

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

N685343074

FACILITY: Xela Pack Inc		SRN / ID: N6853
LOCATION: 8300 Boettner Rd, BRIDGEWATER		DISTRICT: Jackson
CITY: BRIDGEWATER		COUNTY: WASHTEAW
CONTACT: Dino DiMelis , Director of Quality Assurance		ACTIVITY DATE: 01/17/2018
STAFF: Diane Kavanaugh-Vetort	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Conducted complete scheduled inspection at Minor Source. Facility has no Air Use Permits, some exempt equipment.		
RESOLVED COMPLAINTS:		

On the morning of January 17, 2018, I conducted a complete scheduled compliance inspection, announced a short time prior, of the above facility. The purpose of the inspection was to determine the Facility compliance status with applicable federal and state air pollution control regulations, in particular, the Act 451, Part 55, Air Pollution Control Act and the administrative rules. Xela Pack does not currently have Air Use Permits.

The prior inspection was conducted on September 2, 2011. Prior to that the Air Quality Division (AQD) file history indicates an Open Burning Letter of Violation (now referred to Violation Notice) was issued to the Company in 2000. Xela Pack submitted a Permit application for a proposed incinerator which was withdrawn (voided). The incinerator was not installed, no further open burning was identified and the Company instituted proper waste management practices.

Upon my arrival to the site I did not observe any noticeable emissions or odor. Upon entering the facility I provided my identification and stated the purpose of the inspection. I met with Dino DiMelis, Director of Quality Assurance, and the current responsible contact person. Mr. DiMelis was also the contact at the time of the previous inspection. I conducted a pre-inspection interview with Mr. DiMelis. He stated that they currently recycle some pallets (off spec) and reuse the majority of them for packaging/shipping. They recycle cardboard, metals, and other items generated in small quantities. They are considered to be contract packaging and use primarily post consumer recycled paper. Corrugated cardboard boxes for packaging/shipping are supplied by an outside company.

Mr. DiMelis informed me that they have not changed operations much since the previous inspection. Xela Pack commenced operation in 1986 and employs approximately 50 people. They operate in what he referred to as a 24/6 schedule. I inquired whether there was an emergency generator on site and he said no. I explained they are almost all subject to a federal standard pursuant to 40 CFR 63, Subpart ZZZZ (RICE MACT). No generator was observed during the inspection.

Products are received in a variety of containment, mostly drums or totes. Some notable changes, Xela Pack now processes more food products, it is about 75% and personal care products 25%. They operate 5 production lines in 6 rooms with hopes of expansion in the near future. They are now using drum/tote electric heaters.

During the inspection we walked through and outside around the two buildings on the property. Per Dino, they receive products in various sizes of drums and totes. I observed the warehouse areas. I observed the waste and recycling dumpsters and piles of pallets (not excessive) at the back of the property behind the shipping/receiving dock. Overall housekeeping was very good and no concerns were identified.

Per Mr. DiMelis, solid waste is believed to be taken to Carleton Farms Landfill. Previously it was Adrian Landfill (Republic site) now idle/closed. During the previous inspection I observed that the waste liquids such as lotions and soaps, are dumped in a closet holding a plastic tote. It is regularly picked up by a septic type was hauler that hooks hose up to bottom of tote to vacuum it out. At that time, other food quality products, vitamin/mineral supplements, fruit based liquids for example, are disposed of in the sewer and go to the Wastewater Treatment Plant. It is assumed to be Manchester since it is the closest location. Mr. DiMelis said the municipality monitors their effluent. He showed me the area outside where they previously had a septic system and it was replaced by the municipality to a system that processes their waste and sends it to the pipeline to the WWTP.

During the inspection I observed the production floor consisting of approximately six enclosed rooms, controlled environments under positive pressure containing filling and packaging equipment. Several of these appeared to be operational during the inspection. The exhaust on the rooms contain HEPA filtration. They fill sampling and trial packaging size items. Packages are received printed and coated and in flat sheets. They are received in small boxes containing thousands of individuals. They are placed in the automated machines, liquid product is piped in and they are sealed without any adhesives being used. Filled paper containers are boxed and moved to warehouse for shipping. Mr. DiMelis indicated they are regulated by FDA and MDARD due to the use of food grade products.

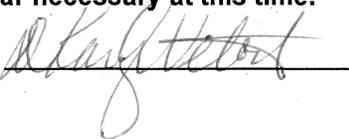
Act 451, Part 55, Part 2 administrative rules contains the Rule 201 requirement to obtain an Air Use Permit to Install and allows for numerous exemptions from this requirement contained in Rules 278 through Rule 291. I observed two exempt process equipment installed and operating at the facility. One small cold cleaner (parts washer) used in the maintenance area. It appears to qualify for exemption Rule 281(2)(h). I observed two or more relatively small nitrogen containers outside the production building contained within fencing. These appear to qualify for the Rule 284 (2)(j) pressurized storage of nitrogen.

I provided Mr. DiMelis with the recently revised Permit to Install Exemption Booklet. Administrative Rules under Part 6 and Part 7 pertain to existing/new cold cleaners and this was briefly explained and I provided him with new orange stickers referencing the requirements of the rules to be placed on the Unit. It is noted both of these items were also provided to Xela Pack during the 2011 inspection.

#### COMPLIANCE SUMMARY

Xela Pack appears to be in substantial compliance with the identified applicable state air pollution control regulations at this time. Xela Pack overall condition and housekeeping was very good. This is a true minor source with only exempt equipment. I do not recommend frequent inspections as it does not appear necessary at this time.

NAME



DATE

1/22/18

SUPERVISOR

