

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

N609749707

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| FACILITY: Tableting Corporation | | SRN / ID: N6097 |
| LOCATION: 4201 Danvers Court SE, KENTWOOD | | DISTRICT: Grand Rapids |
| CITY: KENTWOOD | | COUNTY: KENT |
| CONTACT: Bryan Koster , President | | ACTIVITY DATE: 07/26/2019 |
| STAFF: Kaitlyn DeVries | COMPLIANCE STATUS: Non Compliance | SOURCE CLASS: Minor |
| SUBJECT: The purpose of this inspection was to determine compliance with PTI No. 53-97 and other applicable air quality rules and regulations. | | |
| RESOLVED COMPLAINTS: | | |

On Friday July 26, 2019 Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) Staff Kaitlyn DeVries conducted an unannounced, self-initiated inspection of Tableting, Inc. located at 4201 Danvers Court, SE, Kentwood, Michigan. The purpose of this inspection was to determine compliance with PTI No. 53-97 and other applicable air quality rules and regulations. For the inspection KD was accompanied by the following EGLE Staff:

Wade O'Boyle, Materials Management Division, EGLE
Jonathon Vrugink, Materials Management Division, EGLE
Dave Wierzbicki, Remediation and Redevelopment Division, EGLE

Upon arrival at the facility, EGLE staff met with Mr. Bryan Koster, President, who accompanied EGLE staff on a tour of the facility.

Facility Description

Tableting, Inc. (Tableting) is a custom industrial chemical tablet manufacturer making tablets primarily for use in swimming pools. The facility currently operates one (1) shift per day, five (5) days per week. Tableting produces between 5,000 pounds and 12,000 pounds per day of the pool tablet containing trichloroisocyanuric acid.

Regulatory Analysis

Tableting is a minor source of all criteria pollutants and is currently operating under Permit to Install (PTI) No. 53-97. The permit covers the tablet presses located in the facility.

Compliance Evaluation

PTI No. 53-97 is for the tablet press machines. Tableting currently has five (5) machines. Two (2) are dedicated to the trichloroisocyanuric acid pool tablets. The three (3) other tablets are used for other tablets but may have done the trichloroisocyanuric acid (TCCA) tablets at times.

The tablet press process consists of taking the raw material in via 2,000 pound supersacks, moving the raw materials into a hopper (filling station), and then moving the hopper to the tablet press machine. Mr. Koster explained that Tableting utilizes a cover while moving the materials from the supersack to the hopper in order to minimize dust. Boric acid is used as the binding agent in the TCCA tablet. Mr. Koster stated that the boric acid is hand fed into the system directly at the tablet press; there is no pre-mixing step involved.

Mr. Koster also explained that there is one (1) product that is made using the TCCA that is not in the tablet form, but rather just as a granular form. EGLE staff observed this process and noted that a small dust cloud was coming from this process. KD asked Mr. Koster if this was typical for the process and he indicated at this time it was, however, Tableting was considering putting the raw material into a hopper and then gravity feeding it into the package, rather than pouring the material. KD noted that the particulate from this process was escaping out of the open overhead door and is considered a fugitive emission, but the emissions did not exceed the 20% opacity limit as defined in PTI No. 53-97. KD told Mr. Koster that Tableting needs to minimize fugitive emissions, and making any changes that will do so is a good idea.

Particulate emissions from the TCCA tablet press machines are limited to .01 pounds per 1,000 pounds of exhaust gas, calculated on a dry gas basis, 5.2 pounds per hour, and 8.1 tons per calendar year. These

emission limits are based upon the operational restriction of a maximum calendar year operation of 3,120 hours. PTI No. 53-97 requires daily, monthly, and yearly records of hours of operation. Mr. Koster stated that they do not have these records. KD told Mr. Koster that this was a violation of the permit requirement and a Violation Notice would be issued.

KD also asked about the waste generated from the processes, as some particulate was noticed on the ground near the filling station. Mr. Koster explained that Tableting staff sweeps the waste on the floor and screens out any debris or other contaminants prior to putting the waste into a designated waste container for disposal by a hazardous waste disposal company. Mr. Koster went on to state that it takes 2-3 years to fill up 2-3 of the 55-gallon drums that are used to store the waste prior to disposal. EGLE's Wade O'Boyle discussed the waste regulations with Mr. Koster at that time.

Compliance Determination

Based upon the observations made during the inspection, Tableting, Inc. is not in compliance with PTI No. 53-97; a Violation Notice will be sent.

NAME Kaitlyn Pawlik DATE 7/31/2019 SUPERVISOR [Signature]