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

A240262689

FACILITY: ACCESS BUSINESS GROUP, LLC		**SRN / ID:** A2402
LOCATION: 7575 E Fulton Rd, ADA		**DISTRICT:** Grand Rapids
CITY: ADA		**COUNTY:** KENT
CONTACT: Ben Preston , Supervisor - Global Environmental Health & Safety		**ACTIVITY DATE:** 02/22/2022
STAFF: Kaitlyn DeVries	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: The purpose of this inspection was to determine compliance with Opt-Out Permit to Install (PTI) 93-21, and all other applicable Air Quality Rules and Regulations.		
RESOLVED COMPLAINTS:		

On Tuesday February 22, 2022, Department of Environment, Great Lakes and Energy (EGLE) Air Quality Division (AQD) Staff Kaitlyn DeVries (KD) conducted a scheduled inspection of Access Business Group, LLC located at 7575 East Fulton Road, Ada, Michigan. The purpose of this inspection was to determine compliance with Opt-Out Permit to Install (PTI) 93-21, and all other applicable Air Quality Rules and Regulations.

Prior to entry to the facility, KD observed the perimeter of the facility for odors and opacity. None were noted. Upon arrival, KD met with Mr. Ben Preston, Supervisor – Ada, Global Environmental Health and Safety who was the primary escort on the inspection. During the opening meeting, KD asked Mr. Preston about the status of the Renewable Operating Permit that had been held by Access Business Group. Mr. Preston indicated that he was working on getting a void request together. A request to void the ROP was received on March 10, 2022, and the request was approved on March 14, 2022.

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, Personal Care Department, Lithographic Press Operations, Nutritional Products Department, Ink Jet Coder Operations, 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, in each section below, as appropriate, but include the complete shutdown of the Laundry Department in January 2020, changes to the Liquids Department, and the removal of the equipment from the Durables Department, for which the building now serves as storage. Many of these changes contributed to the reduction in the Potential to Emit (PTE) of the facility, thus the decision to obtain an Opt-Out permit.

Regulatory Analysis

As previously mentioned, Access was formerly subject to the Title V program and held MI-ROP-A2402-2018b, however, Access obtained an Opt-Out permit, in November 2021, and took Federally enforceable limits to restrict their PTE below major source levels for pollutants, specifically for Volatile Organic Compounds (VOC), in addition to the Hazardous Air Pollutant (HAP) Opt-Out Limits that were already in place. Therefore, Access is a synthetic minor source of VOCs and HAPs, and a minor source for the other criteria pollutants. Since Access has taken the Limits for HAPs, 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 HAPs. 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.

Compliance Evaluation

EUCOSMETICS

The emission unit includes the cosmetics manufacturing processes with their associated VOC and particulate emissions. There are 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; VOC emissions are not controlled. The dust collectors were observed during the inspection and appeared to be properly operating.

In total there are 14 production lines on the main floor, but only a handful of them were operating at the time of the inspection. The process flow has 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.

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”, and 0.4” water column (WC). During the inspection, KD noted that the room where the dust collector was housed on the second floor had noticeable particulate on the ground and in the room. KD asked Mr. Preston about the housekeeping for the room, and the area around the dust collector, and he assured KD that this would be cleaned up. Mr. Preston supplied KD with photos that that room had been cleaned up.

Preventative Maintenance (PM) plans are required for both units. Access does regular PMs on the units to ensure proper operation; records for such maintenance are attached to this report. The most recent PMs done on the units were done on March 2, 2022 and were inspections of the magnehelic gauges.

VOC emissions, which are not controlled, are limited to 7.6 tons per year (tpy), per 12-month rolling time period. As of December 2021, the 12-month rolling VOC emissions were 4.2 tons. The highest 12-month rolling emissions in the previous 12 months was in February and March of 2021 at 6.2 tons. The VOC content of materials in each batch has a maximum batch throughput limit as outlined in Table 1.

