

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

A170264588

FACILITY: KASSOUNI MANUFACTURING INC		SRN / ID: A1702
LOCATION: 815 S FRONT ST, BELDING		DISTRICT: Grand Rapids
CITY: BELDING		COUNTY: IONIA
CONTACT: Bruce Leech , Plant Manager		ACTIVITY DATE: 08/18/2022
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: The purpose of the inspection was to determine compliance with Consent Order 2020-18 and all applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

On Thursday August 18, 2022, Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) staff Kaitlyn DeVries (KD) conducted an unannounced, scheduled inspection of Kassouni Manufacturing Inc. (KMI) located at 815 S. Front St, Belding, Michigan. The purpose of the inspection was to determine compliance with Consent Order 2020-18 and all applicable air quality rules and regulations.

Prior to entering the facility KD observed the perimeter for any excess odors or opacity. None were noted. KD met with Jerome, Maintenance Lead, as Mr. Bruce Leech, Plant Manager, was not on site. Jerome served as the escort on the walk through the facility.

Facility Description

Kassouni Manufacturing Inc, (KMI) manufactures several different products including ice/snow melt tablets, and janitorial supplies. KMI formerly produced pool cleaning tablets under PTI No. 364-07, but this permit has been voided as part of the requirements of the Consent Order.

Regulatory Analysis

As previously mentioned, KMI formerly held PTI No. 364-07, which was for the equipment associated with the pool tablets, but this permit has been voided as part of the requirements of the Consent Order. The facility is a minor source of criteria air pollutants and operates utilizing Rule 201 permit exemptions.

Compliance Evaluation

The north end of the facility houses three (3) usable calcium chloride tablet presses that make tablets for ice/snow melt for roofs. Jerome indicated that there are four (4) presses, but only three (3) of them are usable. The raw material is in a flake form and does not have an exhaust point to the atmosphere.

KMI also has 12 injection molding machines, but Jerome indicated that they only run six (6) of them. The injection molding is used to make urinal floor mats. The injection molding is exempt from Rule 201 permitting via Rule 285(2)(l)(vi)(B). The facility also cuts the floor mats, and the cutting is exempt from Rule 201 permitting via Rule 284(2)(l)(vi)(B).

There is also one (1) cold cleaner located on site. The cold cleaner was closed and not in use at the time of the inspection. Jerome indicated it is maintained by Safety Kleen. The cold cleaner is exempt from rule 201 permitting via Rule 281(2)(h).

KMI manufactures a fumigant stick, which utilizes raw material hoppers and two (2) stick presses. There are also dust collectors associated with the blenders and for room ventilation. Both of the dust collectors are exhausted back into the in-room area and are not exhausted externally. This process relies on Rule 201 permit exemption Rule 290. An exemption determination for the use of Rule 290 was submitted to the AQD and demonstrated a Potential To Emit (PTE) for PM10 of 80.4 pounds per month. This is compliant with the 500 pound per month emission limit. The polymer has a screening level of greater than $0.04 \mu\text{g}/\text{m}^3$ and less than $2.0 \mu\text{g}/\text{m}^3$ thus has an allowable emission rate of 10 lbs/month. The potential to emit for the polymer is 5.5 pounds per month. In actuality, the facility only operates one (1) eight-hour shift per day, thus emissions are below emissions allowed per the rule 201 permit exemption of Rule 290. Additionally, KMI is tracking the pressure drop of the dust collectors associated with this process. The dust collector filters are maintained by an outside company, and the maintenance on the dust collectors is done as per the Malfunction Abatement Plan, that was submitted to the AQD, and guidance from the manufacturer.

Per Jerome, and Mr. Leech, KMI is considering making a new product, which is a plant food fertilizer tablet. Mr. Leech indicated they are in the beginning stages of considering this product, and KD reminded him that KMI should be sure that all air quality requirements and rules are met prior to production of this new product.

KD also noted that there was a new roof over the south portion of the building. Jerome indicated that they are planning on replacing the north portion of the roof as well; it is scheduled to be replaced this fall. Images 1 and, below, are of the new portion of the roof.

Compliance Determination

Based upon the observations made during the inspection and a subsequent review of the records, Kassouni Manufacturing Inc. is compliant with Consent Order 2020-18 and other applicable air quality rules and regulations.



Image 1(Roof 1) : Image of the new roof in the south portion of the facility.



Image 2(Roof 2) : Image of the new roof in the south portion of the facility.

NAME Kaitlyn D. Smith

DATE 9.15.2022

SUPERVISOR HH