United States Environmental Protection Agency
Region 7
Enforcement and Compliance Assurance Division

Air Branch

Air Branch Inspection Report
Unannounced Full Compliance Evaluation
Plaze, Inc. (also known as PLZ Corp.)
105 Bolte Lane
Saint Clair, Missouri 63077-3219
FRS# 110017984582

Inspection Date(s):
May 21-22, 2024

CHARLOTTE PAPP
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Date: 2024.08.28 11:57:36 -05'00'

Charlotte Papp, Inspector, ECAD, Air Branch

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Tracey Casburn, Air Branch Chief, ECAD

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CONTENTS

TABLES

APPENDICES

This Contents page shows all the sections contained in this report and provides a clear indication of the end of this report.

INSPECTION OVERVIEW

INSPECTION OBJECTIVE

The objective of the full compliance evaluation (FCE) inspection was to determine compliance of the facility with the Clean Air Act (CAA), specifically those requirements listed in **Table 3** below. The facility is a synthetic minor source.

Table 1 lists the inspection team members.

Table 1. PROJECT TEAM MEMBERS		
Team Member	**Organization**	**Project Role**
Charlotte Papp	EPA Region 7, ECAD, Air Branch	Lead Inspector
Jonathan Boyd	EPA Region 7, ECAD, Air Branch	Field team member

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts in order of contact during the inspection.

Table 2. FACILITY CONTACT INFORMATION		
Name, Title	**Phone No.**	**Email Address**
Jason Honzell, EHS Manager	636-629-3400	Jason.Honzell@plzcorp.com
Mike Lutkewitte, Plant Manager	636-629-3400 ext. 1118	Michael.Lutkewitte@plzcorp.com
James Purgasou, EHS Director	636-629-3400	James.Purgasou@plzcorp.com
Jon Bachmann, Compounding Manager	636-629-3400	Jon.Bachmann@plzcorp.com
Noah Casby, Support Compounds	636-629-3400	Noah.Casby@plzcorp.com
John Barnard, Maintenance Supervisor	636-629-3400	John.Barnard@plzcorp.com
Jean Sedilo, Environmental and Hazardous Waste Director	636-629-3400	Jean.Sedilo@plzcorp.com

FACILITY OVERVIEW

Plaze, Inc. (Plaze), is a full-service contract packager that specializes in aerosol packaging. Some chemicals are blended onsite while other chemicals are received pre-blended. Aerosol cans are filled with the blended chemicals on one of the facility's eight fill lines prior to being sent to a gassing house for pressurization. Plaze uses the North American Industry Classification System (NAICS) code of 325998 for All Other Miscellaneous Chemical Product and Preparation Manufacturing and a Standard Industrial Classification (SIC) code of 7389 for Business Services. Plaze is a major source for volatile organic compounds (VOCs) and is a synthetic minor source for Hazardous Air Pollutants (HAPs).

The last onsite compliance monitoring activity at the facility was on August 3, 2023, and consisted of a FCE conducted by the Missouri Department of Natural Resources (MoDNR). MoDNR completed a Title V certification review on April 1, 2024.

According to Environment and Compliance History Online (ECHO) there has been one CAA formal and four informal enforcement actions at this facility in the past five years. MoDNR issued warning letters to the facility on November 12, 2020 for late submittal of a semi-annual monitoring report, August 23, 2023 for failure to provide records immediately to MoDNR personnel and failure to submit a record of number of batches of each process operated per month, and March 13, 2024 for late submittal of a semi-annual monitoring report. MoDNR issued a Notice of Violation on May 25, 2022, to the facility for the late submittal of a permit renewal application. MoDNR then entered into an Administrative Compliance Order with the facility on December 30, 2022 to resolve the permit renewal application violation.

According to the Plaze's Operating Permit issued by MoDNR on March 13, 2017, the facility is subject to the following regulations and standards subject to review during this inspection (**Table 3**):

Table 3. APPLICABLE PERMIT CONDITIONS, REGULATIONS AND STANDARDS	
Code of Federal Regulation	**Standard Name**
40 CFR Part 63	Subpart VVVVVV, National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources

FACILITY OPERATIONS SUMMARY

The facility stores bulk chemicals in tanks located in two tank farms (one for Building 1, another for Building 5). Chemicals are piped in to designated mixing rooms where they are blended with other chemicals based on customer specifications. These blends are then transferred to the fill lines either via pipe for larger scale projects or via tote for smaller projects. The product is filtered and then sprayed into the appropriate container. If needed, the containers are taken to "gas houses" to be pressurized. Once pressurized, containers are run through a water bath to clean and check for leaks or other issues. Once cleared, the containers receive their tips/caps and are taken to shipping and distribution.

The facility does not have any emission control devices onsite. Compliance is verified using emission calculations. Because the tanks can be changed to other chemicals, depending on what product is being packaged at the facility, in order to calculate the potential to emit, n-Hexane (Cas No. 110-54-3), is assumed as the chemical being stored in the tanks as this is the chemical with the highest emissions that the company would store on site.

