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

A240236417

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:** 09/08/2016
STAFF: Kaitlyn DeVries	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: The purpose of this inspection was to determine compliance with Renewable Operating Permit MI-ROP-2402-2012d and all other applicable Air Quality Rules and Regulations.		
RESOLVED COMPLAINTS:		

On Thursday September 8, 2016 and Friday September 9, 2016 AQD Staff Kaitlyn DeVries (KD) and Chris Robinson (CR) conducted an unannounced, scheduled inspection of Access Business Group, LLC located at 7575 East Fulton Road, Ada, Michigan. Due to the size of the facility, a two-day inspection was warranted. The purpose of this inspection was to determine compliance with Renewable Operating Permit (ROP) MI-ROP-2402-2012d and all other applicable Air Quality Rules and Regulations.

Prior to entry to the facility, Staff observed the perimeter of the facility for odors and opacity. None were noted. Staff then met with Ms. Loretta Campbell-Jones, Environmental Health and Safety, who was the primary escort on the inspection; various other Access staff, primarily the different department supervisors or shift leaders, also accompanied staff on the tour of the facility. KD presented Ms. Campbell-Jones with the Environmental Rights and Responsibilities pamphlet, which was briefly discussed. KD and Ms. Campbell-Jones discussed some impending changes to the facility and how this would affect the forthcoming ROP renewal. KD suggested that a ROP Pre-Application meeting be set up to discuss details of the ROP renewal. Some of the upcoming changes to the facility will be discussed later in this report. Records were requested on the last day of the inspection and provided electronically on a later date.

Facility Description

Access Business Group, LLC (Access) manufactures, packages, and distributes a variety of home and personal care products. Products include lipsticks, toothpaste, body and face lotions, sunscreens, mouthwash, cleaning products, soaps, shampoo and conditioners, and many others. The various manufacturing departments include: Cosmetics Department, Liquids Department, Laundry Department, Pressure Packaging Department, Personal Care Department, Paper Product Division and Lithographic Press Operations, Finishing Department, Nutritional Products Department, Ink Jet Coder Operations, Durables Department, Plastics and Silk Screening area, Facility Heat and Steam Generation Operations, and other miscellaneous operations. The various departments are housed in different buildings on the property.

Regulatory Analysis

Access is currently subject to the Title V program and holds MI-ROP-2402-2012d. Access has taken Hazardous Air Pollutant (HAP) Opt-Out Limits and additional fuel oil restrictions in order to meet the definition of a natural gas fired boiler, thus Access is not subject to the Boiler MACT (40 CFR Part 63 Subpart JJJJJJ). Please see FGBOILERS for further details. Other Federal Regulations that Access is subject to include: 40 CFR Part 60 Subpart Dc for Small Industrial-Commercial Institutional Steam Generating Units, 40 CFR Part 60 Subpart Kb for Volatile Organic Liquid Storage Vessels, 40 CFR Part 60 Subpart IIII for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 63 Subpart ZZZZ for existing stationary Compression Ignition engines at an area source of HAP's, and 40 CFR Part 60 for Compliance Assurance Monitoring (CAM). Access is also subject to 40 CFR Part 59 Subpart C, the National Volatile Organic Compound Emission Standard (NVOCES) for Consumer and Commercial Products. The aforementioned requirements will be fully addressed in the compliance evaluation portion of this report below.
Many of the requirements of the Federal regulations listed above are directly written into the ROP.

The ROP has two (2) sections:

Section 1: Manufacturing Operations

Section 2: Facilities Maintenance Operations

This compliance evaluation section will evaluate both sections and will be organized into the various departments, similarly to the ROP.

Compliance Evaluation

Section 1: Manufacturing Operations

Section 1 consists of the manufacturing operations. This section will generally be evaluated by department. Unless otherwise noted, none of the stack dimensions were explicitly measured during this inspection, as there was no evidence of change or any stack that looked blatantly out of specification.

