

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

B671249916

FACILITY: Oliver Health Care Packaging		SRN / ID: B6712
LOCATION: 445 6TH ST NW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: George Gramas , Plant Manager		ACTIVITY DATE: 08/15/2019
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled unannounced inspection		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the Oliver Health Care Packaging (OHP) facility located in Grand Rapids, MI at 10:29 am on August 15, 2019 to complete a scheduled unannounced inspection. The weather conditions at the time of the inspection were cloudy skies, temperatures in the low 60's °F and light and variable winds from the northeast. Prior to entering the facility offsite odors and emissions observations were completed. No odors or emissions were observed.

Facility Description

OHP is a healthcare packaging production facility. The facility is an opt out source for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). The facility is in operation with Opt Out Permit to Install (PTI) No. 102-17. Since the previous inspection, EU44COATER has been removed from the facility and was verified during the site inspection. Additionally, several pieces of exempt equipment that will be discussed later in this report have been removed and/or are to be removed. No additional significant changes have occurred to the site since the last inspection.

Compliance Evaluation

Upon entering the site, AQD staff AS met with Mr. Ivan DeYoung, Plant Services Team Leader, who provided a tour of the facility and answered site specific questions. Following the site inspection AQD staff AS followed up with several OHP staff who provided all requested documents.

Opt Out PTI No. 102-17

FGCOATERS

This flexible group is for the three remaining hot melt adhesive coating machines. Toluene is used for clean-up and quality testing.

This flexible group is subject to emission limits for VOCs and toluene at 8.9 tons per year (tpy) per a 12-month rolling time period. Records were requested and provided from June 2018 through June 2019. For the month of June 2019, approximately 108 lbs of VOCs (toluene) were emitted. As of June 2019, 5,603.5 lbs (approximately 2.80 tons) of VOCs (toluene) were emitted per a 12-month rolling time period which is within the permitted limit. Previous 12-month rolling time periods were reviewed and also within the permitted limits.

This flexible group is also subject to a daily material limit of 600 lbs of toluene. Records were requested and reviewed from June 2018 through June 2019. The highest daily usage was 137 lbs of toluene used which is within the permitted limit. Based on the records reviewed, it appears that OHP is meeting the daily toluene usage limit.

Safety Data Sheets (SDS) were provided for the top five ingredients used for the adhesive manufacturing and the top five solvents used. However, it was noted when looking at the records and speaking with staff, the majority of the emissions from the adhesive lines are the toluene usages and not the adhesives. Based on the records reviewed, it appears that OHP is keeping track of adhesives and clean-up solvents used. Additionally, it appears that OHP is keeping track of solvent usages and toluene / VOC emission rates.

Nine stacks are listed as associated with this flexible group and were observed during the course of the site inspection. Though the dimensions of each stack were not measured they appeared to be consistent with what is listed in PTI No. 102-17.

FGFACILITY

This flexible group is for all process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

This flexible group is subject to an individual / aggregate HAP emission limit of 8.9 tpy and 22.4 tpy respectively per a 12-month rolling time period. Records were requested and reviewed from June 2018 through June 2019. For the month of June 2019, 150 lbs of HAPs were emitted and as of June 2019, 5.33 tpy of HAPs were emitted per a 12-month rolling time period, which is within the permitted limit for individual and aggregate HAP emissions. Previous 12-month rolling time periods reviewed of HAP emissions were also within permitted limits. Based on the records reviewed, OHP does not separate out their individual HAP emissions. However, aggregate HAP emissions are low enough that they are within individual HAP permitted limits. This method was determined to be acceptable at this time. Moving forward, if aggregate HAP emissions rise above individual HAP permitted limits than emissions will need to be separated out in order to verify compliance with PTI No. 102-17.

This flexible group is subject to a VOC emission limit of 89 tpy per a 12-month rolling time period. Records were requested and reviewed from June 2018 through June 2019. For the month of June 2019, 694.5 lbs of VOCs were emitted. As of June 2019, 11.79 tpy of VOCs were emitted per a 12-month rolling time period, which is within the permitted limit. Previous 12-month rolling time periods reviewed were also within permitted limits.

Based on the records reviewed, OHP appears to be overall keeping track of usages, HAP/VOC contents and monthly/12-month rolling time period emissions.

OHP is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart KK – National Emission Standards for the Printing and Publishing Industry. Since OHP has taken HAP emission limits they are only subject to 63.829(d) and 63.830(b)(1) of this subpart. As stated previously, OHP appears to overall be keeping track of HAP materials used and HAP contents. An initial notification was submitted to the AQD by OHP via email following the inspection. It was determined that OHP appears to be in compliance with the NESHAP Subpart KK rules and regulations.