Table 1: VOC Content of Materials charged to each batch with batch limits and actual throughputs

VOC content of material Charged in each batch	Maximum Throughput, batches per year	Actual throughput as of December 2021
VOC content between 10% and 42% by weight	1,000	667
VOC content between 42% and 80% by weight	100	10.5
VOC content between 80% and 100% by weight	100	22

Isopropyl alcohol usage is limited to 2,000 gallons per year, based upon a 12-month rolling time period. As of December 2021, the isopropyl alcohol usage was 1,264 gallons, for the 12-month rolling time period. Similarly, dry material usage is limited to 10,000,000 lbs. per year, also based upon a 12-month rolling time period. As of December 2021, the 12-month rolling dry material usage was 3,704,833.7 lbs. Access is properly tracking the monthly usage of dry materials.

Stack dimensions, while not explicitly measured, appeared to be correct.

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 not operating at the time of the inspection.

VOC emissions from this press are limited to 4.8 tpy based upon a 12-month rolling time period; as of December 2021, the 12-month rolling emissions were 2.27 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%, as applied. During the inspection 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.

Fountain solution, and blanket/roller wash and cleaning solution usages are individually limited to 4,000 lbs. per year, based upon a 12-month rolling time period. Records indicate that as of December 2021 the fountain solution usage was 2,970 lbs. and the blanket/roller wash and cleaning solution usage was 1,540.3 lbs. Similarly, printing ink usage is limited to 200,000 lbs. per year, based upon a 12-month rolling time period. As of December 2021, the 12-month rolling usage was 8,144.1 lbs.
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.

The stack dimensions, while not explicitly measured, appeared to be correct.

EUENERGYDRINKS

This emission unit is for the energy drink mixing and canning line. The process is located where the former liquids department was, in buildings 17 and 26. This area was operating at the time of the inspection.

Particulate matter (PM) emissions from this emission unit are controlled by two (2) dust collection vacuum units, each equipped with a HEPA filter. PM emissions are limited to 0.005 lb./1000 lbs. of exhaust gas on a dry gas basis. KD was able to view the dust collection systems and they appeared to be properly operating. Access has submitted a preventative maintenance plan, as required. Per a conversation with Mr. Preston, some of the required preventative maintenances have been missed. KD told Mr. Preston to get this in place as soon as possible.

Emissions from this emission unit are limited to 24.7 tpy, based upon a 12-month rolling time period for VOCs and for PM. The 12-month rolling VOC emissions as of December 2021 were 9.98 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 2 below:

Table 2: VOC content of materials charged to each bath and the throughput of each batch

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	11
Group 2: VOC content greater than 45 and no more than 80 lb. VOC per batch	250	102
Group 3: VOC content greater than 29 and no more than 45 lb. VOC per batch	431	218
Group 4: VOC content up to 29 lb. VOC per batch	225	161

Stack dimensions, while not explicitly measured, appeared to be of correct dimension.

EUNUTRPROD31

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. 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 PMs, including weekly and monthly inspections of the dust collectors, with the most recent preventative maintenance conducted on February 21, 2022. 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 1.8" WC, 2.1" WC, and 4.7" WC. The HEPA filters are changed approximately every 30 days, per the requirements of the PM plan.

EUNPPCLEAN

This emission unit was formerly operating under the Rule 201 permitting exemption of Rule 290 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 emissions are limited to 7.6 tpy, based upon a 12-month rolling time period. As of December 2022, the VOC emissions were 0.2 pounds.

Access utilizes sanitizing wipes in this area for cleaning, and the solvents in those wipes have VOC content limits, by weight, and material usage limits, all based upon a 12-month rolling time period, as outlined in Table 3 below.

Table 3: VOC content of solvent containing materials including cleaning wipes based upon a 12-month rolling time period.

VOC content limit of solvent containing material by weight	**Limit**	**Usage as of December 2022**
Solvent containing no more than 1.5% by weight of VOC used	1,200 gallons per year	4.3 gallons
Solvent containing no more than 63.2% by weight of VOC used	1,200 gallons per year	0 gallons
Cleaning wipes containing no more than 15.0% by weight of VOC used	20,000 pounds per year	2,540.6 pounds
Cleaning wipes containing no more than 64.8% by weight of VOC used	10,000 pounds per year	0 pounds

Per the records, and discussions with Mr. Preston, materials containing more than 63.0% by weight and 64.8% by weight of VOC have not been used.

