

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

N808151721

FACILITY: ReConserve of Michigan, Inc.	SRN / ID: N8081
LOCATION: 170 ANGELL STREET, BATTLE CREEK	DISTRICT: Kalamazoo
CITY: BATTLE CREEK	COUNTY: CALHOUN
CONTACT: Scott Allread , General Manager	ACTIVITY DATE: 12/12/2019
STAFF: Amanda Chapel	SOURCE CLASS: SM OPT OUT
SUBJECT:	
RESOLVED COMPLAINTS:	

On December 12, 2019, Air Quality Division's (AQD) Amanda Chapel (staff) arrived at ReConserve of Michigan (facility) located at 170 Angell Street Battle Creek, Michigan at 9:45 am to conduct an unannounced air quality inspection. The purpose of the inspection was to determine compliance with the Permit to Install (PTI) 184-08B and all applicable state and federal air regulations. The following will summarize plant operations and facility compliance status.

The facility processes waste cereal and bakery goods into animal feed by using a series of hoppers, hammermills, dryer, and shakers to create the final product. They run two shifts per day, four days a week. They receive about 15 deliveries of product per day. The last inspection was on May 18, 2016 and the facility was determined to be in non-compliance with the permit. The facility had not submitted a Malfunction Abatement Plan or Continuous Fugitive Dust Control plan and was not keeping records. The facility is a permitted PSD VOC synthetic minor and a true minor of all other criteria pollutants. They are not subject to any NESHAP or NSPS.

Staff drove around the facility to observe if any emissions or odor were present. There were no emissions or odors observed around the facility. I entered the facility, made contact with the secretary, and asked for Mr. Scott Allread. I stated I was there to conduct an unannounced air quality inspection. Mr. Allread and I sat down in his office and I explained the process of the inspection. The facility had a complaint in Spring, 2018 about fallout falling onto a nearby business. The facility determined that it was the roto-chopper and baghouse that were malfunctioning and causing the fallout. The facility has changed their process and now the very fine particulate items are sent directly to large shaker, bypassing the roto-chop and baghouse. There have been no further complaints. Everything remains internally vented.

There are no boilers or generators on site. There is one cold cleaner on site which is maintained by Safety Kleen and is filled with Mineral Spirits. The general process at the facility is raw food is received via delivery truck. The raw material goes into the hopper, gets sent through a magnet and into a hogmill. The cereal product goes directly from the scalper to the large shaker. The bakery product goes from the scalper through the dryer and into the large shaker. Product then either goes though a finished feed mill and then to finished feed or directly to finished feed. The roto-chop which is controlled by the baghouse has been removed from the process. It is only used for grinding supplements.

#### EU-RAW MATERIAL

The facility submitted a continuous fugitive emissions program (CFEP) on 9/14/16. There have been no updates or amendments to the plan. The plan should be updated when the yard is fully covered on concrete or asphalt as the facility is planning to do.

There are daily records kept about number of sweepings per day and if any visible emission or fugitive dust seen from all of the processes at the facility. An example of records was obtained, via email, after the inspection.

The facility appears to be in compliance with all requirements of EU-RAW MATERIAL.

#### EU-DRYING

The facility completed testing to verify emissions limits on 7/28-29/16.

Pollutant	Limit	Testing

<b>VOC</b>	<b>17.8 pph</b>	<b>1.0 pph</b>
<b>PM</b>	<b>0.006 lb/1000 lb dry exhaust gas</b>	<b>0.003 lb/1000 lb dry exhaust gas</b>
<b>PM10</b>	<b>0.84 pph</b>	<b>0.70 pph</b>
<b>PM2.5</b>	<b>0.70 pph</b>	<b>0.56 pph</b>
<b>Formaldehyde</b>	<b>0.04 pph</b>	<b>0.004 pph</b>
<b>Destruction Efficiency</b>	<b>95%</b>	<b>97%</b>

Based on records received from the facility, they appear to be in compliance with the material limit of 300,000 tpy food by-product input. A malfunction abatement plan (MAP) was submitted on 9/14/16 and it has not been updated. During the discussion with Mr. Allread in the office, it was recommended the facility look into updating the MAP to include the new facility operation in response to the fallout complaint received in spring 2019.

Filters are changed approximately twice per day based on the readings of the magnahelic gauge. During the inspection, the RTO was not in operation as the operator was at lunch. Bed 1 temperature was 1112 F, Bed 2 was 1117 F, and the outlet temperature was 190 F. Based on records, there were no RTO bypasses recorded. A log is kept in the operator's room if there is any malfunction including date, time, duration, cause and response to the malfunction. Records are being kept of the RTO temperature. They are mostly being kept in 3-hour time blocks. In the records example obtained via email after the inspection, there are 4 blocks of time that exceeded 3-hours, the most of which was 12.58 hours. In discussion with Mr. Allread, he indicated that anything longer than 3 hours was the total time it took to get 3 hours of RTO run time. For example, if it reads 11.2 then its possible there was a malfunction elsewhere at the facility. A note will be made on the bottom of the records to this effect. Records show that the operating temperature has been maintained above the required 1,450 F.

The facility appears to be in compliance with the requirements in EU-DRYER.

#### EU-STORAGE SILOS

At the time of the inspection, the three silos were currently empty. Mr. Allread said the ag-lime bin hasn't been used in years due to issues with clogging. Limestone is now delivered to the raw bay and used as needed. The other two silos are rice hulls and mids. The silos are subject to the CFEP and MAP that was submitted on 9/14/16. Visual emissions checks are done on the silos at least once per day, usually when the filters are changed. The conveyors that are associated with the silos are all covered or enclosed and the silos have a baffle filter system that is monitored.

The facility appears to be in compliance with the requirements for EU-STORAGE SILOS.

#### EU-SIZING

Due to the fallout complaint in spring 2019, the roto-chop and baghouse in EU-SIZING is not used for the everyday facility process. Cereal no longer goes through the dryer and instead bypasses the roto-chop, baghouse, and dryer. Since the change in process, there have been no more fallout complaints. As discussed above, the roto-chop and baghouse in EU-SIZING is used infrequently to process supplements which are added to the product. VE readings are still being taken daily. EU-SIZING is subject to the MAP that was submitted on 9/14/16. The facility should evaluate if this needs to be updated to reflect the new facility operation.

The facility appears to be in compliance with the requirements for EU-SIZING.

#### EU-FINISHED FEED

EU-FINISHED FEED is entirely enclosed. It is subject to the CFEP which was submitted on 9/14/16.

The facility appears to be in compliance with the requirements for EU-FINISHED FEED.

#### EU-PAPER REMOVAL

EU-PAPER REMOVAL is subject to the CFDP and has daily visual inspections for visual emissions done which are logged. The stack is supposed to vent unobstructed vertically upward. However, the stack vents back internally into the raw bay. This should be changed when the permit is updated to reflect that it is now venting internally.

I thanked Mr. Allread and left the site about 11:30 am. The facility appears to be incompliance with PTI 184-08B and all applicable state and federal air regulations.

NAME Amber Culp

DATE 12/17/19

SUPERVISOR RIL 12/19/19