

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

A240255244

<b>FACILITY:</b> ACCESS BUSINESS GROUP, LLC		<b>SRN / ID:</b> A2402
<b>LOCATION:</b> 7575 E Fulton Rd, ADA		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> ADA		<b>COUNTY:</b> KENT
<b>CONTACT:</b> Chuck Davison , EHS Supervisor		<b>ACTIVITY DATE:</b> 09/01/2020
<b>STAFF:</b> Kaitlyn DeVries	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MAJOR
<b>SUBJECT:</b> The purpose of this inspection was to determine compliance with Renewable Operating Permit (ROP) MI-ROP-A2402-2018b, and all other applicable Air Quality Rules and Regulations.		
<b>RESOLVED COMPLAINTS:</b>		

On Tuesday September 1, 2020 and Wednesday September 2, 2020 Department of Environment, Great Lakes and Energy (EGLE) Air Quality Division (AQD) Staff Kaitlyn DeVries (KD) conducted an announced scheduled inspection of Access Business Group, LLC located at 7575 East Fulton Road, Ada, Michigan.

The inspection was announced to the facility in advance, in order to ensure proper safety measures could be taken as required by executive orders from Michigan's Governor to prevent the spread of COVID-19. The purpose of this inspection was to determine compliance with Renewable Operating Permit (ROP) MI-ROP-A2402-2018b, and all other applicable Air Quality Rules and Regulations. Prior to the inspection, the ROP had undergone a minor modification to incorporate Permit to Install No. 152-19A, in Section 1 of the ROP. This permit was for a new energy drink mix and fill process at the facility in buildings 17 and 26. This new emission unit will be discussed further in the body of this report, under Section 1.

Prior to entry to the facility, KD observed the perimeter of the facility for odors and opacity. None were noted. Upon arrival, KD followed the required COVID-19 screening precautions set in place by Access Business Group, including a temperature check and answering of some standard questions. This was done on both days upon arrival. Staff then met with Mr. Chuck Davison, Supervisor – Ada, Global Environmental Health and Safety, and Mr. Robert Kunkle, Sr. EH&S Analyst who were the primary escorts on the inspection. During the opening meeting, Mr. Davison explained some of the recent changes to how records were kept at the facility and discussed some possible changes that Access Business Group is considering; these changes include the possibility of requesting Opt-out limits and voiding the ROP. KD explained that this may be possible, but Access should review their Potential to Emit (PTE) for all criteria pollutants to see if it would be possible. KD further explained that Access Business Group would need to submit a permit to install (PTI) application requesting Opt-Out limits prior to voiding the ROP. KD suggested that if Access Business Group wishes to pursue this, a pre-application meeting should be set up with AQD's permit section. Throughout the inspection, proper PPE was worn, including facial coverings, and social distancing was practiced.

**Facility Description**

Access Business Group, LLC (Access) manufactures, packages, and distributes a variety of home and personal care products. Products include lipsticks, toothpaste, body and face lotions, mouthwash, cleaning products, soaps, shampoo and conditioners, and many others. The various manufacturing departments include: Cosmetics Department, Liquids Department, Laundry Department, Personal Care Department, Paper Product Division and Lithographic Press Operations, Finishing Department, Nutritional Products Department, Ink Jet Coder Operations, Durables Department, Plastics and Silk Screening area, Facility Heat and Steam Generation Operations, and other miscellaneous operations. The various departments are housed in different buildings on the property. There has been a lot of change occurring at the facility over the course of the past few years. These changes will be described, where appropriate, in each section below, but include the complete shutdown of the Laundry Department in January 2020, changes to Liquids Departments, and the removal of the equipment from the Durables Department, for which the building now serves as storage.

**Regulatory Analysis**

Access is currently subject to the Title V program and holds MI-ROP-2402-2018b. Access has taken Hazardous Air Pollutant (HAP) Opt-Out Limits; thus, Access is not subject to the Boiler MACT (40 CFR Part 63 Subpart JJJJJJ). Other Federal Regulations that Access is subject to include: 40 CFR Part 60 Subpart Dc for Small Industrial-Commercial Institutional Steam Generating Units, 40 CFR Part 60 Subpart Kb for Volatile Organic Liquid Storage Vessels, 40 CFR Part 60 Subpart IIII for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 63 Subpart ZZZZ for existing stationary Compression Ignition engines at an area source

of HAP's, and 40 CFR Part 60 for Compliance Assurance Monitoring (CAM). Access is also subject to 40 CFR Part 59 Subpart C, the National Volatile Organic Compound Emission Standard (NVOCES) for Consumer and Commercial Products. The aforementioned requirements will be fully addressed in the compliance evaluation portion of this report below.

