

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

U41180644945653

FACILITY: Aspen Surgical Hill-Rom Corporation		SRN / ID: U411806449
LOCATION: 6945 Southbelt Dr, Caledonia		DISTRICT: Grand Rapids
CITY: Caledonia		COUNTY: KENT
CONTACT: Eric Fox , EHS Manager		ACTIVITY DATE: 08/09/2018
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	
SUBJECT: FY 2018 Unannounced inspection.		SOURCE CLASS:
RESOLVED COMPLAINTS:		

Clean Air Act Inspection report for Aspen Surgical Hill-Rom, Caledonia, Michigan

Background

Aspen Surgical Hill-Rom is a medical device manufacturer. The facility produces disposable surgical equipment. The facility has approximately 325 employees and normally operates 24 hours per day, Monday through Friday with some work Saturday and Sunday.

Aspen Surgical Hill-Rom has three buildings at the 6945 Southbelt Drive location and is considered to be one stationary source. Aspen Surgical Hill-Rom is not subject to the Title V program, which is discussed below, in the regulatory analysis section of this report.

Introduction and purpose

On August 9, 2018 Tyler Salamasick, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division conducted an unannounced, self-initiated inspection of Aspen Surgical Hill-Rom. The MDEQ inspected the facility located at 6945 Southbelt Drive, Caledonia, Michigan. The purpose of the inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) and the Air Pollution Control Rules.

Compliance History

The Michigan Department of Environmental Quality Air Quality Division has not previously inspected the facility. The MDEQ AQD has not received any complaints regarding emissions from the facility.

Observations and facility processes

AQD staff met with Eric Fox, EHS Manager, presented their identification and informed the representative of the intent of the inspection. The facility representative agreed to show the MDEQ the facility and its processes. Aspen Surgical Hill-Rom produces disposable surgical equipment on multiple different production lines. The main products made are surgical marking pens and wound care. The facility also sorts and packages material. The facility's processes are described in additional detail below.

Molding and Pen Printing

The facility uses 8 extrusion lines to mold various plastic products. They had both polystyrene and low density polyethylene (LDPE) plastics on site. I did not observe the use of mold release agents. Eric informed me that they do not use mold release agents because those agents could be left behind and would impact product quality. The facility does some value added to the plastic after they are molded. The marking pens have either an etching or an ink applied to the surface. The pens are also filled with a marking fluid and assembled.

Packaging of wound covers and needles

The facility operates a clean room in the center portion of the main building. The clean room uses force air and high efficiency filters to establish positive pressure within that work area. The facility takes bulk materials including wound covers and ocular needles and double packages them. They also make minor modifications to some of the materials including bending and assembling. The modifications to the materials did not appear to generate air contaminants.

Warehouse, Quality lab and Mats

The warehousing building is used primarily for storage, but it also has a small mat assemble area. The facility assembles and packages disposable surgical mats. This area did not appear to generate significant air emissions.

Regulatory analysis and compliance evaluation

Aspen Surgical Hill-Rom is a minor source of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). The facility does not currently have any air quality permits.

The facility's primary processes appear to meet the following MDEQ permit exemptions

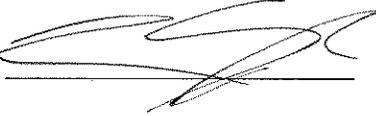
Plastic molding R 336.1286(2)(b)
Printers R 336.1285(2)(l)(ix)

The majority of the remainder of the facility is designated to office space, warehousing and assembly. These areas do not appear to be sources of air contaminants and therefore would not be subjects to the requirements of Rule 201 to obtain a permit to install.

Discussion

Compliance statement: It appears that Aspen Surgical Hill-Rom is in compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) and the Air Pollution Control Rules.

NAME

DATE 8/21/18

SUPERVISOR

