

1. Coatings are limited to 200 gallons per month, as applied, minus water, per emission unit. **(R 336.1287(c)(i))**

Based on records reviewed, all of the emission units that are qualified to utilize the Rule 287(c) exemption are well below this usage limit.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Any exhaust system that serves only coating spray equipment shall be equipped with a properly installed and operating particulate control system. **(R 336.1287(c)(ii))**

Where applicable, this is being done.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 287(c), Permit to Install Exemption Record form (EQP 3562) or an alternative format that is approved by the AQD District Supervisor. **(R 336.1213(3))**
 - a. Volume of coating used, as applied, minus water, in gallons. **(R 336.1287(c)(iii))**
 - b. Documentation of any filter replacements for exhaust systems serving coating spray equipment. **(R 336.1213(3))**

Where applicable, this is being done as required by the permit condition.

FGCOLDCLEANERS

This flexible group covers all of the cold cleaners in the facility. During this inspection cold cleaners were not evaluated.

EMERGENCY GENERATORS

The following flexible groups cover the various types of area source emergency generators used at the facility. These emergency generators were not physically observed during the inspection.

FGCIRICEMACT

Emergency diesel fuel fired compression ignition (CI) internal combustion engines with applicability to the Area Source Reciprocating Internal Combustion Engine (RICE) NESHAP 40 CFR Part 63, Subpart ZZZZ. This is applicable to existing stationary CI engines located at an area source of HAPS that commenced construction or reconstruction before June 12, 2006. The compliance date for CI engines is May 3, 2013.

Emission Units: EUB22GENERATOR, EUB55GENERATOR, EUB58AGENERATOR, EUB17GENERATOR,

EUB31GENERATOR, EUB44AGENERATOR, EUB58CGENERATOR, EUB76GENERATOR,
 EUB43GENERATOR, EUB44BGENERATOR, EUB65GENERATOR,
 EUB21AGENERATOR1, EUB21AGENERATOR2, EUB21AGENERATOR3,
 EUB30DFIREPUMP

Comments will not be made below as all conditions state that the units shall comply with conditions in 40 CFR Part 63, Subpart A and Subpart ZZZZ. Based on discussions with Ms. Campbell-Jones and subsequent review of the semi-annual deviation reports, this is being done as required.

I. EMISSION LIMITS

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of May 3, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

II. MATERIAL LIMITS

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of May 3, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of May 3, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of May 3, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of May 3, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of May 3, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

IX. OTHER REQUIREMENTS

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of May 3, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

FGSIRICEMACT

Emergency natural gas fired spark ignition (SI) internal combustion engines with applicability to the Area Source Reciprocating Internal Combustion Engine (RICE) NESHAP 40 CFR Part 63, Subpart ZZZZ. This is applicable to existing stationary SI engines located at an area source of HAPS that commenced construction or reconstruction before June 12, 2006. The compliance date for SI engines is October 19, 2013.

Emission Units: EUB34GENERATOR, EUB56GENERATOR, EUB72GENERATOR, EUB78GENERATOR, EUB79GENERATOR, EUPORTGENERATOR

Comments will not be made below as all conditions state that the units shall comply with conditions in 40 CFR Part 63, Subpart A and Subpart ZZZZ. Based on discussions with Ms. Campbell-Jones and subsequent review of the semi-annual deviation reports, this is being done as required.

III. EMISSION LIMITS

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of October 19, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

IV. MATERIAL LIMITS

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of October 19, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of October 19, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of October 19, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of October 19, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of October 19, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

IX. OTHER REQUIREMENTS

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary

Reciprocating Internal Combustion Engines by the initial compliance date of October 19, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

FGRICENSPS

This flex group is for new/reconstructed Compression Ignition (CI) engines at an area source of HAPS that commenced construction or reconstruction on or after June 12, 2006. Engines are subject to MACT ZZZZ, but to demonstrate compliance they must comply with requirements in 40 CFR Part 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines for New Source Performance Standard (NSPS)).

