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

ISTRICT: Grand Rapids
OUNTY: OTTAWA
ACTIVITY DATE: 07/28/2015
OURCE CLASS: SM OPT OUT
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Staff, April Lazzaro arrived at the facility to conduct an unannounced inspection and met with Anne McManus, EHS Supervisor. I had contacted Ms. McManus late in the work day on July 27th to confirm she would be in the office on the 28th and the AQD still considers this an unannounced inspection due to the short notice. This facility operates under Opt-out PTI No. 270-96C.

Ms. McManus and I were joined by Mark Huyser and the DEQ Environmental Inspections: Rights and Responsibilities brochure was provided and briefly discussed. Ms. McManus is leaving this position and it was discussed that the information regarding this inspection will be sent to Mr. Huyser to ensure the facility receives it. Also provided was the DEQ Boiler NESHAP brochure, since this facility has five process boilers. The boilers are also subject to NSPS Dc, and Hillshire keeps fuel usage records. It was discussed that the facility also maintains two small emergency diesel fired generators that are subject to the area source RICE MACT. These units are small in size and have fuel limitations in the permit.

FACILITY DESCRIPTION

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Hillshire Brands is a meat processing facility with the main product being poultry. Opt-out PTI No. 270-96C specifically covers the processing ovens that utilize wood smoke with limitations on both wood chips and liquid smoke. Facility wide conditions provide opt-out coverage for CO_2e , NO_x and CO as well as limitations on material limits for natural gas, wood chips, CO_2 gas and No. 2 fuel oil. Also limited by the facility wide conditions are any emissions associated with the various emission units that operate pursuant to Rule 290, Rule 287(c) etc.

The inspection began with a physical tour on the roof of the facility to aid in identifying any issues with opacity from the process stacks. During the observations, the only visible emissions identified were being emitted from the sausage line stack. This was observed for a short period of time within the location parameters as required by Method 9. The emissions appeared below the 5% opacity range, and therefore are compliant. No emissions were observed from any other location during the visual roof inspection.

We adjourned back to the office where Ms. McManus presented AQD staff with the binder that contains the records used to demonstrate compliance.

FGWOODSMOKEOVENS

FGWOODSMOKEOVENS limits PM to 0.24 lb/1,000 lbs of exhaust gas, on a dry gas basis which is determined via test method. The AQD does not recommend stack testing for these ovens at this time.

Material limits are identified for wood chips and liquid smoke. The use of wood chips is limited to 647.4 tons per year based on a 12-month rolling time period. Actual use of wood chips on a 12-month rolling time period ending June 2015 is 100 tons. Use of liquid smoke is limited to 510 tons per year based on a 12-month rolling time period. Actual use of liquid smoke on a 12-month rolling time period ending June 2015 is 8 tons. Ms. McManus provided (attached) recordkeeping identifying the monthly usage of each as required by the permit. Stack measurements were not taken during the inspection.

FGFACILITY

FGFACILITY covers all equipment at the facility including grandfathered and exempt items. Emission limits include $CO_{2}e$, NO_{x} and CO. The emission of $CO_{2}e$ is limited to 89,000 tons per 12-month rolling time period. Actual emissions of $CO_{2}e$ are 28,519 tons per 12-month rolling time period. The emission of NO_{x} is limited to less than 70 tons per 12-month rolling time period. Actual emissions of NO_{x} are 21.17 tons. The emission of $CO_{2}e$ is limited to less than 80 tons per 12-month rolling time period. Actual emissions of $CO_{2}e$ are 20.69 tons.

Material limits are identified for the facility for natural gas, wood chips, CO_2 gas and No. 2 fuel oil. The use of natural gas is limited to 1,300 MMcf per year based on a 12-month rolling time period. The actual usage of natural gas on a 12-month rolling time period ending June 2015 is 460.57 MMcf. The use of wood chips is limited to 647.4 tons and as previously indicated actual reported use is 100 tons. The use of CO_2 gas is limited to 10,000 tons per year based on a 12-month rolling time period. The actual usage of CO_2 gas on a 12-month rolling time period. The actual usage of CO_2 gas on a 12-month rolling time period. The actual usage of CO_2 gas on a 12-month rolling time period ending June 2015 is 3,382 tons. The use of No. 2 fuel oil is limited to 4,965 gallons per year based on a 12-month rolling time period. The actual usage of No. 2 fuel oil for the 12-month rolling time period ending June 2015 is 72 gallons.

Also evaluated under FGFACILITY are the various Rule 290 exempt emission units, the emissions from the facility cold cleaners and the label printer, which is currently operating per rule 287(c), but can also use Rule 290. Emissions and recordkeeping were in order to demonstrate compliance with these requirements as well.

SUMMARY

Hillshire Brands Company Zeeland facility was in compliance at the time of the inspection.

DATE 1-29-15 SUPERVISOR