

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

B709043303

FACILITY: MICHIGAN MILK PRODUCERS ASSOCIATION		SRN / ID: B7090
LOCATION: 431 W WILLIAMS ST, OVID		DISTRICT: Lansing
CITY: OVID		COUNTY: CLINTON
CONTACT: Gasper Calandrino , Plant Engineer		ACTIVITY DATE: 02/13/2018
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled, semi-unannounced partial compliance evaluation inspection to determine MMPA's compliance with PTI 88-09A		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow (author) and Kelly Richart (AQD Lansing District Office)
Personnel Present: Gasper Calandrino (calandrino@mimilk.com), Manager of Engineering and Maintenance MMPA

Purpose: Conduct a semi-unannounced (24-hour notice), scheduled, partial compliance evaluation (PCE) by determining compliance with Michigan Milk Producers Association's (MMPA) Opt-Out Permit No. 88-09A. This inspection was done as part of a full compliance evaluation (FCE).

Facility Background/Regulatory Overview: MMPA is a co-op, owned by dairy farmers, that produces butter, and condensed and evaporated milk in bulk quantities from excess milk supplies (when the milk bottler shuts down). G. Calandrino said MMPA processes about 5 million pounds of milk per day. During the holidays, such as 4th of July and Christmas, MMPA's production increases because the milk bottlers are shut down.

MMPA is an opt-out facility. According to the permit, MMPA is opting out of major source status for greenhouse gases, NOx and PM.

EUBOILER4 is subject to the NSPS Subpart Dc, Standard of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

The 3 emergency generators (under FGGENERATORS) are subject to the NSPS Subpart IIII.

Inspection: At approximately 8:30 a.m. on February 13, 2018, Kelly Richart and I arrived at MMPA and met with Gasper Calandrino, MMPA's Engineering and Maintenance Manager. I provided G. Calandrino with a January 2017 Permit to Install Exemptions Handbook and explained that new exemptions have been added, in addition to clarifications of old exemptions. I informed him that anytime MMPA plans to modify current equipment or install new equipment, exemptions must be looked into, otherwise a permit to install is necessary. I also provided him with a DEQ Boiler NESHAP outreach brochure to determine applicability of MMPA's boilers with the area source Boiler MACT NESHAP Subpart JJJJJJ. Based on my evaluation of the boilers, they are not subject to Subpart JJJJJJ because they are natural gas boilers. I have recommended to G. Calandrino that MMPA also conduct a separate determination.

G. Calandrino provided K. Richart and I a tour of the facility, including all permitted and exempt equipment. Table 1 contains a summary of all permitted and exempt equipment.

Table 1. Equipment List

EU	Description	Control	PTI/ Exemption	Comments
EUBOILER1	40.18 MM Btu/hr Natural gas-fired Johnson Boiler Co Model S-4301	NA	88-09A	Installed 1978
EUBOILER2	45 MM Btu/hr Natural gas-fired Johnson Boiler Co Model PFTA 1000-4G-50- #D.P.	NA	88-09A	Installed 1988
Boiler 3	46 MM Btu/hr Natural gas-fired Model PFTA 1200-4G-150S	NA	Exempt 282(2) (b)(i)	Installed 2008 Boiler is < 50 MM Btu/hr and used for indirect heating of

