

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

A240245614

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: 07/31/2018
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: The purpose of this inspection was to determine compliance with Renewable Operating Permit (ROP) MI-ROP-A2402-2018 and PTI No. 67-11A, which is in the process of being rolled into the ROP, and all other applicable Air Quality Rules and Regulations. At the time of completion of this report, Access is operating under MI-ROP-A2402-2018a, as PTI No. 64-11A was rolled in.		
RESOLVED COMPLAINTS:		

On Tuesday July 31, 2018 AQD Staff Kaitlyn DeVries (KD) conducted a scheduled inspection of Access Business Group, LLC located at 7575 East Fulton Road, Ada, Michigan. The purpose of this inspection was to determine compliance with Renewable Operating Permit (ROP) MI-ROP-A2402-2018 and PTI No. 67-11A, which is in the process of being rolled into the ROP, and all other applicable Air Quality Rules and Regulations. At the time of completion of this report, Access is operating under MI-ROP-A2402-2018a, as PTI No. 64-11A was rolled in.

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 and Ms. Campbell-Jones discussed some impending changes and recent changes to the facility, as well as the current ROP Modification to roll in PTI No. 67-11A. 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, mouthwash, cleaning products, soaps, shampoo and conditioners, and many others. The various manufacturing departments include: Cosmetics Department, Liquids Department, Laundry 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-2402-2018 and PTI No. 67-11a, which is currently being rolled into the ROP. Access has taken Hazardous Air Pollutant (HAP) Opt-Out Limits and additional fuel 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. 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 64 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. While none of the stacks were explicitly measured during the inspection, they appeared to be of correct dimensions.

Access has source-wide HAP emission limits, that apply to both section 1 and section 2, aggregately limiting HAP's to 22.5 tons per year (tpy) and individually to 9 tpy, both 12-months rolling. As of June 2018, the aggregate 12-month rolling HAP emissions were 0.339 tpy, with the individual HAP emissions at 0.109 tpy. 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 observations made 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. HAP content is also properly recorded and tracked.

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.

Mark and Dave joined Ms. Campbell-Jones and KD for the tour of this department. At the time of the inspection, Access was making several different products including creams and mouthwash. In total there are 14 production lines, 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. Dust Collector #1 had a pressure drop reading of 0.51" water column (WC), while Dust Collector #2 had a pressure drop reading of zero (0). KD did take note that even though the reading was zero (0), she could actively hear the pulsation of the collector. 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, which are not controlled, are limited to 12 tpy, per 12-month rolling time period. As of June 2018, the 12-month rolling VOC emissions were 2.14 tons.

Liquids Department

The liquids department primarily makes household cleaning products including glass, kitchen, and metal cleaners. Greg, Troy, Jason, and Mike joined Ms. Campbell-Jones and KD on a tour of this department. 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. A liquid soap was being produced at the time of the inspection. Ms. Campbell-Jones explained that Access is currently making some changes within this department.

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. KD was able to observe the dust collector and it appeared to be properly operating. The pressure drop across the baghouse was 2" WC. 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 only one (1) of the lines was running 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 June 2018, the VOC emission rate was 1.30 pph. Over the course of the past 12 months, the highest pound per hour VOC emission rate was in April 2018, with an emission rate of 2.10 pph. VOC emissions are also limited to a 12-month rolling emission rate of 31.8 tpy; as of June 2018, the 12-month rolling VOC emission rate was 6.37 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, January 2018 had the highest production levels with 173 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 only running one (1) of the lines at the time of the inspection. Dave accompanied Ms. Campbell-Jones and KD through the laundry department.

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. A/QD 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 3" 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. 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. PM records indicate proper operation, as this emission unit was not in operation during 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. PM₁₀ emissions are limited to 2.25 pph.

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. This unit is equipped with a pressure drop indicator, but the line was not in operation during the time of the inspection. Access conducts regular preventative maintenance on this unit, to ensure proper operation. PM records are attached to this report.

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. 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. 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 the (attached) PM records are indicative of proper operation, since these were not 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. VOC emissions from this flexible group are also limited to 1.2 10^{-3} pph. Records indicate monthly emission rates of 0.00014 pph.

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. Access conducts regular PM on these units to ensure proper operation. PM records are attached to this report.

