

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

N113324476

FACILITY: PREMIERE PACKAGING CO		SRN / ID: N1133
LOCATION: 6220 LEHMAN DR, FLINT		DISTRICT: Lansing
CITY: FLINT		COUNTY: GENESEE
CONTACT: Enyichukwu Obimba , Technical Director		ACTIVITY DATE: 02/21/2014
STAFF: Brad Myott	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Conduct self initiated inspection to determine compliance with PTI 314-90, 519-85, and 519-85A.		
RESOLVED COMPLAINTS:		

Premiere Packaging blends and packages different types of household cleaners, car waxes and other misc. cleaners. Chemicals are received by truck and transferred to the storage tanks. Products are blended in horizontal and vertical mix tanks which feed the packaging lines. A dust collector captures dust from the blending area. Premiere Pkg. is a minor source of VOC's and area source of HAPs.

I met with Enyichukwu Obimba, Technical Director. I provided him with a copy of the DEQ Inspections Brochure. We then discussed existing air quality permits at the facility. Mr. Obimba explained that the equipment covered under PTI 314-90 (cutting press) and 519-85A (insecticides and herbicides containers filling equipment) was no longer being used and that the permits could be voided. I will send an email request to the permit section to have those two permits voided. Based on the minor source status of the facility they are not required to report to MAERS.

The original permit for the facility 519-85 is still active and covers storage tanks, blending operations and filling lines at the facility. There have been some additional pieces of equipment added to the process since 1985 but it appears that they are exempt under Rules 284. The emission units at the facility are as follows:

**EUIndoorStorage:** Indoor Bulk material storage of cleaning agents such as caustic soda, surfactants, bleach, citric acid, and polymers. This area consists of several storage tanks ranging in size from 8,000 – 10,000 gallons. These tanks are exempt from permitting under Rule 284(i).

**EUOutdoorStorage:** Outdoor bulk material storage tanks in this area are 10,000 gallons or less. See attached for the most recent list of bulk stored materials at the facility provided by Obi during the inspection. Rule 284 (i) exempts material storage of misc. volatile organic compounds or noncarcinogenic liquids in tanks less than 40,000 gallons.

**EUNorth&SouthBlending:** Products are blended in large blending tanks around 3,000 – 4,000 gallons in size. A few products such as car wax and soft scrub use a powder that is introduced into the top of the tank and emissions are routed to a baghouse. Permit 519-85 requires a pressure drop on the baghouse of less than 3.8" W.G. Obi showed me the pressure gauge and it read at a pressure drop of 3.4". The South area consists of 6 tanks, and the North area consists of 7 tanks. Tanks are 4,000 gallons in size or smaller. They also have ozonization equipment in this area that is exempt per Rule 285(y).

**EUFillingArea:** Filling area consists of 9 packaging lines for filling containers ranging in size from a few ounces up to a gallon. Most of the products packaged here are water based and non-volatile cleaners. Products include car wax, abrasive cleaners, bathroom and counter top cleaners. Emissions from this area are minimal and released into the general in-plant environment. There was little if any odor associated with this equipment. Emissions from this equipment is limited to 3.0 pounds per hour and 3.12 tons per year and according to permit 519-85 evaluation was based on 6.3 million lbs/yr of VOC usage at 0.1 % loss. Based on the bulk stored materials 2013 inventory the company is now using much less than 6.3 million lb/yr of VOC thus it appears they are in compliance with the original VOC permit limit. Furthermore this is an exempt activity per Rule 284, filling of noncarcinogenic liquids in shipping or storage containers that have emissions which are released only into the general in-plant environment.

**EUFirePumpEngine:** This fire pump engine is for emergency use only and rated at 144 hp. It was installed in 2006 and uses #2 fuel oil. In the event of a fire at the facility the engine will automatically kick on and activate the foam sprinkling system in the plant. The engine is equipped with a hours meter and it read 31.9 hours of total use since installation in 2006. Nameplate on engine says October 2006 but company entered into a contractual agreement prior to June of 2006. Thus the engine is considered

existing and subject to the RICE NESHAP Subpart ZZZZ for Emergency Compression Ignition Engines. See attached Summary of Requirements for area sources subject to Subpart ZZZZ. I provided the company with a list of these requirements and explained that since they were an area source of HAPs (less than 10 TPY of single HAP and less than 25 TPY of total HAPs) AQD does not have delegation over this federal regulation. In looking over the Subpart ZZZZ requirements it appeared that the main requirements for the fire pump engine are as follows: it is equipped with a non-resettable hour meter, has oil and air filter changes done every 500 hours of operation or annually whichever comes first, has inspections of air cleaner, hoses and belts, is operated according to manufacturer's emission related instructions and has records of all required maintenance.

EUBoilers: 3 natural gas boilers less than 5 MMBTU/hr each and exempt per Rule 282.

EUREfrigeration: 70 ton refrigeration unit exempt per Rule 280.

Obi gave me a complete tour of the facility. I inspected all of the permitted equipment and I verified the cutting press and the equipment associated with 519-85A has been removed. I did not see any visible emissions from any of the processes. No emission calculations or usage records are required by their PTI. There were some very minor odors in the plant but I did not notice any odors outside the facility.

After conducting the inspection and reviewing the permit to install it appears that the company is in compliance with the conditions of PTI 519-85.

NAME



DATE



SUPERVISOR