Many of the requirements of the Federal regulations listed above are directly written into the ROP.

The ROP has two (2) sections:

Section 1: Manufacturing Operations

Section 2: Facilities Maintenance Operations

This compliance evaluation section will evaluate both sections and will be organized into the various departments, similarly to the ROP.

## **Compliance Evaluation**

### **Section 1: Manufacturing Operations**

Section 1 consists of the manufacturing operations. This section will generally be evaluated by department, or building. While none of the stacks were explicitly measured during the inspection, they appeared to be of correct dimensions.

Access has source-wide HAP emission limits, that apply to both section 1 and section 2, aggregately limiting HAP's to 22.5 tons per year (tpy) and individually to 9 tpy, both 12-months rolling. As of July 2020, the aggregate 12-month rolling HAP emissions were 0.010 tpy, with the individual HAP emissions at 0.0001 tpy. Access is also subject to 40 CFR Part 59 Subpart C, the NVOCES for Consumer Products for volatile organic compound content, labeling of containers, record keeping and reporting. Based on discussions with various Access staff, and observations made during the inspection, Access is properly recording emissions and labeling all containers as per the requirements of this subpart. Some of the labeling requirements include indicating the manufacture date and marking the location of where the consumer products are going. The Volatile Organic Compound (VOC) content of each consumer product is also tracked, for which many of those VOC content requirements are also included later in this evaluation. HAP content is also properly recorded and tracked.

### **Cosmetics Department**

#### ***EUCOSMETICS***

The cosmetics department includes all of the cosmetics manufacturing processes with their associated VOC and particulate emissions. This department has two (2) pulse jet dust collectors located on the second floor of the building; one (1) is internally vented and one (1) is externally vented. The systems were observed during the inspection and appeared to be properly operating.

At the time of the inspection, Access was making several different products including creams and toothpaste. In total there are 14 production lines on the main floor, but only a handful of them were operating at that time of the inspection. The process flows from a top down approach where the raw materials often in powder form, are mixed in mixing vessels and funneled down to the second floor for more processing and finally to the first floor where it is fully processed and packaged. KD did not observe all of the first-floor processing due to additional safety measures that were in place due to COVID-19.

The different mixing stations, for which there are about eight (8) are exhausted to one of the two dust collectors. Dust collector #1 (internally vented) has a particulate limit of 0.01 lb. /1,000 lbs. of exhaust gas, while dust collector #2 (externally vented) has a particulate limit of 0.10 lb. /1,000 lbs. of exhaust gas. Compliance with these emission limits is demonstrated through stack testing, which is not being requested at this time, and proper operation of the dust collectors. Dust Collectors #1 and #2 both had a pressure drop readings of 1" water column (WC). Preventative Maintenance (PM) plans are required for both units. Access does regular PM's on the units to ensure proper operation; records for such maintenance are attached to this report.

VOC emissions, which are not controlled, are limited to 12 tpy, per 12-month rolling time period. As of July 2020, the 12-month rolling VOC emissions were 3.7 tons.

## Liquids Department

The liquids department formerly made household cleaning products including glass, kitchen, and metal cleaners. However, the area where this department was located has been shut down and some of the equipment has been re-purposed. Some of the other lines, have been moved and consolidated with the Personal Care Department. The location where this department formerly was, is now the location of the energy drink manufacturing area, or EUENERGYDRINKS. Please reference EUENERGYDRINKS for compliance details with that emission unit.

### *EULIQUIDDCSYSTEM*

This emission unit represents the dust collector equipment for particulate emissions, during charging and mixing operations. Particulate emissions are limited to 0.10 lbs. /1,000 lbs. Access maintains a PM plan, and does regular maintenance on the collector system to ensure proper operation. Example PM's for this unit are attached to this report.

### *FGLIQUIDPROCESS2*

The liquids department flexible group covers all the process equipment for the mixing process (EULIQMIXPROCESS) and the vapor ventilation system (EULIQVAPORVENT). The liquids department has several large tanks that have the capability to mix a wide variety of products. Once the products are made, they are held in the tanks before being piped over to the filling line for processing and packaging. According to records, this line has been consolidated and is now incorporated into the personal care department.