Particulate emissions from this flexible group are limited to 0.01 lbs. /1,000 lbs. of exhaust gases. There is also a 1.7 pph particulate emission limit, 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. A 0.35 pph particulate limit 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 on each of the four (4) pulse jet baghouses; however, this line was not operating during the time of the inspection. The isolated mixing process was also not in operation at the time of the inspection.

Particulate emissions are limited to 0.01 lbs. / 1,000 lbs. of exhaust gases. Alpha amylase and bacillus subtilis enzymes are limited to 0.0003 pph, as calculated based on monthly production totals at the end of each month. Records indicate a June 2018 production time of 190 hours, and an emission rate of 0.0001 pph. Similar 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 the provisions of 40 CFR Part 64 Compliance Assurance Monitoring (CAM). The emission units that are covered under this flexible group include: EUPMIXER#4WHBV, EUPPKGHOOPER#5BV, EUPPKGHOOPER#6BV, EUPFLUIDBEDDRYER, EUAGER#2DC, EULAUNDRIYSILOS, EUPWHOPPER#1BV, EUPWHOPPER#2BV, EUPWHOPPER#3BV, EUPPKGHOOPER#1BV, EUPPKGHOOPER#2BV, EUPPKGHOOPER#3BV, EUPPKGHOOPER#4BV, EUPPKGSYDC, and EUPPKGHOOPER#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, although some emission units were not in operation at the time of the inspection. 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.

Personal Care Department

EUPERSONALCARE

KD and Ms. Campbell-Jones were accompanied by Troy, Bruce, and Matt in this department. 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. The particulate emissions are controlled with a pulse jet fabric filter dust collector, while the VOC emission are uncontrolled. One (1) line was in operation at the time of the inspection producing a body lotion.

VOC emissions are limited to 6 tpy, 12-month rolling. As of June 2018, the 12-month rolling emissions were 0.53 tons. The highest monthly emissions were in May 2018 with 0.257 tons being emitted. 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. The baghouse appeared to be properly operating with a pressure drop across the baghouse of 0.6" WC 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. Tim accompanied Ms. Campbell-Jones and KD throughout this department.

EUMETOFLEXO

This emission unit is a 20" Omet eight (8) unit packaging flexographic in-line printing press equipped with eight (8) dryers. VOC content is limited to $\leq 25\%$, by volume, of the total volatile fraction, as applied OR non-volatile fraction must be $\geq 60\%$ by volume, as applied, minus water. Access is using the non-volatile fraction must be $\geq 60\%$ 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 June 2018, the 12-month rolling VOC emissions were 1.39 tons.

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 June 2018, the 12-month rolling emissions were 2.83 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 0.62 mmHg.

FGDIGITALPRINTING

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 EUUVCOATER is an AB Graphics UV coater. 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 June 2018, the 12-month rolling VOC emissions were 1.42 tons. VOC content and material usage is properly being tracked as demonstrated 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. Mark and Stephanie accompanied Ms. Campbell-Jones and KD on a tour of this building.

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 the final product is packaged. 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 differential pressure for the three (3) dust collectors were 1.3" WC, 1.5" WC, and 3.3" WC. Dust Collector #3 was going through a cleaning cycle at the time of the inspection. The HEPA filters are changed approximately every 30 day, per the requirements set in the PM plan.

EUNPPCLEAN

This emission unit was formerly operating under the Rule 201 permitting exemption of Rule 290 (details below in FGRULE290) but was permitted in April 2018. The emission unit covers all cleaning and sanitizing activities in the Nutritional Products Plant using means such as reusable applicators and single-use handheld wipes.

VOC emission are limited to 7.6 tpy, based upon a 12-month rolling time period. As of June 2018, the VOC emissions were 0.62 pounds.

Durables Department

The durables department was the last stop of the tour, where Ms. Campbell-Jones and KD were accompanied by Lori and Steve. Currently, the durables department operates one (1) shift, four (4) days per week.

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 and Ken joined Ms. Campbell-Jones and KD for this portion of the inspection. 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 (2)(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(2) (e).

Ink Jet Coder Operations

FGRULE287(2)(c)-1

This flexible group encompasses the following emission units: EULINKJETCODERS, EUCOSVIDEOJETVOC, EUPVIDEOJETCODE, EUPCAINKJET, EUFVIDEOJETCODER, EUDURINKJETCODER, EUPLASTICJETCODER, and EUNPPVIDEOJET. The 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 24.00 gallons in June 2018. All other months have also been well below the 200 gallon limit.