				cleaning solutions, water for the heat exchanger (to heat milk)
EUBOILER4	46.28 MM Btu/hr Natural gas-fired Model PFTA 1200-4g-150S	Low NOx Burner	88-09A	Installed 9/2/09
EUMILKDRYER1	"Box Dryer" 20 MM Btu/hr Natural gas-fired Exhausts dry milk to baghouse	Baghouse	88-09A	Installed 1972
EUMILKDRYER2	"Box Dryer" 21 MM Btu/hr Natural gas-fired Exhausts dry milk to baghouse	Baghouse	88-09A	Installed 1981
EUMILKDRYER3	"Tower Dryer" 24 MM Btu/hr Natural gas-fired Exhausts "fines" dry milk particulate	2 cyclones 2 baghouses	88-09A	Installed 9/2/09
EUDRYERHEATER	28.4 MM Btu/hr heater servicing EUMILKDRYER3	NA	88-09A	Installed 9/2/09
EUGENERATOR1	MTU Detroit Diesel 2 MW Emergency Generator	NA	88-09A	Installed 4/12/09
EUGENERATOR2	MTU Detroit Diesel 2 MW Emergency Generator	NA	88-09A	Installed 4/12/09
EUGENERATOR3	MTU Detroit Diesel 2 MW Emergency Generator	NA	88-09A	Installed 4/12/09
Parts Washer	3'x2' open-faced parts washer unit used to clean equipment that comes into contact with milk products	NA	Rule 281(2)(k)	Does not contain any VOC, considered an aqueous-based parts washer (SDS attached to report)
EUVacuum	Vacuum system for milk powder spillage in packaging room.	Indoor baghouse	Rule 281(2)(a)	Used to exhaust to outside air, not vented into warehouse with filter bags
Diesel Fuel Storage	3,000 gallon container used to store diesel for EUGENERATORS1-3	NA	Rule 284(2)(d)	
Anhydrous Ammonia Cooling System	Refrigeration system for milk and milk products	NA	Rule 280(2)(a)	Closed-loop system containing 2,200 lbs anhydrous ammonia. No NH3 storage tanks onsite

EUBOILER4 & FGBOILERS (EUBOILERS1 and 2)

The boiler room houses EUBOILER1, 2 and 4 and boiler 3 (boiler 3 being exempt because it is rated at less than 50 MMBTU/hr). G Calandrino explained that the boilers are used to for indirect heating purposes, including heating of the equipment cleaning solutions and heating water for the heat exchanger which serves the milk processing units. He also said that there are typically 2 boilers operating at a time: 1 as the lead, 1 in hot standby (fires as needed to maintain a minimum

standby pressure and temperature), and 1 as the lag (firing, but lower operating psi than the lead). He said operating 3 boilers at one time would create too much pressure in the system, causing an overload and automatic shutdown of the boilers. Table 2 contains the flow rate and hours of operation during the inspection.

Table 2. Boiler Operating Parameters

Unit	Operating Status (during inspection)	Natural Gas Flow rate (scfh)	Hours of Operation (for 2/12/18)	Hours of Operation (for 2/13/18)
EUBOILER1	Off	0	2	0
EUBOILER2	Operating	15,327	24	5.54
EUBOILER3	Operating	15,509	24	5.49
EUBOILER4	Down for annual maintenance	0	0	0

Emission Limits

EUBOILER4 is limited to 1.6 lb/hr of NO_x, although this emission rate is only required to be verified upon request by the AQD. At this time it is my professional judgment that a stack test on EUBOILER4 is unnecessary. There are no Emission Limits for FGBOILERS.

Material Limits

EUBOILER 1, 2 and 4 are all required to burn only natural gas. G. Calandrino verified for me that all 3 boilers only burn natural gas.

Process/Operational Restrictions

MMPA is required to have a malfunction abatement plan (MAP) that is implemented and maintained for EUBOILER4 (EUBOILER1 and 2 do not require an MAP).

After review of MMPA's original MAP created for compliance with PTI 88-09A, I recommended to G. Calandrino that he update the MAP by including identification of the major replacement parts that are maintained in inventory for quick replacement; identification of the unit and Low NO_x burner operating variables that are monitored to detect a malfunction or failure, and the normal operating ranges for these variables; and specifying which inspections are being conduct and the frequency for each inspection.

G. Calandrino provided an updated MAP (March 2018 version, attached), which now includes a description of the operations of the boiler that staff will observe daily to ensure the boilers are operating in a satisfactory manner, in addition to state-required CSD-1 maintenance. The MAP currently meets all 3 of the following criteria:

- Supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspection or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
- An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
- A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

Design/Equipment Parameters

EUBOILER4 and FGBOILERS do not have any Design/Equipment Parameter requirements at this time.

Testing/Sampling

EUBOILER4 and FGBOILERS do not have any Testing/Sampling requirements at this time.