Access has source-wide HAP emission limits, aggregately limiting HAP's to 22.5 tons per year (tpy) and individually to 9 tpy, both 12-months rolling. As of July 2016 the aggregate 12-month rolling HAP emissions were 0.380 tpy, thus the individual HAP emissions are also well below the 9 ton limit. HAP emission records are attached to this report. Access is also subject to 40 CFR Part 59 Subpart C, the NVOCES for Consumer Products for volatile organic compound content, labeling of containers, record keeping and reporting. Based on discussions with various Access staff, and what was observed during the inspection, Access is properly recording emissions and labeling all containers as per the requirements of this subpart. Some of the labeling requirements include indicating the manufacture date and marking the location of where the consumer products are going. The Volatile Organic Compound (VOC) content of each consumer product is also tracked, for which many of those VOC content requirements are also included later in this evaluation.

Cosmetics Department

EUCOSMETICS

The cosmetics department includes all of the cosmetics manufacturing processes with their associated VOC and particulate emissions. This department has two (2) pulse jet dust collectors; one (1) is internally vented and one (1) is externally vented. Both systems were observed during the inspection and appeared to be properly operating.

At the time of the inspection, Access was making several different products including toothpaste, lipstick and a face lotion. In total there are 14 lines for production, but only a handful of them were operating at that time of the inspection. Many of the processes start on the top floor of the building and are mixed and processed on their way down to the bottom floor where the packaging takes place. Different mixing rooms and tanks are exhausted to one of the two dust collectors. Dust collector #1 (internally vented) has a particulate limit of 0.01 lb. /1,000 lbs. of exhaust gas, while dust collector #2 (externally vented) has a particulate limit of 0.10 lb. /1,000 lbs. of exhaust gas; both are based on test protocol. Preventative Maintenance (PM) plans are required for both units. Access does regular PM's on the units to ensure proper operation; records for such maintenance are attached to this report.

VOC emissions are limited to 12 tpy, per 12-month rolling time period. As of July 2016, the 12-month rolling VOC emissions were 1.08 tons.

Liquids Department

The liquids department primarily makes household cleaning products including glass, kitchen, and metal cleaners. This department, like many of the others, mixes and blends the ingredients to form the products before being piped over to the processing and packaging line where it is put into the individual containers. Liquid dish soap was being produced at the time of the inspection.

EULIQUIDDCSYSTEM

This emission unit represents the dust collector equipment for particulate emissions, during charging and mixing operations. Particulate emissions are limited to 0.10 lbs. /1,000 lbs. based on test protocol. Staff was able to observe the dust collector and it appeared to be properly operating. The pressure drop across the baghouse was 2.5 inches of water column. Access maintains a PM plan, and does regular maintenance on the collector system to ensure proper operation. Example PM's for this unit are attached to this report.

FGLIQUIDPROCESS2

The liquids department flexible group covers all the process equipment for the mixing process (EULIQMIXPROCESS) and the vapor ventilation system (EULIQVAPORVENT). The liquids department has several large tanks that have the capability to mix a wide variety of products. Once the products are made, they are held in the tanks before being piped over to the filling line for processing and packaging. This department has four (4) filling lines, but was only using two (2) of the lines at the time of the inspection.

VOC emissions from this process are limited to 10.6 pounds per hour (pph) as determined on a monthly basis at the end of each calendar month. As of July 2016, the VOC emission rate was 1.89 pph. Over the course of the past 12 months, the highest pound per hour VOC emission rate was in March 2016, with an emission rate of 2.60 pph. VOC emissions are also limited to a 12-month rolling emission rate of 31.8 tpy; as of July 2016 the 12-month rolling VOC emission rate was 7.54 tons. Additionally, Formaldehyde has an emission limit from this process. Formaldehyde is limited to 876 lbs. /year based on a 12-month rolling time period. Per the attached records no formaldehyde was emitted over the past 12 months. Access is properly maintaining records for this process including the aforementioned emissions calculations and the number of batches per month. Over the past 12 months, March 2016 had the highest production levels with 216 batches produced that month.

Laundry Department

The laundry department produces a variety of home care products including powder detergents, soaps, fabric bleach, and cleaners. The laundry department only operates four (4) days per week, and was wrapping up production for the week when staff arrived for the inspection.

There are numerous baghouses throughout the laundry department, and Access regularly does PM on all of them. Example PM's for each of the baghouses are attached to this report.

