

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

U47180213144037

FACILITY: ECS Production		SRN / ID: U471802131
LOCATION: 2440 W. Highland Road, Howell		DISTRICT: Lansing
CITY: Howell		COUNTY: LIVINGSTON
CONTACT:		ACTIVITY DATE: 04/10/2018
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: <b>MINOR</b>
SUBJECT: Joint inspection by AQD and WMRPD of small business which mixes and repackages cleaning solutions.		
RESOLVED COMPLAINTS:		

On 4/10/2018, the Michigan Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted a joint inspection of ECS Production, along with the DEQ's Waste Management & Radiological Protection Division (WMRPD). AQD was represented by myself, and WMRPD was represented by inspector Bryan Grochowski.

Environmental contacts:

Denny Butcher, Manager; [dbutcher@ecsbottling.net](mailto:dbutcher@ecsbottling.net)

Todd Jezierski, Foreman/Maintenance Supervisor; [todd@ecsbottling.net](mailto:todd@ecsbottling.net)

Facility description:

This facility mixes and blends liquid and dry detergent ingredients to create cleaning solutions, which they then package for consumer use. ECS Production is also known as ECS - Expert Cleaning Solutions.

Emission units:

Several large liquid tanks, and a dry mixer which exhaust to the in-plant environment. Rule 284(2) (i) exempts certain liquid storage containers from needing a permit to install.

- Tank B - 5,500 gal. capacity
- Tank C - 1,700 gal. capacity
- Tank E - 5,500 gal. capacity
- Tank F - 6,000 gal. capacity.

Packaging line: Rule 284(2)(I) exempts filling of noncarcinogenic liquids in shipping or storage containers that have emissions that are released only into the general in-plant environment..

Regulatory overview:

This facility is considered a minor source of criteria pollutants, that is, those pollutants for which a National Ambient Air Quality Standard (NAAQS) exist. These include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns (PM10), and particulate matter smaller than 2.5 microns (PM2.5). A major source of criteria pollutants has the potential to emit (PTE) of 100 tons per year (TPY) or more of any one of the criteria pollutants, and would be subject to the Renewable Operating Permit program.

This facility is also considered to be a minor or area source for hazardous air Pollutants (HAPs), because it has a PTE of less than 10 TPY for any single HAP and less than 25 TPY for all HAPs combined.

The facility appears exempt from the requirement of Michigan Air Pollution Control Rule 201 to obtain a permit to install. The relevant exemptions are:

**Rule 284(2)(i), which exempts:**

(i) Storage, mixing, blending, or transfer operations of volatile organic compounds or noncarcinogenic liquids in a vessel that has a capacity of not more than 40,000 gallons where the contents have a true vapor pressure of not more than 1.5 psia at the actual storage conditions.

**Rule 284(2)(l), which exempts:**

(l) Filling of noncarcinogenic liquids in shipping or storage containers that have emissions that are released only into the general in-plant environment.

**Fee status:**

This facility is not considered a Category I fee-subject facility, because it is not a major source of criteria air pollutants. It is not considered a category II fee-subject source because it is neither a major source for hazardous air pollutants, nor is it subject to a federal New Source Performance Standard regulation. Lastly, it is not considered a Category III fee-subject facility, because it is not subject to a federal Maximum Achievable Control Technology standard. This facility is not required to submit an annual air emissions report via the Michigan Air Emissions Reporting System (MAERS), because it does not meet the criteria for reporting of having more than 10 TPY VOC emissions.

**Location:**

The entrance is a door on the north side of a large industrial building located on M-59, north of the intersection with Grand River Avenue. The closest residences are over 1,200 feet to the east of ECS Production, as measured in Google Maps.

**History:**

This facility was unknown to AQD, but B. Grochowski had been here before, and wanted to follow up on an earlier matter. There is no known history of any air pollution complaints concerning this business. We were told today that the facility has been here since 2009.

**Arrival:**

We arrived onsite around 10:00 AM, and checked in at an office trailer, next to a weigh scale for a landscaping business. We were directed to the entrance for ECS Production, on the north side of the large central building on the site. There were no odors east of the building, nor north of it. No visible emissions could be seen coming from the building. Weather conditions were sunny and 37 degrees F, with winds out of the west at 5 miles per hour.

We entered through the building's north door, and met with Mr. Todd Jezierski, Foreman/Maintenance Supervisor. B. Grochowski explained that he was here to follow up on an earlier matter, and I explained I was here to conduct a first-time air inspection of this facility. Mr. Jezierski tried to contact Mr. Denny Butcher, Manager, by phone (248-796-1250), but was unable to reach him, and provided us with his phone number, in case we need to reach him in the future.

We were advised that repackage products from large containers, into smaller ones, and that they also accept waste liquids, such as batches of products which are not acceptable, and rinse waters. It is my understanding that they also mix and blend liquid and dry detergent ingredients to create cleaning solutions, which they then package for consumer use.

**Inspection:**

Mr. Jezierski accompanied us through the plant.

We observed a line where employees were repackaging liquids into smaller containers for consumer use. Rule 284(2)(I) exempts filling of noncarcinogenic liquids in shipping or storage containers that have emissions that are released only into the general in-plant environment.. This line appeared to meet the exemption criteria.

There were neither odors nor visible emissions that I could detect from several large liquid storage tanks indoors. We were informed that they save their own rinse waters from the large storage tanks inside the plant, and use them to make new products. he indicated that most of their products are water-based. The tanks are described in the list of emission units earlier in this report.

Tank B holds a solution of 50% sodium hydroxide (NaOH), and that is the most caustic material they have on site, we were told.

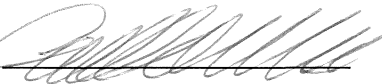
There were no visible emissions from the addition of granulated dry ingredients into a feed hopper, on an elevated platform. Housekeeping in the plant appeared to be very good.

There is a tented area within the plant, where they use a small electric heater to heat liquids that are thick, so that they flow better.

Conclusion:

No instances of noncompliance were detected by AQD. The processes which I observed appeared capable of satisfying the exemption criteria. We left at 10:56 AM.

NAME



DATE

9/29/2018

SUPERVISOR

B.M.