

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

B646763937

<b>FACILITY:</b> GRAY AND COMPANY		<b>SRN / ID:</b> B6467
<b>LOCATION:</b> 3325 POLK RD, HART		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> HART		<b>COUNTY:</b> OCEANA
<b>CONTACT:</b> Rick Dowty , Plant Manager		<b>ACTIVITY DATE:</b> 07/28/2022
<b>STAFF:</b> Scott Evans	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> On site inspection to assess compliance with air quality rules and regulations.		
<b>RESOLVED COMPLAINTS:</b>		

### Introduction

On July 28, 2022, State of Michigan Department of Environment, Great Lakes, and Energy Air Quality Division staff members Scott Evans (SE) and Kaitlyn DeVries (KD) conducted an unannounced, on-site inspection of the Gray & Company facility located at 3325 Polk Rd. in Hart, Michigan, to assess compliance with the requirements of air Permit to Install (PTI) No. 726-88 and all other applicable air quality rules and regulations. This facility is a minor source of pollutants with one active permit. During this inspection, a visit to a second, unpermitted facility was conducted to assess if that location required permitting in any way.

Upon arrival at the facility a perimeter inspection was conducted, during which no odors or visible emissions were observed. After this initial inspection, SE and KD entered the facility and were greeted by Manager Rick Dowty. After discussing the purpose of the visit, a walking inspection of the facility was conducted.

Gray & Company is a producer of maraschino cherries. The process requires a sequence of brining, pitting, jarring, and pasteurizing cherries. Multiple components of these steps include heating the cherries with water heated in multiple on-site boilers. This produces some exhaust in the form of steam that is released externally through various hood systems. This steam does not contain any other significant emissions. The facility also produces some candied cherry products. All products are packaged on-site with pre-printed labels. Some glue is used to adhere the labels to containers and some small printing is done to place identification barcodes on boxes that the final products are packaged in.

### PTI No. 726-88

This is a minor source permit that was first issued on December 20, 1988. It includes four Special Conditions (SCs) that pertain to two 300-HP natural gas fired boilers that are used for the steps requiring heat for the production of the cherries.

SC14 states that there shall be no visible emissions released by the boilers. During the inspection it could be seen that there were no visible emissions.

SC15 states that emissions should be exhausted through a stack with a maximum diameter of 20 inches and a minimum height of 30 feet above ground level. The stacks were observed during the inspection and, though they were not directly measured for safety, they appeared to be compliant with the requirements.

SC16 states that the fuels used in the boilers should not be changed in a way that could significantly impact the emissions coming from the units. The facility confirmed that the boilers still operate off of natural gas.

SC17 states that sulfur dioxide emissions should not exceed 0.53 pounds per million BTUs of heat input. This is based off of the use of oil to run the boilers with 0.5% sulfur content. Since the facility only burns natural gas for the boilers, this limit is not exceeded.

### **Other Items**

In 2020, the facility submitted forms stating that they would be installing a new 24.5 mmBTU/hr boiler at the facility in order to comply with notification requirements within New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart Dc. This boiler is exempt from air permitting requirements by Rule 282(2)(b)(i) as the input is less than 50 mmBTU/hr. This boiler is also exempt from National Emission Standard for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart JJJJJ as it is natural gas fired. At the time of the inspection the boiler had not been activated for use. It was installed to facilitate expanded operations at the facility once the construction of a new warehouse space is completed. This is an ongoing project at this time.

The two existing boilers were constructed in 1978 and 1969. As such, they are exempt from NSPS 40 CFR Part 60 Subpart Dc as they were installed prior to June 9, 1989. They are also exempt from NESHAP 40 CFR Part 63 Subpart JJJJJ as they are natural gas fired units.

Many of the food production operations are conducted in multiple large tanks in which the cherries are submerged in mixtures of various curing, preserving, and flavoring ingredients. These tanks are exempt from air permitting requirements by Rule 284(2)(i) as the ingredients are noncarcinogenic and are placed in tanks under 40,000-gallons. Though some have hoods that vent to the external plant environment, the only emissions are steam that is the result of water heated by the on-site boilers for various production and pasteurizing operations. The heating of the water is covered by permitting and exemptions applicable to the above-mentioned boilers.

The facility also has labeling processes that include some printing and adhesive use. The printing utilizes ink that is exempt from permitting requirements under Rule 287(2)(c) as purchase records reviewed on site could confirm less than 200 gallons per month are used. The adhesive, used to attach labels to containers, is exempt under Rule 287(2)(i).

The facility has a second location which includes multiple in-ground tanks used for storage and transfer of cherries. These storage tanks will house cherries for multiple weeks in various mixtures of preserving and curing ingredients as part of the production process. These tanks are sealed completely to ensure no evaporation or release of necessary liquids and gasses, or additions of rainwater or debris disrupts the balances necessary for production of the cherries. These tanks are only opened during filling or emptying of the tanks into transport trucks as part of the farm-to-storage-to-production facility chain. The tanks are exempt from air permitting rules by Rule 284(2)(i) as the ingredients are noncarcinogenic and are placed in tanks under 40,000-gallons.

### **Conclusion**

At the conclusion of the inspection the facility appeared to be compliant with the requirements of PTI No. 726-88 and all other applicable air quality regulations. These findings were discussed with

the facility at the conclusion of the inspection and facility representatives were advised to inform the AQD if there are any changes to facility operations.

NAME Scott Evans

DATE 8/8/2022

SUPERVISOR HH