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

A638031917

FACILITY: ABBOTT NUTRITION		SRN / ID: A6380
LOCATION: 901 N. CENTERVILLE, STURGIS		DISTRICT: Kalamazoo
CITY: STURGIS		COUNTY: SAINT JOSEPH
CONTACT: Lauren Pecina Maes , EHS Manager		ACTIVITY DATE: 10/23/2015
STAFF: Dennis Dunlap	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Inspection.		
RESOLVED COMPLAINTS:		

This was not an announced inspection. The inspection brochure was handed out. Lauren Pecina Maes is the contact person. The facility usually operates 24 hours a day 7 days per week. There are about 520 total employees. This facility is now a synthetic minor source. It was formerly an ROP source.

Records were looked at first. The temporary boiler is not onsite. For Boilers 4 and 5 monthly records of natural gas and oil usage are being kept. There is a FGBOILERS table that requires 12-month rolling time period calculations of PM, NOx, SO2, CO, CO2e and MMBTU/yr. These calculations are being done. The facility is in compliance with the limits. There is an electronic preventative maintenance plan for the boilers for maintenance activities. Fuel oil is not used very often. There is no longer a coal-fired boiler.

VOC emissions come from mainly cold cleaners (4), printer inks (Rule 287), sanitizers, and flavorings. Monthly records are being kept on this. VOC is also in the FGFACILITY table, calculated in a 12-month rolling time period format. For 2014 about 10,000 pounds of VOC emissions were calculated.

Sanitizers are utilized in spray bottles, hand sanitizers, and for cleaning. These may contain isopropyl alcohol or ethanol. It would appear that most uses would be classified as housekeeping activities. Emissions are tabulated monthly.

Flavorings may be added to liquid products. The flavorings may contain VOC. Monthly calculations are based on VOC content multiplied by an assumed 2% loss factor. It would appear that this would meet the Rule 284(l) exemption.

In the packaging area some adhesives are used. There is an H.B. Fuller hot melt (exempt), There is also Bostik Aquagrip L1121A. From the sds it does not appear that this contains any VOC.

There does not appear to any HAP used at the facility.

There are two dryers, 3 and 4. Monthly and annual PM emissions are being calculated for dryer 4, main and dryer FB. The permit says PM-10 emissions but the facility has stack test data for PM.

Dryer 3 has one scrubber and dryer 4 has two scrubbers. Pressure drop and flow rate are to be monitored once/day and visible emissions checked once/week. The facility actually does hourly readings on these parameters. Records were reviewed for June, 2015. The acceptable ranges are included in the records.

There are 8 material dump stations (FGSCB0108). These were not in operation at the time of the inspection. Four of these (1,2,5, and 7) are only to be operated no more than 10 hours per calendar day. The hours of operation are graphed on daily charts for the four scrubbers associated with these. The graphs were examined over the past year and it appears that the 10 hour criteria was met.

The agglomerizers are no longer in operation.

Two cold cleaners were seen during the inspection. The lids were closed and rules were posted.

During the inspection the dryer four main scrubber was reading 30 gal/min. Dryer three was reading 10

gal/min and the diff. pressure was 1.0.

The treatment plant is across the street. There is a single-bed carbon adsorption system for odor control on the exhaust from 2 influent equalization tanks and one sludge storage tank. There is an O & M Maintenance Plan for the adsorber. According to records the carbon was changed on 12/11/14, 7/10/14, and 8/19/13. A daily check is performed on the unit. There was also a monthly log sheet describing maintenance activities.

There was one emergency diesel generator outside of the treatment building. There may be also one inside (for the wet well) but this was not seen. These were mentioned as possibly subject to federal regulations (NSPS or MACT). Lauren said that she was aware of these regulations. Since this facility is an area source of HAP AQD would not regulate these generators.

NAME Dennis Dunlap

DATE 10/28/15

SUPERVISOR MA 10/28/2015