



Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Clean Air Act Full Compliance Evaluation Inspection Report

Berry Global
Tacoma, Washington

Inspection Date: June 9, 2022

SARA CONLEY

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Date: 2022.08.17 11:54:58 -07'00'

Report Author Signature

Date

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EPA Region 10

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Date

Derrick Terada
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1. Basic Facility and Inspection Information

Facility: Berry Global

Physical Address: 635 East 15th Street, Tacoma, WA 98421

FRS ID: 110055010759

ICIS-Air ID: 100000000000000097

NAICS: 326160 Plastics and Rubber Products Manufacturing

Facility Contact: Jacqueline Johnson
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Date of Inspection: June 9, 2022

Inspection Start/End Time: On site at approximately 10:30 AM and began our opening conference at 10:37 AM. The inspection concluded at 12:20 PM.

Date of Report: August 16, 2022

Inspection Notice: Unannounced

Purpose of Inspection This was a multi-media Clean Air Act (CAA) and Emergency Planning and Community Right-to-Know Act (EPCRA) Section 313 compliance inspection by the Environmental Protection Agency (EPA). Inspector Whyte, EPA Region 10, led the EPCRA Section 313 inspection. Sara Conley led the CAA inspection covered in this report. The Puget Sound Clean Air Agency (PSCAA) was made aware of the inspection beforehand but did not participate in the inspection. The inspection was not announced in advance.

The inspection objective was to evaluate regulatory applicability of the CAA and EPCRA Section 313. This inspection report only covers the CAA inspection.

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

2. Process Description and Equipment

This process description is based on my observations as well as statements made by facility personnel while onsite during the inspection.

- The main process areas at the facility are divided into two sections, the extrusion blown molding lines the stretch blown molding lines. There are six lines for each process, a total of 12 lines. The raw materials, thermoplastic pellets, are shipped to the facility in large boxes which are stored inside the facility. Pellets are fed into each line where they are melted into parison and either blown or stretched into their final form.

- The facility produces plastic containers made of the following materials; polyethylene terephthalate (PET), high and low density polyethylene (HDPE and LDPE), polypropylene (PP), polyvinyl chloride (PVL), and ELVAX which is a material used for flexible military canteens. Polyethylene terephthalate (PET) makes up the largest portion of their product produced, followed by high-density polyethylene (HDPE), and then polypropylene (PP). The facility previously made styrene injection molded products for the machinery required to use styrene has been removed from the site.

Equipment onsite:

- Grinding machines: Excess material and rejected product is ground onsite for reuse. All six blow molding lines are serviced by one large re-grinder, and re-ground material can constitute up to 10% of the final product. The six extrusion lines each have their own re-grinder, and re-ground material can constitute up to 25% of the final product. Material is fed into the machine via a hopper and ground directly into an enclosed bin. Each grinder is equipped with a dust collection system equipped with fabric filter bags and the ground dust is recycled onsite. Any material on the floor, or otherwise deemed soiled, is shipped offsite for recycling.
- Exterior tanks: Jacqueline explained that the tanks that can be seen from the exterior of the building are no longer used. They were used for resin when the facility had the styrene injection line.
- All oil used onsite is food-grade oil.
- There is no printing or coating on-site.
- Rooftop ventilation does not capture any emissions and was replaced in 2021.
- All forklifts are propane powered.
- There are no engines or generators at this facility. They use air electric compressors.

3. Compliance History

A review of EPA's Enforcement and Compliance History Online (ECHO)¹ database shows that at the time of the inspection, the facility was reported as having no air enforcement activities in the last 5 years. However, ECHO indicates that there has been noncompliance with the Clean Water Act for 12 out of the last 12 quarters for, "Late or Missing Discharge Monitoring Report (DMR) Measurements."

4. Records Review

This facility has not had any air quality permits and has not been subject to the Clean Air Act.

