

P0576

MAWILA

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

P057648571

<b>FACILITY:</b> A & R Packing Co. Inc.	<b>SRN / ID:</b> P0576
<b>LOCATION:</b> 34157 Autry, LIVONIA	<b>DISTRICT:</b> Detroit
<b>CITY:</b> LIVONIA	<b>COUNTY:</b> WAYNE
<b>CONTACT:</b> Mark Sitko , Vice President of Operations	<b>ACTIVITY DATE:</b> 04/12/2019
<b>STAFF:</b> Jill Zimmerman	<b>COMPLIANCE STATUS:</b> Non Compliance
<b>SUBJECT:</b> Inspection due to recent odor complaints	<b>SOURCE CLASS:</b> MINOR
<b>RESOLVED COMPLAINTS:</b> C-19-00276, C-19-00293, C-19-00422, C-19-01453, C-19-01514	

DATE OF INSPECTION : 04/12/2019  
 TIME OF INSPECTION : 10:30 am  
 INSPECTED BY : Jill Zimmerman  
 PERSONNEL PRESENT : Mark Sitko, Vice President of Operations Safety .Officer  
 FACILITY PHONE NUMBER : 734-422-2060  
 EMAIL : sitkomark@yahoo.com

### **FACILITY BACKGROUND**

A & R Packing is a meat smoking and packaging facility located in Livonia Michigan, near the intersection of Schoolcraft Road and Stark Road. This facility had been located in Hamtramck, until the former building burned down. A & R Packing purchased the current location in March 2009. Operations began at the current location in September 2009.

The facility recent purchased an adjacent building located on Industrial Drive. This building will be used as warehouse space for finish smoked product. No smoking of meats will occur in the new building. Because these properties are adjacent, they will be considered one source with the same SRN.

### **COMPLAINT/COMPLIANCE HISTORY**

Smoky odors have been verified at this facility. Five odor complaints have been received during the past year. All the complaints describe smoky meats. The reason for my inspection was in response to an odor complaint. During the onsite inspection, no odors were detected.

### **OUTSTANDING VNs**

No VN's have been issued regarding this facility.

### **PROCESS EQUIPMENT AND CONTROLS**

Raw pre-cut meat, such as turkey necks or turkey wings, is delivered to the facility. No meat is slaughtered at this facility. The meat is placed in a brine solution for between 8 and 96 hours. The meat pieces are then placed on trays and put into one of six smoke houses. The smoke houses are powered by natural gas. Hickory wood chips are placed in the smoker and smolder to create the smoky taste in the meats. Each smokehouse has a unique stack. Each smoke house holds 8 multi-shelved trays which are about 5 or 6 feet high. The meat stays in the smoker for approximately 3 hours. When the meat is removed from the smoker, it enters the shower room. The meat is sprayed with water which helps remove some of the grease. The meat then is chilled in a blast chiller. After the meat is chilled, it is packaged and shipped offsite.

The facility also operates one small natural gas fired boiler for building heat and one natural gas fired small water heater.

### **INSPECTION NARRATIVE**

I arrived at the facility at 10:30 am. Initially I performed odor surveillance in the area surrounding the facility. I observed steam rising from the stacks at the facility. I did smell a light smoky meat odors outside of the facility.

I entered the facility and met with Mr. Mark Sitko. Together we discussed the operations and processes at the facility. The facility operates 6 smokers. Although all 6 are capable of operating at the same time, usually only one or two operate at a time. During the onsite inspection, Mr. Sitko said that there have not been any changes to the process since my last inspection. I explained that I had received odor complaints in the area about a smoky meat odor. I also explained that I felt that the facility may be required to obtain a Permit To Install. Mr.

Sitko said that the facility has an afterburner unit, which runs on natural gas. This unit is used when the facility suspects that there may be odors. Although the unit is expensive to run continuously, it does operate at about 85% - 90% efficiency.

Together we walked through the facility, with Mr. Sitko explaining the process along the way. Raw cut up meat is brought to the facility. The brine that the meat soaks in contains sodium nitrate, which is strictly regulated by the federal government. The sodium nitrate is added so that the meat maintains a pink color. The combined 6 smokers use about 20 bags of woodchips per batch. Each bag of woodchips weighs 40 pounds.

Many areas throughout the process are refrigerated rooms, with an ammonia refrigeration system in place in these areas.

#### APPLICABLE RULES/PERMIT CONDITIONS

In the fall of 2018, I requested the potential to emit calculations from the facility. These calculations were received on October 2, 2018. These calculations were completed for the natural gas consumption, but did not take into account the use of the woodchips. Based on conversation with the facility, I assumed that 6 smokers running 3 hour cycles could smoke for a total of 8 batches per day per smoker. Since 20 bags are needed for 1 batch with all 6 smokers, I assumed that 160 bags or 6,400 pounds of woodchips would be smoked daily. Based on these assumptions, the PTE for  $PM_f$  would be 13.4 TPY,  $PM_{total}$  would be 30.96 TPY, and for VOC would be 25.71 TPY. Based on these calculations, it appears that the facility may not qualify for an exemption because the significance level (from Rule 119) for PM is 25 TPY. A copy of the submitted PTE is attached to this report.

The boiler and the water heater are exempt from permitting because of Rule 282 (b). The afterburner is exempt from permitting because of Rule 285 (f).

I shared with Mr. Sitko that one reason for my visit was to determine whether the facility needed a permit and to better understand the PTE calculation. I explained that I felt that the facility needed a permit to install unless he felt that the facility could meet the Rule 290 exempt and I shared a copy of Rule 290 with Mr. Sitko.

#### MAERS REPORT REVIEW

NA

#### FINAL COMPLIANCE DETERMINATION

A & R Packing appears to obtain a PTI permit in order to gain compliance with state regulations. A letter will be sent to the facility based on Rule 278 asking for verification that the facility meets an exemption or that the facility obtain a PTI.

NAME J. C. Zimmerman DATE 4/23/19 SUPERVISOR W. M.