VOC emissions from this process are limited to 10.6 pounds per hour (pph) as determined on a monthly basis at the end of each calendar month. As of June 2020, the VOC emission rate was 0.45 pph. Over the course of the past 12 months, the highest pound per hour VOC emission rate was in May 2020, with an emission rate of 0.76 pph. VOC emissions are also limited to a 12-month rolling emission rate of 31.8 tpy; as of June 2020, the 12-month rolling VOC emission rate was 1.2 tons. Additionally, Formaldehyde has an emission limit from this process. Formaldehyde is limited to 876 lbs./year based on a 12-month rolling time period. Per the attached records no formaldehyde was emitted over the past 12 months. Access is properly maintaining records for this process including the aforementioned emissions calculations and the number of batches per month. Over the past 12 months, May 2020 had the highest production levels with 61 batches produced.

## Laundry Department

The laundry department produced a variety of home care products including powder detergents, soaps, fabric bleach, and cleaners. The laundry department has recently permanently shutdown, per Mr. Davison. The permanent shutdown occurred on January 31, 2020. KD asked Mr. Davison what Access was planning on doing with the equipment in the building, or if there was the intent to remove the equipment all together. Mr. Davison indicated that the decision about what to do with the equipment and the building had not yet been made. KD was able to see the equipment and it was all sitting idle. Mr. Davison indicated they are still maintaining the control equipment, and that was evident per the maintenance records.

There are numerous baghouses throughout the laundry department, and Access regularly does PM on all of them. Example PM's for each of the baghouses are attached to this report. While the equipment was permanently shut down in January 2020, each of the emission units and flexible groups in this department will be described and evaluated below, up through the shutdown of the equipment. However, since the equipment was non-operational, KD only viewed one (1) of the dust collectors to verify that the equipment was still being maintained.

### *EUPMOD1ENZYMERH*

This emission unit represents the Modifier #1 Enzyme Refill Hopper Process with an associated cartridge type filter dust collector system. Particulate emissions are limited to 0.002 lbs. / 1,000 lbs. of exhaust gases and 0.00165 pph. Compliance with these emission limits are demonstrated by proper operation of the control device. This equipment was not in operation during the inspection.

### *EUMOD2ENZYMERH*

Modifier #2 Enzyme Refill Hopper Process with associated dust collector system is located in the same general

area as the Modifier #1 process. The particulate emissions from this emission unit are limited to 0.1 lbs. / 1,000 lbs. of exhaust gases and 0.4 pph. Compliance with these emission limits are demonstrated by proper operation of the control device. This equipment was not in operation during the inspection.

#### *EUPPREMIUMTRANDC*

The premium transfer belt process and dust collector system was not operating at the time of the inspection. PM records indicate proper operation, as this emission unit was not in operation during the time of the inspection. Particulate emissions from this emission unit are limited to 0.1 lbs. /1,000 lbs. of exhaust gases based on test protocol. PM<sub>10</sub> emissions are limited to 2.25 pph.

#### *EUPVBLENDERMIXDC*

This emission unit represents the V-Blender mixer system with an externally vented dust collection system. Particulate emissions are limited to 0.04 lbs. /1,000 lbs. of exhaust gases. This unit is equipped with a pressure drop indicator, but the line was not in operation during the time of the inspection. PM records are attached to this report.

#### *FGLAUNDRYDEPT*

As mentioned above, the laundry department made numerous powdered household products. This flexible group covers a wide variety of them including their associated control devices. The control devices that are used in this flexible group include various baghouses, cyclones, filters, and a scrubber. The emission units that are covered under this flexible group include: EUPMIXER#4WHBV, EUPMARIONMIXER#4, EUPCDBWEIGHHBV, EUPPKGHOOPER#5BV, EUPPKGHOOPER#6BV, EUPFLUIDBEDDRYER, EUPMODIFIER#1DC, EUPAGER#1DC, EUPMODIFIER#2DC, EUPAGER#2DC, EULAUNDRYSILOS, EUPRDHOPPERDC, and EUPR&DHOPPERBV.

Particulate emissions from this flexible group are limited to 0.10 lbs. /1,000 lbs. of exhaust gases.

#### *FGPMARIONMIX12DC*

The two (2) Marion Mixers in this flexible group are housed in the same general vicinity of the laundry department. This flexible group also has a static tank for the fragrance process. There are two (2) pulse jet baghouses associated with this process. Both baghouses were equipped with magnehelic gauges and the (attached) PM records are indicative of proper operation, since these were not operating at the time of the inspection. Particulate emissions from this process are limited to 0.01 lbs. / 1,000 lbs. of exhaust gases and 2.0 pph. VOC emissions from this flexible group are also limited to  $1.2 \times 10^{-3}$  pph. Records indicate that prior to shut down, the monthly emission rates were below the limit.

