

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

P045037692

FACILITY: TRI PAC, INC		SRN / ID: P0450
LOCATION: 17336 M-60 EAST, VANDALIA		DISTRICT: Kalamazoo
CITY: VANDALIA		COUNTY: CASS
CONTACT: Paras Shah , Director, Technical/R&D		ACTIVITY DATE: 11/10/2016
STAFF: Amanda Chapel	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Air Quality Inspection		
RESOLVED COMPLAINTS:		

On November 10, 2016 AQD's Amanda Chapel (staff) went to conduct an unannounced inspection of Tri Pac, Inc. (facility) located in Vandalia, Cass County. The purpose of the inspection was to determine compliance with Permit to Install (PTI) No. 96-13 and all applicable state and federal air regulations. The following will summarize plant operations and facility's compliance status.

I arrived at the facility at about 10:15 am. There were no visible emissions or odors coming from the facility. I entered the door marked Human Resources and made contact with a woman sitting at a desk. I stated that I was here for an unannounced air inspection and I asked for Mr. Paras Shah who was the correspondent for the company when they were applying for the permit. She said that he was out of the office today but she called Mr. Prasham Shah, Operations to the front. When he arrived I stated my purpose, presented my credentials, and gave him a business card. Mr. Shah took us back to his office for a records review.

In Mr. Shah's office, I explained the procedure for an air inspection and described the records that I was looking for. I also provided a copy of PTI 96-13 so he could reference it as we were talking. Mr. Shah stated that he is not normally the environmental person but would do his best in answering any questions or trying to locate any records. Upon Mr. Paras Shah's return, he would be able to provide any missing information. Mr. Shah was able to answer a number of questions about the facility. Tri Pac, Inc employs about 30 people. They run one shift a day and operate Monday to Friday. The facility, which is an aerosol filling operation, began running in about 2010. This is the facility's first inspection since the PTI was issued.

Currently, the facility has installed and is operating two liquid filling lines and one aerosol filling line. The liquid lines were installed in the facility around 2010 and the aerosol line was installed in 2013. The PTI currently has two liquid filling lines and two aerosol filling lines permitted. The facility also has two boilers. The first boiler is a propane fired boiler installed in 2007 with a heat capacity of 535,000 Btu/hour which heats the water bath. The second boiler is a propane fired boiler installed in 2013 with a heat capacity of 2,940,000 Btu/hour which heats the gas house. These boilers are exempt under Rule 282(b)(i).

I asked Mr. Shah if they had monthly and 12-month rolling records for the use of gun bore solvents as well as propellant used in the facility. He was able to provide me with annual records for gun bore cleaner usage but was unable to locate any records for monthly use, rolling 12-month total, or usage of propellant. I requested that Mr. Paras Shah email me the records no later than November 16, 2016. Mr. Shah was able to provide me with the MSDS for both the gun bore cleaner and the propellant.

The facility has one main production area. There are two liquid filling lines located in this area. One was in use during the inspection. An employee adds the bottles to be filled at one end of the line and a conveyor system moves them along the automated filling line where other employees

off load the filled bottles. There is also one aerosol filling line in this area. This was not in use during the inspection. The line operates similarly to the liquid filling line but the containers are conveyed outside to the gas house where the aerosol is applied to the container and sealed. The containers are then conveyed back into the main building to be unloaded.

Located next to the main production area is a final product storage area as well as a chemical storage and mixing area. There are five tanks located inside the building that do not vent out, which are used to mix the material which is used to fill the containers on the liquid filling line. This area also contains the hazardous waste storage area.

The facility has a maintenance area located in another large storage room. There is one cold cleaner located in the main maintenance area. The lid was closed and there was liquid inside at the time of the inspection. The cold cleaner is exempt under Rule 281(h). I did provide a sticker for the lid and I requested the MSDS for the liquid in the cold cleaner be emailed to me by Mr. Paras Shah when he returned. In a conversation on November 21, 2016, Mr. Shah told me that the cold cleaner is filled with the #9 gun bore cleaner.

We returned to Mr. Shah's office and I reiterated that I will need the completed facility records for 2014 and 2015 along with records from 2016 for solvent/gun bore cleaner and propellant emailed to me by November 16, 2016. I also stated that I would need a copy emailed to me of the MSDS for the liquid in the cold cleaner as well as a copy of the construction completion notification required by the PTI. I thanked Mr. Shah and left the facility around 11:40 am.

The following lists their permits' special conditions and their compliance status with them.

The following conditions apply source-wide to: FGAEROSOL

IV. Design/Equipment Parameters

The permittee shall equip and maintain FGAEROSOL with a liquid metering device.
(R336.1205, R336.1702)

AQD Comment: COMPLIANT. FGAEROSOL is equipped with liquid metering devices.

VI. Monitoring/Recordkeeping

The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the end of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.
(R336.1224, R336.1225, R332.1702(a))

AQD Comment: COMPLIANT. Complete records were provided to the AQD.

The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R336.1224, R336.1225, R332.1702)

AQD Comment: COMPLIANT. The facility provided Material Safety Data Sheets (MSDS) for the No. 9 Gun Bore Cleaner and Halocarbon 134a (propellant). MSDS contains chemical composition information for each material, including weight percent of each component.

The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the amount (in gallons) of solvent/gun bore cleaner and propellant used each month and 12-month rolling time period. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R336.1205, R336.1702)

AQD Comment: COMPLIANT. Records were kept in a satisfactory manner.

VII. Reporting

Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of any of the aerosol can filling processes (R336.1201(7)(a))

AQD Comment: Company had not submitted the notification prior to the inspection but did submit it as a result of the inspection.

VIII. Stack/Vent Restrictions

The exhaust gasses from FGAEROSOL shall not be discharged to the ambient air at any time. (R336.1225, 40 CFR 52.21(c) & (d))

AQD Comment: COMPLIANT. Aerosol filling operations are done in a small building located to the south of the main facility. The aerosol filling operation is automated, indoors, and there are no stacks.

NAME Ann Chae

DATE 11/22/16

SUPERVISOR MA 11/22/2016