

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

N831747086

FACILITY: LABUDDE GROUP INC		SRN / ID: N8317
LOCATION: 3880 RAYL RD, AKRON		DISTRICT: Saginaw Bay
CITY: AKRON		COUNTY: TUSCOLA
CONTACT: Scott Schember , Quality Control Manager		ACTIVITY DATE: 11/14/2018
STAFF: Matthew Karl	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection to determine compliance with PTI No. 51-17.		
RESOLVED COMPLAINTS:		

On Wednesday (11/14/18), I (Matt Karl) conducted a compliance inspection at LaBudde Group Inc. located at 3880 Rayl Road, Akron, Michigan. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) Administrative Rules; Permit to Install (PTI) No. 51-17. Mr. Scott Schember, Quality Control Manager, assisted me during my inspection and provided requested records.

Facility Description:

The facility processes (dries) fruit and vegetable byproducts received from food grade facilities locally and regionally to provide ingredients for animal feed. The facility employs 27 staff and operates 3 shifts. The facility processes tomato pumice and vegetable byproducts on a seasonal basis, roughly from mid-August to mid-October. The facility processes beet pulp from local sugar factories from roughly August to March.

The facility uses two 10 MMBtu natural gas-fired rotary drum drying systems (EUROTARYDRYER1 and EUROTARYDRYER2), each equipped with a cyclone. The facility consists of two main buildings (Buildings A and B) where food processing operations (EUVEGETABLE and EUBEETPROCESS) occur after being dried.

EUVEGETABLE consists of a hammer mill and uncontrolled bagging operations. The hammer mill emissions are controlled by a baghouse and are emitted from stack SVVEGETABLE. EUBEETPROCESSA consists of equipment used for screening and bagging dried beet pulp in Building A. EUBEETPROCESSB consists of equipment used for screening and bagging dried beet pulp screening and loading operations in Building B, including bulk beet pulp loadout operations with an extendable flexible boot to minimize visible emissions. Emissions from Building B are controlled by a cyclone and are emitted from stack SVBEETPROCESSB. The following table summarizes the emission units:

Emission Unit ID	Emission Unit Description	Fuel Type	Rated Capacity (MMBtu/hr)	Control Device	Stack ID
EUROTARYDRYER1	Rotary Dryer	Natural Gas	10	Cyclone	SVROTARYDRYER1 (West)
EUROTARYDRYER2	Rotary Dryer	Natural Gas	10	Cyclone	SVROTARYDRYER2 (East)
EUVEGETABLE	Hammer Mill	-	-	Baghouse	SVVEGETABLE
EUBEETPROCESSA	Screening and Bagging Equipment	-	-	-	SVBEETPROCESSA
EUBEETPROCESSB	Screening and Loading Equipment	-	-	Cyclone and Extendable Flexible Boot	SVBEETPROCESSB

Site Inspection:

I arrived on site at approximately 11:00 am. The facility was not operating at the time of my inspection. I met with Scott Schember in the facility office. Scott informed me that the facility had completed drying the incoming tomato pumice and vegetable byproducts on 10/20/18. The dried tomato pumice will continue to have preservatives added and be packaged through December. The facility will continue to accept and process beet pulp through March (or the end of the sugar factories campaigns). I reviewed records of the amounts of incoming tomato and incoming wet vegetable materials being processed for 2017 and 2018. I received copies of the visible emissions surveys for the dryers for 2017 and 2018. I received copies of the amounts of incoming beet pulp for 2018 to the date of my inspection. A more detailed discussion of these documents will follow in the "Records Review" section below.

Records Review:

I reviewed the following documents as part of this records review. The records described below are stored in the District files:

- FGDRYERS Visible Emissions Daily Check Sheet for 6/13/17-11/8/17; 4/24/18-10/27/18
- INCOMING BEET PULP August-November 2018
- DRY TOMATO Records 8/16/18-11/25/18
- DRY VEGETABLE Records 8/29/18-11/13/18
- EUVEGETABLE Visible Emissions Daily Check Sheet for 8/3/17-9/1/17; 9/30/18-10/28/18
- EUBEETPROCESSA Visible Emissions Daily Check Sheet for 11/7/17-12/20/17; 2/13/18-3/26/18
- EUBEETPROCESSB Visible Emissions Daily Check Sheet for 6/18/17-7/30/17; 4/6/18-5/17/18
- WEEKLY BAG HOUSE MAINTENANCE Records 6/15/17-11/21/18
- MONTHLY BAG HOUSE MAINTENANCE Records 6/15/17-11/14/18
- QUARTERLY BAG HOUSE MAINTENANCE Records 6/15/17-9/16/18

EUVEGETABLE: Compliant

VI.1. The permittee shall conduct daily visible emissions observations while EUVEGTABLE is being operated, either by a certified or a non-certified reader, as required in Emission Limit SC I.5. If excessive visible emissions are observed, the permittee shall take corrective action and document the corrective action.

I reviewed the EUVEGETABLE Visible Emissions Daily Check Sheets Scott provided via email on 11/28/18. Over the time period of the records provided, 8/3/17-9/1/17 and 9/30/18-10/28/18, there were no visible emissions observed by a non-certified reader.

