DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: Meeting Notes

P1451/2/61		
FACILITY: Fluresh, LLC		SRN / ID: P1451
LOCATION: 1751 W. Beecher Road, ADRIAN		DISTRICT: Jackson
CITY: ADRIAN		COUNTY: LENAWEE
CONTACT: Jocelyn Reynolds, Project Manager and Safety Coordinator		ACTIVITY DATE: 07/15/2024
STAFF: Brian Merle	COMPLIANCE STATUS:	SOURCE CLASS:
SUBJECT: Meeting between AQD Permit engineers and Fluresh staff to discuss recently issued permit.		
RESOLVED COMPLAINTS:		

Facility Contacts

D445430304

Ryan McGinn, Director of Environmental Sciences and Quality (No longer with company)

RMcGinn@fluresh.com

616-706-7459

Jocelyn Reynolds, Product Manager and Safety Coordinator

jreynolds@fluresh.com

734-799-6592

On Monday, July 15th, 2024, AQD Staff met with Fluresh, SRN P1451, to discuss their recently issued permit, PTI No. 57-24. AQD staff in attendance at the meeting were Brian Merle, District Inspector, Allan Terry, Permit Engineer, and Grace Knauss, Permit Engineer. Fluresh staff in attendance were Ryan McGinn, Director of Environmental Sciences and Quality, and Jocelyn Reynolds, Project Manager and Safety Coordinator. This meeting was set up to discuss the facilities VOC emissions, which are predicted to exceed the facility's current emission limit.

We arrived at the facility at 9:45 AM and we went through the front gate. No visible emissions or odors were observed upon my arrival. We proceeded into the facility and checked in with security where we received security badges. Here, we met Ryan and Jocelyn who directed us back to a conference room.

Allan began the discussing by going over the calculations the facility is using to calculate their VOC emissions. Ben Dennis joined the discussion virtually from Grand Rapids-Ben designed the extraction system. Ryan also explained how the facility is implementing inventory tracking for their ethanol to assist with their calculations.

Allan explained that he had gone through similar permits issued to different facilities around the state and found that most facilities did not need a hazardous waste variable in their calculations, which Fluresh requested in their permit. Additionally, other facilities in the state have a higher VOC emission limit than what was calculated for Fluresh for a similar process. Ben gave an overview of the process, and explained that the reused ethanol can be reproofed to allow for more uses. Reproofing removes water from the ethanol, raising its proof.

We then went on a tour of the facility, starting in the extraction room. Here, Ryan explained that the plant mass is processed with chilled ethanol in the CUP-30 extraction machine. This produces a tincture, which is at around 70% ethanol. This is then put through a 4-stage filter, a falling film evaporator, and then goes to the "kitchen" where it is processed to remove the desired cannabis products. Ethanol removed in the kitchen is collected in decarb reactors, which then go to a hazardous waste barrel. Ryan explained there may be some ethanol loss after the CUP-30 extraction, which may account for some of the higher emissions they have been calculating. We went to where the hazardous waste barrel is kept inside. I observed that there was a plug unscrewed from the top of the barrel, which Ryan screwed back in. Ryan then took us into a grow room, where he explained the process of growing and how that eventually leads to the extraction. We then went outside to observe the ethanol and hazardous waste storage area. When the facility receives ethanol in 55-gallon drums, they are kept in a spill contained area. However, the facility has recently started purchasing ethanol in IBC tanks, which cannot fit over the curb in the spill containment area. These are kept by the hazardous waste drums.

We headed back into the facility, where Ryan explained he would go over their product tracking spreadsheet to make sure everything is correct. Allan also suggested that they determine the actual recovery percentage of the CUP-30 unit to ensure it is in line with the manufacturer's specifications. We left the area at approximately 11:00 AM.

Following the meeting, Allan was able to determine that the facility had a lower charge volume of ethanol in the CUP-30 that they used in their calculations for the permit application. When Allan performed the calculations with the actual charge of the CUP-30, he arrived at a higher VOC emission rate that was more in line with other permits that have been issued (Attachment 1). The facility will be submitting a permit modification to make this change. We were also informed that Ryan was no longer with the company.

Allan informed me by email on July 22nd that the facility had already mailed their modification to the department, and they are waiting for it to arrive.

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DATE 07/23/2024

G.C SUPERVISOR