

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection**

B404539655

FACILITY: Kraft Heinz Foods Company		SRN / ID: B4045
LOCATION: 431 W. Sixteenth St., HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT: Marena Rash , Mechanical Engineer		ACTIVITY DATE: 05/04/2017
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Self Initiated Inspection in response to a notification of fall out from the new mustard process area.		
RESOLVED COMPLAINTS:		

On Thursday May 3, 2017 AQD Staff Kaitlyn DeVries (KD) and WRD Staff Chris Veldkamp (CV), conducted an unannounced, unscheduled compliance inspection of Kraft Heinz Foods Company (Heinz) to follow up on a notification from Ms. Marena Rash, Mechanical Engineer at Heinz, regarding potential outfall contamination from their new mustard process area.

In the e-mail received from Ms. Rash, attached, there was definite visible collection of bran and mustard seed debris that came from the air handling units that were installed to control the particulate emissions and odors associated with the mustard process.

KD and CV arrived in the vicinity at approximately 9:50 am and surveyed the area for odors. KD could detect some slight vinegar odors in the parking lot adjacent to the facility. Staff met with Ms. Rash to discuss the incident.

Ms. Rash went on to explain the events that have ensued since the notification. Ms. Rash explained that that one (1) of the mustard rooms was up and running, while the other was still being constructed. The equipment housed in both of the rooms was transferred from another facility, and the original design didn't have any exhaust directly related to the milling and slicing equipment. The ventilation was designed solely for in room comfort exhaust, but they quickly learned that additional exhaust was needed. However, installation of the equipment led to the additional exhaust.

When Heinz first discovered the debris on the roof, Ms. Rash ordered a halt in production. Heinz then placed environmental cloth on all of the roof drains and in the early section of the exhaust from the mustard milling process to prevent further fugitive emissions. Heinz then had the roof cleaned and are currently in the process of determining a long term solution.

KD reminded Ms. Rash, that AQD had not received any notification of installation of this process, exemption determination for the process, or a permit to install (PTI) application. Ms. Rash went on to explain that she had been working with a consultant to determine if the process was exempt, but no official determination had been made. KD told Ms. Rash, that since no exemption had been determined, no associated records, and no PTI, this was a Rule 201 Violation and Heinz would be receiving a Violation Notice.

Ms. Rash then took staff to the roof to observe the debris, followed by a tour of the mustard process area. While a majority of the debris has been cleaned, there was still some mustard seed debris on the roof. KD also noted a distinct mustard odor while on the roof. Staff asked about the residual yellow powder on the roof, but Ms. Rash stated that the yellow powder was merely pollen. Ms. Rash showed KD which stack the mustard seed was coming from and related it back to where in the mustard process the particulate was coming from.

Following the review of the roof and the mustard process area, Ms. Rash, KD and CV met with Mr. David Edwards, Plant Manager, to discuss the observations. KD again stated that unless Heinz was able to meet an exemption, a PTI was needed for the mustard process area. Since no PTI was received and there were no records for the utilization of an exemption, a Violation Notice would be issued.

After meeting with the plant manager, Ms. Rash escorted staff to the boardwalk area on the north side of the building between the facility and Lake Macatawa. No obvious signs of bran or mustard seeds were evident on the shoreline or boardwalk; however, there had been large amounts of rain in the days prior to the inspection.

Based on the observations made during the inspection, Heinz will be sent a Violation Notice for Rule 201 – Failure to obtain a permit to install.

NAME Kaitlyn Davis DATE 5/4/17 SUPERVISOR [Signature]