

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

B153728798

FACILITY: Ralcorp Holdings, Inc.		SRN / ID: B1537
LOCATION: 150 S MCCAMLY, BATTLE CREEK		DISTRICT: Kalamazoo
CITY: BATTLE CREEK		COUNTY: CALHOUN
CONTACT: Keith DeBates, Engineering Manager		ACTIVITY DATE: 03/11/2015
STAFF: Dorothy Bohn	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: unannounced inspection		
RESOLVED COMPLAINTS:		

I arrived at 1:35. Jennifer Vaden was out of the office. Her boss, Keith DeBates, assisted me in the inspection. Keith said that Ty Hakman was no longer at the plant. Michelle Hull, HR Manager joined us for the beginning conference. I gave Keith an inspection brochure. The signs on the plant state Con Agra Foods so I asked Keith if they were Ralston, Ralcorp or ConAgra, or just owned by ConAgra. He said they are owned by ConAgra Foods and are slowly becoming that but is not sure what the legal status is at the moment. Ralcorp has been the holding company and Ralston Foods the legal entity and probably still is. The company recently submitted PTE calculations and went from being a Rule 208a source to a true minor.

Keith and I then went through the plant and viewed the equipment in the permits. Prior to entering the facility I drove around it and did not observe any visible emissions (VEs). Also, while touring the plant we were on various roofs several different times and opacity was not observed from any of the stacks. Keith said that their production is down a lot since 2012.

Boilers: Both boilers are natural gas fired. Boiler 3 was built in 1960 and is 35K #steam/hr and 42MMBtu/hr and originally had both oil & gas capability. It should be grandfathered but MAERs says it is operating under Rule 282(b) and is NSPS Dc subject. It was installed unpermitted in 1961. It was permitted in 1994 under #313-94 and the eval form says it is NSPS. This is the same time they installed/permitted Boiler 4. With the installation of #4 boiler 3 became the backup but it doesn't look like anything else changed and they hadn't been using fuel oil. A few years ago, the PTI for boiler 3 was voided and it is currently operating under Rule 282(b).

Boiler 4 is operating under PTI 314-94. It is subject to NSPS Db. Boiler 3 typically only operates now for about 2 weeks in the summer when they do maintenance on boiler 4. Boiler 4 was operating at the time of the inspection. Jennifer Vaden responded to my email inquiry (attached).about the fuel use for the boilers. NSPS Dc 60.48c(g) (2) requires monthly records of fuel use. She supplied one month – 10/14. While at the inspection I observed daily records that Keith said was from Consumers Energy but we could not tell what equipment the data was for.

1 Building: This is for wheat flakes. There are 7 units included in PTI #163-10A. We looked at each. The requirements for all are VE readings and hours of operation, except EU1bldckrcyclns which has a pressure drop reading instead of VEs and EU1bldflkxfer which had an inspection of the site glass on the cyclone. The Ducon wet scrubber for stage A did not appear to be working. It was at 0. The Ducon wet scrubber for Stage B was showing a 2" pressure drop. This building has 2 coaters but none of the coatings contain VOC – just vitamins and water. The maintenance shop of this building has lathes, grinders, etc. but nothing vents outside so it is exempt per Rule 285(l)(vi).

3 Building: This is for rice & corn biscuit product. Only one unit is in PTI #163-10A. This unit just has the VE monitoring requirement. This building also contains the tempering oven covered by PTI 1051-84. It has an opacity limit of 20% and an emission limit but has never been tested. The tempering oven is uncontrolled.

5 Building: This is the grain elevator for 1 & 3 buildings. Keith said they were done receiving grain for the day. The grain they receive now has already been cleaned so that equipment is not in use and most of it has been removed. There are 4 units included in the PTI – all pertaining to wheat for 1 building. They have requirements for hours of operation and pressure drop readings. Dust collector 4-2-1001 was operating at a pressure drop of 3.0".

11 Building: This equipment is all operating under exemption Rule 290. This building was originally for animal food production but was converted to people food in the 1980's. This equipment is similar to other processes and included cyclones, wet scrubbers and a baghouse for control. There is one coater with a spare so they can be

changed in and out for cleaning. This coater is operating under Rule 290 also. Records for 2014 show a maximum monthly emission of 536 #VOC.

Records: #1 & 5 buildings hours of operation records are calculated as one - the same for both operations. The data submitted for MAERs shows 6008 hours for 2014. The records that we found were complete through 12/13 but the data to do the calculations for 2014 was there and Keith pasted it into the spreadsheet. The results showed a range of about 6000 to 6800 each month for the 12 month rolling total (MRT). The weekly VE observations are being recorded along with the pressure drop monitoring and the site glass observation for all the equipment with that requirement. There are a lot of entries of "down" on the equipment. Jennifer also responded in the attached email that "down" means the equipment was down for the whole reporting period.

Other Buildings: 7 Building has not been used in over 25 years. 9 Building is connected to 3 building and has a wet scrubber for the strawberry dust off the packaging line. 10 Building is the grain storage for building 11. It looks like a small cyclone on the side of it but Keith says that vents back inside to a baghouse and exhausts internally.

Packaging: I observed packaging lines in several buildings. Keith said that they started converting from ink jet printers about 4 years ago and completed that process about 4 months ago. Lasers are used on some cartons and thermo transfer is used on other cartons and cases. Printer ribbon is used on bags. All gluing uses hot melt adhesive.

Cold Cleaners: There is one in 1 building maintenance. The lid was partially closed with a part sitting inside that blocked it from closing all the way. There was a small amount of solvent in the corner that hadn't drained down into the drum. Keith took the part out. The unit was posted. Keith said Safety Kleen services their cold cleaners. It looks like it uses Safety Kleen premium gold solvent. The other unit is in the 11 Building maintenance area. The area was locked. But we could see the Graymills unit. The lid was closed and it was posted by Safety Kleen.

I left the facility at 5pm. Ralston appears to be in compliance.

NAME

Dorothy Bohn

DATE

3/19/15

SUPERVISOR

MA 3/19/2015