Emission Units: EUB30GENERATOR, EULS1GENERATOR, EUB20DFIREPUMP

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. NMHC + NOx	4.0 g/kW-hr	Test Protocol	Each CI engine	SC VI.1	40 CFR 60.4205(b) 40 CFR 89.112 40 CFR 60.4205(c)
2. CO	3.5 g/kW-hr	Test Protocol	EUB30GENERATOR, EULS1GENERATOR	SC VI.1	40 CFR 60.4205(b) 40 CFR 89.112
3. PM	0.20 g/kW-hr	Test Protocol	Each CI engine	SC VI.1	40 CFR 60.4205(b) 40 CFR 89.112 40 CFR 60.4205(c)

Testing has indicated that the units are operating in compliance with the limits listed above.

II. MATERIAL LIMITS

1. The permittee shall burn only diesel fuel, in the CI engines with the maximum sulfur content of 15 ppm (0.0015 percent) by weight. **(R 336.1205(1)(a), R 336.1402(1), 40 CFR 60.4207, 40 CFR 80.510(b))**

This is being done as required by the permit condition.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee may operate each CI engine for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per calendar year. **(40 CFR 60.4211)**

Based on records reviewed, this is being done as required by the permit. The most hours an engine has operated in 2014 is 14.2 hours.

2. The permittee shall install, maintain, and operate each CI engine according to the manufacturer written instructions, or procedures developed by the owner/operator and approved by the engine manufacturer, over the entire life of the engine. **(40 CFR 60.4206, 40 CFR 60.4211)**

This is being done as required by the permit condition.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall equip and maintain each CI engine with non-resettable hours meters to track the

operating hours. **(40 CFR 60.4209)**

These were not visually observed by JD, but based in information received, the units are in compliance with this condition.

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Within 180 days after commencement of trial operation, the permittee shall verify NMHC, NO_x, CO and PM emission rates from the CI engines, by testing at owner's expense, in accordance with Department requirements or by maintaining manufacturer certification documentation as required in SC VI.1. If testing is to be performed, the permittee must submit a complete stack-testing plan to the AQD. No less than 60 days prior to testing, the permittee must submit a complete stack-testing plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test **(R 336.2001, R 336.2003, R 336.2004, 40 CFR 60.4211)**

Access maintains manufacturer certification documentation as required in SC VI.1 in order to comply with this condition.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall keep, in a satisfactory manner, a record of testing required in SC V.1 or manufacturer certification documentation indicating that each CI engine meet the applicable emission limitations contained in the federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subpart IIII. The permittee shall keep all records on file and make them available to the Department upon request. **(40 CFR 60.4211)**
2. The permittee shall monitor and record the hours of operation of each CI engine during emergencies and non-emergencies, on a calendar year basis, in a manner acceptable to the District Supervisor, Air Quality Division. The permittee shall record the time of operation of each CI engine and the reason it was in operation during that time. **(40 CFR 60.4211, 40 CFR 60.4214)**

This is being done as required by the permit condition.

3. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in each CI engine, demonstrating that the fuel sulfur content meets the requirement of 40 CFR 80.510(b). The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil. **(40 CFR 80.510(b))**

This is being done as required by the permit condition.

IX. OTHER REQUIREMENTS

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subpart A and Subpart IIII, as they apply to each CI engine. **(40 CFR Part 60 Subparts A & IIII, 40 CFR 63.6590)**

Based on discussions with Ms. Campbell-Jones, applicable portions are being complied with.

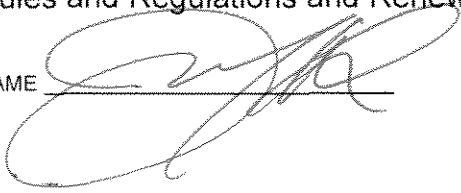
2. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, as they apply to each CI engine by the date upon startup. **(40 CFR Part 63 Subparts A and ZZZZ, 40 CFR 63.6595)**

Based on discussions with Ms. Campbell-Jones, applicable portions are being complied with.

CONCLUSION

Based on the observations made at the time of inspection and the subsequent records reviewed, Access Business Group appears to be in compliance with all applicable Air Quality Rules and Regulations and Renewable Operating Permit No. MI-ROP-A2402-2012b.

NAME



DATE

9/30/14

SUPERVISOR

PAAB