

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

A433864871

FACILITY: GERBER PRODUCTS CO		SRN / ID: A4338
LOCATION: 405 STATE ST, FREMONT		DISTRICT: Grand Rapids
CITY: FREMONT		COUNTY: NEWAYGO
CONTACT: Adrian Machado , Sr. Safety, Health, Environmental Specialist		ACTIVITY DATE: 08/30/2022
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: The purpose of this inspection was to determine compliance with PTI no. 45-14B, and all other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

On Tuesday August 30, 2022, Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) staff Kaitlyn DeVries (KD) conducted an unannounced, scheduled inspection of Gerber Products Co., located at 405 State Street, Fremont Michigan. The purpose of this inspection was to determine compliance with PTI no. 45-14B, and all other applicable air quality rules and regulations.

KD arrived on site shortly before 10:00 am and met with Mr. Adrian Machado, Senior Safety, Health, and Environmental Specialist, who accompanied KD on the walkthrough of the facility.

Facility Description

Gerber Products, Co. (Gerber) is a baby food manufacturing facility. Raw materials are processed, packed, labeled and shipped at the facility. The facility was in between products at the time of the inspection, they had just finished producing green beans, and were awaiting the arrival of squash, thus very little was in operation at the time of the inspection.

Regulatory Analysis

Gerber is a synthetic minor source of air pollutants and holds Title V Opt-Out PTI No. 45-14B, which has synthetic minor limits for Volatile Organic Compounds (VOC), Carbon Monoxide (CO), Nitrogen Oxides (NOx), and individual and aggregate Hazardous Air Pollutants (HAPs). The permit also has greenhouse gas limits (CO_{2e}). Gerber also has generators that are subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) promulgated in 40 CFR Part 62 Subpart ZZZZ for Stationary Reciprocating Internal Combustion Engines.

Additionally, Boiler 4 and the other small boilers are subject to the New Source Performance Standards (NSPS) promulgated under 40 CFR Part 60 Subpart Dc for Small Industrial-Commercial-Institutional Steam Generating Units. These regulations will be discussed in further detail in the Compliance Evaluation portion of this report.

Compliance Evaluation

FGBOILERS

This flexible group covers two (2) 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 (1) 84.4 MMBTU per hour natural gas fired boiler capable of producing 70,000 pounds of steam per hour.

KD was able to see that the two (2) 67.3 MMBTU boilers had been removed and are inoperable. Boiler 1 last operated on March 3, 2021, and Boiler 2 last operated on March 7, 2021. Thus, these boilers have not been used, and subsequently no fuel oil has been used. The permit contains some No. 2 fuel restrictions including usage limit and a sulfur content limit, however since there is no fuel oil, these conditions will not be evaluated. Similarly, the pound per hour (pph) emission rate limits for CO and NOx for boilers 1 and 2 will also not be evaluated.

The 84.4 MMBTU per hour boiler was still in place and operational, however, per records it has not been used in the previous 12 months. Boiler 4 has NOx and CO emission limits of 8.3 pph and 7.0 pph, based upon test protocol. Testing, however, is not being requested at this time.

In place of these boilers, the facility has installed several other small natural gas boilers. This will be discussed further in the exempt emission unit section of this report, below.

Stack dimensions, with only the stack for boiler 4 left, were not explicitly measured but appeared to be correct.

FGGENERATORS

This flexible group is for three (3) diesel fueled emergency generators (EUCATERPILLAR, EUDETROITDIESEL, and EUCUMMINS). As previously mentioned, these generators are subject to 40 CFR part 63 Subpart ZZZZ as an area source.

Gerber is tracking the hours of operation for the three (3) generators; none of the generators operated for more than 2 hours per month.

FGFACILITY

This flexible group covers all process equipment source-wide including equipment covered by other permits, grand-fathered equipment, and exempt equipment. Table 1, below, identifies the emission limits for the facility.

Table 1: Facility Wide Emissions

Pollutant	Emission Limit	Actual Emissions	Time Period/Operating Scenario
NOx	99 tpy	2.65 tons	12-month rolling time period
CO	99 tpy	1.97 tons	12-month rolling time period
CO2e	89,730 tpy	2,769.75 tons	12-month rolling time period
VOC	99 tpy	0.16 tons	12-month rolling time period
Each Individual HAP	9.9 tpy	0.04 tons ^A	12-month rolling time period
Aggregate HAPs	24.9 tpy	0.05 tons	12-month rolling time period

^A n-hexane was the highest emitted HAP over the previous 12-month rolling time period.

There is a facility-wide natural gas limit of 1,453 MMSCF per year, based upon a 12-month rolling time period. Records indicate the 12-month rolling usage as 17.866 MMSCF as of August 2022.

Gerber is properly tracking the natural gas usage and all emissions as outlined in the table above.

Exempt Emission Units

Gerber also relies on some Rule 201 permitting exemptions for various emission units at the facility.

Gerber currently has two (2) parts washers that are exempt from Rule 201 permitting under Rule 281(2)(h).

There are also some thermoforming processes located on site. The thermoforming is used to make the plastic containers for the baby food. The thermoforming process is exempt from Rule 201 permitting under Rule 286(2)(d).

As mentioned above, Gerber installed six (6) identical new 11.5 MMBTU natural-gas-fired boilers. The AQD had received the initial notification pursuant to NSPS 40 CFR Part 60 Subpart Dc in April 2021. As part of the records request, KD asked Mr. Machado for the exemption determination related to the installation of these boilers as they were all installed at the same time. A detailed exemption determination was provided detailing that each of the six (6) boilers are exempt from Rule 201 permitting via Rule 282(2)(b)(i), and since they were all part of the same project provided information that the significance threshold as per Rule 278 was not exceeded.

There is also a Cummins natural gas generator, which is exempt from rule 201 permitting under rule 285(2)(g). This engine is also subject to the provisions of 40 CFR Part 63 Subpart ZZZZ as an area source but is not subject to the New Source Performance Standards of 40 CFR Part 60 Subpart JJJJ as it was installed prior to 2008.

There are three (3) cold storage refrigeration systems that utilize anhydrous ammonia. The three systems (Building 76 Gerber Cold storage, building 85 Project Columbia -System 85 A, and Building 85 Project NRC 2 – System 85 B) were installed in 1988, 2014, and 2019 have capacities of 23,449.8 lbs. (4,689.96 gallons), 1,365.9 lbs. (273.18 gallons) and 2,167.7 lbs. (433.54 gallons), respectively. The current rule 201 permit exemption Rule 280(2)(a) exempts the two (2) systems that use less than 500 gallons of anhydrous ammonia. The other system, installed in 1988, relies on the previous Rule 201 permit exemption Rule 280(a), as it was written prior to the changes that went into effect in 2016, so long as Gerber maintains records of the installation dates and permit rules as written.

Lastly, Gerber has one paint booth that relies on Rule 287(2)(c) as a rule 201 permitting exemption. This booth, however, is not in use. But Gerber staff indicated that if this booth gets used, they track the amount of paint that is used, but it has not been used in quite some time.

Compliance Determination

Based upon the observations made during the inspection and a subsequent review of the records, Gerber is compliant with PTI no. 45-14B and other applicable air quality rules and regulations.

NAME Kaitlyn Dine

DATE 9/29/2022

SUPERVISOR HH