#### *FGMWH1-3VACH1-2*

The five (5) emission units associated with this flexible group (EUPVACUMWHOP#1BV, EUPVACUMWHOP#2BV, EUPWHOPPER#1BV, EUPWHOPPER#2BV, and EUPWHOPPER#3BV) include three (3) weigh hoppers with bin vents for the three (3) Marion mixers, and two (2) vacuum weigh hoppers with bin vents. There are five (5) pulsejet baghouses utilized for control of the particulate emissions in this flexible group. All of the baghouses had appropriate PM plans, and PM's were regularly conducted to ensure proper operation. Particulate emissions from this flexible group are limited to 0.01 lbs. /1,000 lbs. of exhaust gases. There is also a 1.7 pph particulate emission limit, for all of the five (5) collection systems combined.

#### *FGPPKGHOPPERS1-4*

Four (4) packaging hoppers and four (4) associated pulse-jet baghouses are included in this flexible group. The emission units include: EUPPKGHOOPER#1BV, EUPPKGHOOPER#2BV, EUPPKGHOOPER#3BV and EUPPKGHOOPER#4BV. Access conducts regularly scheduled PM's in accordance with their PM plan; records of the PM's can be found attached to this report. At the time of the inspection, the baghouses were not operating.

Particulate emissions are limited to 0.10 lbs. / 1,000 lbs. of exhaust gases. A 0.35 pph particulate limit also applies to each of the collection systems.

*FGPPKGSLYDC*

This flexible group is for the Packaging Sly Process with a dust collector, the Line #7 Process with a dust collector, Packaging Line #7 with bin vents, an isolated mixer process with a dust collector, and an extruder transfer process with a dust collector. Magnehelic pressure gauges were on each of the four (4) pulse jet baghouses; however, this line was not operating during the time of the inspection.

Particulate emissions are limited to 0.01 lbs. / 1,000 lbs. of exhaust gases. Alpha amylase and bacillus subtilis enzymes are limited to 0.0003 pph, as calculated based on monthly production totals at the end of each month. Records prior to the shutdown, indicate compliance with the pound per hour emission rate. Similar to all of the other dust collector systems throughout the facility, Access maintains PM plans for these, and regularly conducts maintenance. Maintenance records are attached to this report.

*FGPMCAM*

This flexible group covers all of the emission units throughout the entire facility that are subject to the provisions of 40 CFR Part 64 Compliance Assurance Monitoring (CAM). The emission units that are covered under this flexible group include: EUPMIXER#4WHBV, EUPPKGHOOPER#5BV, EUPPKGHOOPER#6BV, EUPFLUIDBEDDRYER, EUAGER#2DC, EULAUNDRYSILOS, EUPWHOPPER#1BV, EUPWHOPPER#2BV, EUPWHOPPER#3BV, EUPPKGHOOPER#1BV, EUPPKGHOOPER#2BV, EUPPKGHOOPER#3BV, EUPPKGHOOPER#4BV, EUPPKGSLYDC, and EUPPKGHOOPER#7BV. Specifics for several of these emission units are covered in other flexible groups.

All of these emission units are in the laundry department. Since the laundry department has shutdown, the pressure drop readings were not obtained. KD discussed the requirement to continue to submit all CAM reports, as required per the ROP, even though the equipment is not running.

Access has successfully submitted all semi-annual and annual monitoring requirements.

Personal Care Department*EUPERSONALCARE*

This emission unit addresses the mixing operation in the Personal Care area and their associated particulate and VOC emissions. It includes several product storage tanks, mix tanks, pre-mix tanks, pre-weigh areas, equipment wash room and packaging areas. The particulate emissions are controlled with a pulse jet fabric filter dust collector, while the VOC emission are uncontrolled. Two (2) lines were in operation at the time of the inspection producing a baby lotion and a baby shampoo. Per Mr. Kunkle, this department operates three (3) shifts per day, five (5) days per week.

VOC emissions are limited to 6 tpy, based upon a 12-month rolling time period. As of July 2020, the 12-month rolling emissions were 1.6 tons. The highest monthly emissions were in January 2020 with 0.307 tons being emitted. All recordkeeping for this emission unit appear to be adequate and are attached to this report.

Particulate emissions from the baghouse are limited to 0.01 lb. /1000 lbs. of exhaust gasses. Compliance with the particulate limits are demonstrated through stack testing and proper operation of the baghouse. Stack testing is not being requested at this time. The baghouse appeared to be properly operating with a pressure drop across the baghouse of 4.8" WC at the time of the inspection. Access does regular preventative maintenance and maintains a PM plan for the baghouse. Records of PM's done on the unit are attached to this report.

