



Franks and Sausage Since 1967

Kent Quality Foods, Inc. | 703 Leonard NW | Grand Rapids, MI 49504 | p: 800.748.0141 | f: 616.459.8433 | kentqualityfoods.com

DEQ, AQD Grand Rapids District  
350 Ottawa Ave NW, Unit 10  
Grand Rapids, MI 49503  
Attn: Mr. Adam Shaffer



Re; DEQ Violation Notice Letter dated August 21, 2018

Kent Quality Foods is in receipt of a Violation Notice issued by the Michigan Department of Environmental Quality – Air Quality Division (MDEQ-AQD) pursuant to an inspection of our operation on June 1, 2018. The Violation Notice claims that ten (10) cooking/smoking ovens were installed and commenced operation without an air use Permit to Install (PTI). We believe the observations or statements of the above stated Violation Notice are inaccurate and do not constitute a violation per the following explanation.

We apply liquid smoke to our product for a period of time measured in seconds after which it is rinsed off with clean water. There is a period of time measured in hours between the liquid smoke application and the oven cooking process in which any remaining water and liquid smoke drips off the product. This product is then moved into 5 of our 10 ovens (Ovens 1-5). Through our historical observation of our process and research of using liquid smoke, we are not aware of any emissions generated from the use of liquid smoke. This is further substantiated by AP-42, Section 9.5.2 which does not provide any emissions data or description of emissions from the use of liquid smoke. The purpose of using liquid smoke is to avoid the generation of actual smoke. For these reasons and pursuant to our previous e-mail communications, we continue to believe Ovens 1-5 are exempt from the requirement to obtain a Permit to Install (PTI) pursuant to Rule 282(2)(b)(i) as we are not generating emissions beyond what is generated during fuel combustion and these units satisfy the size and fuel criteria of that exemption.

Regarding the other 5 ovens (Ovens 6-10), these ovens are used as part of a batch smoking process. Over the past year (8/1/17 – 7/31/18), we have used 48,340 pounds (or 24.17 tons) of wood chips in the smoking process. AP-42 provides emissions factors for Filterable Particulate Matter (PM), Condensable PM, Total PM, and Volatile Organic Compounds (VOCs). For PM, we have conservatively evaluated annual Total PM emissions which equate to 1,281 pounds (24.17 tons of wood chips \* 53 pounds PM/ton of wood = 1,281 pounds PM) for the most recent 12-month period. For VOCs, we estimate 1,063 pounds for the most recent 12-month period (24.17 tons of wood chips \* 44 pounds VOC/ton of wood = 1,063 pounds VOC). It should be noted these are uncontrolled emissions which do not account for use of the afterburner control device.

As the emissions generated from the smoking process are noncarcinogenic and actual monthly emissions are well below exemption criteria provided under Rule 290, we also believe Ovens 6-10 are exempt from the requirement to obtain a PTI. If you should require additional records or calculations for the past two years, please let me know and we would be happy to provide records to you.

In conclusion, it has been our understanding the oven installations were exempt from PTI requirements. We also believe the existing afterburner permit remains valid as the process was not modified and the afterburner remains unchanged. If you believe it would be helpful to discuss via a conference call, we would be happy to participate at your convenience.

Respectfully

Greg J. Jaroch

Engineering Manager

**Kent Quality Foods, Inc.**

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