Monitoring/Recordkeeping

MMPA is required to monitor and record the monthly fuel use (natural gas) for EUBOILER4. Fuel usage rates are required to be recorded per the NSPS Subpart Dc. G. Calandrino provided me with the "Usage and Operating Hours Tracking" spreadsheet that contains fuel usage and operating hours for all permitted processes (see attached). Monthly natural gas usage rates for EUBOILER4 are recorded on a monthly basis. The highest usage rate within the 2016 and 2017 calendar years was 12.9 mmcf in May 2016. In addition to meeting the NSPS requirement, records for fuel use are also required to be recorded in order to calculate NO_x emissions from the unit as a compliance check with FGFACILITY requirements.

There is also a requirement that MMPA monitor emissions, operating information, and keep records for EUBOILER4 in accordance with NSPS Subparts A and Dc. Although MMPA meets the definition of "affected facility" in Subpart Dc, it appears the standards within the subpart refer only to boilers which burn coal or mixtures of coal with other fuels. As far as I understand, the only applicable requirement from this subpart is to maintain records of the amount of each fuel (natural gas)

combusted during each calendar month, which MMPA is doing for all boilers. MMPA is in compliance with the Monitoring and Recordkeeping requirements for EUBOILER4.

There are no Monitoring/Recordkeeping requirements for FGBOILERS at this time.

Reporting

EUBOILER4 and FGBOILERS do not have any Reporting requirements at this time.

EUMILKDRYER3 ("Tower Dryer")

The tower dryer dries milk and exhausts particulate to two cyclone collectors with 2 associated baghouses. Condensed milk (50% solids/50% water) is sprayed into the dryer, which is kept at 375°F. Particulate moves from the dryers into the cyclones. Ninety-five percent of the particulate is captured in MMPA's "vibro-fluid bed" (which helps dry the milk further before sending it to storage). From there, 5% of the remaining particulate is captured in the cyclones and the remaining fines (<1%) are captured in the baghouses.

Emission Limits

Visible emissions from the dryer are restricted to 10% opacity per 6-minute average. I saw no signs of opacity during the inspection coming out of any stacks pre- and during inspection.

MMPA is also limited to 0.0156 lb total PM/1000 lb gas and 5.6 lb PM₁₀ per hour. Testing to ensure these rates are being met are only required if requested by the AQD. At this time it is my professional judgment that a stack test to verify these rates is not necessary.

Material Limits

There are currently no Material Limits for EUMILKDRYER3.

Process/Operational Restrictions

MMPA is required to have a malfunction abatement plan (MAP) that is implemented and maintained.

After review of MMPA's original MAP created for compliance with PTI 88-09A, I recommended to G. Calandrino that he update the MAP by including identification of the major replacement parts that are maintained in inventory for quick replacement, including for the 2 baghouses and 2 cyclones; and identification of the dryer, baghouse, and cyclone operating variables that are monitored to detect a malfunction or failure and the normal operating range for each of these variables.

G. Calandrino provided an updated MAP (February 2018 version, attached), which now includes the operating range for the pressure drop on each baghouse, and the inclusion of spare parts kept in inventory. The MAP currently meets all 3 of the following criteria:

- Supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspection or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
- An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
- A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

Design/Equipment Parameters

MMPA is required to maintain and operate the 2 cyclones and 2 baghouses in a satisfactory manner. G. Calandrino explained the following:

"The pressure drops on the Bag Houses normally run between 3 and 5 inches of H₂O column (WC). A drop in pressure, obviously, would indicate that a leak was developing. A differential pressure of 2 WC would trigger alarm. We have not experienced a drop in pressure, because we schedule sock/filter change outs once a year; usually in the month of November or early December. Our first runs with the dryer indicated that filters could be expected to last a minimum of 18 months. Because the filter change-out typically takes 3 - 4 days, we decided to make the changes at 12-month intervals. This puts the needed downtime at a time of the year when we are typically drying less product and avoids any worry of filter degradation. Beyond this, the stack is visually checked each day for any signs of particulate emission."

