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August 29, 2018

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Michigan Department of Environmental Quality
Air Quality Division
Grand Rapids District
350 Ottawa Avenue NW, Unit 10
Grand Rapids, Michigan 49503



RE: Violation Notice Response and Rule 278a Demonstration
Hearthside Food Solutions, LLC
2455 Oak Industrial Drive, N.E.
Grand Rapids, MI 49505
SRN: N8270, Kent County

Dear Sir or Madam:

This letter is in response to the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) Violation Notice letter, addressed August 9, 2018. The Violation Notice letter stemmed from the July 31, 2018 AQD inspection of the Hearthside Food Solutions facility located at 2455 Oak Industrial Drive N.E. in Grand Rapids, Michigan. The letter indicated there were violations for failure to obtain a permit to install for three separate emission sources, as required by Michigan Act 451, Part 2, Air Use Approval, Rule 201, including Line 1, the National Dryer and Line 215.

Hearthside Food Solutions, LLC (Hearthside) submits that it did not fail to obtain a permit since the three sources qualify for permitting exemptions provided in Michigan Act 451, Part 2, Air Use Approval, Rules 280 through 291, as detailed below. It is Hearthside's belief that a couple of events unrelated to air emissions may have caused difficulty in assessing compliance at the facility and may have affected the AQD inspector's assumptions regarding facility emissions. First, a significant quantity of bread crumbs were spilled from the crumb separating barrel while it was being emptied, prior to the AQD inspection. Hearthside believes the presence of these spilled crumbs on the roof gave the inspector the false impression that particulate emissions were being emitted from Line 1 and the National Dryer. The spilled crumbs have been removed from the roof top. Second, the on-going roof repair work resulted in debris on the roof that also complicated the assessment of potential particulate emissions.

The inspection report states that Line 1 does not meet the permitting exemption in Rule 285(dd), although Hearthside doesn't claim that particular exemption for Line 1. Hearthside believes that Rule 282(1)(a)(v), version 1995-AQD-23, is a more appropriate exemption since Line 1 consists of a bakery oven "where the products are edible and intended for human consumption". Line 1 consists of a natural gas-fired oven with a maximum total heat input rating of 2.7 MMBtu/hr. Since Line 1 meets the criteria of Rule 282(1)(a)(v) and because rule 278 does not apply, Hearthside believes Line 1 should be exempted from permitting. Please refer to Rule 278a demonstration in Attachment 1.

The AQD inspection report noted staining on the roof near the Line 215 vents (Popcorn Popper). The equipment was subsequently inspected by Hearthside and it was determined that the mist collectors were not

operating properly. The equipment associated with Line 215 was immediately shut down and repair work was started and is in process. The equipment will remain out of service until the repairs are complete and operating at full efficiency. Line 215, which was installed in 2013, will qualify for the permitting exemption in Rule 285(1)(dd)(iii), version 2004-007. Please refer to Attachment 1 for exemption details. Also, the inspector noted a grease catch basin located below the stack that had overflowed due to overfilling by rainfall; there was not a lid on the unit. Hearthside plans to reroute the line feeding from the catch basin to the grease trap located inside the plant so that collected grease is properly contained.

The Line 4 dryer is controlled by a cyclone located at the north end of the lower roof. The AQD inspection report concluded the cyclone was not functioning properly due to the presence of particulate material on the roof "surrounding the unit". As was the case with Line 1, Hearthside contends the particulate material observed by the inspector was the result of spilled bread crumbs which occurred during the emptying of the crumb separating barrel, and were not due to any control issues related to the cyclone itself. Also, the inspection report states that the cyclone screen was completely plugged. While the cyclone screen was in need of cleaning, it is Hearthside's belief that the condition of the screen was not impacting the effectiveness of the cyclone. The screen has been cleaned and will be inspected weekly to ensure proper function, along with the other vents and equipment located on the roof. The cyclone is effectively capturing the particulate materials generated by the Line 4 dryer; therefore it qualifies for permitting exemption provided in Rule 285(1)(dd)(iii), version 2004-007.

Prior to the July 31, 2018 AQD inspection, Hearthside made repairs to the cyclone, replacing areas that were showing early signs of corrosion, so as to ensure proper function of the control device. Additionally, Hearthside recognizes the cyclone is approaching the end of its life cycle and has allotted capital budget to replace the cyclone in 2019.

In addition to the corrective actions mentioned above, Hearthside plans to relocate the crumb collection drum to grade, so that it is more easily accessed and the likelihood of crumb spillage is reduced. As noted above, Hearthside has instituted a weekly inspection of the equipment located on the roof to proactively identify any potential future issues.

Please see the attached documentation.

- Attachment 1 – Rule 278a Demonstration.

We wish to thank you in advance for your review of this matter. If you have any questions or need additional information, please contact me at (616) 309-8353

Sincerely,

By: John Denny
Hearthside Food Solutions
Sr. Director, Engineering

Enclosure

cc: Ms. Jenine Camilleri, Enforcement Unit Supervisor, DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760