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 washroom and packaging areas. The particulate emissions are controlled with a pulse jet fabric filter dust collector, while the VOC emissions are uncontrolled. There are five (5) lines in this area, but only runs four at a time at a maximum. There was one (1) line in operation at the time of the inspection, their contract line, which was making a baby shampoo.
VOC emissions are limited to 6.0 tpy, based upon a 12-month rolling time period. As of December 2021, the 12-month rolling emissions were 2.5 tons. The highest monthly emissions were in October 2021 with 0.553 tons being emitted. All recordkeeping for this emission unit appears to be adequate. Materials used in this emission unit are limited to a specified number of batches, based upon their VOC content. This is outlined in Table 4, below.

Table 4: VOC Content of Materials charged to each batch with batch limits and actual throughputs

VOC content of material Charged in each batch	**Maximum Throughput, batches per year**	**Actual throughput as of December 2021**
VOC content between 10% and 42% by weight	2,000	1,321
VOC content between 42% and 80% by weight	2,000	201.6
VOC content between 80% and 100% by weight	2,000	2

Particulate matter (PM) 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 and the area around the baghouse was clean. Access does regular preventative maintenance and maintains a PM plan for the baghouse, with the most recent PM being done on February 3, 2022. Records of PM's done on the unit are attached to this report.
Stack dimensions, while not explicitly measured, appeared to be correct.

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 tanks, 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 on site, it shall be assumed that all sulfur content requirements of those emission units are also being met.

EUBOILERS800B30A

This emission unit is an 800 horsepower/32.5 MMBTU natural gas tube boiler that is located in Building 30A. It is used to provide backup steam and heat for the facility. This boiler is subject to 40 CFR Part 60 Subpart Dc, and 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.

FGDIGIGALPRINTING

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 EUUVOCATER is an AB Graphics UV coater.

VOC emissions from this process are limited to 3.2 tpy, based upon a 12-month rolling time period. As of December 2021, the 12-month rolling VOC emissions were 0.95 tons. VOC content and material usages are properly being tracked as demonstrated in the attached records. Access has previously requested, and AQD approved, the use of manufacturer's formulation data in lieu of Method 24 for determining VOC content. During the inspection, all containers, including waste containers were closed.

Digital label press UV coatings, cleaning materials, and cartridges and toners have material usage limits based upon a 12-month rolling time period, and those limits are described in the table 5 below.

Table 5: Digital Label Press materials used based upon a 12-month rolling time period.

Material used	**Limit**	**Usage as of December 2021**
Digital Label Press UV Coatings	45,000 lbs./year	10,033.4 lbs.
Digital Label Press Cleaning Materials	1,600 lbs./year	310.4 lbs.
Digital Label Press Cartridges and Toners	5,000 lbs./year	1,990.6 lbs.

The stack dimensions, while not directly measured, appeared to be correct.

FGBOILERS

This flexible group includes four (4) non-New Source Performance Standards (NSPS) boilers in operation at the plant. These boilers use natural gas as fuel source and vary in size from 14.7 MMBTU to 98 MMBTU. Since Access has taken the HAP Opt-Out limits and only burn natural gas, 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. The stack dimensions were not measured during this inspection but appeared to be correct. KD did notice in some, what appeared to be holes in one of the boiler stacks. Based upon the visual of the holes it was unclear if they were actual holes or just wear in the outer insulation of the stack. Mr. Preston indicated he would check with the boiler mechanics. Upon inquiry, Mr. Preston confirmed with the boiler mechanics that the hole sand tears are only in the outer layer of insulation and are due to age, which are being repaired. Other holes are monitoring points.

FGCIRICEMACT

All existing 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. 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 + NOx, 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 PMs 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 the100 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 is certified, this ensures compliance with the limit.

