

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

N635243190

FACILITY: TWIN CITY FOODS INC	SRN / ID: N6352
LOCATION: 1315 SHERMAN ST, LAKE ODESSA	DISTRICT: Grand Rapids
CITY: LAKE ODESSA	COUNTY: IONIA
CONTACT: Emery Fox , Plant Manager	ACTIVITY DATE: 01/25/2018
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Compliance
SUBJECT: The purpose of inspection was to determine compliance with applicable air quality rules and regulations.	
RESOLVED COMPLAINTS:	

On Thursday January 25, 2018 Air Quality Division (AQD) Staff Kaitlyn DeVries (KD) conducted an unannounced, scheduled inspection of Twin City Foods, Inc. located at 1315 Sherman St., Lake Odessa, Michigan. The purpose of inspection was to determine compliance with applicable air quality rules and regulations.

Prior to entering the facility, the perimeter was observed for any excess odors or opacity. None were noted. KD met with Mr. Emery Fox, Plant Manager, who accompanied KD on a tour of the facility.

Facility Description

Twin City Foods, Inc. (Twin City Foods) is a food processing facility for the frozen vegetable industry. Primary products include peas, corn, carrots, green beans, and lima beans, all either conventional or organic. The product being processed is varies, depending on the season. When the product arrives at the facility, the vegetables are water washed, cut, and processed prior to being flash frozen and placed into cold storage.

Regulatory Analysis

Twin City Foods does not currently hold any permits through AQD, but rather relies on permitting exemptions.

Compliance Evaluation

The facility has three (3) boilers used to produce steam for the process. Two (2) boilers, installed in 1967 are 250 HP, while the third boiler is 600 HP, and was installed in 1971. All three (3) boilers are natural gas only, and are exempt from Rule 201 permitting under Rule 282(2)(b)(1). These boilers are also not subject to New Source Performance Standards (NSPS) promulgated under 40 CFR Part 60 Subpart Dc, because they were installed prior to the June 9, 1989. The facility does, however, perform routine maintenance on the boilers, and the maintenance records were readily available.

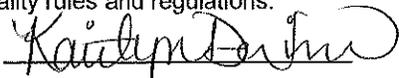
There are also two (2) large closed ammonia systems used for cold storage refrigeration. The cold storage refrigeration equipment is exempt under Rule 280 (a) as it was written at the time of installation. If the cold storage refrigeration equipment is modified or reconstructed, then it would need to be evaluated against the current Rule 280(2)(a) exemption that excludes cold storage equipment using anhydrous ammonia with a storage capacity of more than 500 gallons.

Finally, Twin City Foods has one (1) Generac natural gas emergency generator, that is 862,000 BTU and was installed in 2013. This generator is exempt from Rule 201 permitting under Rule 282(2)(g). This unit does, however, appear to be subject to the new source performance standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines promulgated under 40 CFR Part 60 Subpart JJJJ. These regulations require the unit to be equipped with a non-resettable hour meter and shall not run for more than 50 hours per year, unless used for an emergency situation. Per Mr. Fox, this unit is for their cold storage only, and runs monthly for maintenance.

Compliance Determination

Based on the observations made during the inspection, it appears as if Twin City Foods, Inc. is in compliance with applicable air quality rules and regulations.

NAME



DATE

1/30/2018

SUPERVISOR

