

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection**

B282526037

<b>FACILITY:</b> Fabri-Kal Corporation	<b>SRN / ID:</b> B2825
<b>LOCATION:</b> 4141 Manchester Rd., KALAMAZOO	<b>DISTRICT:</b> Kalamazoo
<b>CITY:</b> KALAMAZOO	<b>COUNTY:</b> KALAMAZOO
<b>CONTACT:</b> Todd Woodfill , Asset Care Manager	<b>ACTIVITY DATE:</b> 07/21/2014
<b>STAFF:</b> Dorothy Bohn	<b>SOURCE CLASS:</b>
<b>SUBJECT:</b> unannounced, self-initiated inspection	
<b>RESOLVED COMPLAINTS:</b>	

I arrived at 1:05. Todd Woodfill is the asset care manager and assisted me in the inspection. He is responsible for the facility, maintenance, tooling, and some health and safety. I gave Todd an inspection pamphlet. The company was located at 3301 E. Cork Street (B6430) before ceasing operations there in 1991, except for warehousing. They then restarted operations on Cork St. in 2002 and AQD's last inspection of the facility was as they were preparing to re-open. About 4 years ago they moved their operations from Cork St. to 4141 Manchester Rd, Kalamazoo (was Mead Paper, SRN B2825). They have a corporate office building off of Lover's Lane, Kalamazoo.

There is an area of the plant being leased to Easy Pac but they are moving out soon according to Todd. Easy Pac makes plastic containers and cuts boxboard. The scrap plastic is collected and goes back to the thermoformers.

Fabri-Kal makes foodgrade plastic containers, such as glasses and yogurt cups. Currently, there are 7 thermoform lines but they are planning to add more. This equipment is exempt per Rule 286(d). The plastic is extruded into sheets then the container is punched out of the sheet. Plastic types are PLA, HDPE and PP. The scrap plastic is collected, cut to small pieces and goes back to the thermoformers.

I did not observe them but Todd said that there are 5-7 silos that store the raw, small plastic pellets. He said that the silos have filters for control. These can be exempt per Rule 284(k). The building is heated with gas-fired heaters by the ceiling. These are exempt per Rule 282(b).

They have a small, gas-fired emergency generator that Todd said was installed in 2012. It is a Cummins-Bridgeway unit, model # GGHH-7092542, rated at 100 Kw. I told him about the federal NSPS and MACT regs and that they are an area source of HAP and suggested that he check with the manufacturer (who does their maintenance) about their compliance with the regs.

Print Shop: Fabri-Kal prints the labels on the yogurt cups and designs on the drinking cups, etc. Dwayne manages the shop. They have 5 Polytype, dry off-set printers, each can apply 8 colors. The inks are UV cured. The inks are mostly used as purchased from Zeller & Gmelin. The MSDS (attached) lists everything as trade secrets except 4986-89-4 (pentaerythritol tetraacrylate 5-17%) which is not listed in our toxics list. The MSDS says the ink is < 1% volatile by weight. Jim keeps the records and he said that June was a busy month and they used 1086# of ink, but in May they used 1122#. The specific gravity of the ink ranges from 1.1-1.9 so the density is 9.17 – 15.85 #/gallon. At a density of 9.17 they would have used 122 gallons in May. This is well under the 200 gallons/month and the ink is very low VOC.

They use a 50 gallon drum of Printer's Blanket Wash 100 about every 3 weeks (MDSD attached). It is 100% volatile with only 0.2% being a HAP. It is used to clean the machines. This would be exempt per Rul 285(r).

I left at 2:15. The company appears to be in compliance.

NAME Dorothy Bohn

DATE 7/22/14

SUPERVISOR

Ma-7/22/2014