

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

A433831273

FACILITY: GERBER PRODUCTS CO		SRN / ID: A4338
LOCATION: 405 STATE ST, FREMONT		DISTRICT: Grand Rapids
CITY: FREMONT		COUNTY: NEWAYGO
CONTACT: John Hruby , Environmental Supervisor		ACTIVITY DATE: 09/17/2015
STAFF: Denise Plafcan	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: An announced scheduled inspection to determine compliance with new PTI 45-14.		
RESOLVED COMPLAINTS:		

Denise Plafcan (DP) and Kaitlyn DeVries conducted an announced scheduled inspection to determine compliance with Title V Opt-out Permit to Install No. 45-14 and state and federal Air Quality rules and regulations. Since the company is located an hour away from Grand Rapids and the contact person is located in a different building, a voice message was left for the contact person prior to leaving the Grand Rapids District office. Staff drove by the area and did not detect any obvious issues of odors, malfunctions or fugitive emissions. Upon entering the plant no one was immediately available because they were involved in a week long ISO 14001 recertification audit. Pat Conklin, Associate Dir. Safety, Health and Environment, and John Hruby, Environmental Supervisor, arrived and after a brief introduction and discussion, DP explained the purpose of the inspection and reviewed the "Environmental Inspections: Rights and Responsibilities" brochure.

John was the escort on the inspection along with Rachael Cole, Safety and Health Specialist. After following the stringent security, safety and sanitation requirements, the inspection began in the boiler area and included an overview of the plant. The inspection did not include the administrative offices.

Gerber is a manufacturer of baby food. They have ~700 employees and run 24 hours a day 7 days a week. Raw materials are processed, packed, labeled, and shipped. The facility has removed all glass jar packaging and now only uses aseptic thermoform containers that are formed on site, sealed and then a plastic lid is placed on top. The thermoforming portion of the process is exempt from Rule 201 permitting under Rule 286(d). Since all glass packaging has been removed all former printing lines have also been removed. Previously the facility had a spray booth that was used for maintenance purposes and was operating under Rule 287c exemption from Rule 201 permitting. This spray booth has been removed. They also have a cold cleaner in the maintenance area which is ~8 sq. ft. and exempt from Rule 201 permitting by using a Rule 281(h) exemption.

The facility uses one or two of four boilers at a time to supply process steam to the facility. Usage depends on demand from facility processes. Three of the boilers (1, 2 & 4) are permitted and one is grandfathered (3). The grandfathered unit Boiler No. 3 is going to be decommissioned once Boiler No. 4 is operating and all repairs have been made to Boiler Nos. 1 and 2. During the inspection, Greg Gibbons, Utilities Manager, pointed out the new stack that was going in to replace the combined stack of Boiler Nos. 1 and 2. Once this replacement is made then Boiler No. 3 will be taken down. Boiler Nos. 1 and 2 run on natural gas but are also permitted to use fuel oil. Boiler No. 4 is only permitted to use natural gas. All of these boilers only use natural gas. Since the new stack was lying on the ground a measurement of the diameter was made and discovered that it was 5 inches larger than allowed. This will be addressed in a VN.

**EMISSION UNIT SUMMARY TABLE**

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID
EUBOILER1	67.3 MMBtu Natural gas and No. 2 fuel oil fired boiler capable of producing 50,000 pounds of steam per hour.	FGBOILERS
EUBOILER2	67.3 MMBtu Natural gas and No. 2 fuel oil fired boiler capable of producing 50,000 pounds of steam per hour.	FGBOILERS

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID
EUBOILER4	84.4 MMBtu Natural gas fired boiler capable of producing 70,000 pounds of steam per hour	FGBOILERS
EUCATERPILLAR	1200 HP 750 kW Caterpillar diesel-fueled emergency generator.	FGGENERATORS
EUDETROITDIESEL	325 HP 250 kW Detroit Diesel diesel-fueled emergency generator, used for lighting.	FGGENERATORS
EUCUMMINS	364 HP 200kw Cummins diesel-fueled emergency generator.	FGGENERATORS