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

FGFACILITY

This flexible group covers all process equipment source-wide including equipment covered by all permits, grandfathered equipment, and exempt equipment. Access had previously taken limits for HAPs, but has taken a VOC restriction as well, and demonstrated that their potential to emit (PTE) is below major source thresholds and is now operating under this Title V opt-out permit.

VOC emissions are limited to 74.1 tpy, based upon a 12-month rolling time period. Records indicate the 12-month rolling VOC emissions, as of December 2021, at 58.96 tons. The VOC emissions data was obtained from the 2021 MAERS data. KD spoke with Mr. Preston about having the records more clearly match the requirements of the newly issued PTI, rather than that what had previously been required in the ROP. Mr. Preston indicated the records would be cleaned up and more closely match the requirements of the PTI.

HAPs are individually limited to less than 9 tons per year and aggregately limited to less than 22.5 tons per year, both based upon a 12-month rolling time period. The aggregate HAP emission were 0.001 tons, with glycol ethers being the highest emitted HAP at 1.28 pounds.

As required by the Opt-Out permit, to limit PTE, Access has taken several enforceable limits to limit the Potential to Emit. Some of those restrictions have been identified in their specific emission unit, above, while others are limited in FGFACILITY.
Access is limited to 50 gallons of coatings per month for each paint booth. Records indicate less than 50 gallons per month has been used. Each Videojet ink coder is limited to 100 gallons of ink per month. Usage records indicate the Videojet ink coders are less than 100 gallons of ink per month.

The narrow web UV press is limited to no more than 80,000 pounds of ink, coating, and cleaner combined, per year. Records indicate that no more than 41,000 pounds have been used in a 12-month period.

Access is limited to 2,500 tons of plastic raw material in the plastic blow molding area. Records indicate December 2021 having the highest usage in the 12-month period at 2,237.16 tons.

There is an 8,000 gallon per year limit for UV curable ink in the silk-screening printing area. Records indicate that 1,000 gallons or less are used per month for all UV coatings. However, the records are unclear if this is the total UV coatings for just this piece of equipment or total for the facility. KD has spoken with Mr. Preston about making sure the records are more clearly laid out and indicative of the changes to the recordkeeping requirements for PTI No. 93-21.

EXEMPT EMISSION UNITS

Access has a plastic and silk-screening area located in the same building as the old liquids department, and now the energy drink building. 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). As mentioned in FGFACILITY, above, the silk screening and the plastic blow mold area have additional material usage restrictions. Also, in this area, there is a dust collector that collects plastic scrap from the plastic grinding process, for which the area was clean from debris.

Access also has several other emission units that rely on Rule 201 permit exemption, Rule 287(2)(c). These emission units are ink jet coders for printing and 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. These processes are individually limited to 200-gallon usage per month and are exhausted into the in-plant environment under the Rule 201 permit exemption. 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. Additionally, as noted above in FGFACILITY, these ink jet coders have an additional restriction of 100 gallons per month, for which they are also compliant.

There are also a couple of paint booths that utilize Rule 287(2)(c), as a Rule 201 permitting exemption. Per Mr. Preston, these booths are seldom used, with only one (1) of the booths being used, and KD was able to observe the records indicating less than 200 gallons per month of coating usage. KD noted that while these booths have not been recently used, there were some small gaps in the filters, and Access should address any filter issues prior to using the booths. Additionally, as noted above in FGFACILITY, these booths have an additional restriction of 50 gallons per month, for which they are also compliant.

Access has several cold cleaners located throughout the buildings. All of the cold cleaners, with the exception of the cold cleaner located in the printing area, was closed. As soon as the cold cleaner that was in the printing area was discovered open, Mr. Preston closed it and stated he would remind staff to close the unit when not in use. These units are exempt from Rule 201 permitting under Rule 281(2)(h).

Compliance Determination

Based on the observations made during the time of the inspection and a subsequent review of the records, it appears Access Business Group, LLC, is in compliance with PTI No. 93-21. Access should, however, ensure that all records are kept appropriately to ensure compliance with PTI No. 93-21.

NAME _____ DATE 4/15/2022 SUPERVISOR _____