EUPMOD1ENZYMERH

This emission unit represents the Modifier #1 Enzyme Refill Hopper Process with an associated cartridge type filter dust collector system. Particulate emissions are limited to 0.002 lbs. / 1,000 lbs. of exhaust gases and 0.00165 pph, both based on test protocol. AQD staff was able to observe the baghouse, and it appeared to be properly operating with a magnehelic installed and operating with a pressure drop of 1" water column. The cartridge filters that are used for this collector system are cleaned and then re-used in the system.

EUMOD2ENZYMERH

Modifier #2 Enzyme Refill Hopper Process with associated dust collector system is located in the same general area as the Modifier #1 process. The particulate emissions from this emission unit are limited to 0.1 lbs. / 1,000 lbs. of exhaust gases and 0.4 pph. Both of these emission limits are based on test protocol. As mentioned above, PM's are regularly conducted on this baghouse.

EUPPREMIUMTRANDC

The premium transfer belt process and dust collector system was not operating at the time of the inspection. Per Access staff, only one product is run on this line, and is not regularly produced. The baghouse did appear to be properly operating at the time of the inspection. Particulate emissions from this emission unit are limited to 0.1 lbs. /1,000 lbs. of exhaust gases based on test protocol. PM_{10} emissions are limited to 2.25 pph, also based on test protocol.

EUPVBLENDERMIXDC

This emission unit represents the V-Blender mixer system with an externally vented dust collection system. Particulate emissions are limited to 0.04 lbs. /1,000 lbs. of exhaust gases based on test protocol. This unit also has an opacity limit of 10% based on a 6-minute average. Staff was able to access the roof of the laundry department, and did not observe any excess opacity coming from any of the stacks, or silos.

FGLAUNDRYDEPT

As mentioned above, the laundry department makes numerous powdered household products. This flexible group covers a wide variety of them including their associated control devices. The control devices that are used

in this flexible group include various baghouses, cyclones, filters, and a scrubber. The emission units that are covered under this flexible group include: EUPMIXER#4WHBV, EUPMARIONMIXER#4, EUPCDBWEIGHHBV, EUPPKGHOPPER#5BV, EUPPKGHOPPER#6BV, EUPFLUIDBEDDRYER, EUPMODIFIER#1DC, EUPAGER#1DC, EUPMODIFIER#2DC, EUPAGER#2DC, EULAUNDRYSILOS, EUPRDHOPPERDC, and EUPR&DHOPPERBV.

Particulate emissions from this flexible group are limited to 0.10 lbs. /1,000 lbs. of exhaust gases based on test protocol. Per Access staff, regular PM's are conducted on all of the control devices, and the filters are changed regularly, based on the PM plan for that device. AQD staff was able to observe the scrubber that is associated with this flexible group, but Access staff explained that while the scrubber is still operational, it has not been used in many years. Similarly to the scrubber, the cyclones have not been used in at least two (2) or more years. Additionally, all of the baghouses associated with this flexible group were properly equipped with magnehelic gauges.

FGPMARIONMIX12DC

The two (2) Marion Mixers in this flexible group are housed in the same general vicinity of the laundry department. This flexible group also has a static tank for the fragrance process. There are two (2) pulse jet baghouses associated with this process. Both baghouses were equipped with magnehelic gauges and appeared to be properly operating at the time of the inspection. Particulate emissions from this process are limited to 0.01 lbs. / 1,000 lbs. of exhaust gases and 2.0 pph, both based on test protocol. VOC emissions from this flexible group are also limited to 1.2×10^{-3} pph, based on test protocol.

FGMWH1-3VACH1-2

The five (5) emission units associated with this flexible group (EUPVACUMWHOP#1BV, EUPVACUMWHOP#2BV, EUPWHOPPER#1BV, EUPWHOPPER#2BV, and EUPWHOPPER#3BV) include three (3) weigh hoppers with bin vents for the three (3) Marion mixers, and two (2) vacuum weigh hoppers with bin vents. There are five (5) pulsejet baghouses utilized for control of the particulate emissions in this flexible group. All of the baghouses have appropriate PM plans, and PM's are regularly conducted to ensure proper operation. At the time of the inspection, they all appeared to be properly operating.

