

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

A433843208

FACILITY: GERBER PRODUCTS CO		SRN / ID: A4338
LOCATION: 405 STATE ST, FREMONT		DISTRICT: Grand Rapids
CITY: FREMONT		COUNTY: NEWAYGO
CONTACT: John Hruby, Environmental Supervisor		ACTIVITY DATE: 02/01/2018
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the Gerber Products Company (GP) facility located in Fremont, MI at 10:14 am on February 1, 2018 to complete a scheduled unannounced inspection.

Facility Description

Before leaving the Grand Rapids District Office, a phone call was made to Mr. John Hruby, Environmental Supervisor, to verify appropriate personnel would be onsite based on the previous inspection. Prior to entering the facility, offsite odor and visible emission observations were completed. Weather conditions at the time of the inspection were snowy, winds from the west/southwest at 15-25mph, and temperatures in the low 20s°F. No significant odors were observed. Steam was observed coming from stacks onsite.

Upon arrival, AQD staff AS initially met with Mr. Hruby, Ms. Racheal Cole, Safety & Health Specialist, Mr. Craig Johnson, Engineering Resources, and several corporate staff. During the inspection, several additional staff answered site specific questions.

GP is a baby food processing company. The facility is in operation with one Opt Out Permit to Install (PTI) No. 45-14A and is a synthetic minor source of nitrogen oxides (NO_x), sulfur dioxides (SO_x), carbon monoxide (CO), particulate matter (PM), and volatile organic compounds (VOCs). Since the last inspection in September 2015, no significant changes have occurred to the facility with regards to air emissions.

FGBOILERS

This flexible group is for the three large onsite boilers

- EUBOILER1 – 67.3 MMBtu boiler capable of producing 50,000 pounds of steam per hour.
- EUBOILER2 – 67.3 MMBtu boiler capable of producing 50,000 pounds of steam per hour.
- EUBOILER4 – 84.4 MMBtu boiler capable of producing 70,000 pounds of steam per hour.

This flexible group is subject to pound per hour limits for NO_x and CO per testing. Based on the observations made during the inspection and previous records reviewed, no testing will be required at this time.

During the inspection, it was stated by GP staff that only natural gas is used for each boiler. Based on this, the No. 2 fuel oil conditions were not applicable at this time for FGBOILERS. During the inspection, monitoring gauges of natural gas usage were observed on all three boilers as well as a monitoring gauge identifying the total natural gas used. A record book showing the daily logs was also reviewed. The boilers are inspected on a yearly basis and the last inspection for the three boilers was in October / November 2017. Monthly and 12-month rolling natural gas totals were reviewed for FGBOILERS from January 2017 through December 2017. The 12-month rolling total as of December 2017 for natural gas used was 422.49 million standard cubic feet (MMSCF). Based on the onsite observations and records reviewed, GP is adequately keeping track of its natural gas usage for FGBOILERS.

Two stacks are listed in association with this flexible group. Though the stacks were not measured, the dimensions appear to be consistent with those listed in Opt Out PTI No. 45-14A. During the site inspection, GP staff stated that a portion of the top of stack SVBOILER1&2 had been replaced due to old age.

Federal regulations were reviewed to identify any potentially applicable rules that may apply to facility processes and equipment. It was concluded that EUBOILER4 is subject to New Source Performance Standards Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. A notice of construction and start-up was received in response to the violation notice dated September 30, 2015, that was issued to the company. GP is keeping track of monthly gas usages for this boiler and for December 2017 13,304 thousand standard cubic feet (MSCF) of natural gas had been used. While reviewing EUBOILER1 and EUBOILER2 it was concluded that the two boilers were installed in 1983 and modified in 1996. The modification was switching the boilers from coal usage to natural gas usage. In a letter from EPA to MDEQ-AQD dated April 6, 1993 the switching to an alternative source of fuel that will lower emissions is not considered a major modification if neither the rate of production nor hours of operations at the facility will increase due to the change. It was concluded that EUBOILER1 and EUBOILER 2 are therefore, not subject to NSPS Subpart Dc.

FGGENERATORS

This flexible group is for the three diesel fueled emergency generators. Additional information regarding each specific generator is described below.

- **EUCATERPILLAR** – This emission unit is a 1200 HP 750 kW caterpillar diesel-fueled emergency generator. At the time of the inspection, a non-resettable device monitoring the hours in use was observed with the generator. The monitoring device at the time of the inspection read 402 hours. The last inspection for this generator was completed on January 26, 2018. Per SC.VI.2, GP shall record and maintain monthly and 12-month rolling totals of engine hours. Records were reviewed from January 2017 through December 2017. The highest monthly engine use during that time was 20 hours in November. As of December 2017, the 12-month rolling total is 40 hours which is well within the 500-hour limit. Previous 12-month rolling totals were also well within the permitted limit.
- **EUDETROITDIESEL** - This emission unit is a 325 HP 250 kW caterpillar diesel-fueled emergency generator. At the time of the inspection, a non-resettable device monitoring the hours in use was observed with the generator. The monitoring device at the time of the inspection read 832.3 hours. The last inspection for this generator was completed on January 16, 2018. Per SC.VI.2, GP shall record and maintain monthly and 12-month rolling totals of engine hours. Records were reviewed from January 2017 through December 2017. The highest monthly engine use during that time was 19.5 hours in November. As of December 2017, the 12-month rolling total was 38.3 hours which is well within the 500-hour limit. Previous 12-month rolling totals were also well within the permitted limit.
- **EUCUMMINS** - This emission unit is a 364 HP 200 kW caterpillar diesel-fueled emergency generator. At the time of the inspection, a non-resettable device monitoring the hours in use was observed with the generator. The monitoring device at the time of the inspection read 329.2 hours. The last inspection for this generator was completed on January 26, 2018. Per SC.VI.2, GP shall record and maintain monthly and 12-month rolling totals of engine hours. Records were reviewed from January 2017 through December 2017. The highest monthly engine use during that time was 20 hours in November. As of December 2017, the 12-month rolling total was 51 hours which is well within the 500-hour limit. Previous 12-month rolling totals were also well within the permitted limit.