Table 3 provides the pressure drop data on each of the baghouses and cyclones recorded during the inspection. The pressure drop on the baghouses was recorded on the equipment. The pressure drop on the cyclones was recorded from G. Calandrino's electronic continuous readout monitoring system in his office (computer program). G. Calandrino said that the cyclones do not have operating ranges. He

explained that the pressure drop is consistent run to run because there are no filter socks or other internal elements of the cyclone systems that wear. Any pressure build-up would be a result of the rotary valve near the bottom of each unit being plugged. In these instances, he said an alarm is generated, in which case a downtime event must be scheduled and the plugged areas of the system cleaned out. The cyclones do not vent to the outside air.

The appropriate operating ranges on the 2 baghouses are 2 – 8 " H₂O. G. Calandrino explained that the reason why Baghouse 1 had a pressure drop of 8.5 " H₂O during the inspection is because the units had just turned online and the powder on the socks had not yet been pulsed down.

Table 3. Recorded Pressure Differential Data

	Baghouse 1	Baghouse 2	Cyclone 1	Cyclone 2
Pressure Drop ("H ₂ O)	8.5	6.2	11.5	11.7
Operating Range ("H ₂ O)	2 - 8	2 - 8	NA	NA

Testing/Sampling

There are currently no Testing/Sampling requirements for EUMILKDRYER3.

Monitoring/Recordkeeping

MMPA is required to continuously monitor and keep a daily record of the pressure drop for the 2 baghouses. G. Calandrino provided me with the daily record sheets for 1/1/2018 – 1/31/2018. Attached are the first 10 days of pressure drop readings. The pressure drop is recorded every 2 hours, rather than the minimum requirement of once daily. I reviewed the records for January 2018, and the typical operating range for each booth was 2.2 – 3.7 " H₂O; there were no instances recorded where the baghouse was operating outside of the 2 – 8 " H₂O normal operating range, which is indicative of proper operation of the baghouse.

Additionally, MMPA's updated MAP for EUMILKDRYER (2/2018 update, attached) includes the requirement to perform daily visible emission readings and a record of observations from the exhaust stack. By conducting visible emission readings MMPA is providing another avenue for ensuring that the baghouses are operating properly. Attached is a copy of the "Daily Utility Log" where VE's for all boilers, FGMILKDRYERS, and EUMILKDRYER are recorded.

Reporting

There are currently no Reporting requirements for EUMILKDRYER3.

VIII. Stack/Vent Restrictions

The permit requires that the stack discharge exhaust gases unobstructed vertically upwards. R. Shaw said that the stack has double doors that close when the dryer isn't running to keep animals and water out. Otherwise, the doors are open to allow for unobstruction. MMPA is in compliance with this condition.

EUDRYERHEATER

EUDRYERHEATER is a non-contact dryer/heat exchanger that is fired by natural gas. The heat produced in this unit is sent through a heat exchanger; filtered outside air is heated through contact with the heat exchanger to be used for the milk-drying process in EUMILKDRYER3. This air stream dries the milk and then exhausts from the stack associated with EUMILKDRYER3. Natural gas usage from EUDRYERHEATER is reported for FGFACILITY.

Emissions Limits

EUDRYERHEATER is limited to 2.1 lb/hr of NO_x, although this emission rate is only required to be verified upon request by the AQD. It is my professional judgment that a stack test on EUDRYERHEATER is unnecessary at this time.

Material Limits

The permit requires that EUDRYERHEATER only be fired by natural gas. This unit is only natural gas-fired.

There are currently no Process/Operational Restrictions, Design/Equipment Parameters, Testing/Sampling, Monitoring/Recordkeeping, or Reporting requirements for EUDRYERHEATER.

FGMILKDRYERS (EUMILKDRYER1 and 2)

MMPA refers to EUMILKDRYER1 and 2 as the "box dryers." These units were not operating during the inspection and G. Calandrino said these are not used as much as the tower dryer. G. Calandrino said it takes approximately 1 hour to heat the dryers up to temperature before being operational. You must wear required MMPA hairnets and overcoat to inspect these pieces of equipment. The shaker arms (MMPA refers to this as the "spider compartment") shake the milk particulate to the floor of the baghouse (the floor of the baghouse is a large chamber that collects the particulate) where personnel will sweep up and remove whatever is collected. From the chamber, the exhaust air exits the facility through a stack.

