

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

N819244077

FACILITY: Request Foods, Inc.		SRN / ID: N8192
LOCATION: 3460 JOHN F DONNELLY DR, HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT: Mark Zink , Manager of People Services		ACTIVITY DATE: 03/15/2018
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2018		
RESOLVED COMPLAINTS:		

### Background

Request Foods (Request) SRN: N8192 is a food manufacturing facility that specializes in manufacturing frozen prepared foods. The production facility is located at 3460 John F Donnelly Drive, Holland, Michigan. Request is located in a light industrial area with the nearest residential structure approximately 1500 feet south of the facility. The facility was inspected on 3/15/2018 by Tyler Salamasick, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division. The intent of the inspection was to determine the facility's compliance with the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; PTI 186-09 and PTI No. 98-16. PTI 186-09 permits and limits an associated waste water pretreatment system with an associated carbon adsorption system.

The facility recently obtained PTI No. 98-16 for four 2763 HP (1990 kW) natural gas fired reciprocating internal combustion engines. The facility has not installed the engines and has been given an extension by the MDEQ AQD beyond the standard 18 months to install the equipment. Once the engines are installed the facility will be a major source of air contaminants. Request will need to apply for a Title V permit and incorporate its existing permits into a renewable operating permit (ROP).

### Inspection

Site arrival was at approximately 9:45 am on 3/15/18. Upon meeting, I presented my State of Michigan identification card, informed the facility representative of the intent of my inspection and was permitted onto the site. I met with Mark Zink, the Director of People Services, Pete Sheffield, Director of Facility, Mike Hintz PSM Coordinator and Paul Lucas, Manager of Maintenance. I discussed the facility's processes and background with the representatives and Mike showed me the facility.

Request Foods produces frozen entrees. The facility uses three Cleaver Brooks Boilers generate steam which are used in the food production. I observed one of the boiler plates that indicated the boiler was a 2002 20.4 MMBtu natural gas fired boiler. The facility's records indicate that the other 21 MMBtu boilers were installed in 1995 and 2009. The boilers are subject to the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units 40 CFR Part 60 Subpart Dc. The facility has already provided the required notices for the boilers as indicated in the previous inspection report. The facility has three mechanics who perform preventative maintenance and conduct regular inspections. Mike also indicated that they have the boilers tuned regularly. The boilers appear to be exempt from Rule 201 pursuant to Rule 282(2)(b)(i) which in part states...

### **R 336.1282 Permit to install exemptions; furnaces, ovens, and heaters.**

Rule 282. (1) This rule does not apply if prohibited by R 336.1278 and unless the requirements of R 336.1278a have been met.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following: ...  
... (b) Fuel-burning equipment which is used for space heating, service water heating, electric power generation, oil and gas production or processing, or indirect heating and which burns only the following fuels: (i) Sweet natural gas, synthetic natural gas, liquefied petroleum gas, or a combination thereof and the equipment has a rated heat input capacity of not more than 50,000,000 Btu per hour....

The different entrees are produced on 7 different production lines. The lines can be modified to produce different products, depending on customer specifications. Once the product is complete it is frozen and packed for shipping. The facility utilizes a 140,000lb anhydrous ammonia refrigeration system to cool the product after it is finished. The refrigeration equipment was previously exempt per Rule 280.

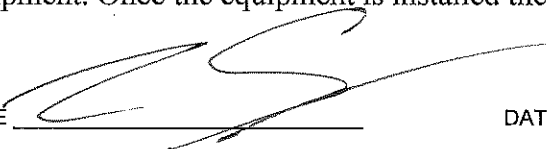
After observing the processes, we went to the waste water pretreatment facility located near-by at 3845 John F Donnelly Drive. The facility is permitted under PTI No. 186-09. The treatment facility (EU-WWPTS) is equipped with a Duall single bed odor control system. Waste water staff informed me that the pretreatment facility does not normally have odors and that they only use the carbon system if odors occur.

The permit requires that EU-WWPTS is operated and maintained per an approvable operating and maintenance plan in a manner that ensures the odor control equipment is operated in a satisfactory manner. I did not observe any strong odors while I was on site and it appear that the facility was operating the plant correctly relative to odors.

#### Conclusion

It appears that Request Foods is in compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, Michigan's Air Pollution Control Rules and PTI No. 186-09. Request has not installed the equipment permitted by PTI No. 98-16. The facility was provided an extension on the deadline to install the equipment. Once the equipment is installed the facility will be subject to the Title V program.

NAME



DATE

5/7/18

SUPERVISOR

