

DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

P035518124

FACILITY: KAR NUT PRODUCTS COMPANY (Kar's Nuts)		SRN / ID: P0355
LOCATION: 1200 E 14 MILE ROAD, MADISON HTS		DISTRICT: Southeast Michigan
CITY: MADISON HTS		COUNTY: OAKLAND
CONTACT: Bill Leva , Director of Operations		ACTIVITY DATE: 06/07/2012
STAFF: Robert Elmouchi	COMPLIANCE STATUS: Pending	SOURCE CLASS: <i>Minor</i>
SUBJECT: Self initiated inspection.		
RESOLVED COMPLAINTS:		

On June 7, 2012, I conducted a self-initiated unannounced inspection of Kar Nut Product Company (Kar's Nuts) located at 1200 East 14 Mile Road, Madison Heights, Michigan (**SRN/ID: P0355**). The purpose of this inspection was to determine Kar's Nuts' compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); and the administrative rules.

This inspection was motivated by odor observations I conducted a few months earlier where it appeared that a strong oil odor originated from Kar's Nuts. I conducted additional odor observations immediately before the inspection and detected the same odor but it was intermittent and faint and did not appear to constitute a violation of R901. **NOTE:** I'm often in the vicinity of Kar's Nuts and have only detected a strong odor one time, which may have been the result of meteorological conditions. The MACES (Michigan Air Compliance and Enforcement System) database does not contain any complaint of a foul odor allegedly originating from Kar's Nuts or their street address.

I entered the Kar's Nuts office, met with Mr. Mike Zborowski, Sanitation Supervisor and Safety Coordinator; presented AQD photo identification and stated the purpose of the inspection. Mr. Bill Leva, Director of Operations; Mr. Kevin Foster, Maintenance Supervisor; and Mr. Jeff Toomajian, Maintenance & Facility Manager joined the opening meeting and were present during portions of the inspection. Mr. Leva escorted me throughout the inspection and was present at the closing meeting.

The Kar's Nuts building occupies 160,000 square feet and employees 170 people of which approximately 110 to 120 work mainly in the building and the remainder work off site. Kar's Nuts processes peanuts, almonds, sunflower kernels and cashews, plus blends other fully prepared confections with the processed nuts. Kar's Nuts roasts nuts (plain and honey roasted) and kernels in either cotton seed oil or peanut oil. About 2 to 3 percent of the nuts and seeds packaged are raw. No dry roasting is conducted at this facility.

The cooking of nuts and kernels is conducted in the roasting room. The roasting is performed by conveying the product through a hot oil waterfall. Roasting by submersion into a vat of hot oil is not performed at this facility. Approximately 4 to 5 percent of the oil is retained by the product. The remaining oil is filtered, reused and a mass-balance estimated ¼ to ½ percent exhausted through the stack. Oil mist eliminators are used to control the emission of volatilized oil from the roasting process. The oil mist eliminators are cleaned once per month. The exhaust stacks and in-line fans are cleaned twice each year.

Approximately 550,000 pounds of oil is projected to be purchased this year. Approximately ¼ to ½ percent of the oil is lost through the exhaust stream. A high-end estimate (based on ½ percent) of annual oil emissions is 2,750 pounds per year, which averages to 229 pound per month, which is less than 50% of the 500 pounds of controlled emissions per month allowed per the R 336.1290(ii)(A) exemption from the permitting requirements of R 336.1201.

On June 12, 2012, the AQD received a spreadsheet (hard copy attached) from Mr. William Leva, which shows actual oil purchases from January through May and projected purchases from June through December 2012. The values appear to demonstrate the roasting process qualifies for the R 336.1290(ii)(A) exemption from the permitting requirements of R 336.1201.

CONCLUSION

The compliance status of Kar Nut Product Company is pending the maximum total Btu heat input rate of the roasting room oil heaters, which appear to have the potential to be exempt from the permitting requirements of R 336.1201 per R 336.1282(a)(v).

MACES- Activity Report

NAME Robert Stansfield

DATE 01/14/2012 SUPERVISOR _____