



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Mauser Packaging Solutions, Delphi, Indiana

FROM: Meaghan Pashen, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Supervisor
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: Mauser Packaging Solutions

Facility Location: 5935 N 9th Street, Delphi, IN 46923

Date of Inspection: December 2, 2022

EPA Inspector(s):

1. Meaghan Pashen, Environmental Engineer
2. Valeria Apolinario, Environmental Engineer
3. Alexandra Letuchy, Environmental Engineer

Other Attendees:

1. Randall Hoffman, IDEM Inspector
2. Chad Criswell, Plant Manager

Contact Email Address: Chad Criswell: chadcriswell@mauserpackaging.com

Purpose of Inspection: To investigate potential volatile organic compound (VOC) emissions from facility wash lines.

Facility Type: Container wash and destruction facility

Regulations Central to Inspection: The Indiana State Implementation Plan (SIP), including the applicability of VOC regulations.

Arrival Time: 9:30 AM EST

Departure Time: 11:00 AM EST

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet concurrent with the Inspection Report
- ☒ Small Business Resource Information Sheet not provided during the Inspection. Reason: Provided with Inspection Report
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Chad Criswell unless otherwise noted.

Company Ownership: Facility sold from Next Day Container to Industrial Container Services in March 2017. Facility purchased by Mauser Packaging Solutions in Fall of 2017.

Process Description:

Mauser Packaging Solutions at 5935 N 9th Street, Delphi, IN (Mauser or the Facility) is a container wash and destruction facility. The Facility's processes consist of a reconditioning line and a destruction line. The facilities received used containers or totes inside metal cages. Prior to processing, containers are removed from the metal cages. Cages are reused, and bottles are replaced for rebottled materials. Rebottled materials proceed to the wash line.

At the reconditioning line, caps are removed from the containers, and containers move one by one on a conveyer through the wash line. After the caps are removed, remaining container material is drained at four drain stations. The line moves every 90 to 105 seconds through each drain station. Containers then move through the wash house and are flushed initially using overhead wands with ambient temperature water, and then with hot water. After being washed, containers move to a manual turntable to blow off any labels and remaining material. Containers are then dried by ambient air and at the drier stations. There are five dryers. An 'air check machine' is utilized to pressurize totes to inspect for leaks.

Non-washable totes are processed at the destruct line. The destruct machine cuts totes and scrapes out remaining contained material. There are no air pollution controls at the Facility.

Staff Interview:

The Facility operates Monday through Thursday, from 6 AM to 4:30 PM and has 21 employees. The Facility does not have an air permit. The minimum threshold in determining operating

permit applicability for sources not required to use air pollution control equipment to comply with state VOC emission rules is 10 tons per year. EPA is requesting the Facility's VOC emission calculations.

Heavy containers that have more than 1 inch of residual material remaining in the containers are rejected. The Facility maintains safety data sheets (SDS) if a container formally contained hazardous materials. EPA is requesting the SDS sheets maintained by the Facility. The Facility has not received any recent odor complaints.

Reconditioning of containers is done every Monday for 6 hours of production. The reconditioning line processes approximately 120 to 150 totes per week. Common materials formally in containers includes cleaning or cutting fluids.

At full capacity, the Facility rebottles approximately 1000 bottles per week.

Water used in washing processes is city water. Water is reused throughout the process. Overhead pressure wash water is reused for 1 week, and dump water is held by a heat tank for 4 months before being disposed.

The five dryers are typically run at approximately 100 °F, but due to recent issues are currently being run at ambient temperature. The air check machine operates for 30 seconds for new bottles and 75 seconds for reconditioned bottles.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

The Facility was not in operation during the inspection. EPA walked the production process and saw the reconditioning line. Building A contains washing processes and Building B contains the destruct line.

EPA reviewed the Facility's Material Acceptance Policy. See Digital Image Log.

Photos and/or Videos: were taken during the inspection.

RECORDS REVIEW

- Material Exemption List (see Digital Image Log)

CLOSING CONFERENCE

- ☒ Provided U.S. EPA point of contact to the facility

Requested documents on 1/25/2023, via email:

- Provide applicable SDSs for containers formally containing hazardous material, indicating what line the container was processed on.
- VOC emission calculations

DIGITAL SIGNATURES

Report Author: **Pashen,
Meaghan**  Digitally signed by
Pashen, Meaghan
Date: 2023.01.25
08:52:48 -06'00'

Section Supervisor: **Brian
Dickens**  Digitally signed by Brian
Dickens
Date: 2023.01.25
09:47:51 -06'00'

Facility Name: Mauser Packaging Solutions
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APPENDICES AND ATTACHMENTS

1. Confidential Business Information Attachment
2. Digital Image Log

Contains Items Claimed as CBI – Non-Releasable

Facility Name: Mauser Packaging Solutions

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CONFIDENTIAL BUSINESS INFORMATION ATTACHMENT

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Alexandra Letuchy's inspection notes, contained in R5 Records Center.

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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Valeria Apolinario	2. Archival Record Location: R5 Electronic Records Center
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Latitude and Longitude	Description of Image
1	IMG_0311.JPG	12/02/2022 10:27 PM EST		Wash Line
2	IMG_0312.JPG	12/02/2022 10:57 PM EST		Material Exemption List