

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

M426837530

FACILITY: AMERICAN SOY PRODUCTS		SRN / ID: M4268
LOCATION: 1474 N WOODLAND DR, SALINE		DISTRICT: Jackson
CITY: SALINE		COUNTY: WASHTENAW
CONTACT: Nathan Hitt , Quality Manager		ACTIVITY DATE: 11/04/2016
STAFF: Zachary Durham	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled, unannounced inspection of PTI 638-85 for soy bean dehulling process and NSPS Subpart Dc boiler. Note: Operations have significantly changed since last inspection - soy bean processing reduced.		
RESOLVED COMPLAINTS:		

Contact

Nathan Hitt
Quality Manager
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Purpose

This was a scheduled, unannounced inspection of the facility located at 1474 N. Woodland Dr., Saline, MI 48176. The purpose of the inspection was to determine compliance with state and federal air pollution control rules and regulations and Permit to Install (PTI) 638-85. Upon arriving at the facility, I met with Nathan Hitt. Dave Ingram, the Process/Technical Manager, was also present for a portion of the inspection.

Background

This facility was last inspected on 1/13/2011 by Diane Kavanaugh Vetort. Diane met with Kim Dennis, whom is no longer with the company. It was brought to the company's attention that the equipment in PTI 638-85 has since been deemed exempt from requiring a permit by Rule 285(dd). At that time, the company chose to keep the permit active.

The inspection also identified a boiler that has a maximum heat input capacity of about 13 MMBtu/hr. The boiler was determined to be exempt from permitting under Rule 282(b)(i), though is subject to the New Source Performance Standard (NSPS) in 40 CFR Part 60, Subpart Dc for small industrial-commercial-institutional steam generating units.

The process they operate has since changed from the last inspection. The company now only processes soybeans and uses the associated equipment for about 4 days per month, or about 5% of their product. The main processes being run in the plant now consist of broth mixing and packaging. Broth production does not use the same equipment required for soybean dehulling, nor does it require any control equipment. The broth base is received in large buckets and blended with water in their mixing equipment. Steam from the boiler is routed to this process.

Compliance Evaluation

At the time of the inspection the equipment in PTI 638-85 was not running, however, the control equipment was still physically connected to the dryer unit as required in both the PTI and Rule 285(dd) exemption. Dave indicated that the filters are changed out regularly according to a regular maintenance schedule.

I also observed the boiler, which had an inspection tag dated 6/7/16. It appeared to be in good condition with regular maintenance and daily operational checks. This NSPS Subpart Dc boiler is natural gas-fired, and thus the sulfur dioxide (SO₂) or particulate matter (PM) conditions within the subpart are not applicable as they would be for coal-fired units.

No visible emissions were seen at any time during the inspection.

The company does not have any emergency backup generators installed at the facility.

Compliance Determination and Recommendations

American Soy Products is in compliance with PTI 638-85 and state and federal rules and regulations.

Should the company proceed with plans to remove the equipment in PTI 638-85, I recommend that the permit be processed for voiding. No void action will be taken unless directed to do so by the company.

NAME Fack DunhamDATE 11/7/16SUPERVISOR [Signature]