Per SC.IX.1, the three emergency generators must comply with all provisions of 40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. The MDEQ AQD is not delegated authority by the EPA for this standard. This was discussed with GP staff.

FGFACILITY

This flexible group is for all processes and equipment on site. GP is subject to several emission limits that are listed below.

- **NO_x** – GP is subject to a 12-month rolling total of 99 tons per year (tpy) limit of NO_x emissions. Records were reviewed on site from January 2017 through December 2017. For the month of December 2017, 2.18 tons of NO_x emissions were emitted. The 12-month rolling total as of December 2017 is 26.91 tons of NO_x emissions, which is well within the permitted limit. Previous months reviewed also show that GP is within the permitted limit.

- **CO** – GP is subject to a 12-month rolling total of 99 tpy limit of CO emissions. Records were reviewed on site from January 2017 through December 2017. For the month of December 2017, 0.82 tons of CO emissions were emitted. The 12-month rolling total as of December 2017 is 4.05 tons of CO emissions, which is well within the permitted limit. Previous months reviewed also show that GP is within the permitted limit.
- **CO₂e** – GP is subject to a 12-month rolling total of 89,730 tpy limit of CO₂e emissions. Records were reviewed on site from January 2017 through December 2017. For the month of December 2017, 2,230.26 tons of CO₂e emissions were emitted. The 12-month rolling total as of December 2017 is 24,219.38 tons of CO₂e emissions, which is well within the permitted limit. Previous months reviewed also show that GP is within the permitted limit.
- **Individual/Aggregate HAPs** – GP is subject to a 12-month rolling total of 9.9 tpy and 24.9 tpy for individual and aggregate hazardous air pollutants (HAPs) respectively. Records were reviewed from January 2017 through December 2017. The highest individual HAP emission is Hexane. Approximately 0.03 tons of hexane emissions were emitted in December 2017 and the 12-month rolling total for hexane as of December 2017 was 0.35 tpy, which is well within the permitted limit. The aggregate HAPs for the month of December 2017 was 0.03 tons and the 12-month rolling total aggregate HAPS as of December 2017 was 0.38 tpy, which is well within the permitted limit. Previous months reviewed for individual and aggregate HAPs also show that GP is within permitted limits.
- **VOCs** – GP is subject to a 12-month rolling total of 99 tpy limit of VOC emissions. Records were requested and reviewed from January 2017 through December 2017. For the month of December 2017, 0.10 tons of VOC emissions were emitted. The 12-month rolling total as of December 2017 is 4.71 tons of VOC emissions, which is well within the permitted limit. Previous months reviewed also show that GP is within the permitted limit.
- **Natural Gas Usage** – GP is subject to a facility wide 12-month rolling total limit of 1,453 MMSCF of natural gas. GP staff at the end of each month collect natural gas usages from meters for all applicable onsite equipment to identify total natural gas used. Records of 12-month rolling total natural gas usage were reviewed from January 2017 through December 2017. The 12-month rolling total of natural gas used on site as of December 2017 was 422.49 MMSCF, which is well within the permitted limit. Previous 12-month rolling totals also show that GP is within the permitted limit.

Additional Observations

- One parts washer was observed that has an air/vapor interface of approximately 8.8 square feet. Crystal Clean services the parts washer. The parts washer uses mineral spirits and the lid was closed at the time of the inspection. An operating procedures label was observed on the cleaner and the parts washer appears to be exempt per Rule 281(2)(h).
- During the inspection, the question was raised on the production of the plastic containers used in the food processing. The process used is thermoforming, where plastic comes in as sheets and a hot press is used to create the desired shape container. After further review, it appears the thermoforming process is exempt per Rule 286(2)(d).
- GP utilizes one maintenance paint booth on site and utilizes the Rule 287(2)(c) exemption. Usage records were reviewed from January 2017 through December 2017 with the highest monthly usage at three gallons. Though the booth was not observed during the inspection a follow up photo of the booth was requested and received. The photo identifies dry filters adequately in place. Based on this, the booth appears to be exempt per Rule 287(2)(c).
- Two natural gas boilers that are used for heating of the Gerber Life Insurance Building were observed. The boilers were approximately 399,000 Btu/hr in size. GP utilizes the Rule 282(2)(b)(i) exemption for the two boilers which appears applicable.
- The Wicks boiler that is in the Gerber Life Building was observed. The boiler is approximately 22.0

MMBtu/hr and has been decommissioned.

- Areas were observed with various maintenance equipment including a drill press. The equipment observed appears to be exempt per Rule 285(2)(l)(vi)(B).
- A metal bending machine was observed during the inspection that appears to be exempt per Rule 285(2)(l)(i).

Conclusion

A final discussion was completed with AQD staff AS, Mr. Hruby, and Ms. Cole. Based on the review of the records provided and the facility walk through, GP appears to be in compliance with Opt Out PTI No. 45-14A.

NAME Adam E. Hruby

DATE 02/07/2018 SUPERVISOR [Signature]