

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

N819255070

<b>FACILITY:</b> Request Foods, Inc.		<b>SRN / ID:</b> N8192
<b>LOCATION:</b> 3460 JOHN F DONNELLY DR, HOLLAND		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> HOLLAND		<b>COUNTY:</b> OTTAWA
<b>CONTACT:</b> Mike Hintz , Maintenance Team Leader		<b>ACTIVITY DATE:</b> 08/12/2020
<b>STAFF:</b> Scott Evans	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Announced, Scheduled air quality compliance inspection.		
<b>RESOLVED COMPLAINTS:</b>		

**Introduction**

On Wednesday, August 12, 2020, AQD staff Scott Evans (SE) conducted an air quality inspection of the Request Foods Inc. facility located at 3460 John F. Donnelly Dr. in Holland, MI. This facility is a food production facility that makes various food products including pasta and frozen entre meals. The facility utilizes electric ovens for production as well as boilers and oil-boilers. The facility also has a waste-water pre-treatment system with a carbon adsorption system to control odors. The facility is currently subject to two Permits to Install (PTI): PTI No. 186-09 and PTI No. 98-16.

While approaching the facility, there were no visible emissions coming from the facility and there were no noticeable odors around the perimeter of the facility. Upon arrival, SE was greeted by Maintenance Team Leader Mike Hintz (MH). Immediately after entering the facility a basic health screening was conducted and proper PPE was equipped in order to comply with safety measures in place during the COVID-19 pandemic. A walking inspection of the facility was conducted, which included visits to the three buildings associated with the facility: two food production buildings and one building that houses the wastewater pre-treatment system.

**PTI No. 186-09**

This PTI covers only one Emission Unit (EU-WWPTS). This Emission Unit is the carbon bed adsorption system that was installed to manage odors coming from the wastewater Pre-Treatment System. There are no emission limits in place and the only applicable requirement for the unit is for facility staff to keep records of maintenance procedures performed on the system. At the time of inspection, the system was operational and there had been no recent maintenance operations required for proper function.

After inspecting the system and reviewing the permit, it is the opinion of SE that this permit may no longer be necessary for this facility. After reviewing the facility file, it appears that the permit was required due to historic air permitting rules that are no longer in place. It appears that current PTI rule exemptions may apply that would warrant voiding this permit. Further discussions will be held with the facility to determine if the equipment meets exemption requirements and, if so, whether the facility wishes to request that the permit be voided.

**PTI No. 98-16**

This PTI was approved in anticipation of the installation of a co-gen unit at the facility that would include four RICE units and would likely cause the facility to reach emission levels that would trigger Title V permitting requirements. After the permit was initially approved, the facility requested an extension on the window of time for the equipment to be installed. This resulted in the facility having 36 months to install the equipment after September 29, 2016. During this time, prior to installation of any equipment, the plans to install the unit were abandoned. As such, as of the date of this inspection, no equipment associated with this PTI has been installed and there are no plans to install any of it.

This permit has expired and should be voided. As of September 29, 2019, (36 months after the approval of the permit) no equipment has been installed, meaning that the installation timeframe as established by the approval of this permit has been exceeded.

**Exempt and Other Items**

Located at the facility are five steam-producing boilers: three in one food production building and two in the other food production building. All are exempt from air permitting rules under Rule 282(2)(b)(i). The specifications of each boiler are as follows:

- Installed in 1995 with a maximum heat input of 21 MMBtu.
- Installed in 2002 with a maximum heat input of 20.4 MMBtu.
- Installed in 2009 with a maximum heat input of 20.4 MMBtu.
- Installed in 2010 with a maximum heat input of 20.4 MMBtu.

- Installed in 2014 with a maximum heat input of 20.4 MMBtu.

These boilers are all subject to New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart Dc. Records suggest that the facility had notified the department of the installation of these boilers as is required for compliance with this NSPS. These boilers are not subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 60 Subpart JJJJJ since the boilers at this area source all operate on natural gas.

The Facility has five emergency generators: Two in each food production building and one with at the wastewater pre-treatment building. All generators are exempt from air permitting requirements under Rule 285(2) (g). The specification of the generators are as follows:

- Installed in 2002 with <1 mmBtu capacity.
- Installed in 2011 with <1 mmBtu capacity.
- Installed in 2011 with <1 mmBtu capacity.
- Installed in 2013 with <1 mmBtu capacity.
- Installed in 2017 with <1 mmBtu capacity.

Four of these generators are subject to NSPS 40 CFR Part 60 Subpart JJJJ (the generator installed in 2002 is not subject). All generators appear to be compliant as all are run weekly for operational maintenance as required by the associated maintenance plans but are run for ~10 hours per year in total for this maintenance. There was no use beyond this stated use for testing and maintenance. Four of these generators are subject to NESHAP 40 CFR Part 60 Subpart ZZZZ (the generator installed in 2002 is not subject). All generators are compliant as is demonstrated by compliance with NSPS 40 CFR Part 60 Subpart JJJJ.

### Conclusions

As discussed above, the facility appears to be in compliance with air quality regulations and PTI No. 186-09. PTI No. 98-16 will be voided.

NAME Scott Evans

DATE 9/15/2020

SUPERVISOR AH