Miscellaneous

FGRULE290

Six (6) other emission units (EUPSA8RADICALH6B, EUPMOD#1PREMIXDC, EUPPNWTARPECO, EUFPOLYBAGGING, EUFLEXOPLATES, and EUDURABLESCLEAN) utilize Rule 290 for exemption from the Rule 201 permitting. All these emission units were installed prior to December 20, 2016 and demonstrate compliance with Rule 290 in effect at the time of installation.

These emission units are located throughout the facility. 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 EUPMOD#1PREMIXDC are controlled. The emissions from each of these processes are below the emission restrictions for each of the pollutants.

In addition to the emission units noted above, Access was utilizing Rule 290 for their ethanol emissions for cleaning in the Nutritional Products Department and for isopropyl alcohol emissions in the durables department, until it was permitted in April 2018. 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 for the equipment in Section 2. 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 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 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 the additional fuel restrictions in order to meet the definition of a natural gas fired boiler, 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. In total, there are four (4) boilers in this flexible group and vary in size from 14.7 MMBTU to 98 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 #2 fuel oil was used in any of the six (6) boilers during the for all of 2017 and thus far in 2018.

During the inspection, staff was able to observe two (2) of the four (4) boilers in operation. The two (2) were located in building 30. Darrell accompanied KD and Ms. Campbell-Jones in the boiler area.

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. Currently, Access has fifteen (15) of these type of engines at various locations throughout the facility. Access conducts regular preventative maintenance (PM) on them. Maintenance records are attached.

Each of the engines are limited to no more than 100 hours of operation per calendar year for purposes including maintenance checks and readiness testing. The engines are allowed 50 hours each, per calendar year in non-emergency situations, but are included in the 100 hours. All engines are equipped with hour meters, and the attached records indicate each engine has operated under the 100-hour limit during the 2017 calendar year.

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. Access has four (4) 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. Each of the engines are limited to no more than 100 hours of operation per calendar year for purposes including

maintenance checks and readiness testing. The engines are allowed 50 hours each, per calendar year in non-emergency situations, but are included in the 100 hours. All engines are equipped with hour meters, and the attached records indicate each engine has operated under the 100-hour limit during the 2017 calendar year.

FGCIRICENSPS

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. These engines are also subject to the provisions of 40 CFR Part 63 Subpart ZZZZ; compliance with Subpart ZZZZ is demonstrated via compliance with Subpart IIII.

Access currently has four (4) 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 ran for each engine, 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 + NO_x, 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.

FGSIRICENSPS

This flexible group is for the emergency natural gas fired spark ignition (SI) combustion engines with applicability to 40 CFR Part 60 Subpart JJJJ – the NSPS for Stationary Reciprocating Internal Combustion Engines that commenced construction after June 12, 2006 and were manufactured on or after January 1, 2009. The engines in this flexible group are also subject to the provisions of 40 CFR Part 63 Subpart ZZZZ, however, compliance with Subpart ZZZZ is demonstrated via compliance with Subpart JJJJ.

Currently, Access only has one (1) emission unit subject to these regulations, and it is a 96 HP natural gas fired generator that is equipped with an hour meter. Similar to the other engines, it is limited to 100 hours per calendar year for purposes including maintenance checks and readiness testing. The engine is allowed 50 hours per calendar year in non-emergency situations but must be included in the 100 hours. Records indicate the engine has operated less than the 100 hours during the 2017 calendar year.

The engine, which is a certified engine, has a CO emission limit of 387 g/hp-hr and a NO_x+HC emission limit of 10 g/kW-hr. Since the engine are certified, this ensures compliance with the limit.

Access conducts regular preventative maintenance on the engine, and records are attached to this report.

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All of the small paint booth operations are contained in this flexible group. These units were installed prior to the rules change in December 20, 2016, thus they demonstrate compliance with Rule in effect at the time of installation.

The booths are located in different buildings around the facility. There are currently two (2) of these booths, as Access removed one since the previous inspection. Each booth is limited to a maximum usage of 200 gallons per month. Per the available records a max of 2.125 gallons was used in the two (2) paint booths combined, which is indicative of compliance with the 200-gallon limit. The booths are 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.

Compliance Determination

Based on the observations made during the time of the inspection and a subsequent review of the