

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

B671263216

FACILITY: Oliver Health Care Packaging		SRN / ID: B6712
LOCATION: 445 6TH ST NW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Adam Snider , Plant Manager		ACTIVITY DATE: 05/24/2022
STAFF: Michael Cox	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Unannounced Inspection		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Michael Cox (MTC) arrived at the Oliver Healthcare Packaging facility located at 445 6TH Street NW, Grand Rapids, MI at 1:30 pm on May 24, 2022, to complete a scheduled unannounced inspection. Prior to entering the facility offsite odors and emissions observations were completed. No odors or emissions were observed.

### Facility Description

Oliver Healthcare Packaging is a packaging production facility serving the healthcare industry. 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. 102-17A.

### Compliance Evaluation

Upon entering the site, AQD staff MTC met with Mr. Adam Snider, Plant Manager, Mr. George Gramas, Global Director of Operations, Mr. Arik Hoppe, Maintenance Manager, Mr. Nathan Reinke, Process Engineer, and Mr. Ivan DeYoung, former Plant Services Team Leader, who provided a walk-through of the facility and answered site specific questions. Requested records and documentation were provided by Mr. Nathan Reinke on-site and following the inspection.

### Opt-Out PTI No. 102-17A

#### FGCOATERS

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

This flexible group is subject to emission limits for VOC emissions at 8.9 tons per year (tpy) per a 12-month rolling time period and toluene emissions at 8.9 tons per year (tpy) per a 12-month rolling time period. Records were requested and provided from April 2021 through April 2022. The highest 12-month consecutive VOC emissions from FGCOATERS occurred during the 12-month period ending in March 2022, when 1.72 tons of VOC was emitted. The highest 12-consecutive month toluene emissions from FGCOATERS occurred during the 12-month period ending in February 2022, when 1.63 tons of toluene was emitted.

This flexible group is also subject to a daily material limit of 600 pounds (lbs.) of toluene. Records were requested and reviewed from April 2021 through April 2022. The highest daily usage of toluene was noted to be 163 lbs./day of toluene used on July 12, 28, and September 1, 2021, which is within the permitted limit. Based on the

records reviewed, it appears that Oliver Healthcare Packaging is meeting the daily toluene usage limit.

Oliver Healthcare Packaging has been approved to use manufacturer's formulation data instead of Method 24 testing for VOC content of materials used by FGCOATERS. Oliver Healthcare Packaging is currently using Manufacturer's Formulation Data for VOC content of materials used to calculate emissions. Safety Data Sheets (SDS) and Manufacturer's Formulation Data were requested and provided for the top five ingredients used for the adhesive manufacturing and solvents used. Specifically, SDS for HD STM STRLZBL Scuff Black PT# 00920W, toluene, Glycol Ether EP (COMB), 01601/FL-AB PMS000U Black Tyvek C, and Scuff Resist White, were cross referenced with the facility's VOC/HAP content logs for accuracy. No discrepancies were noted after a review of the referenced records. Oliver Healthcare Packaging is keeping track of adhesives and clean-up solvents usage as required. Additionally, it appears that Oliver Healthcare Packaging is keeping track of toluene and VOC emission rates as well.

Eight stacks are associated with this flexible group and were observed during the course of the site inspection. The stacks appeared to be consistent with what is listed in PTI No. 102-17A.

#### **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 HAP emission limit of 8.9 tpy and an aggregate HAP emission limit of 22.4 tpy per a 12-month rolling time period. Records were requested and reviewed for the time period of April 2021 through April 2022. The highest 12-consecutive month individual HAP emission occurred during the 12-month periods ending in February and April 2022, when 1.74 tons of toluene was emitted. The highest 12-consecutive month aggregate HAP emissions occurred during the 12-month period ending in March 2022, when 4.57 tons of HAP was emitted from the facility. Based on the records reviewed, Oliver Healthcare Packaging is keeping track of individual and aggregate HAP emissions as required.

This flexible group is also subject to a VOC emission limit of 89 tpy per a 12-month rolling time period. Records were requested and reviewed for the time period of April 2021 through April 2022. The highest 12-consecutive month VOC emissions occurred during the 12-month period ending in March 2022, when 11.79 tons of VOC was emitted. Based on the records reviewed, Oliver Healthcare Packaging appears to be keeping track of VOC emissions as required.