Paper Product Division and Lithographic Press Operations

The paper products division utilizes different printing operations to make things such as product packaging and marketing materials. At the time of the inspection several of the presses were operating. During the inspection of this department, all containers, including waste containers were closed. Access has requested, and AQD approved, the use of manufacturer's formulation data in lieu of Method 24 for determining VOC content for all of the emission units in this department.

*EUMETOFLEXO*

This emission unit is a 20" Omet eight (8) unit packaging flexographic in-line printing press equipped with eight (8) dryers. VOC content is limited to  $\leq 25\%$ , by volume, of the total volatile fraction, as applied OR non-volatile fraction must be  $\geq 60\%$  by volume, as applied, minus water for compliance purposes. Access is using the non-volatile fraction must be  $\geq 60\%$  by volume, as applied, minus water for compliance purposes. Per the attached records, all of the inks and coatings used have a non-volatile fraction above 60%, as applied, minus water. VOC emissions from this press are limited to 10.7 tpy, 12-month rolling. As of July 2020, the 12-month rolling VOC emissions were 0.6 tons.

#### *EUKBARAPIDA106PRESS*

This emission unit is a non-heatset sheetfed offset-lithographic printing press with IR and UV curing systems and manual and automatic wash systems. This press was operating at the time of the inspection and was running at approximately 15,000 units per minute. VOC emissions from this press are limited to 13.9 tpy, 12-month rolling; as of July 2020, the 12-month rolling emissions were 3.04 tons. The VOC content of the fountain solution is limited to 5.0% by weight, as applied. Per the attached records, the VOC content of the fountain solutions are less than the maximum 5.0%. The press-related cleaning solvents used here are limited to a VOC composite partial vapor pressure of 10 mmHg at standard temperature and pressure. Per the attached records, the partial vapor pressures are below the maximum 10 mmHg.

#### *FGDIGALPRINTING*

This flexible group covers the digital printing operations for printing labels and product information documents associated with various consumer products and include EUHPINDIGO and EUUVCOATER. EUHPINDIGO is a Hewlett-Packard Indigo WS 6800 digital printing press, and EUUVCOATER is an AB Graphics UV coater. The stack dimensions, while not directly measured, appeared to be correct. VOC emissions from this process are limited to 8.8 tpy, 12-month rolling. As of July 2020, the 12-month rolling VOC emissions were 1.02 tons. VOC content and material usages are properly being tracked as demonstrated in the attached records. At the time of the inspection, all containers were closed, in a manner that minimized fugitive emissions.

#### Nutritional Products Department

The nutritional products plant is located in building 31 and produces a variety of powdered drink mixes for dietary supplements. Other processes include raw material transfer, mixing/blending, and packaging. Mr. Ben Preston joined for this part of the inspection.

#### *EUNUTRPROD31*

This emission unit includes all of the blenders, weigh hoppers, mixers, pneumatic conveying systems and three (3) dust collection systems with HEPA filters that are exhausted to the in-plant environment. The process starts from the top floor and is fed down three (3) levels to the bottom floor where the final product is packaged. Throughout the process, the various powders are mixed, and blended to create the final product. Each of the mixing rooms on all of the floors along the way have ventilation controls that exhaust to one of the three (3) dust collection systems. The final packaging process allows for the product, type dependent, to be packed one of several ways. The product can be packed in a small pouch, a larger tub, or into a stick.

Access has developed a PM plan for the dust collectors associated with this emission unit and does regular Preventative Maintenance. Attached are records of the PM's, including weekly and monthly inspections of the dust collectors. AQD staff was able to observe the dust collectors during the inspection, and they appeared to be properly operating. The differential pressure for the three (3) dust collectors were 1.9" WC, 1.2" WC, and 4.1" WC. The HEPA filters are changed approximately every 30 day, per the requirements of the PM plan.

#### *EUNPPCLEAN*

This emission unit was formerly operating under the Rule 201 permitting exemption of Rule 290 (details below in FGRULE290) but was permitted in April 2018. The emission unit covers all cleaning and sanitizing activities in the Nutritional Products Plant using means such as reusable applicators and single-use handheld wipes.

VOC emission are limited to 7.6 tpy, based upon a 12-month rolling time period. As of August 2020, the VOC emissions were 0.5 pounds.

