

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

A571168614

FACILITY: Burnette Foods, Inc		SRN / ID: A5711
LOCATION: 4856 FIRST ST, NEW ERA		DISTRICT: Grand Rapids
CITY: NEW ERA		COUNTY: OCEANA
CONTACT: Joel Smith , Plant Manager		ACTIVITY DATE: 08/16/2023
STAFF: Eric Grinstern	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: On-site compliance inspection		
RESOLVED COMPLAINTS:		

Facility Description

Burnette Foods, Inc. is a food processing facility located in the City of New Era. The facility primarily processes and cans beans and pumpkin. The facility has a wastewater treatment system that utilizes an anaerobic digester system and flare.

Regulatory Analysis

Burnette is currently operating under permit to install (PTI) No. 92-15. PTI 92-15 addresses EU-FLARE, which burns the gas produced by the anaerobic digester, EU-UASB-SCRUBBER, which is the scrubber associated with the preacidification/equalization tank associated with the anaerobic digester, and EU-WWTP-SCRUBBER, which is an odor control unit not associated with the digester that is no longer at the facility and had not been used since 2016. PTI No. 92-15 establishes monitoring and recordkeeping requirements, limits SO₂ from the flare, and requires the facility to develop and operate under malfunction abatement and operating and maintenance plans.

Compliance Evaluation

At the facility AQD staff consisting of Eric Grinstern (EG) met with Joel Smith, Plant Manager. Mr. Smith accompanied EG on a tour of the permitted emission units and provided requested records. Below is an evaluation of compliance based on PTI No. 92-15.

EUFLARE

One (1) enclosed flare to combust biogas produced by the anaerobic digester.

The permit limits the emission of sulfur dioxide to 30.0 tons on a 12-month rolling time period basis. Compliance with the limit is based on the tracking of the gas flow rate to the flare, the H₂S content of the gas and calculating SO₂ emissions based on the flow and H₂S content. The facility provided records documenting SO₂ emissions of 2.1275 tons for the previous 12-month time period.

The permit requires the submittal and operation under a malfunction abatement plan (MAP). The facility provided an updated MAP on February 9, 2017, with a revision date of February 2, 2017.

The facility is required to install a device to monitor and record the volumetric flow rate of digester gas burned in EU-FLARE, on a continuous basis. EG observed the instrumentation used to monitor gas flow to the flare. The flow rate data is electronically recorded.

The facility is required to verify the H₂S content of the digester gas burned in the flare no less than once every 6 months. The facility stated that they check the H₂S content of the gas once per week with a Draeger tube. The facility records document the change in the recorded H₂S content of the gas.

The stack of the flare is required to have a maximum diameter of 52 inches and a minimum height of 23.4 feet. Actual measurements were not taken, however, visual observation of the stack showed that it appeared to comply with the requirements.

EU-UASB-SCRUBBER

An odor control unit which utilizes carbon filtration to remove hydrogen sulfide and odors of the preacidification/equalization tank.

This emission unit is also required to have an O&M plan. Additionally, the facility is required to operate the scrubber in a satisfactory manner, as described in the O&M plan. The facility provided an updated O&M plan on February 9, 2017, with a revision date of February 2, 2017.

The O&M plan states that the scrubber will be monitored by testing for H₂S in the exhaust of the scrubber and evaluating the differential pressure across the scrubber.

The facility stated that they check the exhaust for H₂S weekly and observe the pressure drop gauge. The O&M plan does not specify maintaining records of the checks. EG recommended that the facility document the H₂S, and pressure drop checks. During the inspection the pressure drop was zero, which the facility stated was what it has always been since it was installed. EG recommended the facility evaluate if the pressure drop unit has too high of a scale for the scrubber and install a unit with a smaller scale if applicable. Additionally, during the inspection, it was observed that the exhaust from the scrubber was set up to be passed through a barrel of Carbtrol (activated carbon), however the duct work was not connected. The facility stated that they added the Carbtrol drum for additional odor control. The use of Carbtrol is not required by the permit. The facility stated the duct work recently disconnected and they planned to repair it ASAP.

Compliance Determination

Based upon the observations made during the time of the inspection and a subsequent review of the records Burnette Foods provided, the facility appears to be in compliance with the applicable air quality rules and regulations at this time.

NAME Eric Grinstern

DATE 08/18/2023

SUPERVISOR 