As previously stated, Oliver Healthcare Packaging has been approved to use manufacturer's formulation data instead of Method 24 testing for VOC content of materials used by the facility. Oliver Healthcare Packaging is currently using Manufacturer's Formulation Data for VOC content of materials used to calculate emissions. Safety Data Sheets (SDS) and Manufacturer's Formulation Data were requested and provided for the top five ingredients used for the adhesive manufacturing and solvents used. No discrepancies were noted after a review of the referenced records.

Oliver Healthcare Packaging is keeping track of usages, HAP/VOC contents and monthly/12-month rolling time period emissions.

Oliver Healthcare Packaging is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart KK – National Emission Standards for the Printing and Publishing Industry. Since Oliver Healthcare Packaging has taken HAP emission limits, they are only subject to 63.829(d) and 63.830(b)(1) of this subpart. As stated previously, Oliver Healthcare Packaging appears to overall be keeping track of HAP materials used and HAP contents. An initial notification was submitted to the AQD by Oliver Healthcare Packaging on August 23, 2019.

### Additional Observations

- A storage room for all inks, solvents, and water-based coatings was observed during the site inspection.
  - Five flexographic printing presses (24 IMPI, 26 IMPI, 1600 Webtron, Aquaflex and CI Press) and one off-set printing press (Heidelberg) were observed during the site inspection. OHP claims that the flexographic printing presses and off-set printing press are exempt from Rule 201 permitting per Rule 290. Records were requested and reviewed for the time period of April 2021 through April 2022. In the records provided, each material used by a printing press is broken down into VOC emissions per machine and HAP emissions per machine. The records further break down to toluene emissions per machine. Upon review of the records, the Aquaflex and CI Press are the two units with the highest monthly emissions. It was noted that the CI printing press emitted 1,181.7 lbs. of VOC emissions during the month of October 2021, which is over the 1,000 lb. monthly emission limit. However, the months prior and following this for the CI Press and the other emission units were below the 1,000 lb. monthly emission limit. The company will need to ensure they do not exceed the Rule 290 exemption limits again unless first obtaining a Permit to Install. Select SDS were requested and provided for the top used materials and were reviewed with no issues noted.
  - Two emergency generators were observed during the inspection. Based on the size, both generators are exempt from Rule 201 permitting per Rule 282(2)(b)(i). One of the generators appears to be 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.
1. Emergency Lighting Generator Asset #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. A non-resettable meter is installed on the generator. This engine has only operated 79 hours for maintenance and readiness checks. Oliver Healthcare Packaging conducts monthly preventative maintenance on the engine. Oliver Healthcare Packaging staff stated that no modifications have occurred to the generator since installation. This generator appears to not be subject to NESHAP Subpart ZZZZ or NSPS JJJJ based on size, fuel type consumption, and date of installation.
  2. Data Center 2 Generator Asset #9800 - This is a Gillette Model # SP-410-1-1NZ natural gas fired engine spark emergency generator that was installed in March 2021. The size of this emergency generator is 40 KW. This emergency generator is used for power to the computer room of the building only. 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 approximately 14 hours for maintenance and readiness checks. Oliver Healthcare Packaging conducts monthly preventative maintenance on the engine. The generator is certified to comply with EPA emissions standards from the manufacturer. Oliver Healthcare Packaging staff stated that no modifications have occurred to the generator since installation. This generator 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 a previous inspection it was determined that the unit could hold ten gallons of material at a time. This unit is exempt from Rule 201 permitting per Rule 285(2)(u).
- Several pouch machines were observed during the inspection. Here a three-sided seal product is made. The pouch machines observed are vented inside and are exempt from Rule 201 permitting 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 are exempt from Rule 201 permitting 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. The materials used for this process were stated to be low in VOCs and contain no HAPs. Based on the information provided, the unit is exempt from Rule 201 permitting per Rule 287(2)(k).
- Several natural gas-fired boilers and a heater were observed that appear to be exempt from Rule 201 permitting 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 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 not operating. The compactor machine is exempt from Rule 201 permitting per Rule 285(2)(l)(vi)(C).

### Conclusion

Based on the observations made during the facility walkthrough, and records provided, Oliver Healthcare Packaging appears to be in compliance with PTI No. 102-17A and all other applicable air quality rules and regulations.

NAME Michael T. Cox

DATE 6/15/2022

SUPERVISOR 