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

B723047797

FACILITY: MENNEL MILLING CO		**SRN / ID:** B7230
LOCATION: 109 S MILL ST, DOWAGIAC		**DISTRICT:** Kalamazoo
CITY: DOWAGIAC		**COUNTY:** CASS
CONTACT: Josiah Boulee , Manager		**ACTIVITY DATE:** 01/15/2019
STAFF: Amanda Chapel	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

On January 15, 2019, AQD's Amanda Chapel (staff) conducted an unannounced air quality inspection of Mennel Milling (facility) located in Dowagiac, Cass County Michigan. The purpose of the inspection was to determine the facility's compliance with permit to install (PTI) 205-80, 206-80, 960-91, 961-91, and 962-92 and all applicable state and federal air regulations. The following will summarize plant operations and facility's compliance status.

The facility is a minor source for air pollutants and not subject to 40 CFR 60 Subpart DD which only applies to facilities with a storage capacity above 2,000,000 bushels. The main land use surrounding the facility to the north and west is residential and rural to the south and east. At the time of the inspection it was about 25 degrees F with a 9 mph wind from the SSW. As this facility, all jewelry must be removed except rings without stones.

I arrived on site about 10:15 am. As I was driving toward the facility, I observed a cloud of dust coming from the grain loading area where a truck was emptying grain. I observed for about 10 minutes. I could not do an opacity reading because the sky was overcast and the area was surrounded by trees. I drove to the office and since there was nobody at the desk, I paged someone using the designated phone. Mr. Randy Robison, Head Miller, met me in the lobby. I introduced myself, provided a card, and explained that I was there to complete an air quality inspection based on the facility's five active permits. He told me that the plant manager, Mr. Josiah Boulee was unavailable but Mr. Robison would be able to answer my questions and take me on a tour.

First, we went into the downstairs conference room where staff was having a meeting. They were able to provide me with information about the storage capacity at the facility. Currently the facility can store 792,953 bushels of wheat and 1,800,000 lbs of flour which is about 30,000 bushels of wheat. The yearly throughput is about 3,700,000 bushels. The facility has two boilers and one parts washer. They employ about 20 employees and run 24 hours a day seven days a week.

The tour started in the maintenance room. In here there was one parts washer which is serviced by safety kleen. The lid was closed and it contains 105 solvent MSDS 82341. There was also an adhesive remover which is a food grade screen cleaner which the facility built themselves. The tank contains cyano-off #505 cured adhesive remover. The lid was closed. The SDS shows that this is less than 1% volatile. The general process at Mennel Milling is as follows: the grain is dumped at the scale house and conveyed through the cleaning machine and stored. When the grain is removed from storage its conveyed to the mill. Here it is cleaned again, tempered, milled, and cleaned again. When it gets sent to the blending room, the product is blended according to the specific recipe, vitamins are added, and its sent to load out for delivery.

Next, we walked outside to the grain loading and elevator. The elevator has 1 Carter-Day dust collector (205-80), 1 Kice dust collector (960-91) and 1 MAC dust collector installed under exemption 285(2)(dd)(iii). At the time of the inspection, it appeared that the Carter-Day dust collector was malfunctioning. Mr. Robison stated that the explosion panel had malfunctioned the previous day and they were not running the dust collector. That explained the dust observed coming from the loading area. He said they would need to get it fixed ASAP because the MAC dust collector was running overtime to compensate but would eventually fill up and they would have to stop accepting grain. I told him to let me know when they got the dust collector repaired. The lot, parking, and roadways are all paved, preventing fugitive dust from any driving and parking area.

We walked to the exempt MAC dust collector which appeared to be operating correctly. Mr. Robison said the dust collectors have preventative maintenance monthly. The blower is checked semi-annually and

the socks changed at least annually. There is a monthly inspection of the magnahelic gauge to make sure the dust collector is operating. The MAC magnahelic was sitting at 0 at the time of the inspection. Upon entering the elevator, we walked past the elevator cleaning machine which was in operation since a truck was loading. Mr. Robison took me up to the top of the grain elevator to observe the Kice dust collector permitted under PTI 960-91. The dust collector had maintenance in November to change all the necessary parts. It appeared to be in good working order.

From here, we walked outside the mill to observe the Carter-Day dust collector permitted under 206-80 located along the river. There were no visible emission present at the time of the inspection and the dust collector was operational. We entered the mill and observed the large central vacuum system which is used to clean the mill. There is another one located in the blend plant. The model in the mill is a Kice HR12-6H. This drops product thought an airlock down a gravity line and exhausts the clean air though a line horizontally outside. This operation appears to be exempt per 285(2)(dd)(i) since it is used on a non-production basis.

We also observed the two operational Kice dust collectors in the mill from PTI 961-91, DynaJet S-100-10 and DynaJet S-64-6. A third Kice dust collector is permitted though this permit, CJC-15, but it has been removed from the site. The permit says that the stacks must discharge unobstructed vertically upward unless S-100-10 is vented inside during the winter months. Model S-64-6 will vent inside the building. Since the last inspection, model S-100-10 no longer can vent internally and the vent is pointed downward toward the office. Model S-64-6 still vents internally. There is one boiler in the mill. It's a Cleaver Brooks with a capacity of 2.092 MMBtu/hr installed in 10/26/82. This appears to be exempt under exemption 282(2)(b)(i).

Finally, we toured the blending house. There are two Kice dust collectors permitted under PTI 962-91 and an exempt Mikropul dust collector installed under the exemption 285(2)(dd)(iii). The two Kice dust collectors are the DynaJet R-96-10 and DynaJet S-49-10. They both appeared to be in operation and no visible emissions were seen. The Mikropul dust collector is used intermittently during the cooker process. There is also a central vacuum system in this building with Kice model HR12-10 which repurposes the air used for vacuuming to blow the collected product into the mill Carter-Day. This operation appears to be exempt per 285(2)(dd)(i) since it is used on a non-production basis. The boiler in the blending plant is a Cleaver Brooks installed on 2/4/88 with a capacity of 5.23 MMBtu/hr which is exempt under 282(2)(b)(i).

Mr. Robison walked back to the main office. I explained to him that its possible the dust I saw escaping from the truck loading area would have been a violation over 20% opacity but since I was unable to do a reading, I could not site the violation. I stated that he needed to email me as soon as he found out when the dust collector could be repaired. I also explained that the downward venting of the Kice dust collector from the mill was a violation. He said he would have to talk to corporate and let me know what they would do. I thanked him for taking me around and left the facility around 12:20 pm.

On Wednesday, January 17, I received an email from Mr. Robison letting me know the dust collector was evaluated by an outside contractor and could be repaired. This repair was scheduled to be completed on Saturday, January 19. I responded that he should let me know when that is done. On Thursday, January 18 I spoke to Brendan Coughlan with Mennel Milling in Ohio. We discussed what would be needed by the Department to make the source exempt from permitting and also what would be required to bring the exhaust back into compliance.

On February 11, 2019 I received a 278a demonstration and a void request for permits 205-80, 206-80, 960-91, 961-91, and 962-91 associated with the facility from Mr. Brendan Coughlan. The facility will continue to operate under exemption 285(2)(d)(iii) for equipment for handling, conveying, cleaning, milling, mixing, cooking, drying, coating, and packaging grain-based food products and ingredients that are connected to a baghouse, cycles, rotoclone, or scrubber. I reviewed the 278a calculations submitted with the void request. It appears the facility meets the 278a requirements and can void the permits. Because the facility is now exempt, there will be no violation notice associated with the inspection.

NAME [signature] DATE 2/11/19 SUPERVISOR RJL