**EUENERGYDRINKS**

This emission unit is for the energy drink mixing and canning line. This emission unit was permitted under PTI No. 152-19A and was recently rolled into the ROP through a minor modification. The process is located where the former liquids department was, in buildings 17 and 26. Particulate matter emissions from this emission unit are controlled by two (2) dust collection vacuum units, each equipped with a HEPA filter. This area recently began production but was not operation at the time of the inspection. Per Mr. Ben Preston, who accompanied KD and Mr. Davison for this part of the inspection, Access is awaiting some final Quality Assurance testing before continuing with production on a larger scale.

Emissions from this emission unit are limited to 24.7 tpy, based upon a 12-month rolling time period for VOCs and 0.005 lb./1000 lbs of exhaust gas on a dry gas basis for PM. KD was able to view the dust collection systems and the location where the pressure drop readings would be taken. Since the emission unit has only been in operation since August 2020, the only VOC emission data available is from August 2020. VOC emissions in the month of August were 0.2 tons.

In addition to emissions restrictions, this emission unit has batch limits based upon the VOC content of the product that is being produced. Furthermore, the VOC content of the material used in this emission unit cannot exceed 114 pounds per batch, and Access is properly tracking the VOC content of the materials used. The batches are limited as described in the table below:

VOC content of material charged to each batch	Maximum throughput batches per year	Batches produced
Group 1: VOC content greater than 80 and no more than 114 lb. VOC per batch	30	0
Group 2: VOC content greater than 45 and no more than 80 lb. VOC per batch	250	1
Group 3: VOC content greater than 29 and no more than 45 lb. VOC per batch	431	8
Group 4: VOC content up to 29 lb. VOC per batch	225	0

Access has submitted a preventative maintenance plan, as required, and is following the plan accordingly. Stack dimension, while not explicitly measured, appeared to be of correct dimension.

Durables Department

The durables department, or durables building, used to make drinking water filtration units. However, this department has discontinued operations and is now just a warehousing area.

Plastic and Silk-Screening Area

This area is housed in the same building as the old liquids department, and now the energy drink building. There are two (2) primary areas, the plastic blow-molding area and the silk screen printing area. Many of the plastic bottles that are used for other processes are made here, including the bottles used in the Nutritional Products Department. The blow molding equipment is exempt from Rule 201 permitting under Rule 286(2)(c). After the bottles are molded, they are then sent elsewhere in the facility for use, or for further processing. There are four (4) silk screening machines, for which only three (3) of them are primarily used; each machine has the capability to run up to six (6) different colors. UV light is used to help the ink adhere to the bottle. The silk-screening process is also exempt from Rule 201 permitting under Rule 287(2)(e). In this area, there is one (1) dust collector that collects plastic scrap from the plastic grinding process. In this area, KD noted that particulate was scattered throughout the room that the collection unit was in. Mr. Davison ensured KD that this would be cleaned up immediately and the frequency of cleaning would be reviewed to ensure it is adequate and this would not occur again. In follow up with Mr. Davison about this area, post inspection, Access conducted a root cause analysis and would be fixing the issue. Mr. Davison also supplied KD with photographs that the area had been cleaned.

## Ink Jet Coder Operations

### *FGRULE287(2)(c)-1*

This flexible group encompasses the following emission units: EULINKJETCODERS, EUCOSVIDEOJETVOC, EUPVIDEOJETCODE, EUPCAINKJET, EUFVIDEOJETCODER, EUDURINKJETCODER, EUPLASTICJETCODER, and EUNPPVIDEOJET. The ink jet coders are used in a variety of places around the facility. The printers are used for printing shipping and product information onto boxes or the product itself.

Emissions from these processes are individually limited to 200-gallon usage per month to allow the use of this exemption and are exhausted into the in-plant environment. Access is properly tracking the ink usage for each of the printers and all usages. The sum of the emission units within their respective building locates are less than the 200 gallons allowed, indicative of the demonstration of compliance with the 200-gallon usage limit.

## Miscellaneous

### *FGRULE290*

Six (6) other emission units (EUPSA8RADICALH6B, EUPMOD#1PREMIXDC, EUPPNWTARPECO, EUPPOLYBAGGING, EUFLEXOPLATES, and EUDURABLESCLEAN) utilize Rule 290 for exemption from the Rule 201 permitting. All these emission units were installed prior to December 20, 2016 and demonstrate compliance with Rule 201 permit exemption, Rule 290 in effect at the time of installation.