Emission Limits

EUMILKDRYER1 and EUMILKDRYER2 are each limited to 0.02 lb PM/1000 lb gas (on a dry gas basis), although this emission rate is only required to be verified upon request by the AQD. At this time, it is my professional judgment that a stack test from either of these units is unnecessary.

Opacity from FGMLKDRYERS is limited to 10% during a 6-minute average. I saw no signs of opacity while onsite, therefore MMPA is in compliance with this condition.

Material Limits

There are currently no Material Limits for FGMLKDRYERS.

Process/Operational Restrictions

MMPA is required to have a malfunction abatement plan (MAP) that is implemented and maintained.

After review of MMPA's original MAP created for compliance with PT1 88-09A, I recommended to G. Calandrino that he update the MAP by including Identification of the major replacement parts that are maintained in inventory for quick replacement, including for the baghouse; and identification of the dryer and baghouse operating variables that are monitored to detect a malfunction or failure, and the normal operating range for each of these variables.

G. Calandrino provided an updated MAP (February 2018 version, attached), which now includes the operating range for the pressure drop on each baghouse, and the inclusion of spare parts kept in inventory. The MAP currently meets all 3 of the following criteria:

1. Supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspection or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.

An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.

A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

Design/Equipment Parameters

Fabric filters are required to be installed, maintained and operated in a satisfactory manner. There are 10 chambers per dryer. If MMPA staff notice particulate in the shaker arms, they know they have a problem with the system. They check the shaker arms before every start up. Additionally, if pressure drops greater than -3 inHg or if vacuum loss is greater than 3inHg, an alarm will sound

Although not required by the permit, but specified in the FGMLKDRYERS MAP, MMPA keeps daily box dryer inspection logs, this includes Daily Air Emissions Observations, where the baghouse pressure drop data is recorded, the most recent shaker arms (spider) inspection, and recorded observations of the condition of the spider and bags in the baghouse.

There are currently no Testing/Sampling, Monitoring/Recordkeeping, or Reporting requirements for FGMLKDRYERS.

FGGENERATORS (EUGENERATOR1, 2, 3)

These units are "exercised" for approximately 15 minutes every Tuesday and are only used as backup emergency generators. They are powered on diesel fuel and subject to the NSPS Subpart IIII.

Emissions Limits

Each of the generators in the flexible group have limits of NOx, CO, PM and HC emissions under the NSPS Subpart IIII. These emission limits only apply if the certified engines are operated or maintained in an uncertified manner.

Material Limits

The generators are only allowed to burn diesel fuel and the diesel fuel sulfur content can be no more than 0.0015 percent by weight. These engines are only fired on Detroit diesel fuel. During the previous inspection, G. Calandrino provided me with documentation from the fuel oil supplier indicating that the fuel is ultra-low sulfur diesel fuel, rated at 15 ppm. G. Calandrino said that of the 3000-gallon diesel tank they have onsite, they've only used half of the tank in the past 2 years.

Process/Operational Restrictions, Design/Equipment Parameters & Monitoring/Recordkeeping

MMPA is required to operate the engines according to manufacturer's instructions. G. Calandrino provided me with the MTU Detroit Diesel specifications sheets (attached) which states that the engines (all are the same family/model) are EPA Tier 2 Certified. I have requested a copy of the operations and maintenance manual for the engines to ensure that the maintenance activities noted in the maintenance records G. Calandrino provided me are in-line with what is required by the manufacturer. This review will determine if the engines have been maintained in a certified manner. I will provide a separate activity report for this determination.

The engines in FGGENERATORS are not to exceed 2 MW per generator. R. Shaw, during a previous inspection, said each engine is 12 cylinders, 4000 HP, and 2 MW. MMPA is only allowed to install 2 MW engines and is therefore in compliance with this condition.

The permit also requires that the maximum operating time for each generator not exceed 500 hours per 12-month rolling period per engine and that MMPA keep record of the hours on a 12-month rolling time period. According to MMPA's "Usage and Operating Hours Tracking", MMPA has kept operating hours for each engine on a monthly basis. Table 4 contains the 12-month rolling operating hours for each engine from January – December 2017. Operations for this 12-month rolling period have been kept below the 500-hour limit.