Additional Observations

- A storage room for all inks, solvents, and water-based coatings was observed during the site inspection.
- Seven flexographic printing presses (23 IMPI, 24 IMPI, 25 IMPI, 26 IMPI, 1600 Webtron, Aquaflex and CI Press) and one off-set printing press (Heidelberg) were observed during the site inspection. Additionally, it was concluded that a former press (Miller) was in the process of being removed offsite and a second flexographic printing press (Nilsaton) had been removed in July 2019. OHP claims that the flexographic printing presses and off-set printing press are exempt per Rule 290. Records were requested and reviewed. In the records provided, each material used by a printing press is broken down into VOC and HAP contents with HAPs broken down further into each individual HAP content. Emission records per Rule 290 appeared to be split into two areas. The first area demonstrated compliance of certain toxic air contaminants (TACs) when compared to the 20 lbs per month emission limit. Emissions were the sum of all printing presses and not broken down per unit. Records reviewed appeared to show emissions within applicable limits. The second area added up all VOC, HAP, and TAC emissions under VOC emissions to be compared to the 1,000 lb emission limit per printing press. Upon review of the records, the Aquaflex and CI Press are the two units with the highest monthly emissions. For the April 2019 records, it was noted that the Aquaflex printing press emitted 1,013.8 lbs of emissions which is over the 1,000 lb monthly emission limit. Months following this for the Aquaflex and the other seven units were below the 1,000 lb monthly emission limit. Select SDS were requested and provided for the top used materials. Upon review and discussing the records with OHP staff, numerous errors were identified when determining VOC/HAP/TAC emissions. It was determined that despite the errors noted, the monthly emissions per printing press would appear to still be within applicable limits and appear to be exempt per Rule 290. However, moving forward these errors noted in the monthly records shall be addressed appropriately and records resubmitted at

a later date to verify they have been completed. If necessary, the decision of compliance for the printing presses shall be revisited up resubmittal of corrected records.

Two emergency generators were observed during the inspection. Based on the size, OHP believes both generators appear to be exempt per Rule 282(2)(b)(i). This exemption appears to be applicable. One generator is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart ZZZZ – Reciprocating Internal Combustion Engines, and New Source Performance Standards (NSPS) Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. Additional information regarding each emergency generator is discussed further below.

- o **Emergency Lighting Generator Asses #09305** – This is a Model # EG25F3S natural gas fired engine spark emergency generator that was installed in 06/01/2006. The size of this emergency generator is 22.5 KW and the manufacturer is Eaton Cutler Hammer. This emergency generator is used for emergency lighting of the building only. OHP staff stated that no modifications have occurred to the generator since installation. Based on the information provided, it was determined that the emergency generator appears to not be subject to the NESHAP Subpart ZZZZ or the NSPS Subpart JJJJ.

- o **Data Center 2 Generator Asset #8886** - This is a Model # 076000NG natural gas fired engine spark emergency generator that was installed in 09/01/2010. The size of this emergency generator is 30 KW and the manufacturer is Briggs and Stratton. This emergency generator is used for power to the computer room of the building only. Based on OHP staff it appears that a non-resettable meter to record the hours of operation is installed on the generator. At the time of the inspection the engine has run 250 hours. Standard maintenance for this generator is 20 minutes per week of operation to prevent the device from seizing during an emergency. From June 2018 through June 2019 there was only one power outage where this generator was used. That was on September 20, 2018 where the emergency generator was used for approximately two hours. Additionally, OHP stated that they now have in place, as of 08/20/19, documentation to record hours during every event and preventative maintenance. A certificate of conformity was requested and provided by OHP staff. Records identifying dates of historical preventative maintenance completed and recent preventative maintenance operations were provided. Based on the observations made and the records provided, Emergency Generator #8886 appears to be in compliance with NESHAP Subpart ZZZZ and NSPS Subpart JJJJ rules and regulations.

- The solvent reclamation unit was observed during the inspection. During the previous inspection it was determined that the unit could hold ten gallons of material at a time. OHP believes this unit to be exempt per Rule 285(2)(u). This exemption appears to be applicable.

- Several pouch machines were observed during the inspection. Here a three-sided seal product is made. The pouch machines observed are vented inside and OHP believes are exempt per Rule 285(2)(l)(vi)(B). This exemption appears to be applicable.

- Various slitter machines and other material cutting units were observed during the inspection that are vented internally and appear to be exempt per Rule 285(2)(l)(vi)(B).

- An adhesive mixing area that is used to blend materials that form the adhesives used in the facility coating lines was observed during the inspection. OHP believes that this unit is exempt per Rule 291 and a demonstration was requested and provided. The materials used for this process were stated to be low in VOCs and contain no HAPs. Based on the demonstration provided, the unit appears to be exempt per Rule 291.

- During the inspection, several boilers and a heater were observed that appear to be exempt per Rule 282(2)(b)(i).

- A compactor machine used for collecting waste from select pouch machines, slitter machines, and several flexographic printing presses was observed during the inspection. The compactor had what appeared to be a cyclone and baghouse collection system associated for control of emissions. The baghouse contains 120 bags and a magnehelic gauge was observed for the unit. At the time of the inspection the unit was down for repairs. OHP believes this process and collection system are exempt per Rule 285(2)(l)(vi)(C). Based on the observations made, this exemption appears to be applicable.

Conclusion

Based on the facility walkthrough, observations made, and records received, OHP appears to be in compliance with PTI No. 102-17 and applicable air quality rules.

NAME Adam J. Smith

DATE 09/26/19

SUPERVISOR 