These emission units are located throughout the facility. Access maintains appropriate records for each of the emission units in accordance with the requirements of Rule 201 permitting exemption, Rule 290. In the attached records, a detailed description of the processes and emission calculations are included. Some of the emission units, such as EUPPOLYBAGGING are uncontrolled, and some, such as EUPMOD#1PREMIXDC are controlled. Based on the attached records, both emission units are well below the maximum allowed emission under Rule 290.

In addition to the emission units noted above, Access was utilizing Rule 290 for their ethanol emissions for cleaning in the Nutritional Products Department and for isopropyl alcohol emissions in the durables department, until it was permitted in April 2018.

## **Section 2: Facilities Maintenance Operations**

Section 2 consists of the facilities and manufacturing operations, such as the equipment used for heating and steam generation and other miscellaneous operations.

The same source-wide HAP limits are also enforced for the equipment in Section 2. HAP emissions are aggregately and individually limited to 22.5 tpy and 9 tpy, respectively, on a 12-month rolling timeframe. Please reference the HAP emissions evaluation in Section 1 of this report for complete details.

Furthermore, all required semi-annual and annual reporting requirements for section 2 have been submitted on time and complete.

### *EUFUELOILTANKS*

This emission unit encompasses the six (6) No. 2 fuel and diesel fuel oil storage tanks. The fuel in the tanks is trucked in from the supplier to the trucks, on an as needed basis. These storage tanks are also subject to 40 CFR Part 60 Subpart Kb for Volatile Organic Liquid Storage Vessels, for which per the attached records, all requirements are being met. The sulfur content of the fuel received in these tanks is certified to be less than the max allowable 15 ppm (0.0015% by weight). Since this fuel, if used, is used in all of the boilers and generators listed below, it shall be assumed that all sulfur content requirements of those emission units are also being met.

### *EUBOILERS800B30A*

This 800 horsepower/32.5 MMBTU natural gas and No. 2 fuel oil fired fire tube boiler is located in Building 30A. It is used to provide backup steam and heat for the facility. This boiler primarily uses natural gas for fuel but has the capability to use fuel oil. If the boiler is using fuel oil, the oil comes from one of the fuel oil storage tanks, for which the fuel shipment information including the supplier, quantity of oil received, and sulfur content are recorded. Records indicate that no fuel oil was used in this boiler for the reporting period.



This boiler is subject to 40 CFR Part 60 Subpart Dc, and many of the conditions are written into the permit and described above. It appears as if all of the requirements are being met. Since there appeared to be no changes to the boiler, the stack dimensions were not explicitly measured.

#### *FGBOILERS*

This flexible group includes all non-New Source Performance Standards (NSPS) boilers in operation at the plant. These boilers use No. 2 fuel oil as a back-up fuel and natural gas as the primary fuel source. Since Access has taken the HAP Opt-Out limits and additional fuel restrictions in order to meet the definition of a natural gas fired boiler, these boilers are not currently subject to 40 CFR Part 63 Subpart JJJJJJ, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, and Commercial Boilers Area Sources. In total, there are four (4) boilers in this flexible group and vary in size. Since there appeared to be no changes, the stack dimensions were not measured during this inspection. If fuel oil is used, the fuel comes from the fuel oil tanks, as mentioned above; thus, the fuel specification requirements are met. Records indicate that no #2 fuel oil was used in any of the six (6) boilers during the for all of 2019 and thus far in 2020.

Access supplied KD with maintenance records indicating the facility is conducting preventative maintenance as appropriate.

#### *FGCIRICEMACT*

All emergency diesel fuel fired compression ignition (CI) internal combustion engines with applicability to the area source Reciprocating Internal Combustion Engine (RICE) NESHAP 40 CFR Part 63, Subpart ZZZZ (4) located at an area source of HAP's that commenced construction or reconstruction before June 12, 2013 are covered by this flexible group. Currently, Access has fifteen (15) of these type of engines at various locations throughout the facility, however, one (1) generator, EUB22 GENERATOR has been temporarily taken out of service. Access conducts regular preventative maintenance (PM) on them. Maintenance records are attached.

Each of the engines are limited to no more than 100 hours of operation per calendar year for purposes including maintenance checks and readiness testing. The engines are allowed 50 hours each, per calendar year in non-emergency situations, but are included in the 100 hours. All engines are equipped with hour meters, and the attached records indicate each engine has operated under the 100-hour limit.

