

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

B404552459

FACILITY: Kraft Heinz Foods Company		SRN / ID: B4045
LOCATION: 431 W. Sixteenth St., HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT: Marena Rash , Mechanical Engineer		ACTIVITY DATE: 01/29/2020
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced scheduled inspection		
RESOLVED COMPLAINTS:		

On Wednesday, January 29, 2020, inspectors Scott Evans (SE) and Kaitlyn DeVries (KD) conducted a scheduled, unannounced inspection at the Kraft-Heinz Foods Company facility located in Holland, Michigan. Upon arriving at the facility and checking in with the security guard at the front of the facility, SE and KD were greeted by the ORM Manager, Marena Rash (MR). After a brief discussion with MR about the intent of the day's visit, a facility walk-through was conducted to complete a visual inspection of equipment and processes at the facility. After the walk-through was completed, SE and KD provided MR with a list of required records for review, which were received at a later date.

This facility produces multiple varieties of mustard, barbeque sauce, vinegar, and pickle relish. For the mustard, mustard seeds are received at the facility, processed in one of two rooms (depending on if standard or specialty mustards are to be produced), sent to large, enclosed vats for recipe mixing, and bottled at the facility. Barbeque sauces are similarly mixed in large, enclosed vats to recipe specifications and bottled at the facility. Vinegar is produced by sending alcohol and water into mash tanks, then to acetators for a required time, filtered, blended, and bottled within the facility. Pickle relish is made from pickles either produced on site or off-site and received at the facility, which are then sliced and mixed as per recipe requirements before being packaged at the facility.

PTI 238-02A

Walking Inspection:

This permit to install encompasses one emissions unit labeled EUACET, which includes five 12,000-gallon acetator tanks. The emissions from these five tanks are controlled by two wet scrubbers. These acetator tanks are limited to 9 tpy of VOC emissions and 0.39 pph of Acetaldehyde emissions.

It is worth noting that there are a total of seven acetators installed and functional at the facility. Two were installed prior to cutoff dates for grandfathering of equipment: one in 1955 and one 1957. Given the age of these pieces of equipment and that they have remained unchanged over the years, they are not currently subject to the same permitting requirements as the other acetators.

During the walkthrough, visual inspection of the tanks and the wet scrubbers verified that all appeared to be in good condition. Only one scrubber was active at the time as the current production rates only required one for effective pollution control. During this visual inspection, SE recorded the daily and hourly parameters of the wet scrubber, as documented below:

- Liquid flow rate of 15.1 gpm
- Pressure drop of 7.1 inches
- Air Flow of 1060 acfm

These recorded values were within acceptable range of parameters of PTI 238-02A as described below:

- Liquid Flow Rate expected at 15 gpm for proper function as outlined in the Operation & Maintenance Plan (O&MP)
- Pressure drop should be between 13.5 inches and 3.5 inches. As outlined in the O&MP
- Air flow for the newer unit (the unit in use during the inspection) is approved at 235 acfm per acetator tank. With five tanks, the limit calculates to 1175 acfm.

An important note regarding air flow to the wet scrubbers. PTI 238-02A notes a 700 acfm limit for the older scrubber. As this was not the scrubber in use during the inspection, the limits are permitted as outlined in the O&MP, as is described above.

Records Review:

Section VI of EUACET within PTI 238-02A outlines the following parameters be monitored:

- Daily Liquid Flow Rate

- Daily Pressure Drop
- Air Flow
- Monthly Batch Production
- 12-Month Rolling VOC Emissions
- Older Scrubber Operational Dates

On Monday, February 10, 2020, MR provided SE with records to verify maintenance of the above records. Scans of the handwritten logs that demonstrate record keeping of Daily Liquid Flow Rate, Daily Pressure Drop, and Scrubber Operational Dates were provided. These records also contained a daily record of Hourly Air Flow. It was noted during the walking inspection that Air Flow is monitored at least once per hour, but only recorded daily when the other daily records are recorded. Records were provided for the entire year of 2019 and these were reviewed. Only a few representative samples are attached to this report for the sake of brevity. It is worth noting that Section VI(4) of EUACET within PTI 238-02A notes requirements of an actual record of hourly air flow levels. However, this is only for the older wet scrubber, which is not the scrubber used on a day to day basis. This older scrubber was not used in the year of 2019.

An excel workbook demonstrating kept records of Monthly Batch Production and 12-Month Rolling VOC Emissions. These records spanned back as far as 2002. In 2019, all five permitted acetators operated during each calendar month. On average, each tank produced just over 24 batches per month, with the highest rate coming from acetator #6 in October 2019 at 30 batches produced.

Within this same excel sheet were calculations of VOC emissions. VOCs in lbs/mo were shown to be calculated using the batch records kept in the sheet. These rates were then converted to monthly rates in tons/mo, which were then added for every 12-month span to achieve the 12-month rolling annual rate of VOC emissions. In each month of 2019 the 12-month rate was 8.98 tpy, which is within the established limit of 9 tpy.

PTI 516-93

This permit encompasses a boiler that was installed in 1993. Visual inspection confirmed that the boiler in use at the facility was the same boiler as is covered within the permit. This boiler is natural gas-fired at 32,426,000 Btu/hr. During the inspection there were no visible emissions coming from the unit, as required by the permit. This boiler is not subject to NSPS regulations.

Within the boiler room were two other boilers. One boiler was an old coal-fired boiler that has been decommissioned and rendered inoperable for many years. One boiler is a natural gas-fired boiler that was installed in 1953 and so is grandfathered from current air permitting requirements.

PTI 346-73

This permit encompasses a baghouse that was installed in 1973 to capture particulate matter released from pickle-brine production. During this inspection it was verified that this baghouse had not been used for many years and, at this time, has been dismantled and removed from the site. It is recommended that this permit be voided at this time.

Exemptions and Other Items

During the inspection, the O&MP was discussed. SE asked if any updates had been made since the implementation of the 2010 copy (the one on file within state records). MR verified that the 2010 copy was still the relevant and used copy of the O&MP.

There are many large vats (all under 40,000 gallons) used for pickling both within the facility buildings and in the outside areas of the facility. These vats contain only pickles submerged in the pickling solution. This solution contains only non-carcinogenic materials and so the vats are exempt from air permitting requirements per Rule 284(2)(i) due to the size of the containers and the vapor pressure of the pickling brine (primarily vinegar and water) being well below the required 1.5 psi limit.

Within kitchens of the facility where the relish, barbeque sauces, and mustards are produced there are emissions of particulate matter and VOCs. The extent of these emissions is dependent on the recipes being produced at any given time. Records were provided that showed the emissions for 2019. These records effectively demonstrated that no month exceeded 1,000 lbs/mo of uncontrolled or 500 lbs/mo of controlled VOCs or PM. These records show that the kitchens are exempt from air permitting requirements per Rule 290(2)(a)(i).

There are two emergency diesel generators on site. One installed in 1992 and is capable of approximately 730 HP. The other is unclear on install date and is capable of approximately 375 HP.

Conclusion

During the inspection it appeared that the facility was in compliance with all active permits and air regulations.

NAME Scott Evans

DATE 2/24/2020

SUPERVISOR HH