FIELD ACTIVITIES SUMMARY

The inspection team arrived at the facility on May 21, 2024, at 8 a.m. and completed a drive by surveillance inspection. We did not observe visible emissions. I made entry at the front office and introduced myself and Mr. Boyd. I presented my credentials and provided my business card to the facility staff listed in **Table 2**. I conducted an opening conference during which I explained that the purpose of the visit was to conduct an inspection to determine compliance with the CAA, specifically, to determine compliance with the regulations and standards listed in **Table 3**. I explained that after asking for some general business information, we would observe storage tanks, process units, and review associated records demonstrating compliance with the standards. I explained to Mr. Lutkewitte that the facility would have an opportunity to make a claim of business confidentiality at the end of the inspection and provided him with a Confidential Business Information (CBI) form. Mr. Lutkewitte did make a claim of confidentiality (**Appendix A**).

The inspection team was given a facility tour by the facility staff listed in **Table 2** (excluding Jean Sedilo). We were given a facility safety briefing by the facility staff. I was asked to wear the following PPE for general site safety: steel-toed boots, safety glasses, and ear protection. Due to the spark/combustion risks onsite, all photographs were taken on the facility's intrinsically safe camera with my instructions on framing and content.

I obtained copies of the records as indicated on the Receipt for Documents (**Appendix B-1**). Additional records were requested via email (**Appendix B-2**) and submitted via a OneDrive folder on May 21, 2024, and June 7, 2024.

We broke for lunch at approximately 11:30 a.m. and returned to the facility at 12:24 p.m. We obtained a "hot work" permit and re-visited key process areas with the Forward Looking InfraRed (FLIR) camera. We returned to the conference room at approximately 2:00 p.m. and broke for the day.

The following day, May 22, 2024, we arrived at the facility at 8:29 a.m. We discussed records for approximately one hour, and then I prepared for the closing conference. I conducted a closing conference at 10:05 a.m. with the facility staff listed in **Table 2**. I provided the facility with copies of the CBI form (**Appendix A**), receipt for documents including documents requested for digital submittal (**Appendix B-1 and 2**), and small business information sheet. We departed the facility at 10:17 a.m.

Measurement and/or Sampling Activities

I conducted field measurements using a FLIR camera during the onsite inspection. **Table 4** summarizes field measurement activities.

All environmental measurement activities were performed in accordance with the EPA Region 7 quality system. I followed manufacturer and EPA processes for instrument calibration which was documented in an EPA internal database.

Table 4 summarizes field measurement activities.

Table 4. FIELD MEASUREMENT ACTIVITIES

Location Identifier	Date(s) and Time	Method and/or Procedure[1], and Equipment	Measurer Name
MOV_0001.mp4 Building 1 Tank Farm	5/21/24	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, Model No.GF320, and Serial No. 44401229	Charlotte Papp
MOV_0002.mp4 Building 1 Propellant Tanks	5/21/24	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, Model No.GF320, and Serial No. 44401229	Charlotte Papp
MOV_0003.mp4 Batch Mixing Room 1	5/21/24	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, Model No.GF320, and Serial No. 44401229	Charlotte Papp
MOV_0004.mp4 Building 1 Fill Line	5/21/24	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, Model No.GF320, and Serial No. 44401229	Charlotte Papp
MOV_0005.mp4 Mixing Room A	5/21/24	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, Model No.GF320, and Serial No. 44401229	Charlotte Papp
MOV_0006.mp4 Mixing Room B	5/21/24	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, Model No.GF320, and Serial No. 44401229	Charlotte Papp
MOV_0007.mp4 Building 5 Tank Farm	5/21/24	**Region 7 procedure:** *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, **Equipment:** Teledyne, Model No.GF320, and Serial No. 44401229	Charlotte Papp

[1] The current version of each procedure, at the time of the investigation, was followed.

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

Ambient weather, site conditions, and field activities were documented in the field records. All photographs are attached as **Appendix C**. I made the following observations during the

inspection. I discussed all observations with facility representatives during the closeout meeting unless otherwise noted in the observation description.

These observations are not final compliance determinations. The EPA Region 7 Air Branch case review team will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

While observing the Building 1 Fill line with the FLIR camera, I noted there was very little emission coming off of the tops of filled bottles.

No emissions were visible with the FLIR camera on any exterior tanks or feed lines from those tanks.

I reviewed records required by the facility's permit and Subpart VVVVVV. These included chemical lists, storage capacities, emission calculations, and others. As of the date of this report, all records appear complete and to demonstrate compliance.

For example, Plaze has a facility wide limit and must emit less than 10 tons of each individual HAP and less than 25 tons combined of HAPs from the installation in any consecutive 12-month period. Plaze demonstrates compliance with these plant wide limits by calculating the monthly and rolling 12-month HAP emissions for each individual HAP and for total combined HAPs and maintaining a complete set of Safety Data Sheets (SDS) for all HAP containing materials at the installation. The emission calculation and SDS records must be kept for no less than five years and be made available immediately to MoDNR and EPA personnel upon request. I reviewed the emissions calculation and SDS sheets and they appear to be complete and to demonstrate compliance.

End of report.