Particulate emissions from this flexible group are limited to 0.01 lbs. /1,000 lbs. of exhaust gases based on test protocol. There is also a 1.7 pph particulate emission limit, based on test protocol, for all of the five (5) collection systems combined.

FGPPKGHOPPERS1-4

Four (4) packaging hoppers and four (4) associated pulse-jet baghouses are included in this flexible group. The emission units include: EUPPKGHOPPER#1BV, EUPPKGHOPPER#2BV, EUPPKGHOPPER#3BV and EUPPKGHOPPER#4BV. All four (4) emission units were equipped with magnehelic gauges, but per Access staff, the dust collection systems are only operating when product is being transferred to and from the hoppers.

Access conducts regularly scheduled PM's in accordance with their PM plan; records of the PM's can be found attached to this report. At the time of the inspection, no product was being transferred, thus the baghouses were not operating.

Particulate emissions are limited to 0.10 lbs. / 1,000 lbs. of exhaust gases, based on test protocol. A 0.35 pph particulate limit based on test protocol is also enforced for each of the collection systems.

FGPPKGSLYDC

This flexible group is for the Packaging Sly Process with a dust collector, the Line #7 Process with a dust collector, Packaging Line #7 with bin vents, an isolated mixer process with a dust collector, and an extruder transfer process with a dust collector. Magnehelic pressure gauges were installed and properly operating on each of the four (4) pulse jet baghouses. The Sly Dust collector was running with a pressure drop of 1.5" water column. The isolated mixing process was not in operation at the time of the inspection.

Particulate emissions are limited to 0.01 lbs. / 1,000 lbs. of exhaust gases based on test protocol. Alpha amylase and bacillus subtilis enzymes are limited to 0.0003 pph, also based on test protocol. Similarly to all of the other dust collector systems throughout the facility, Access maintains PM plans for these, and regularly

conducts maintenance. Maintenance records are attached to this report.

FGPMCAM

This flexible group covers all of the emission units throughout the entire facility that are subject to 40 CFR Part 64 Compliance Assurance Monitoring (CAM). The emission units that are covered under this flexible group include: EUPMIXER#4WHBV, EUPPKGHOPPER#5BV, EUPPKGHOPPER#6BV, EUPFLUIDBEDDRYER, EUAGER#2DC, EULAUNDRYSILOS, EUPWHOPPER#1BV, EUPWHOPPER#2BV, EUPWHOPPER#3BV, EUPPKGHOPPER#1BV, EUPPKGHOPPER#2BV, EUPPKGHOPPER#3BV, EUPPKGHOPPER#4BV, EUPPKGSLYDC, and EUPPKGHOPPER#7BV. Specifics for several of these emission units are covered in other flexible groups.

During the inspection, AQD Staff was able to observe the pressure drop indicators for each of the emission units. Access staff also ensured KD that in addition to the regular PM done on the units; they are all equipped with alarms if the pressure drop is out of specification.

Access has successfully submitted all semi-annual and annual monitoring requirements.

Pressure Packaging Department

Per Ms. Campbell-Jones, the pressure packaging department is the department that will change the most over the next year. This department will cease all production in 2017, more specifically April 2017 (or thereabouts). Production in this department has already decreased, and only two (2) of the lines were running at the time of the inspection. This department has previously made a wide variety of products, but now primarily makes, sunscreens, aerosols, and other personal and home-care products. The department uses three (3) types of propellants for the aerosol cans, depending on the product and customer needs.

EUPPGASHOUSE68P

Gashouse 68 includes the gassing of propellant, mixing and charging of products. This line was in production during the inspection, unlike the other two (2) gashouses mentioned below. Per Access staff, all of the gashouses operate in the same manner. VOC emissions are limited to 1.6 pph on a monthly basis determined at the end of each calendar month, and 4.0 tpy on a calendar year basis. Per the attached records, as of July 2016 the emission rates were 1.03 pph and 4.0 tpy. The emission records, the records indicating the number of cans processed per month, and hours of operation appear adequate. Over the past 12 months, March 2016 saw the largest production, operating a total of 179 hours.

