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

B671238337		
FACILITY: Oliver Products		SRN / ID: B6712
LOCATION: 445 6TH ST NW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Trent Nobach, Director of Operations/Corporate Project Manager		ACTIVITY DATE: 01/09/2017
STAFF: Adam Shaffer	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled unannounce	ed inspection.	•
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) and April Lazzaro (AL) arrived at the facility at approximately 9:10 am on January 9, 2017 to conduct an unannounced scheduled inspection. The purpose of this inspection was to determine compliance with applicable air quality rules and regulations.

## Facility Description

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Oliver Products (OP) is a medical device and pharmaceutical packaging company with the Grand Rapids site the corporate office for the company. The site had previously been in operation with several permits, which were voided between 1994 and 2000. No odors or emissions were observed prior to entering the site.

## **Compliance Evaluation**

AQD staff met with Mr. Ivan DeYoung, Maintenance, and Mr. Trent Nobach, Director of Grand Rapids & Hamilton Operations/Corporate Project Manager. The purpose of this inspection was explained in further detail which included a facility walk through and concluded with a final discussion at the end. Several additional representatives of OP were contacted throughout the inspection to answer/make aware of specific questions AQD staff had and/or the final results of the inspection.

After the initial discussion with Mr. Nobach and Mr. DeYoung, a facility-wide inspection was completed. The layout of the facility included office areas, chemical/product storage areas, the adhesive coating/printing line processes and adhesive manufacturing.

The process initially starts with four adhesive coating lines identified as Coating Lines 42, 44, 46 & 47 with two tanks ranging from 800-1,200 gallons of adhesive for each respective unit. The adhesives are heated and gravure printed onto a web then cooled after application. The coating lines are externally vented. The three main types of products produced at this facility are roll, lid and pouch products. Based on info obtained, the facility equipment has VOC emissions. OP had no emissions data, nor was able to provide the permitting status of this equipment. This is a violation of Rule 201.

Next observed were the flexographic & offset printing operations. Eight flexographic printing presses identified as CI Press, Aquaflex, 28 Webtron, 22 Nilsaton and IMPIS 23, 24, 25 & 26 and two offset printing presses identified as ISO 7&8 were observed throughout the facility. The printers are run on varying amounts of time per month. Based on information obtained, the facility equipment has VOC emissions. OP had no emissions data, nor was able to provide the permitting status of this equipment. This is a violation of Rule 201. Open five gallon containers were observed adjacent to the printing presses. AQD staff advised OP staff to in the future seal the containers to prevent evaporative loss.

Additional equipment including five slitting machines, two converting machines and six pouch converting machines were observed at the facility.

The 14,000 cfm catalytic oxidizer (CO) located on the rooftop was visually observed. Mr. Nobach stated that the CO has not been used for approximately five years; however, was still connected.

The chemical storage room was visually inspected. Large quantities of solvents and inks in 55-gallon containers or less were observed throughout the chemical storage room. The solvents identified included isopropyl alcohol, toluene, n-propyl alcohol, n-propyl acetate, and glycol ether PNP. The chemicals isopropyl alcohol and toluene are used for general cleaning and the adhesive coating lines respectively. The cleaning operations are done manually with the used rags being stored in sealed containers that were observed adjacent to adhesive coating lines and printing presses. The used rags are then shipped off site to Cintas. It was later determined that the solvent based chemicals were stored in the chemical storage room and the water based solvents were kept in a

separate area adjacent to several printing machine presses.

A ten gallon solvent distillation unit was observed on site and OP staff stated that all inks/solvents with the exception of toluene were distilled and reused. OP staff stated that one cold cleaner was located in the facility. A woodworking saw was located on site that was vented internally.

Several boilers were observed throughout the inspection. The boilers were identified to be approximately 204,000 Btu/hr or less. A non-contact hot oil heater is also utilized. Significant oil staining was observed adjacent to the oil heater. A flexographic plate making machine was observed in the basement level and is being phased out.

The adhesive manufacturing process was observed in the basement level of the facility which included an internally vented adhesive manufacturing mix tank baghouse and an adhesive manufacturing dust collector (powder grinder). OP staff stated that there are three different processes to create the adhesive used in the coating lines identified in the beginning of the inspection and they are mixing and melting the powder adhesives, dry blend mixing and weighing. The adhesive manufacturing equipment is internally vented. AQD and OP staff spoke with Mr. Bob Langlin, Adhesive Formater, who confirmed all parafins are non-chlorinated.

## Conclusion

A closing conversation with AQD staff and OP staff was then conducted. Mr. Nobach called Mr. Paul Kominski, the corporate EH&S, who is located in Philadelphia, to take part in the discussion. Mr. Bob Jarra was also present.

At this time it was determined that OP was not maintaining emissions records, and unable to provide the permitting status of the various processes. As previously indicated, this is a violation of Rule 201. Mr. Kominski stated that he is not familiar with Michigan Air Pollution regulations and we informed him that we would provide the air quality consultant list.

OP was in non-compliance at the time of the inspection. The company was informed that a violation notice for Rule 201 would be sent.

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DATE OI /24/2017 SUPERVISOR