VI.3. The permittee shall maintain records of the following information for the baghouse:

- a) **The baghouse manufacturer's specific recommendations for proper operation of the baghouse including:**
 - i. **Inspection frequency.**
 - ii. **Recommended spare parts.**
 - iii. **Measurements or parameters used to determine filter replacement.**
- b) **Inspection dates**
- c) **Filter and/or spare parts replacement dates.**

I reviewed the WEEKLY, MONTHLY and QUARTERLY BAG HOUSE MAINTENANCE records Scott provided via email on 11/28/18. The weekly bag house maintenance records indicated that the filter and pulse mechanism were inspected on a weekly basis over the time period from 6/15/18-11/21/18. Over this time period, the inspections indicated the pulse mechanism was operational and no corrective action was necessary. The filters were replaced twice during this time period, on 10/19/17 and 11/1/18. The monthly bag house maintenance records indicated that over the period from 6/15/17-11/14/18 the air plenum was dust free and no corrective action was necessary. The quarterly bag house maintenance records indicated that the air header tank was drained of moisture at the time of each quarterly inspection over the period from 6/15/17-9/16/18.

VI.4. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the amount of fruit and vegetable products processed in EUVEGETABLE each month and 12-month rolling time period. The permittee shall keep all records on file at the facility and make them available to the Department upon request.

I reviewed the dried tomato and dried vegetable records that Scott was able to provide via email on 11/27/18. The dried tomato records covered 8/16/18-11/25/18. Over this time period, 1994 tons of tomato was processed. The dried vegetable records covered 8/29/18-11/13/18. Over this time period, 910 tons of vegetables were processed. The total amount of dried tomato and dried vegetables was 2904 tons, which is 24.2% of the material limit of 12,000 TPY.

EUBEETPROCESSA: Compliant

VI.1. The permittee shall conduct daily visible emissions observations while EUBEETPROCESSB is being operated, either by a certified or a non-certified reader, as required in Emission Limit SC I.5. If excessive visible emissions are observed, the permittee shall take corrective action and document the corrective action.

I reviewed the EUBEETPROCESSA Visible Emissions Daily Check Sheets Scott provided via email on 11/28/18.

Over the time period of the records provided, 11/7/17-12/20/17 and 2/13/18-3/26/18, there were no excessive visible emissions observed by a non-certified reader and no corrective action was taken. Visible emissions recorded ranged from 1-2% opacity.

EUBEETPROCESSB: Compliant

VI.1. The permittee shall conduct daily visible emissions observations while EUBEETPROCESSB is being operated, either by a certified or a non-certified reader, as required in Emission Limit SC I.5. If excessive visible emissions are observed, the permittee shall take corrective action and document the corrective action.

I reviewed the EUBEETPROCESSB Visible Emissions Daily Check Sheets Scott provided via email on 11/28/18. Over the time period of the records provided, 6/18/17-7/30/17 and 4/6/18-5/17/18, there were no excessive visible emissions observed by a non-certified reader and no corrective action was taken. Visible emissions recorded were consistently noted as 2% opacity.

FGDRYERS: Compliant

VI.1. The permittee shall conduct daily visible emissions observations while FGDRYERS is being operated, either by a certified or a non-certified reader, as required in Emission Limit SC I.5. If excessive visible emissions are observed, the permittee shall take corrective action and document the corrective action.

I received a copy of the Visible Emissions Daily Check Sheet for the dryer stacks (West and East) during my on-site inspection. In 2017, the records indicated the dryers were operated from 6/13/17-11/8/17. A visible emissions observation was made each shift by a non-method 9 certified operator when the dryers were running. Over this time period, the non-certified opacity readings ranged from 0-14% opacity. No excessive (>20% for 6 minutes) opacity was observed, and no corrective actions were taken.

In 2018, the records indicated the dryers were operated from 4/24/18-10/27/18. A visible emissions observation was made each shift by a non-method 9 certified operator when the dryers were running. Over this time period, the non-certified opacity readings ranged from 0-18% opacity. No excessive (>20% for 6 minutes) opacity was observed, and no corrective actions were taken.

VI.3. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the amount of fruit and vegetable products processed in FGDRYERS each month and 12-month rolling time period. The permittee shall keep all records on file at the facility and make them available to the Department upon request.

See EUVEGETABLE VI.4. above.

FGBEETPROCESS: Compliant

VI.1. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the amount of dried beet products processed in FGBEETPROCESS each month and 12-month rolling time period. The permittee shall keep all records on file at the facility and make them available to the Department upon request.

I reviewed the incoming beet pulp records that Scott was able to provide during my 11/14/18 inspection. The beet pulp records were from 8/23/18-11/13/18. During this time period, 9783 tons of beet pulp were received; this is 21.74% of the material limit of 45,000 TPY.

Summary:

At the time of my inspection and records review, LaBudde Group Inc. appeared to be in compliance with PTI No. 51-17.

NAME Matthew R. Korb DATE 12/4/18 SUPERVISOR C. Korb