

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

N740247729

FACILITY: CONAGRA FOODS INC.		SRN / ID: N7402
LOCATION: 4551 SQUIRES RD, QUINCY		DISTRICT: Jackson
CITY: QUINCY		COUNTY: HILLSDALE
CONTACT: Matthew Mapes , Utilities Maintenance Team Leader, PSM Coordinator		ACTIVITY DATE: 02/05/2019
STAFF: Brian Carley	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced targeted inspection		
RESOLVED COMPLAINTS:		

Facility Contact: Matt Mapes, Utilities Maintenance Team Leader, PSM Coordinator  
 Phone: 517-689-2272  
 Email: [matthew.mapes@conagra.com](mailto:matthew.mapes@conagra.com)

**Purpose**

This was an unannounced targeted inspection of Conagra Foods. This facility is operating under the permit exemption Rule 282(2)(b)(i) and under 40 CFR Part 60 Subpart Dc. This facility is a true-minor source for emissions. I arrived at the facility and met with Matt Mapes. Matt Singleton, Plant Manager, also was present for this inspection.

**Background**

This facility of Conagra Foods makes kosher meats under the Hebrew National brand. They have two boilers that are used to generate steam and heat for the facility. The two boilers are rated at 20.085 and 16.75 MMBTU/hr, which meet the Rule 282(2)(b)(i) exemption. This facility currently doesn't have any active permit-to-install because they meet the exemption.

**Compliance Evaluation**

We first sat down to discuss the two boilers that we have on record for them. For the two boilers, they have only requirement in Subpart DC that they must meet and that is to report their natural gas usage in each boiler semi-annually. They have been meeting the semi-annual reporting requirements of Subpart DC (see files). I also learned of a smaller backup boiler that is used when one of the boilers is down for maintenance. It is also using natural gas as its fuel and is 600 HP (~1,528,000 Btus/hr). This unit is also exempt per Rule 282(2)(b)(i). I then asked them if they had a generator on site, which they said they did. This is an emergency 400 KW generator with a diesel engine that is rated at 700 HP (~1,783,000 Btus/hr). This unit is exempt under Rule 285(2)(g), which exempts internal combustion engines that have less than 10,000,000 Btu/hr maximum heat input. This unit is also subject to 40 CFR Part 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (a.k.a. RICE MACT) as an area source. The following is what they are required to do to be in compliance with the RICE MACT: Operate/maintain engine & control device per manufacturer's instructions or owner-developed maintenance plan; Change oil/filter & inspect hoses/belts every 500 hours or annually; inspect air cleaner every 1,000 hours or annually, however, may use oil analysis program instead of prescribed oil change frequency; Emergency engines must have hour meter and record hours of operation; Keep records of maintenance; and Notifications not required.

We then went to where the boilers were located, and they showed me where they were monitoring the natural gas usage and how they were recording it. They take daily readings and enter those reading into their database.

**Compliance Determination**

I determined that they are in compliance with Rules 282(2)(b)(1) and 285(2)(g) and Subpart Dc. Based on what they told me on how they operate and maintain the generator set subject to the RICE MACT, even though Michigan currently not delegated to enforce this area source MACT, I believe they are in compliance with the RICE MACT. We thanked Matt M. and Matt S. for their time and left.

NAME Brian Carley DATE 2/8/19 SUPERVISOR [Signature]