#### FLEXIBLE GROUP SUMMARY TABLE

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGBOILERS	Two 67.3 MMBtu per hour natural gas and No. 2 fuel oil fired boilers, each capable of producing 50,000 pounds of steam per hour, And one 84.4 MMBtu per hour natural gas fired boiler capable of producing 84.4 pounds of steam per hour	EUBOILER1, EUBOILER2, EUBOILER4
FGGENERATORS	Three diesel-fueled emergency generators	EUCATERPILLAR, EUDETROITDIESEL, EUCUMMINS
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	

#### The following conditions apply to: FGBOILERS

**DESCRIPTION:** Two 67.3 MMBtu per hour natural gas and No. 2 fuel oil fired boilers, each capable of producing 50,000 pounds of steam per hour, And one 84.4 MMBtu per hour natural gas fired boiler capable of producing 70,000 pounds of steam per hour. **Emission Units:** EUBOILER1, EUBOILER2, EUBOILER4 **EMISSION LIMITS** The following limits are all based on test protocol for EUBOILER1, EUBOILER2 and EUBOILER4, no testing was conducted or requested as part of this compliance inspection and no fuel oil is being used in any boiler. All fuel oil related compliance has been removed from this section.

Pollutant	Limit	Compliance for these limits was not verified during this inspection.
1. NOx	6.2 pph	
2. CO	6.1 pph	
3. NOx	8.3 pph	
4. CO	7.0 pph	

#### REPORTING

The permittee shall submit notification of the date of construction and actual startup of EUBOILER4 in accordance with 40 CFR 60.7. Noncompliance with this condition since notification has not been submitted, this will be included in the VN.

#### STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	COMPLIANCE
SVBOILERS1&2	54	110	Actual diameter measurement of a new replacement stack lying on the ground was 59 inches. This will be included in the VN.
SVBOILER4	90	90	This stack appears to be accurate.

**The following conditions apply to: FGGENERATORS**

**DESCRIPTION:** Three diesel fueled emergency generators

**Emission Units:** EUCATERPILLAR, EUDETROITDIESEL, EUCUMMINS

**PROCESS/OPERATIONAL RESTRICTIONS**

The permittee shall not operate each engine of FGGENERATORS for more than 500 hours per year on a 12-month rolling time period basis as determined at the end of each calendar month. Based on the records reviewed on site no engine ran longer than 43 hours.

**DESIGN/EQUIPMENT PARAMETERS**

The permittee shall equip and maintain each engine of FGGENERATORS with non-resettable hours meters to track the operating hours. EUDETROITDIESEL was physically inspected and it had an operational continuous run time clock of 775 hours.

**MONITORING/RECORDKEEPING**

The day of the inspection, September 17<sup>th</sup>, all records were readily available including the previous month. Records were reviewed electronically and values recorded before leaving the facility.

**OTHER REQUIREMENTS**

The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart ZZZZ, as they apply to each engine of FGGENERATORS. They appeared to be in compliance.

**The following conditions apply Source-Wide to: FGFACILITY**

**EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	COMPLIANCE
NOx	99 tpy	12-month rolling time period as determined at the end of each calendar month.	28.05 tpy
CO	99 tpy	12-month rolling time period as determined at the	4.55 tpy

		end of each calendar month.	
CO2e	89,730 tpy	12-month rolling time period as determined at the end of each calendar month.	26091.11 tpy
Each Individual HAP	9.9 tpy	12-month rolling time period as determined at the end of each calendar month.	Aggregate HAPs 0.4 tpy
Aggregate HAPs	24.9 tpy	12-month rolling time period as determined at the end of each calendar month.	Aggregate HAPs 0.4 tpy
VOCs	99 tpy	12-month rolling time period as determined at the end of each calendar month.	<1 tpy

### **MATERIAL LIMITS**

The natural gas usage for FGFACILITY shall not exceed 1,453 MMSCF per year based on a 12-month rolling time period as determined at the end of each calendar month. Based on the 2014 MAERS submittal that includes all natural gas used at the facility and multiple meters added together they used 375.45 MMSCF.

### **MONITORING/RECORDKEEPING**

The day of the inspection, September 17<sup>th</sup>, all records were readily available including the previous month. Records were reviewed electronically and values recorded before leaving the facility.

Based on the observations made at the time of the inspection, records review, and MSDS's provided, the facility appears to be in noncompliance with the two conditions cited above and a VN will be issued.

NAME

Devin Oglea

DATE

9.20.15

SUPERVISOR

PAB