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

P058568891

FACILITY: CLEMENS FOOD GROUP		SRN / ID: P0585
LOCATION: 572 Newton Road, COLDWATER		DISTRICT: Kalamazoo
CITY: COLDWATER		COUNTY: BRANCH
CONTACT:		ACTIVITY DATE: 08/24/2023
STAFF: Chance Collins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection for FCE		
RESOLVED COMPLAINTS:		

On August 24, 2023, AQD staff traveled to Branch County to perform an inspection of Clemens Food Group. The purpose of the inspection was to determine the facility's compliance with Permit to Install No. 6-15A and applicable state and federal air pollution control regulations.

AQD staff arrived on site at 8:55 a.m. to rainy conditions with a temperature of 80°F and a south wind of 15 mph. There were slight odors typically associated with the facility upon arrival.

AQD staff met with Cody Sanger (Refrigeration Supervisor), and Robert Morris (Facilities Maintenance Director) who walked AQD staff around the facility and answered all questions regarding inspection.

This facility is a pork processing facility. It takes in about 13,000 hogs per day. The facility has installed three 1,200 HP boilers but are permitted to install four. The boilers are subject to 40 CFR Part 60 Subpart Dc and 40 CFR Part 63 Subpart JJJJJJ.

The following discusses the findings of the inspection and the review of records:

EUIPPDryer: Industrial pretreatment plant sludge dryer fueled with natural gas, with heat input of approximately 3 MMBTU/hr. Emissions from the IPP dryer exhaust through a dual cyclone to the biofilter. The dryer is subject to 40 CFR Part 61 Subpart E.

Flexible Group ID: FGNatGas, FGFACILITY

Pollution Control Equipment: Dual cyclone, Biofilter

EUAmmoniaRef: A refrigeration system that includes ammonia storage tanks with combined total capacity of approximately 27,300 gallons.

Flexible Group ID: FGFACILITY

Pollution Control Equipment: NA

All records and plans are being maintained in a satisfactory manner.

FGBoilers: Four multi-fuel boilers, each capable of firing natural gas, distillate oil, and animal fat/vegetable oil. Each boiler is subject to 40 CFR Part 60, Subpart Dc, and to 40 CFR Part 63, Subpart JJJJJJ.

Emission Units: EUBoiler1, EUBoiler2, EUBoiler3, EUBoiler4

Pollution Control Equipment: NA

The permittee is only burning natural gas with no current plans to use any other fuel. As of July 2023, the 12-month rolling time period natural gas usage was 218,771 MCF.

The stack heights were checked using a laser range finder and were found to be within permit limits.

All records are being maintained in a satisfactory manner.

FGGenerators: Five natural gas-fired emergency genereators. Each generator is subject to 40 CFR Part 60, Subpart JJJJ, and to 40 CFR Part 63, Subpart ZZZZ.

Emission Units: EUGen1, EUGen2, EUGen3, EUGen4, EUGen5

Pollution Control Equipment: NA

Each generator is equipped with an hour counter and records are kept for total hours of operation for each generator. The following is the current hour count for each generator:

EUGen1: 80.3 EUGen2: 73.6 EUGen3: 77.1 EUGEN4: 73.6

FG20KScrubber: All equipment at the facility that is exhausted to the 20,000 cfm scrubber.

Pollution Control Equipment: Spray tower that exhausts to the 20,000 cfm packed bed scrubber, Baghouse dust collector that exhausts to the 20,000 cfm packed bed scrubber, Packed bed scrubber designed for gas flow rate of 20,000 acfm.

A Malfunction Abatement Plan was readily available and reviewed on site. FG20KScrubber is equipped with a device to monitor differential pressure across the scrubber (3.95), Liquid flow rate or water makeup flowrate (wmfr) of scrubbing solution to the packing section (6.52 gpm), and Oxidation-reduction potential (ORP) in the scrubbing solution (753).

FG25KScrubbers: All equipment at the facility that is required to be exhausted to the inlet of the inlet of the venturi scrubber, including the rendering operations other than the blood dryer. Two 25,000 cfm scrubbers operate in series, with the venturi scrubber exhausting to the packed bed scrubber. The packed bed scrubber then exhausts to the 100,000 cfm scrubber.

Emission Units: EUHydrolyzer, EUCooker, EUInedible

Pollution Control Equipment: Two scrubbers in series: Venturi Scrubber and Packed bed scrubber.

The packed bay scrubber was equipped with devices to monitor the differential pressure across the scrubber (4.1), the wmfr (7.9 gpm), and the ORP in the scrubbing solution (679).

FG100KScrubber: All equipment at the facility that is exhausted to the 100,000 cfm packed bed scrubber. This scrubber receives the exhaust from FG25KScrubbers (the 25,000 cfm venturi scrubber followed by the 25,000 cfm packed bed scrubber)

along with the exhaust from the inedible processing operations and the rendering operations other than the blood dryer.

Emission Units: EUBloodTank1, EUBloodTank2, EUBloodCoagCent, EUHydrolyzer, EUCooker, EUInedible

Pollution Control Equipment: Packed bed scrubber

The 100,000 cfm packed bed scrubber is equipped with devices to monitor the differential pressure across the scrubber (4.51), wmfr (5.3), and ORP in the scrubbing solution (668).

FGNatGas: All equipment at the facility that burns natural gas exclusively, except for the emergency generators. The group consists of the three natural gas-fired singers, the blood dryer, the industrial pre-treatment plant sludge dryer, the air make-up units, and the miscellaneous heaters. This flexible group does not include any boiler in FGBoilers.

Emission Units: EuSinger1, EUSinger2, EUSinger3, EUBloodDryer, EUIPPDryer, EUAMUnits, EUMiscHeaters.

All records of natural gas usage are being kept in a satisfactory manner.

FGFACILITY:

The 12-month rolling time period NO_x emissions are being recorded and tracked in a satisfactory manner. As of July 2023, the 12-month rolling NO_x emissions were at 4.42 tons per year. This is well within the permit limits of 78.1 tons per year.

A Nuisance Minimization Plan for Odor is being implemented and maintained.

NAME _____ DATE 9/7/23 SUPERVISOR _____