DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: On-site Inspection

FACILITY: ConAgra Foods Packaged Foods, LLC		SRN / ID: B2359
LOCATION: 100 Sherman Rd., FENNVILLE		DISTRICT: Kalamazoo
CITY: FENNVILLE		COUNTY: ALLEGAN
CONTACT: Jeff Beaugrand, Operations / QS Supervisor		ACTIVITY DATE: 11/18/2021
STAFF: Cody Yazzie	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Onsite Inspection	,	\$
RESOLVED COMPLAINTS:		

On November 18, 2021 Air Quality Division (AQD) staff (Cody Yazzie) arrived at 100 Sherman Rd, Fennville Michigan at 2:45 PM to conduct an unannounced air quality inspection of ConAgra Packaging Foods, LLC (hereafter ConAgra) SRN(B2359). Staff made initial contact with the office receptionist and stated the purpose of the visit. Jeff Beaugrand, ConAgra, Operations/QS Supervisor, is the environmental contact and arrived shortly thereafter and took staff to his office for further discussions.

This facility used to be known as Birds Eye Foods, LLC. The facility became the Pinnacle Food Group, LLC prior to the previous inspection in 2018. Prior to this inspection the facility became ConAgra Foods Packaged Food, LLC. It currently operates three shifts per day. There are two product shifts and 1 shift for sanitation. The facility is typically in operation 4 days per week.

This facility cans various fruits. Depending on the season the facility will process fresh and frozen fruits. The facility was currently canning fresh apples during the inspection. The facility transports the apples throughout the facility to the different operations using water. The apples get sent through a peeler then sent through a vacuum wash. After the wash the apples are canned, and the syrup is added.

ConAgra was last inspected by the AQD on August 1, 2018 and appeared to be in Compliance at that time with PTI No 594-96 Staff asked, and Mr. Beaugrand stated that the facility does not have any emergency generators.

Mr. Beaugrand gave staff a tour of the facility. Required personal protective equipment are a hard hat, steel toe boots, hair net, safety glasses, and hearing protection. Staff observations and review of records provided during and following the inspection are summarized below:

Boilers:

The facility operates two 750 HP Johnston Boilers and unit heaters that were installed under PTI No. 594-96. This permit has Special Conditions 13-15 related to the use of Fuel Oil as the operating fuel of the two boilers. The facility has not used fuel oil since prior to the previous inspection in 2018. Special Condition 13 requires the facility to maintain 12-month rolling SO2 emissions from the 2 boilers and unit heaters every month. However, since the boilers and unit heaters are fueled by natural gas SO2 emissions are roughly 30-50 lbs based on fuel usage and round down 0.0 TPY.

The facility maintains records of the natural gas usage of both the boilers and unit heaters. Staff was provided with records for both the monthly and 12-month rolling natural gas usage records. Staff was provided with records of gas usage records from January 2018 through October 2021. The largest monthly usage was recorded in July 2018 in which the facility used 10.728MMCF of natural gas. The largest recorded 12-month rolling usage was recorded in July 2021 in which the facility recorded 57.1364 MMCF of natural gas. The facility has no permit estabilished limit for the natural gas usage as long as it is monitored and recorded and does not exceed the 71.8 TPY SO2 limit as a part of Special Condition 13.

Cold Cleaners:

Staff asked about the cold cleaners that were being used at the facility. Mr. Beaugrand indicated that the facility was using the same amount and same type of cold cleaners as the previous inspection in 2018 indicated. It was also noted that the facility was still utilizing the Safety Kleen Premium Solvent as noted in the previous report. Staff did observe one of the cold cleaners during the inspection and Staff noted that the operating instructions were posted above the cleaner. The cold cleaners appeared to be in compliance with the Part 7 rules.

Lagoons:

The facility has four lagoons that are used to treat the wastewater that comes from the facility. The lagoons are located across the street from the facility on property that ConAgra owns. The wastewater is piped to the first two smaller lagoons. The wastewater is then pumped from the smaller lagoons to the two larger lagoons before they facility spray applies the wastewater to the surrounding property that Pinnacle owns. This appears to meet exemption Rule 285(2)(m).

Printing and Labeling:

The facility labels all the cans at the facility. The labels are pre-printed, and the facility just uses three labeling machines to apply adhesives. The facility uses four adhesives in this process. Three are hot melt adhesives that appear to meet exemption Rule 287(2)(i). The liquid white glue H.B. Fuller item number PA3501B is used at an approximate rate of 1.5 gallons a day. This liquid adhesive coating line appears to meet exemption Rule 287(2)(a).

The facility also utilizes a number of different printing machines that print codes on the can labels. These printing machines apply inks/solvents at an average monthly rate of roughly 3.8 liters this would convert to roughly 1.00 gallons. This emission unit appears to meet the Rule 287 (2)(c) exemption requirements being well below the 200 gallon per month limit.

At the time of the inspection and based on a review of records obtained during or following the inspection, the facility appears to be in compliance with PTI No. 594-96. Staff stated to Mr. Beaugrand that a report of the inspection would be sent to the facility for their records. Staff concluded the inspection at 3:45 PM.-CJY

NAME Cody Jung

DATE 4/22/2022 SUPERVISOR RIL 4/26/22