FGPPGASH9&66

Much like EUPPGASHOUSE68P, this flexible group includes the gassing propellant and the charging/mixing of products for gashouses 9 and 66. Neither of these two (2) lines and associated gashouses were in use at the time of the inspection. VOC emissions from this process are limited to 134.0 pph based on monthly production totals as determined at the end of each calendar month and 85.0 tpy based on a 12-month rolling time period. Based on the attached records, the July 2016 hourly emission rate was 37.0 pph, while the 12-month rolling emissions were 25.08 tpy. Over the past 12 months, October 2015 saw the largest production month, operating a total of 679 hours.

EUBAGINCAN5

This emission unit is a conveyorized line for filling aerosol cans. This process consist of two (2) parallel filling heads, each equipped with four (4) filling lines, a hot water test bath, a "tipping" station and a banding station. This line was processing sunscreen during the inspection, and is somewhat of a seasonal line. Per Access staff, the water bath and the banding station have not been utilized in many years.

The 12-month rolling VOC emissions from this process are limited to 20 tpy. As of July 2016 the 12-month rolling VOC emissions were 2.311 tpy. The VOC emission records for this process are attached and appear adequate. Ethanol usage is also properly being tracked. As of July 2016 the 12-month rolling average ethanol usage was 2,511.2 pounds.

Personal Care Department

EUPERSONALCARE

This emission unit addresses the mixing operation in the Personal Care area and their associated particulate and VOC emissions. It includes several product storage tanks, mix tanks, pre-mix tanks, pre-weigh areas, equipment wash room and packaging areas.

VOC emissions are limited to 6 tpy, 12-month rolling. As of July 2016, the 12-month rolling emissions were 0.05 tons. All recordkeeping for this emission unit appear to be adequate, and are attached to this report. Particulate emissions from the baghouse are limited to 0.01 lb. /1000 lbs. of exhaust gasses based on test protocol. The particulate emissions are controlled with a pulse jet fabric filter dust collector and the VOC emissions are uncontrolled. The baghouse appeared to be properly operating with a pressure drop across the baghouse of 1" water column at the time of the inspection. Access does regular preventative maintenance and maintains a PM plan for the baghouse. Records of PM's done on the unit are attached to this report.

Paper Product Division and Lithographic Press Operations

The paper products division utilizes different printing operations to make things such as product packaging and marketing materials. At the time of the inspection several of the presses were operating. During the inspection of this department, all containers, including waste containers were closed. Access has requested, and AQD approved, the use of manufacturer's formulation data in lieu of Method 24 for determining VOC content for all of the emission units in this department.

FGRULE624

This flexible group contains EUMETOFLEXO and EUPPWNTARPECO, which are subject to the reporting requirements of Rule 624 (4) for graphic art lines. Rule 624 requires the recordkeeping of the usage of each coating and the VOC content per gallon of coating minus water as applied, for each of the coatings use and amongst others. Access is properly tracking all of this information (see attached records).

EUMETOFLEXO is a 20" Omet eight (8) unit packaging flexographic in-line printing press equipped with eight (8) dryers. VOC content is limited to ≤ 25%, by volume, of the total volatile fraction, as applied OR non-volatile fraction must be ≥ 60% by volume, as applied, minus water. Access is using the non-volatile fraction must be ≥ 60% by volume, as applied, minus water for compliance purposes. Per the attached records, all of the inks and coatings used have a non-volatile fraction above 60%, as applied, minus water. VOC emissions from this press are limited to 10.7 tpy, 12-month rolling. As of July 2016, the 12-month rolling VOC emissions were 1.31 tons. EUPPWNTARPECO is a narrow web UV printing press that is subject to the recordkeeping provisions of Rule 624, and the emissions for this emission unit are accounted for under FGRULE290.

