

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

P046931299

FACILITY: ACCESS BUSINESS GROUP-SPAULDING PLAZA		SRN / ID: P0469
LOCATION: 5101 SPAULDING PLAZA, ADA		DISTRICT: Grand Rapids
CITY: ADA		COUNTY: KENT
CONTACT: Loretta Campbell Jones , Environmental, Health and Safety		ACTIVITY DATE: 09/15/2015
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: The purpose of this inspection was to determine compliance with Permit No. 144-13 and all other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

On September 15, 2015, AQD Staff Kaitlyn DeVries (KD) conducted an announced scheduled inspection of Access Business Group – Nutrilite Spaulding Plant (NSP) located at 5101 Spaulding Plaza, Ada Michigan. The purpose of this inspection was to determine compliance with Permit No. 144-13 and all other applicable air quality rules and regulations.

KD arrived on site of the Access Business Group's main facility located at 7575 Fulton Street in Ada at 9:00 am to meet with Loretta Campbell-Jones, Environmental Specialist. After checking in with at the main facility, KD followed Ms. Campbell-Jones over to the NSP. Ms. Campbell-Jones and KD were greeted on site by several Access personnel including Patrick Markey, Nutrilite Group Leader, Darold Parks and Mike Van Wormer from the maintenance department, and Rick Winchel, Maintenance Supervisor. KD also presented Ms. Campbell-Jones with the Environmental Rights and Responsibilities pamphlet. No odors or visible emissions were observed during observations after the inspection. KD left the facility at approximately 11:00 am.

Facility Description:

The facility manufactures dietary supplements for human consumption in the form of soft-gel capsules. This is currently the only operation in the plant. However, there is room for expansion by either adding more soft-gel lines, or adding a separate tablet line. The facility only recently began production at this location after converting the facility from a warehouse/distribution center into its current state.

Compliance Evaluation:

After introductions and obtaining proper personal protective equipment, staff proceeded to tour the production area. The one permit held by NSP is for the entire soft-gel production process. Such equipment includes weigh stations, mixers/dissolver tanks, portable tanks, encapsulation machines, sorters, inspection tables, laser coders, dryers, conveying systems, packaging systems, one dust collection system, and raw materials. The raw materials include powders and low volatility oils, with solvents used for cleaning and sanitizing purposes. NSP is a Good Manufacturing Process (GMP) certified facility, thus the rooms housing the various steps in the production process are kept extremely tidy. The internally vented dust collection system collects fugitive emissions from several points in the production process including the powder weigh out room, the liquid mixing room, and the drying room.

The powder weigh out room and the liquid mixing room are where some of the raw materials are portioned and prepped for use in the final, encapsulated product. The drying room allows for the soft-gels to tumble dry before packaging.

The dust collection system is an 18 cartridge 5,000 cfm Torit Donaldson baghouse equipped with a HEPA filter that is exhausted into the in-plant environment. Per Ms. Campbell-Jones, there have been no changes to the PM plan submitted to AQD in 2014. Examples of recent PM's are attached to this report, including regular monthly PM's and other regular regular maintenance.

NSP has VOC and PM emission limits. PM is limited to 0.01 lbs./1,000 lbs. exhaust gas based on test protocol. VOC's are limited to 820 lbs./month. Since NSP has only recently begun operation, records could only be obtained from January 2015 through July 2015. July 2015 was the highest monthly VOC emissions at 19.72 lbs. Complete monthly VOC emission data is attached to this report.

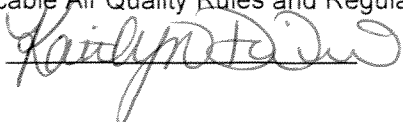
NSP has a pallet washing process that uses 140°F potable water and diluted potassium hydroxide. The pallet washing process was previously internally vented, but is now externally vented due to excess humidity generated during the washing operations. This process is exempt from Rule 201 permitting under Rule 281 (e).

Additionally, NSP has two (2) identical natural gas only steam boilers rated at 9.954 million btu/hr capacity. Since these boilers are natural gas only and are less than 10 million btu/hr, they are not subject to 40 CFR Part 60 Subpart Dc or the NESHAP Subpart 6J. Rather, these boilers are exempt from Rule 201 permitting under Rule 282 (b).

Compliance Determination:

Based on the observations made at the time of the inspection and the review of the available records, Access Business Group – Nutrilite Spaulding Plant (NSP) appears to be in compliance with PTI No. 144-13 and all applicable Air Quality Rules and Regulations.

NAME



DATE

9.21.2015

SUPERVISOR

PAB