

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

A258637788

FACILITY: BISSELL Homecare, Inc.		SRN / ID: A2586
LOCATION: 2345 WALKER RD NW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Erica Bouc , Associate Manager-Facilities, Safety and Security		ACTIVITY DATE: 11/04/2016
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled, unannounced inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) and April Lazzaro (AL) arrived at the facility at approximately 8:30 am on November 4, 2016 to conduct an unannounced scheduled inspection. The purpose of this inspection was to determine compliance with applicable air quality rules and regulations.

No odors were observed upon entering the site. AQD staff met with Mr. Phil Wheeler, Associate Facilities Coordinator for BISSELL Homecare, Inc. (Bissell) at the start of the inspection. AQD staff briefly discussed the purpose of the inspection and a walk through of the plant was performed to observe on site operations. Additionally, during the inspection Mr. Brian Hughes and Mr. Brent Levigne, representatives of Bissell, assisted in presenting on site operations. Ms. Erica Bouc, Associate Manager - Facilities, Safety and Security of Bissell was contacted after the inspection for records of on site operations.

Facility Description:

This Bissell facility is a cleaning product manufacturing facility. The site is the main headquarters for Bissell and the overall layout of the facility consist of corporate offices; an outlet retail store, storage/warehouse and a cleaning product manufacturing, bottle fill line. The site had previously been in operation under several permits which were voided in 1996.

Facility Inspection

A walk through of the facility was then conducted. Bissell operates a cleaning product manufacturing facility. Bissell manufactures their bottles for the associated cleaning products in this operation with four plastic blow molding machines that utilize compressed air and nitrogen. Once the bottles are created, the next step is for a steam powered sleeve operation machine to shrink and place sleeves on select bottles. The bottles then proceed to the mixing/filling area to be filled with the appropriate product mixture. Numerous size containers (325 gallons – 55 gallons) of select chemicals were observed in the mixing/filling area and are pumped to the two mixing tanks (2,000 gallons) depending on what solution is being created. Additionally, there are six storage tanks that were later verified ranging from 6,000 to 12,000 gallons. Records of the vapor pressures and/or contents within the six tanks were requested from Ms. Bouc after the inspection. All chemicals that are utilized for on-site operations are in liquid form with the exception of one chemical that is in a powder form. The cleaning product after being manufactured is stored in two non-heated storage tanks prior to being pumped to the bottling production line and were later verified to be 3,500 gallons. Routine testing of pH, solid percentage and hydrogen peroxide content in the storage tanks is conducted. An 800 gallon tank utilized for storage of hot water to clean the mixing system lines and a 1,600 gallon reinstate tank that is utilized for storage of waste prior to testing for proper disposal were observed. A stack was observed leading to exterior portions of the facility above the manufacturing area. Records were requested from Ms. Erica Bouc after the inspection regarding the mixing operations and tank storage. What documents that were provided to AQD staff initially were determined to be incomplete.

Once the cleaning products are manufactured they are placed into the bottles at the filling line. The bottles are capped from one of three capping machines and then a self-adhesive label is placed on the bottle via a sticker label machine. The finished products are then packaged and stored on site prior to being shipped to the appropriate location.

Two areas adjacent to the production line were observed with four plastic regrinding systems of all waste produced from each respective plastic blow molding machine. The grinders are part of a recirculating system. The clean regrind is reused and resent to the production line with the remaining dirty regrind contained and sent to an offsite recycling center.

Several natural gas boilers were located on site throughout the facility. Documents provided by Ms. Bouc identified one boiler at 21,000,000 BTU/hour, was constructed in 1958 and at the time of the inspection was

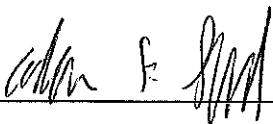
observed to be disconnected and no longer in use. The second boiler initially identified at 12,000,000 BTU/hour and was later determined to be 21,000,000 BTU/hour was constructed in 1958. The second boiler was also initially identified as being updated in 2005; however, this was identified as incorrect by Ms. Bouc and the update was confirmed to be in 1995. Mr. Wheeler during the inspection stated that the second boiler was not continuously used and when in operation was at max forty percent capacity. Based on follow up conversations with Ms. Bouc it was determined that the updates were not considered modifications and therefore, the boilers are not subject to NSPS regulations. Additionally, based on the age of the initial construction the boilers are considered grandfathered and therefore, exempt of any permitting requirements.

Two paint booths were observed within the northern portions of the facility structure. Both paint booths at the time of the inspection were not in operation. One paint booth was determined to be self-contained and the remaining booth was used on a seasonal basis and strictly for aerosols. Records were requested from Ms. Bouc for the two paint booths; however, monthly records of emissions were not available for review.

Two emergency backup generators of 70 & 60 KW were observed throughout the facility.

Two parts washers were identified through the inspection. One parts washer was labeled with a cold cleaner operating procedures label; however, was open and containing an open container at the time of the inspection. AQD staff informed Mr. Wheeler and Mr. Hughes that all containers within the parts washer should be enclosed during non-operations. The remaining parts washer was closed; however, unlabeled. AQD staff provided Bissell personnel with cold cleaner operating procedure labels which were placed on the parts washer at the time of the inspection.

Records were requested from Ms. Bouc for the Bissell facility following the inspection. Ms. Bouc provided a limited amount of records to AQD staff. Based on the lack of records, Bissell was not within compliance at the time. A follow up conference call was conducted with AQD staff, Ms. Bouc and Mr. Mike Winchester, an Environmental Consultant for Sali Groups-ES, LLC, on November 21, 2016 where records were requested according to Rule 278a to determine the applicability of possible exemptions for onsite equipment instead of the alternative route of a Violation Notice (VN) at this time. Additionally, vapor pressures and/or contents of the main storage tanks on site were also requested. Additionally, Bissell was then required to complete a facility wide Potential to Emit (PTE) evaluation with possible applicable exemptions for any/all units previously mentioned. Bissell was granted thirty days (December 21, 2016) to calculate the PTE and provide records. An extension of an additional thirty days (January 21, 2016) was approved when Bissell requested additional time to collect select documents. Several phone calls were completed following the January 21, 2016 submittal of the PTE and associated records between AQD staff and Ms. Bouc. Minor discrepancies regarding records were identified and resolved. The correct sizes of several tanks were identified on the records submitted. The PTE calculated and the exemptions identified for units mentioned above show that a permit is not required at this time. However, several units identified in the mixing/filling area were presented as exempt per Rule 290. No monthly emission records were able to be provided; therefore, a Rule 201 violation was noted. Based on the lack of emission records for select items identified in the documents provided; Bissell was not in compliance at this time.

NAME 

DATE 02/08/17

SUPERVISOR 