EUKBARAPIDA106PRESS

This emission unit is a non-heatset sheetfed offset-lithographic printing press with IR and UV curing systems and manual and automatic wash systems. This press was operating at the time of the inspection, and was running at approximately 15,000 units per minute. VOC emissions from this press are limited to 13.9 tpy, 12-month rolling; as of July 2016 the 12-month rolling emissions were 0.05 tons. The VOC content of the fountain solution is limited to 5.0% by weight, as applied. Per the attached records, the VOC content of the fountain solutions are less than the maximum 5.0%. The Flint Group Supreme ink has a VOC content of 1.45% as applied. Access is properly tracking the VOC content of the inks that are used. The press-related cleaning solvents used here are limited to a VOC composite partial vapor pressure of 10 mmHg at standard temperature and pressure. Per the attached records, the partial vapor pressures are below the maximum 10 mmHg. An example partial pressure of one of the products used is 0.45 mmHg.

FGDIGIGALPRINTING

This flexible group covers the digital printing operations for printing labels and product information documents associated with various consumer products, and include EUHPINDIGO and EUUVCOATER.

EUHPINDIGO is a Hewlett-Packard Indigo WS 6800 digital printing press, and EUUVOCATER is an AB Graphics UV coater; both were installed and began operation in October 2015 and have replaced some of their other, older equipment. The stack dimensions, while not directly measured, appeared to be correct.

VOC emissions from this process are limited to 8.8 tpy, 12-month rolling. As of July 2016 the 12-month rolling

VOC emissions were 0.446 tons. VOC content is and material usage is properly being tracked as seen in the attached records. At the time of the inspection, all containers were closed, in a manner that minimized fugitive emissions.

Nutritional Products Department

The nutritional products plant is located in building 31, and produces a variety of powdered drink mixes for dietary supplements. Other processes include raw material transfer, mixing/blending and packaging.

EUNUTRPROD31

This emission unit includes all of the blenders, weigh hoppers, mixers, pneumatic conveying systems and three (3) dust collection systems with HEPA filters that are exhausted to the in-plant environment.

The process starts from the top floor, and is fed down three (3) levels to the bottom floor where there is final product. Throughout the process, the various powders are mixed, and blended to create the final product. Each of the mixing rooms on all of the floors along the way have ventilation controls that exhaust to one of the three (3) dust collection systems. The final packaging process allows for the product, type dependent, to be packed one of several ways. The product can be packed in a small pouch, a larger tub, or into a stick.

Access has developed a PM plan for the dust collectors associated with this emission unit, and does regular PM. Attached are records of the PM's, including weekly and monthly inspections of the dust collectors. AQD staff was able to observe the dust collectors during the inspection, and they appeared to be properly operating. The HEPA filters are changed approximately every 30 day, per the requirements set in the PM plan.

Durables Department

The durables department was the last stop on the second day of the inspection. Currently, the durables department operates three (3) shifts, five (5) days per week, but will be downsizing to one (1) shift per day. This decrease in production levels will occur simultaneously with the end of production in the pressure packaging area (April 2017 as mentioned above).

The durables department primarily makes two (2) types of drinking water filtration units, i.e. carbon filtration devices. All of the equipment is exhausted into the general in-plant environment. This department uses an ink-jet coder (EUDURINKJETCODER) for labeling. The emissions from this process are accounted for in FGRULE287 (see below).

Plastic and Silk Screening Area

This area is housed in the same building as the liquids department. There are two (2) primary areas, the plastic blow-molding area and the silk screen printing area. Many of the plastic bottles that are used for other processes are made here, including the bottles used in the Nutritional Products Department. The blow molding equipment is exempt from Rule 201 permitting under Rule 286 (c). After the bottles are molded they are then sent elsewhere in the facility for use, or for further processing. There are four (4) silk screening machines, for which only three (3) of them are primarily used; each machine has the capability to run up to six (6) different colors. UV light is used to help the ink adhere to the bottle. The silk screening process is also exempt from Rule 201 permitting under Rule 287(e).

