

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

B703828841

FACILITY: Continental Dairy Facilities, LLC		SRN / ID: B7038
LOCATION: 999 WEST RANDALL STREET, COOPERSVILLE		DISTRICT: Grand Rapids
CITY: COOPERSVILLE		COUNTY: OTTAWA
CONTACT: Derrick Scheidel, EH&S Supervisor		ACTIVITY DATE: 03/04/2015
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	
SUBJECT: Unannounced, scheduled inspection.		SOURCE CLASS: SM OPT OUT
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility for an unannounced, scheduled inspection and met with Derrick Scheidel, Ron Thompson and Jeff Gailbraith of Continental Dairy Facilities, LLC and Paul Moore of fairlife, LLC. These two companies operate under one SRN as they are considered one stationary source. All were provided with a copy of the DEQ Environmental Inspections: Rights and Responsibilities brochure and its contents were discussed.

FACILITY DESCRIPTION

The stationary source operates under Opt-out Permit to Install (PTI) No. 101-09B which covers the milk dryer and associated handling and packaging equipment in the Continental Dairy Facilities, LLC portion of the facility, as well as the Opt-out conditions for the entire stationary source. PTI No. 88-14 covers the product lines in the fairlife, LLC portion of the plant and covers one product bottling line sanitizing station with wet scrubber control and a dry ingredients blending operation with internally vented baghouse. Approximate total employment at the stationary source is 210 people.

We observed the pressure drop gauges for equipment permitted per 101-09B. EU-STORAGE&FILL was at 2.7" and within appropriate range. EU-TRANSPORT was at ~0.6" which is a little low but verified as normal operation. The pressure drop of EU-DRYER was lower than the range identified in the Malfunction Abatement Plan (MAP), but it was learned that the baghouses had a total bag replacement on February 17th, 2015 and this is normal. Staff suggested to Mr. Scheidel that he modify the MAP to include a variance for this practice. The facility previously stack tested for PM and PM₁₀ at the dryer and was able to demonstrate compliance with the emission limits. No additional testing is currently recommended. The facility monitors the pressure drop of the dryers on a continuous basis.

As we accessed the roof, chunks of dried product were visible. It is believed that this material is released during the clean in place (CIP) emission unit cleaning process that happens monthly. The amount of material had appeared to have accumulated over the winter. Staff mentioned that this is not acceptable, and I asked to be present for the next CIP to observe the origins of this material. Mr. Scheidel agreed to have me back to observe the CIP and it is tentatively scheduled for April 21, 2015.

Mr. Scheidel also maintains the recordkeeping for FGFACILITY, which contains limits on NO_x, CO_{2e}, PM, PM₁₀ and PM_{2.5}. Mr. Scheidel promptly provided the required recordkeeping for FGFACILITY.

Facility limit for NO_x is 75.7 tons per 12-month rolling time period. Current reported emissions are 23.97 tons. The limit for CO_{2e} is 89,965 tons per 12-month rolling time period. Current reported emissions are 23.97 tons. The limit for PM is 29.1 tons per 12-month rolling time period. Current reported emissions are 0.0004 tons. The limit for PM₁₀ is 33.3 tons per 12-month rolling time period. Current reported emissions are 0.002 tons. The limit for PM_{2.5} is 33.3 tons per 12-month rolling time period. Current reported emissions are 0.002 tons. It is recommended that Mr. Scheidel change his recordkeeping format to report emissions in tons vs the current reporting in pounds. The facility may want to do both, as the permit requires reporting in tons, but MAERS requires reporting in pounds. The facility has a limit of 1,492 MMscf per 12-month rolling time period. Current reported gas usage is 398.97 MMscf. It is noted that the two 44.9 MMBtu/hr boilers located in the fairlife, LLC area are still in the process of being installed and are not operating. Right now there is only one gas meter for the stationary source, but it is believed that fairlife, LLC will be installing a separate meter.

We left Mr. Scheidel and Mr. Moore and I continued on to the fairlife, LLC portion of the stationary source. Fairlife, LLC manufactures enhanced liquid milk product and gets all the liquid milk from Continental Dairy Facilities, LLC. The operations are covered under PTI No. 88-14 which is for a dry blending operation with internally vented baghouse and one product bottling line with wet scrubber control.

The emission unit EUDIB covers the dry blending process which is controlled by a cartridge filter and internally vented. It is required to have a MAP, which is not needed for this small operation. During the next permit revision, I will recommend to permit staff that this be modified.

The emission unit EUSANITIZE covers one bottling line that is all automated- there is no human touching the bottles at any point in this line. The line includes a blow mold bottle expansion section which uses infrared heat and air to expand the form. The bottles are sanitized with peroxyacetic acid and those emissions are controlled by a wet scrubber. The emissions associated are acetic acid which is the breakdown of the peroxyacetic acid. This emission unit by definition consists of the entire line, which includes the blow molding as well.

The facility has one line in production and two lines in different states of installation. Mr. Moore did not know the permitting status of these lines. I explained that the permit process is a Permit to Install, which means that a permit should be obtained prior to beginning installation. He stated he would contact the environmental consultant he uses for assistance. During the physical inspection of the scrubber, none of the plant personnel were familiar with how the unit is regulated via the permit and MAP. The operating variables that are required to be monitored were not available. Mr. Moore was able to find the records in the days following the inspection.

Basically, the operation of this scrubber does not match up with the MAP that was written by the consultant and modifications are recommended. These should be submitted by May 1, 2015.

Since the unpermitted lines could be considered exempt and they are not operating yet which means no records are required and the facility has stated they plan to get a permit for them, they are not currently in violation. However, the facility needs to conduct this type of evaluation, before installing various processes in the future.

CONCLUSION

At this time, the facility is considered to be in compliance. Further evaluation and completion of the FCE will take place following observation of the CIP on the milk dryer, and modification of the MAP for the wet scrubber.

NAME



DATE

3-18-15

SUPERVISOR

PAB