

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

E484244572

FACILITY: Kent Quality Foods, Inc.		SRN / ID: E4842
LOCATION: 703 Leonard Street NW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Greg Jaroch , Engineering Manager		ACTIVITY DATE: 06/01/2018
STAFF: Adam Shaffer	COMPLIANCE STATUS: Non Compliance	
SUBJECT: Scheduled, unannounced inspection.		SOURCE CLASS: Minor
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the facility at 9:01 am on June 1, 2018 to complete a scheduled unannounced inspection. The weather conditions were partly cloudy, winds from the north/northwest at 0-5mph, and low 70's°F.

Facility Description

Kent Provisions Company, now Kent Quality Foods, Inc. (KQF) is a food processing company of hot dogs / sausage products. The company has two active permits which are permit to install (PTI) No. 146-74, that is for a smokehouse afterburner control system, and PTI No. 683-79, which is for a C-120-AR afterburner on an existing meat smoke house. The equipment for PTI No. 146-74 has been removed from the site; however, the equipment for PTI No. 683-79 is still active on site. Based on this, the PTI No. 146-74 will be voided. The company operates 24 hours a day, seven days a week.

Compliance Evaluation

Prior to entering the facility, offsite odors and visible emissions observations were conducted. Steam was observed coming from one stack on site. No additional visible emissions were identified, and no significant odors were noted. Upon entering the facility, AQD staff AS met with Mr. Greg Jaroch, Engineering Manager, for KQF. Mr. Jaroch provided a tour of the facility, answered site specific questions and provided requested data. The onsite processes are split into two sections which are the raw meat area and the cooked meat area. In the raw meat area, meat is brought on site and goes through various grinding and mixing processes before being sent to the ovens where it is cooked/smoked. Once the meat is cooked/smoked it goes through several additional processes such as quality checking and removal of casings from products before being packaged and shipped off site for consumption.

PTI No. 683-79

This permit is for the C-120-AR afterburner and what appears to be two meat smoke houses. On site operations currently consist of ten 1.5 MMBTU/hr ovens which are used for cooking/smoking meat products and were installed between 1985 and 2016. Since the date of installation is several years following the issuance of PTI No. 683-79, it was concluded that the ovens on site are not included in the mentioned permit. After further review, operation of the ten ovens observed was concluded to be a Rule 201 violation. A violation notice (VN) will be issued. Additionally, since the ovens that were included in PTI No. 683-79 are no longer on site, the permit should be voided.

The current cooking/smoking process that KQFs does for meat products was observed and discussed. Several of the ovens are used for smoking the meats during production. During operation and when products are smoked with wood chips, emissions are bypassed to the afterburner. It was verified by KQF staff that all emissions from the wood chip smoking are bypassed to the afterburner. The afterburner was observed during the inspection; however, it was not in operation. A temperature display and control system showing the afterburner temperature and setpoint were observed during the site inspection. The setpoint for the afterburner is 1,200°F. The control system was installed in 2003. When questioned on the startup process, it was stated by KQF staff that the afterburner is brought up to 1,200°F and then the smoking process is begun with emissions bypassed to the afterburner. No visible emissions were noted from the afterburner stack prior to and upon leaving the facility. No recent odor complaints have been received from surrounding properties regarding KQF.

Additional Observations

- Two emergency generators were observed during the site inspection that were both approximately 5.08

MMBTU/hr in size. The generators were installed on August 9, 2016 and started operation on August 26, 2016. Each generator has a 1,500-gallon diesel fuel tank. The sulfur content of the diesel fuel is 15 parts per million or less. The diesel tanks appear to be exempt per Rule 284(2)(d). The two generators appear to be exempt per Rule 285(2)(g). The emergency generators are potentially subject to 40 CFR Part 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants (HAPs) for Stationary Reciprocating Internal Combustion Engines. Since KQF is an area source of HAPs, this standard applies. However, the MDEQ AQD has not been delegated enforcement of this standard by the EPA. Additionally, the two emergency generators are subject to 40 CFR Part 60 Subpart IIII – New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines. The company is utilizing ultra-low sulfur diesel fuel which meets the specifications identified in 40 CFR 60.4202. A Certificate of Conformity was requested and provided for the emergency generators. The certificate verified that both emergency generators meet the applicable emission limits per NSPS Subpart IIII. Both generators are equipped with a running hourly gauge. The west generator hourly running gauge read 70.9 hours and the east generator was 66.1 hours at the time of the inspection. KQF staff stated that they run each generator 15 minutes a week for testing. Per NSPS Subpart IIII rules, emergency generators can be run up to 50 hours per year for operations such as maintenance, testing and non-emergency situations. Based on the total hours run for each generator since initial startup, this appears to be acceptable. KQF's appears to be in compliance with 40 CFR Part 60 Subpart IIII regulations.

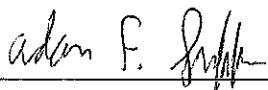
- A vat wash machine was observed and is vented externally. A request was made for Safety Data Sheets (SDS) of cleaning materials used and was provided. Additionally, an email from the supplier was provided stating that both products contained no volatile organic compounds (VOCs). Based on this, the vat wash machine appears to be exempt per Rule 281(2)(e).
- A parts washer was observed in a maintenance area. The surface area of the parts washer was less than 10 square feet; however, no lid was observed. KQF staff stated the cleaner used contains no VOCs. An SDS was requested and the material used was concluded to have a 12.7 % VOC content. The material is not heated during operation. Based on the observations made, the parts washer meets the definition of a cold cleaner per Rule 103(aa). The parts washer appears to be exempt per Rule 281(2)(h). The parts washer was installed after July 1, 1979 and is subject to MDEQ Part 7 Air Pollution Control Rules, Emission Limitations and Prohibitions – New Sources of Volatile Organic Compound Emissions, specifically Rule 707 for new cold cleaners. The vapor pressure of the material used is approximately 0.33 psia; therefore, a mechanically assisted cover is required for the parts washer. AQD staff AS discussed with KQF staff proper operations of new cold cleaners, such as having a mechanically assisted cover for the parts washer. On July 26, 2018, KQFs provided verification of the installation of a cover for the parts washer to AQD staff AS.
- One natural gas boiler was observed that was installed on 07/30/1968 and is 6.275 MMBTU/hr in size. The boiler appears to be exempt per Rule 282(2)(b)(i). Based on the size and date of installation of the boiler it is not subject to NSPS.
- The rooftop was observed during the course of the inspection. Stacks for the ovens and afterburner were observed.

Conclusion

A final discussion was held between AQD staff AS and Mr. Jaroch. Based on the facility walkthrough, observations made, and records received, KQF is not in compliance with applicable air quality rules. A VN will be sent for the following violation.

- KQFs is in operation with ten 1.5 MMBTU/hr ovens that are used for cooking/smoking meat products. The ovens were concluded to not be operating with a permit; therefore, this is a Rule 201 violation.

NAME



DATE

08/15/18

SUPERVISOR

