

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N827057558

FACILITY: HEARTHSTONE FOOD SOLUTIONS		SRN / ID: N8270
LOCATION: 2455 OAK INDUSTRIAL DR, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Heather Lebeau , Employee & Community Relations Manager		ACTIVITY DATE: 02/19/2021
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On-Site compliance inspection to assess compliance with PTI No. 126-09A and all other applicable air quality regulations.		
RESOLVED COMPLAINTS:		

Introduction

On Friday, February 19, 2021, an on-site air quality inspection of Hearthstone Food Solutions facility located at 2455 Oak Industrial Dr. in Grand Rapids, MI, was conducted by Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) staff member Scott Evans (SE) to assess compliance with Permit to Install (PTI) No. 126-09A and all other applicable air quality regulations. This was an announced inspection due to the ongoing COVID-19 and the necessity for coordinated preparation to ensure the safety of all EGLE and facility employees.

This Hearthstone Food Solutions facility is a food production facility that produces, and packages baked snack items such as chips, popcorn, and trail mixes. This facility also receives already made snack products and packages them for distribution. For food production the facility utilizes five oven lines, a chip dryer, two fryers, a popcorn popper, and a caustic cooker. For packaging the facility utilizes multiple pieces of mixing equipment, and printing and packaging lines.

The facility has only one Opt-out PTI (PTI No. 126-09A) which was initially issued in 2009 as PTI No. 126-09 and then modified in 2010 and issued as PTI 126-09A. This modification was requested and approved to include site-specific emission factors based on testing results from testing initiated by the facility (not requested by the AQD). The permit limits source-wide Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) emissions to opt the facility out of Title V permitting. Resulting from the last inspection conducted in 2018, a Violation Notice (VN) was issued to the facility regarding particulate matter (PM) and waste-oil accumulation on the roof. These issues were resolved and verified by AQD staff in 2019.

Evaluation

On the day of the inspection, SE arrived at the facility after conducting perimeter evaluations of the facility. During the perimeter evaluation there were no signs of visible emissions and only faint odors of baked goods were present. Before entering the facility, SE donned appropriate personal protective equipment (PPE) for safety during the ongoing COVID-19 pandemic. Upon entry, SE was greeted by Hearthstone Staff Members Dustin Cass (DC), Victor Alvarado (VA), Curt Compher (CC), Karl Schuelke (KS) and Heather Bailey (HB). After introductions and a brief discussion of the intent of the inspection, a walking inspection was conducted of the facility to evaluate compliance with PTI No. 126-09A and all other applicable air quality regulations.

PTI No. 126-09A

This is the only presently active permit for this facility. It outlines one flexible group:

- FGFACILITY – Encompasses all process equipment on site.

This flexible group has three specified opt-out emission limits within the PTI:

- Individual Hazardous Air Pollutants (HAPs) limited to 9.0 tons per year (tpy) on a 12-month rolling schedule.
- Aggregate HAPs limited to 22.5 tpy on a 12-month rolling schedule.
- Volatile Organic Compounds (VOCs) limited to 90.0 tpy on a 12-month rolling schedule.

The facility provided records (discussed in greater detail below) that included tracking of emissions as outlined above. For the period of January 2020 to December 2020, the following emissions information was recorded:

- All individual HAP emissions were zero during the period of the requested records, as no HAP-containing flavorings were used.
- Aggregate HAP emissions were zero during the period of the requested records, as no HAP-containing flavorings were used. Highest recorded 12-month VOC emission total was 25.86 tons in December 2020.

These records demonstrate compliance with the emission limits discussed.

The facility has one process restriction outlined in PTI No. 126-09A:

- Total Bread production limited to 116,948,847 lbs. per 12-month rolling annual period.

As demonstrated in the provided records, the highest 12-month rolling total of bread production from January 2020 to December 2020 was 43,687,887 lbs. total in December 2020. This record demonstrates compliance with the process restriction outlined.

PTI No. 126-09A outlines that the AQD may request testing at the expense of the facility to determine emission factors for HAPs and VOCs. The most recent testing was conducted, as mentioned above, as a self-initiated process by the facility as part of the process of modifying PTI No. 126-09. At this time there is no reason to believe that significant changes have occurred that would result in these testing results being inaccurate. As such, no testing is requested at this time.

As outlined in PTI No. 126-09A, the facility is expected to maintain the following records for at least a five-year period:

- Current listing of chemical composition of flavoring materials from manufacturers.
- Monthly and 12-month rolling annual records of bread produced.
- The following VOC records on a monthly basis:
 - Amount of VOC containing material used.
 - Amount of VOC containing material reclaimed (if any).
 - VOC emission factor data.
 - VOC monthly emissions.
 - VOC 12-month rolling annual emissions.
- The following HAP records on a monthly basis:
 - HAP emission factor data.
 - Individual and Aggregate monthly emissions.
 - Individual and Aggregate 12-month rolling annual emissions.

The above records are expected to be completed for each month by the 15th day of the subsequent month in a format acceptable to the AQD.

As mentioned above, the facility provided records for the period of January 2020 to December 2020 at the request of SE. The records were provided in a timely manner and in an acceptable format. As required by the records, chemical information as well as emission factor data were included in the records to demonstrate the calculations that were used to determine the emission totals for both VOCs and HAPs. As discussed above, the required records could be used to determine monthly and 12-month rolling annual bread production, HAP emission, and VOC emission data. At this time, the facility is compliant with recordkeeping requirements.

Other Items

The facility operates five ovens. These ovens are exempt from permitting requirements under Rule 282(2)(a)(v) as they are natural gas ovens with heat inputs of less than 10 mmBtu that produce food for human consumption.

The facility operates two caustic cookers, two dryers, a popcorn popper, and a fryer. These pieces of equipment are all exempt from permitting requirements under Rule 285(2)(dd)(iii) as they are all controlled by various cyclones or baghouses. During the inspection, one baghouse on the ground floor and one baghouse on the roof of the facility were observed. Both were in well-maintained condition and showed no signs of visible emissions. The roof and the parking lot surrounding these baghouses were absent of accumulated particulate matter when observed.

The facility has many storage tanks for various food ingredients including flour and oil. These tanks are all exempt from permitting requirements under Rule 284(2)(i) or Rule 284(2)(k) as they all either store noncarcinogenic solid material or noncarcinogenic liquids under 40,000 gallons.

The facility presently has two boilers on site. One boiler is a 2 mmBtu Fulton natural gas fired boiler and the other is a 6 mmBtu Superior natural gas boiler. Both boilers are exempt from permitting requirements under Rule 282(2)(b)(i). Both boilers are exempt from New Source Performance Standard (NSPS) requirement 40 CFR Part 60 Subpart Dc as they have total maximum outputs of less than 10 mmBtu. Both boilers are exempt from National Emission Standards for Hazardous Air Pollutants (NESHAPs) requirement 40 CFR part 63 Subpart JJJJJ as they are both gas-fired boilers.

The facility had one parts washer located in their maintenance room. During the inspection, the lid was closed. This parts washer is exempt from permitting requirements under Rule 281(2)(h) as it is a cold cleaner with a surface area of less than 10 ft².

Conclusion

At the conclusion of the inspection, the facility appeared to be in compliance with the rules outlined in PTI No. 126-09A and all other applicable air quality regulations.

NAME Scott Evans

DATE 4/5/2021

SUPERVISOR HH