#### *FGSIRICEMACT*

This flexible group covers all of the natural gas fired spark ignition (SI) internal combustion engines with applicability to the area source RICE NESHAP 40 CFR Part 63 Subpart ZZZZ (4Z) for existing SI engines located at an area source of HAPS that commenced construction or reconstruction before June 12, 2006. Access has four (4) of these engines located at various locations throughout the facility. Many of these are dedicated to specific buildings. Access does regular PM on the generators, and records for them are attached. Each of the engines are limited to no more than 100 hours of operation per calendar year for purposes including maintenance checks and readiness testing. The engines are allowed 50 hours each, per calendar year in non-emergency situations, but are included in the 100 hours. All engines are equipped with hour meters, and the attached records indicate each engine has operated under the 100-hour limit.

#### *FGCIRICENSPS*

This flexible group encompasses all new/reconstructed CI engines at an area source of HAP's that commenced construction or reconstruction on or after June 12, 2006 that must comply with 40 CFR Part 60 Subpart IIII. These engines are also subject to the provisions of 40 CFR Part 63 Subpart ZZZZ; compliance with Subpart ZZZZ is demonstrated via compliance with Subpart IIII.

Access currently has four (4) engines that are subject to this NSPS. These engines, like the other RICE subject engines, are located at various locations throughout the facility grounds. These engines burn the diesel fuel that is obtained from the storage tanks, thus meeting all of the fuel specification requirements. The hours ran for each engine, is below the 100-hour run time limit per calendar year; the engines are equipped with an hour meter tracking the hours of operation.

Emissions from the engines are limited to 4.0 g/kW-hr NMCH + NO<sub>x</sub>, 3.5 g/kW-hr CO, and 0.20 g/kW-hr PM, all based on test protocol. Access maintains documentation of certification, which is compliant with these emission

limits. Regular PM's are conducted on the generators, and records for them are attached.

#### *FGSIRICENSPS*

This flexible group is for the emergency natural gas fired spark ignition (SI) combustion engines with applicability to 40 CFR Part 60 Subpart JJJJ – the NSPS for Stationary Reciprocating Internal Combustion Engines that commenced construction after June 12, 2006 and were manufactured on or after January 1, 2009. The engines in this flexible group are also subject to the provisions of 40 CFR Part 63 Subpart ZZZZ, however, compliance with Subpart ZZZZ is demonstrated via compliance with Subpart JJJJ.

Currently, Access only has one (1) emission unit subject to these regulations, and it is a 96 HP natural gas fired generator that is equipped with an hour meter. Similar to the other engines, it is limited to 100 hours per calendar year for purposes including maintenance checks and readiness testing. The engine is allowed 50 hours per calendar year in non-emergency situations but must be included in the 100 hours. Records indicate the engine has operated less than the 100 hours.

The engine, which is a certified engine, has a CO emission limit of 387 g/hp-hr and a NOx+HC emission limit of 10 g/kW-hr. Since the engine are certified, this ensures compliance with the limit.

Access conducts regular preventative maintenance on the engine, and records are attached to this report.

#### *FGRULE287(2)(c)-2*

All of the small paint booth operations are contained in this flexible group. These units were installed prior to the rules change on December 20, 2016; thus, they demonstrate compliance with Rule 287(2)(c) in effect at the time of installation.

The booths are located in different buildings around the facility. The ROP currently lists two (2) of these booths, however, it was discovered during the inspection that there is a third booth located in the maintenance area. KD noted that this emission unit was not listed in the ROP, but if it meets the requirements of Rule 201 permitting exemption Rule 287(2)(c), the booth in the maintenance area can still be considered exempt and use this permitting exemption. Mr. Davison followed up with KD after the inspection and Access staff uses small amounts of spray paint in that booth and they are adequately tracking the usage of paint in that booth.

To use the exemption, each booth is limited to a maximum usage of 200 gallons per month. Per the available records a max of 3.25 gallons was used in any of the given booths. The booths are equipped with fabric filters. The filters are changed on an as needed basis, and the filter changes are properly recorded.

#### *FGCOLDCLEANERS*

This flexible group covers all of the cold cleaners located in various parts of the facility. Cold cleaners are located throughout the campus, including in the paper products area, plastics area, maintenance area, and others. All of the cold cleaners that were observed were closed and not in use. Per Mr. Davison, Access maintains these units and changes the cleaning liquid themselves. The cold cleaners were all closed and properly labeled. All of the requirements appear to be met.

#### **Compliance Determination**

Based on the observations made during the time of the inspection and a subsequent review of the records, it appears that Access Business Group, LLC, is in compliance with MI-ROP-A2402-2018b.

NAME Kaitlyn DeVries DATE 9/21/2020 SUPERVISOR HH