The generators are required to be equipped with non-resettable hours meters. We looked at all non-resettable hours meters to record total operating hours (Table 4), and verified that they are non-resettable.

Table 4. Engine Operating Hours

Engine	12-month Rolling Hours (January – December 2017)	Total hours of operation (2/2018)	Total hours of operation (8/2014)
1	20	241	194
2	20	213	132
3	20	278	157

Testing/Sampling

There are currently no Testing/Sampling requirements for FGGENERATORS.

Monitoring/Recordkeeping

MMPA is required to keep 12-month rolling records of fuel usage for each engine. The "Usage and Operating Hours Tracking" tracks fuel usage on a monthly basis as well. The 12-month rolling fuel usages (January – December 2017) for each engine are as follows:

- EUGENERATOR1: 470 gallons diesel
- EUGENERATOR2: 165 gallons diesel
- EUGENERATOR3: 370 gallons diesel

Reporting

There are currently no Reporting requirements for FGGENERATORS.

FGFACILITY

FGFACILITY takes into account all emissions sources and restricts PM, NO_x and Greenhouse Gas emissions.

Emission Limits & Monitoring/Recordkeeping

On a 12-month rolling basis, MMPA is limited to 89 tpy PM, 89 tpy NO_x, and 89,900 tpy CO_{2e} Greenhouse Gas Emissions.

G. Calandrino records the PM, NO_x, and GHG monthly emissions, which are converted to 12-month rolling totals on "Permit Compliance Summary Worksheet" (attached). I asked for records from January 2017 – December 2017. Table 5 shows actual emissions for each pollutant with associated limits.

Table 5.

Pollutant	12-month Rolling Emissions (tpy)	Limit (tpy)
NO _x	24	89
PM	39	89
CO _{2e}	34,876	89,900

Material Limits & Monitoring/Recordkeeping

MMPA is restricted to 1,423 MMCF of natural gas per 12-month rolling time period and they are required to record the natural gas usage rates for each emission unit and flexible group in FGFACILITY on a monthly basis. G. Calandrino records the natural gas usage on the "Usage and Operating Hours Tracking" spreadsheet. The rolling total for 12 months for all combined emission units' (EUBOILER1, EUBOILER2, EUBOILER3, EUBOILER4, EUMILKDRYER1, EUMILKDRYER2, EUDRYERHEATER [which encompasses EUMILKDRYER3 natural gas usage]) natural gas usage is 578 MMCF. (see attached spreadsheet)

Process/Operational Restrictions

There are currently no Process/Operational Restrictions for FGFACILITY.

Design/Equipment Parameters

There are currently no Design/Equipment Parameters for FGFACILITY.

Testing/Sampling

There are currently no Testing/Sampling requirements for FGFACILITY.

Monitoring/Recordkeeping

MMPA is required to keep a current listing of the chemical compositions of all cleaning solutions used including the weight percent of each component. G. Calandrino said they use 3 different cleaners (2% NaOH solution for caustic wash; 2% Nitric acid solution for the acid wash; and peracetic acid as a sanitizer) to clean the 3 dryers (SDS were provided during the previous inspection and haven't changed). These cleaners contain no HAPs or VOCs. G. Calandrino said bacteria builds up in these units and so they are cleaned in place every 24 hours with these solutions.

There are currently no Reporting or Stack/Vent Restrictions for FGFACILITY at this time.

Inspector's Safety and Health: You will be required to wear a hairnet and disposable "overcoat" if you want to view the FGMILKDRYERS, EUMILKDRYER3, or EUDRYERHEATER. You will also be required to sanitize your boots at their sanitary spray station and wash your hands. Hard hats, safety glasses and hearing protection are essential in most places of the plant.

Compliance statement: MMPA is in compliance with PTI 88-09A pending the determination that the 3 emergency engines are being maintained according to manufacturer's specifications.

NAME Michael Lopez

DATE 3/9/18

SUPERVISOR B-M