Ink Jet Coder Operations

FGRULE287(c)

This flexible group encompasses the following emission units: EULINKJETCODERS, EUCOSVIDEOJETVOC, EUPVIDEOJETCODE, EUPPVIDEOJETCODE, EUPCAINKJET, EUFVIDEOJETCODER, EUDURINKJETCODER, EUPLASTICJETCODER, and EUNPPVIDEOJET. EUDURINKJETCODER has already been described in detail in its respective department descriptions above. The other ink jet coders are used in a variety of places around the facility. The printers are used for printing shipping and product information onto boxes or the product itself.
Emissions from these processes are individually limited to 200 gallon usage per month, and are exhausted into the in-plant environment. Access is properly tracking the ink usage for each of the printers and all usages and the highest usage printer, EUCAINKJET, used 34.65 gallons in July 2016. All other months have also been well

below the 200 gallon limit.

Miscellaneous

FGRULE290

Five (5) other emission units (EUPSA8RADICALH6B, EUPMOD#1PREMIXDC, EUPPNWTARPECO, EUFPOLYBAGGING and EUNPPCLEAN) utilize Rule 290 for exemption from the Rule 201 permitting. These emission units are located throughout the facility. AQD staff was able to observe these emission units. Access maintains appropriate records for each of the emission units in accordance with the requirements of Rule 290. In the attached records, a detailed description of the processes and emission calculations are included. Some of the emission units, such as EUFPOLYBAGGING are uncontrolled, and some, such as EUPSA8RADICALH6B are controlled. The emissions from each of these processes are below the emission restrictions for each of the pollutants.

In addition to the five (5) emission units noted above, Access is also utilizing Rule 290 for their ethanol emissions for cleaning in the Nutritional Products Department and for isopropyl alcohol emissions in the durables department. Based on the attached records, both of these emission units are well below the maximum allowed emission under Rule 290.

Section 2: Facilities Maintenance Operations

Section 2 consists of the facilities and manufacturing operations, such as the equipment used for heating and steam generation and other miscellaneous operations.

The same source-wide HAP limits are also enforced here. HAP emissions are aggregately and individually limited to 22.5 tpy and 9 tpy, respectively, on a 12-month rolling timeframe. Please reference the HAP emissions evaluation in Section 1 of this report for complete details.

Furthermore, all required semi-annual and annual reporting requirements for section 2 have been submitted on time and complete.

EUFUELOILTANKS

This emission unit encompasses the six (6) No. 2 fuel and diesel fuel oil storage tanks. The fuel in the tanks is trucked in from the supplier to the trucks, on an as needed basis. These storage tanks are also subject to 40 CFR Part 60 Subpart Kb for Volatile Organic Liquid Storage Vessels, for which per the attached records, all requirements are being met. The sulfur content of the fuel received in these tanks is certified to be less than the max allowable 15 ppm (0.0015% by weight). Since this fuel, if used, is used in all of the boilers and generators listed below, it shall be assumed that all sulfur content requirements of those emission units are also being met.

EUBOILERS800B30A

This emission unit is a 800 horsepower/32.5 MMBTU natural gas and No. 2 fuel oil fired fire tube boiler is located in Building 30A. It is used to provide backup steam and heat for the facility. This boiler is primarily natural gas only, but has the capability to use No. 2 fuel oil. If the boiler is using fuel oil, the oil comes from one of the fuel oil storage tanks, for which the fuel shipment information including the supplier, quantity of oil received and sulfur content are recorded. Records indicate that no fuel oil was used in this boiler for the reporting period.

This boiler is subject to 40 CFR Part 60 Subpart Dc, and many of the conditions are written into the permit and described above. It appears as if all of the requirements are being met. Since there appeared to be no changes to the boiler, the stack dimensions were not explicitly measured.

FGBOILERS

This flexible group includes all non-New Source Performance Standards (NSPS) boilers in operation at the plant that uses No. 2 fuel oil as a back-up fuel to natural gas. Since Access has taken the HAP Opt-Out limits and additional restrictions for all boilers in this flexible and EUBOILERS800B30A, mentioned above, these boilers are not currently subject to 40 CFR Part 63 Subpart JJJJJJ, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, and Commercial Boilers Area Sources. The additional restrictions and

language added to restrict the use of fuel oil to a point that the regulation is no longer applicable to the facility. In total, there are six (6) boilers that fall into this flexible group and vary in size from 14.7 MMBTU to 67 MMBTU. Since there appeared to be no changes, the stack dimensions were not measured during this inspection. If fuel oil is used, the fuel comes from the fuel oil tanks, as mentioned above; thus the fuel specification requirements are met. Records indicate that no No. 2 fuel oil was used in any of the six (6) boilers during the January, 1, 2016 through July 31, 2016.

