

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

P051733897

FACILITY: Mastronardi Produce		SRN / ID: P0517
LOCATION: 270 N. Filmore Road, COLDWATER		DISTRICT: Kalamazoo
CITY: COLDWATER		COUNTY: BRANCH
CONTACT: David Jarzynka , General Manager		ACTIVITY DATE: 03/22/2016
STAFF: Dale Turton	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

AQD Staff conducted an inspection of this greenhouse operation.

Upon entering I was met by David Jarzynka, General Manager. We were also joined by S. Lee Johnson, an attorney with Honigman.

This facility currently has over 100 acres of greenhouse. A little over half of the acreage is managed by Maroa Farms, Inc. and a little less than half is managed by PepperCo USA, Inc. Maroa Farms hydroponically grows various varieties of tomatoes, and small crops of strawberries and cucumbers. PepperCo hydroponically grows bell peppers of various colors. All of these products are sold under the "Sunset" brand.

In order to enter beyond the lobby into the facility, we were required to suit up and step through a solution to disinfect our boots to guard against carrying in biological contaminants into the greenhouse.

Mastronardi Produce owns both of the companies that are located adjacently at this site. , Mastronardi has applied for a Renewable Operation Permit (ROP) due to the power plant operations associated with the facility. The ROP is currently being drafted by AQD staff. It is anticipated that this permit will eventually be approved under the permit number MI-ROP-P0517-2016. At the date of this report, further development of the ROP is being put on hold pending the application for and the issue of a permit to install regarding firing oil in the boilers as described below. Below is a further discussion of the equipment and the applicable regulations:

Boilers

There are a total of seven Crone Company gas fired hot water boilers that have been installed at the facility. All of the units were installed without an Air Use Permit. Rule 282(b) exempts fuel-burning equipment used for space heating or service water heating if they are burning sweet natural gas and have a rated heat input capacity of not more than 50 million Btu/hr.

Two 10,800 Kw units were installed in 2011. These are located in the Maroa Farms, Phase 1 boiler room. According to the company, these are also rated at 37 million Btu/hr. Two 9,600 Kw units were installed in 2014. These are located in the Maroa Farms, Phase 2 boiler room. According to the company, these are also rated at 33 million Btu/hr. Three more 10,800 Kw units were installed in 2014. These are located in the PepperCo boiler room. According to the company, these are also rated at 37 million Btu/hr.

These boilers produce hot water and no steam. Each is equipped with a CO₂ scrubber to capture the gas so it can be sent to the greenhouses for the benefit of the plants. The remaining exhaust gases for each unit is discharged unobstructed vertically through the roof.

All boilers are subject to the Federal New Source Performance Standards for Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. Note: Steam generating unit means a device that combusts any fuel and produces steam or heats water or heats any heat transfer medium. The only requirement for gas fired units of this size is that sources must notify the administrator of the installation (40 CFR §60.7) & (40 CFR §60.48c), and monthly records of fuel usage must be kept. AQD has received the NSPS notifications for all seven units. They are also keeping records of natural gas usage. The usage for the calendar year 2015 has been submitted with the MAERS reporting.

At the present time, only natural gas can be burned in the boiler since that is the only fuel supply connected. The

units do have the capability to burn #2 fuel oil, but at this time there is no fuel oil being stored on site available to the boilers. The company has informed AQD that they will be making application to the AQD for a permit to be able to burn #2 fuel oil in the boilers.

Emergency Generators

There are three Kohler model 700REOZDE generators that have been installed. There is one located in Maroa Farms, phase 1 boiler room and another located in Maroa Farms, phase 2 boiler room. A third generator is located in the PepperCo boiler room. The manufacturers' specification sheet lists them at 1046 BHP. These generators are #2 diesel oil fired reciprocating internal combustion engines (RICE).

All of the generators were installed without an Air Use Permit. Rule 285(g) exempts internal combustion engines that have less than 10 million Btu/hr maximum heat input. Based on the maximum rate of fuel that can be burned, the size of each unit is less than 10 million Btu/hr.

These generators are subject to the Federal Standards of Performance for New Stationary Compression Ignition Internal Combustion Engines 40 CFR 60, Subpart IIII (RICE NSPS). The requirements of the NSPS regulations are going to be listed in the ROP. At this time the company is performing the regular required maintenance on the units.

The recordkeeping will be more formalized after the ROP is issued.

Other

Michigan South Central Power Agency has installed three natural gas fired generators adjacent to the greenhouse facility. This is known as "Coldwater Peaking Plant". Future plans are to strip the CO₂ from the exhaust of the engines and blow it into the greenhouse. At this time there was no information given as to when this begin. These generators, although immediately adjacent, are not considered a part of the Mastronardi facility.

NAME

Dale Twiston

DATE

3/30/2016

SUPERVISOR

MD 3/30/2016