

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

B646740711

FACILITY: GRAY AND COMPANY		SRN / ID: B6467
LOCATION: 503 POLK RD, HART		DISTRICT: Grand Rapids
CITY: HART		COUNTY: OCEANA
CONTACT: Rick Dowty, Plant Manager		ACTIVITY DATE: 07/11/2017
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY '17 on-site inspection to determine the facility's compliance status with PTI No. 726-88 and other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

Gray & Co. is located at 503 Polk Road in Hart, MI. AQD staff Chris Robinson (CR) arrived at this location at approximately 12:45pm on July 11, 2017 for the purpose of conducting an unannounced site inspection to determine compliance with applicable air rules and regulations, including the facility's Permit to Install (PTI) No. 726-88. Weather conditions were sunny and clear, approximately 80°F with WSW winds at 6 mph. CR met with Mr. Clyde Hendrick, Maintenance, Mr. Earl Girard, Production Supervisor and Mr. Rick Dowty, Plant Manager, announcing intent to inspect and providing proper AQD inspector identification.

FACILITY DESCRIPTION

Gray and Company is a manufacturer of maraschino cherries. The general manufacturing process is as follows:

Cherries → Brine → Pitted → Added to Syrup (Dyed & Flavored) → Jarred & Pasteurized → Packaged

The brining process is conducted at an outdoor storage facility located in Mears, Michigan, which Mr. Dowty provided CR with a tour of. This process utilizes large open pits that are filled with cherries and a brining solution containing SO₂ gas. The pits are covered and the chemistry of the brine solution is maintained until the cherries are ready for processing. The brining process typically takes up to three years, but can take as long as needed as long as the chemistry of the brine is maintained. No odors or visible emissions were observed.

Once the Hart, MI processing facility receives the brined cherries, they are pitted and sorted for quality. The cherries are then soaked in a sugar syrup that is flavored and dyed to a particular color. The syrup used in the various stages of this process is made in heated tanks and can be used warm or hot throughout the entire process. The cherries soak up as much of the sugars from the syrup as possible. Once the sugar content is high enough, the syrup is drained off and sent to another area of the plant. Drained syrup is reused throughout the entire process. Syrup used for canning is brought up to a higher sugar content through a condensing process. The cherries are then sorted by size and put into jars, covered with the hot concentrated sugar syrup, capped and then sent through a steam pasteurization process. The pasteurization process ensures freshness in the product. Once the jars have gone through this process, they are labeled, dated and then packaged. All of the labels are preprinted at another location and the date is applied to the jars with a laser printer.

COMPLIANCE EVALUATION

Exemptions

The ink from the laser dating process and adhesive from the labeling process discussed above appear to be exempt from Rule 201 permitting. The ink appears to be exempt under rule 287(2)(c). Per discussions with Mr. Hendrick, and Mr. Girard the facility's usage is well under 200 gallons of ink per month. Ink is purchased on an as needed basis in one (1) liter bottles. Based on the attached purchase orders for February 2017 through July 2017, provided by Mr. Hendrick, the facility has purchased approximately eight (8) liters (~2 gallons) of ink. Well below the 200 gallon per month exemption limit. The adhesive appears to be exempt under Rule 287(2)(i) for equipment used for the application of a hot melt adhesive, which is what the facility utilizes for the labels.

PTI No. 726-88

The steam used for operating the equipment at this facility is generated by two Cleaver Brooks 300 HP boilers (12.5 MMBtu each) that are covered under this permit (No. 726-88). This permit has four (4) Special Conditions (14-17), which includes no visible emissions, a vertical stack discharge requirement with a maximum diameter of 20-inches and height of no less than 30-ft above grade, no fuel substitutions resulting in an appreciable change in quality or increase of emissions without AQD approval, and a sulfur dioxide emission rate not to exceed 0.53 lbs./MMBtu heat input (0.5% sulfur content & heat input of 18,993 BTU's/lb.).

During the inspection CR did not notice any visible emissions. Stacks were not explicitly measured, but visual observations appeared to meet permit requirements. Per conversations with Mr. Hendricks the boilers are only set up to burn natural gas. Since the boilers only burn natural gas, the 0.5% sulfur limit does not apply.

Other Rules & Regulations

Based on the boiler nameplates, the boilers were manufactured on 5/16/1978 and 12/19/1969. NSPS 40 CFR Part 60 Subpart Dc is only applicable to boilers manufactured or installed after June 9, 1989, therefore, these two boilers are not subject to 40 CFR Part 60 Subpart Dc. In addition, the boilers are not subject to 40 CFR Part 63 Subpart JJJJJJ because they are natural gas fired only.

COMPLIANCE DETERMINATION

Based on observations made during this inspection, Gray & Co. appears to be compliant with PTI No. 726-88 and any other applicable air rules and regulations.

NAME



DATE

8/3/2017

SUPERVISOR