During the inspection, staff was able to observe two (2) of the six (6) boilers in operation. The two (2) were located in building 30. Per a conversation with Ms. Campbell-Jones, Boiler #4 (EUBOILER#4B4) is completely shutting down. In fact, Access staff confirmed that on the second day of the inspection (September 9), the gas-line to this boiler was completely disconnected. Records also indicate that there was no natural gas usage in EUBOILER#4B4 or EUBOILER#5B4.

FGRULE287(c)

All of the small paint booth operations are contained in this flexible group. The booths are located in different buildings around the facility, including one booth in the facilities department, one in a research and development area, and one in a more office type space. Per Ms. Campbell-Jones, Access has plans to remove the booth located in the office space. Each booth is limited to a maximum usage of 200 gallons per month. Per the available records a max of 2.25 gallons was used in paint booths combined, which is indicative of compliance with the 200 gallon limit. The booths viewed were adequately equipped with fabric filters. The filters are changed on an as needed basis, and the filter changes are properly recorded.

FGCOLDCLEANERS

This flexible group covers all of the cold cleaners located in various parts of the facility. Staff was able to observe one (1) of the cold cleaners located near the lithographic printing presses. The cold cleaner was closed and properly labeled. All of the requirements appear to be met.

FGCIRICEMACT

All 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 (4) located at an area source of HAP's that commenced construction or reconstruction before June 12, 2013 are covered by this flexible group. The compliance date for CI engines is May 3, 2013. Currently, Access has fifteen (15) of these type of engines at various locations throughout the facility and does regular preventative maintenance (PM) on them. Maintenance records are attached.

Access has been submitting the compliance reports in accordance with the requirements of 4Z for these engines, and based on these records (attached), all of these engines appear to be compliant.

FGSIRICEMACT

This flexible group covers all of the natural gas fired spark ignition (SI) internal combustion engines with applicability to the area source RICE NESHAP 40 CFR Part 63 Subpart ZZZZ (4Z) for existing 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.

Access has six (6) of these engines located at various locations throughout the facility. Many of these are dedicated to specific buildings. Access does regular PM on the generators, and records for them are attached. The maximum run time for the first six (6) months of the 2016 calendar year indicate a maximum of 4.8 hours of run time. Access has been also submitting the compliance reports in accordance with the requirements of 4Z for these engines, and based on these records (attached), all of these engines appear to be compliant.

FGRICENSPS

This flexible group encompasses all new/reconstructed CI engines at an area source of HAP's that commenced construction or reconstruction on or after June 12, 2006 that must comply with 40 CFR Part 60 Subpart IIII. The compliance date for these engines is May 3, 2013. Access currently has three (2) engines that are subject to this NSPS. These engines, like the other RICE subject engines, are located at various locations throughout the facility grounds. These engines burn the diesel fuel that is obtained from the storage tanks, thus meeting all of

the fuel specification requirements. The hours of operation are properly being tracked; the maximum run time for any of these engines is 8 hours, using a total of 72 gallons of fuel. The 8 hours ran, is below the 100 hour run time limit per calendar year; the engines are equipped with an hour meter tracking the hours of operation.

Emissions from the engines are limited to 4.0 g/kW-hr NMCH + NOx, 3.5 g/kW-hr CO, and 0.20 g/kW-hr PM, all based on test protocol. Access maintains documentation of certification, which is compliant with these emission limits. Regular PM's are conducted on the generators, and records for them are attached. Access has been submitting the compliance reports in accordance with the requirements of 4I for these engines, and the attached records indicate compliance.

Compliance Determination

Based on the observations made during the time of the inspection and a subsequent review of the records, it appears as if Access Business Group, LLC, is in compliance with MI-ROP-2402-2012d and all applicable air quality rules and regulations.

NAME Kaitlyn Davis DATE 9/29/16 SUPERVISOR