DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

A63	80	55	53	3

FACILITY: ABBOTT NUTRITION		SRN / ID: A6380	
LOCATION: 901 N. CENTERVILLE, STURGIS		DISTRICT: Kalamazoo	
CITY: STURGIS		COUNTY: SAINT JOSEPH	
CONTACT:		ACTIVITY DATE: 08/25/2020	
STAFF: Chance Collins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT	
SUBJECT: Scheduled Inspection	on		
RESOLVED COMPLAINTS:			

On August 25, 2020, AQD staff traveled to St. Joseph County to perform an inspection of Abbott Nutrition to determine the facility's compliance with Permit to Install No. 88-13B and state and federal air pollution control regulations.

AQD staff arrived on site at 11:00 a.m. to cloudy conditions with a temperature of 79°F and a N wind of 6 mph. There were no noticeable odors or visible emissions upon arrival.

AQD staff met with Kim Bush (EHS Manager) who answered all questions and escorted staff around the facility.

The following discusses the results of the on-site inspection and review of records:

EUBLR04/EUBLR05

Emission Unit: Natural Gas and fuel oil fired boiler with a maximum capacity of 98 MMBTU per hour.

Flexible Group ID: FGBOILERS

Pollution Control Equipment: Low NOx burners and flue gas recirculation

The facility is required to monitor and record the natural gas and fuel oil consumption rates from EUBLR04 for each calendar month. These records are being kept and were acceptable.

The facility is required to keep records of the maximum sulfur content in the fuel oil for each delivery. These records are being kept and were acceptable.

The facility is required to keep a record of the measures taken and results of implementing the Preventative Maintenance Program. These records are being kept and were acceptable.

EUBLRTEMP

Emission Unit: Natural gas and diesel-fired temporary boiler

Flexible Group ID: FGBOILERS

Pollution Control Equipment: Low NOx burners and flue gas recirculation

The temporary boiler has never been installed at the facility. It is still located at the corporate office in Chicago, Illinois.

FGBOILERS

Boilers that generate steam for process equipment.

Emission Units: EUBLR04, EUBLR05, EUBLRTEMP

Pollution Control Equipment: Low NOx burners and flue gas recirculation.

The facility is required to record the total combined calendar month and 12-month rolling fuel usage records in MMBTU for FGBOILERS. These records are being kept and were acceptable. The facility has a material limit for fuel usage at the facility of 1,071,435 MMBTU/year on a 12-month rolling time period.

As of August 2020, the 12-month rolling time period fuel usage was 452,793.39 and was within the limit.

The facility is required to record monthly and 12-month rolling time period PM, NOx, SO2, CO, and CO2e emission calculations for FGBOILERS. These records are being kept and were acceptable. The following table shows the emission limit and actual emissions per pollutant for the facility.

POLLUTANT	LIMIT in Tons per year	ACTUAL 12-MONTH	Compliant?
	(TPY)	ROLLING	-
PM	16.3 tpy	1.615 tpy	YES
NOx	Less than 90 tpy	17.8 tpy	YES
SO2	68.8 tpy	0.1 tpy	YES
CO	76.9 tpy	17.8 tpy	YES
CO2e	87,562 tpy	26,094 tpy	YES

EUWWPTS

Emission Unit: Duall single-bed carbon adsorption system for odor control on exhaust from two influent equalization tanks and one sludge storage tank in the WW pretreatment system.

Pollution Control Equipment: Duall single-bed carbon adsorption system

The facility is required to monitor and record all operation and maintenance activities in accordance with the preventative maintenance plan for EUWWPTS. These records are being kept and were acceptable.

The facility is required to monitor and record any carbon change-outs for EUWWPTS. These records are being kept and were acceptable. The last carbon change-out occurred on August 13, 2020.

FGDRYERS

Nutritional products spray dryers including cyclones integral for product recovery.

Emission Units: EUDRY03, EUDRY04

Pollution Control Equipment: Wet impingement scrubbers each with a water-based mist eliminator.

At the time of inspection, FGDRYERS were not running.

The facility is required to keep annual PM10 mass emission records for Dryer Main and Dryer FB of EUDRY04. These records are being kept and were acceptable. The annual PM10 limit for EUDRY04 is 16.2 tons per year. As of August 2020, PM10 emissions are at 11.9 tons per year, which is within the limits of the permit.

The facility is required to monitor and record the pressure drop across each scrubber/mist eliminator at least once per calendar day. These records are being kept and were acceptable.

The facility is required to record the liquid flow rate through each scrubber at least once per calendar day. These records are being kept and were acceptable.

The facility is required to record the results of a weekly visible emission observation on FGDRYERS during peak operating conditions. These results are being recorded and were acceptable.

The facility is required to keep a record of the measures taken and results of implementing the Preventative Maintenance Program. A log is being kept and was acceptable.

FGSCB0108

Material dump station each controlled by a venturi-type wet scrubber.

Emission Units: EUSCB01, EUSCB02, EUSCB03, EUSCB04, EUSCB05, EUSCB06, EUSCB08

Pollution Control Equipment: Venturi-type wet scrubbers, one for each station.

The dump stations were not in use at the time of inspection.

The facility is required to record the results of a weekly visible emission observation taken from each stack for each emission unit in FGSCB0108 during peak operating conditions. These records are being kept and were acceptable.

The facility is required to keep a record of the measures taken and results of implementing the Preventative Maintenance Program. A log is being kept and was acceptable.

FGFACILITY

The facility is required to calculate and keep monthly and 12-month rolling time period total PM, NOx, SO2, CO, CO2e, and VOC mass emission records for FGFACILITY. These records are being kept and were acceptable.

The facility is required to calculate and keep monthly and 12-month rolling time period individual and aggregate HAP mass emission records for FGFACILITY. These records are being kept and were acceptable.

The following table shows the results of records review for emission limits at FGFACILITY per pollutant:

POLLUTANT	LIMIT (TPY)	ACTUAL	COMPLIANT?
PM	Less than 90 tpy	11.9 tpy	Yes
NOx	Less than 90 tpy	17.8 tpy	Yes
SO2	Less than 90 tpy	0.13 tpy	Yes
СО	Less than 90 tpy	17.8 tpy	Yes
CO2e	Less than 90,000 tpy	23,672 tpy	Yes
VOC	Less than 90 tpy	6.26 tpy	Yes
Individual HAP	Less than 9 tpy	0.38 tpy (highest)	Yes
Aggregate HAPs	Less than 22.5 tpy	0.4 tpy	Yes

9/28/2020 DATE

SUPERVISOR RIL 10/5/20