5. Inspection Elements and Field Observations – June 9, 2022

a) Making Entry

¹ <https://echo.epa.gov/>

1. On-site at approximately 10:30 AM, Jennifer Birdsbill greeted us and asked us to sign into the facility. We declined to sign the visitor log because it contained legal language for a liability waiver. We explained why we could not sign it, and Jennifer showed us to the conference room. We were joined by Jacqueline Johnson in the conference room and began our opening conference at 10:37 AM.

b) Opening Conference (6/9/22, 10:37 AM)

1. Attendees
 - Jennifer Birdsbill - EH&S Manager
 - Jacqueline Johnson - Plant Manager
 - Sara Conley – Inspector, EPA Region 10
 - Brendan Whyte – Inspector, EPA Region 10
 - Elly Walters – Inspector, EPA Region 10
2. Introductions, including presentation of EPA inspector credentials.
3. Discussion regarding facility history, processes, and equipment which informed most of the process description and equipment in Section 2, above.
4. Jacqueline explained how material usage and emissions are tracked for the facility. The company, Berry Global, uses Cornerstone Environmental for purchase tracking. This program is used to monitor purchases and chemicals on a monthly, quarterly, and annual basis. Every product and chemical needed at the facility is managed and supplied to the facility at the corporate level. Safety Data Sheets are accessible in the program by the facility and all target HAP or other regulatory compounds can be searched in Cornerstone Environmental for the facility. There were no target HAPs like styrene or MMA in the program for this facility when Jacqueline looked during the opening conference.
5. Jacqueline mentioned that they have conducted air emission testing for WA State Labor and Industries compliance focused on vinyl chloride in the interior air.
6. Discussed taking photos with Jacqueline and Jennifer. Elly explained that she would be taking photos and videos throughout the inspection and the facility agreed to this. Elly explained the confidential business information (CBI) policy and asked them to inform us if any photos or videos we took were CBI.
7. Discussed scope of inspection, generally to include a facility walkthrough.
8. Review of facility safety information.

c) Field Observations (6/9/2022, ~11:30 AM – 12:05 PM)

1. Jennifer and Jacqueline lead Brendan, Elly, and I on a facility walkthrough. We followed the process from the shipping and receiving area through both molding lines. The primary focus of the walkthrough was on any possible sources of air emissions. We asked about refrigerants, which are used in the air compressors on-site. Jacqueline explained the silos and storage tanks outside the facility and walked us through their former use. On our tour Jacqueline and Jennifer took

safety and maintenance seriously and regularly checked to see that all the EPA inspectors were within the pedestrian areas due to forklift traffic and asked staff onsite that any dust on the ground be cleaned up. There was very little dust anywhere at the facility even on the equipment. I did see some dust around the entrance to the grinder collection bin and a tiny bit of dust on the floor surrounding the grinder. Each step of the process was explained by Jennifer and Jacqueline, and I used this information in Section 2 to discuss the process and the equipment on-site.

2. Elly Walters used the FLIR camera while we walked through the facility and she used it to look for possible sources of volatile emissions. No FLIR video was taken because there were not any volatiles that could be detected with the FLIR camera.

3. Returned to the main office at 12:05 PM.

d) Closing Conference (12:05 PM – 12:15 PM)

1. The closing conference was held beginning at 12:05 PM. The list of attendees is included below. We explained the next steps for EPA. We did not take any photographs and there was not any CBI provided in the inspection. I did not have compliance concerns to discuss at the time of the closing conference.
2. Attendees
 - Jennifer Birdsbill - EH&S Manager
 - Jacqueline Johnson - Plant Manager
 - Sara Conley – Inspector, EPA Region 10
 - Brendan Whyte – Inspector, EPA Region 10
 - Elly Walters – Inspector, EPA Region 10
3. The inspectors departed the facility around 12:20 PM.

6. Post-inspection

EPA will meet with PSCAA in August, 2022, to provide them with a preliminary overview of the inspection.