

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

N827045483

FACILITY: HEARTHSTONE FOOD SOLUTIONS		SRN / ID: N8270
LOCATION: 2455 OAK INDUSTRIAL DR, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Heather Lebeau , Employee & Community Relations Manager		ACTIVITY DATE: 07/31/2018
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the Hearthstone Food Solutions H2 Plant at about 10:50 AM to conduct an unannounced, scheduled Full Compliance Evaluation and met with Heather Lebeau, Employee & Community Relations Manager. We were joined by Karl Schuelke, Building Maintenance and Ronnie Smith, Maintenance Supervisor. I explained that I was there for a routine scheduled inspection.

#### FACILITY DESCRIPTION

Hearthstone Food Solutions- H2 facility is located in an industrial area adjacent to I-196. This facility conducts snack mix components baking and mixing operations sold by national brands. They also do co-packing which is where they receive a product from someone else and package it to certain specifications. The two main products produced at this plant are snack foods and popcorn. The facility operates five baking lines, a chip dryer, caustic cooker, popcorn popper, two fryers (one new), two boilers and a variety of material handling and mixing equipment. The company has obtained synthetic minor limits for Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) pursuant to Opt-out Permit to Install (PTI) No. 126-09A.

#### COMPLIANCE EVALUATION

There has recently been staffing changes at the facility and they are currently without an environmental contact, though they are actively seeking replacement. Ms. Lebeau is currently covering the environmental work and is getting help with the records. Although I did not view the records, Ms. Lebeau stated that they were being maintained and would send them via e-mail right away. I emailed a request on August 6, 2018 asking when they would be submitted. They were received August 7, 2018.

Hearthstone has identified permit exemptions for all equipment at the facility, and these exemptions were evaluated during the inspection. The majority of equipment had been identified as being exempt from permitting pursuant to Rule 285(dd) (2003 version).

Rule 285(dd) states that the requirement to obtain a permit to install does not apply to any of the following: Equipment for handling, conveying, cleaning, milling, mixing, cooking, drying, coating, and packaging grain-based food products and ingredients which meet any of the following:

- (i) Equipment used on a non-production basis
- (ii) Equipment has emissions that are released only into the general in-plant environment.
- (iii) Equipment has externally vented emissions controlled by an appropriately designed and operated particulate control system.

The new fryer line would fall under the Rule 285(2)(dd) (2016 version) since it is brand new.

At the time of the inspection, a new roof was in the process of being installed on the south east section of the lower roof. This consists of removing the top layer of material, as well as a layer of insulation and replacing it with a white rubber roofing membrane. The northern end of the roof had been replaced, and the south was in progress. Upon accessing the roof, there was visible dark material seen, and Mr. Schuelke stated that the majority of the material was remnant of the roofing insulation removal which is a somewhat messy job. However, it became clear to me that while there was roofing material, some of it was particulate emissions from the process dryers.

The National dryer is located at the north end of the lower roof and is equipped with a cyclone for particulate control. The cyclone had recently had several pieces of metal replaced, and there were still spots in disrepair. Additionally, the exhaust screen was nearly completely plugged and appeared to be impeding the air flow. There was quite a bit of particulate material on the roof surrounding the unit. As

such, the National dryer does not meet the requirements of the Rule 285(dd) exemption. A Rule 201 violation will be cited for the National dryer. (see attached photos) Additionally, the equipment is in violation of Rule 910, for failure to properly operate an air cleaning device. We discussed the equipment with Curt Compher, H2 Sanitation Manager who indicated he has been working to fix the unit. I asked how often the exhaust screen is cleaned and was told it was not cleaned, because there was no way to safely access the equipment up in the air.

Lines 1-5 are located from east to west with their various dryer stacks have been previously identified as exempt per the Rule 285(dd) exemption. There was accumulated dark material that Mr. Schuelke stated was roofing material. A close look at Line 1 clearly had particulate matter emissions as evidenced by material on and surrounding a stack. Line 1 does not meet the requirements of the Rule 285(dd) exemption. A Rule 201 violation will be cited for Line 1. As for the material around the other lines, we discussed that it should be cleaned up, so that a determination can be made as to whether or not it is product material or roofing debris. None of the lines are equipped with a particulate control system as required by the exemption. Hearthside Food Solutions should evaluate the status of the lines, and AQD will follow up to observe the roof in the future to see if there are particulate emissions. However, the Rule 285(dd) exemption is not appropriate for any of the lines without the required particulate control system. A request pursuant to Rule 278a will be sent to the company so they can identify the appropriate exemption for the equipment. The facility response should also identify the burner size for each oven for each line.

We accessed the upper level of the roof, which is made of the old roofing material which is a white ribbed steel roof. The Line 215 stacks have been previously identified as exempt per the Rule 285(dd) exemption. There was significant staining on the roof and evidence of oil particulate emissions in the area. Furthermore, there was a catch basin for grease drippings below the stack. This was filled with grease and water as it is exposed to the elements. The roof was stained black where the grease had run over the sides of the catch basin and down into the roof drain, and from there to the storm drain. We talked to Mr. Compher about how often the catch basin is cleaned/emptied. He indicated that it is not cleaner or emptied. This information has been shared with the Water Resources Division staff. Due to the amount of oil particles being emitted as particulate, the Rule 285(dd) exemption is not appropriate without the required particulate control system. The popcorn popper will be included in the Rule 278a request for appropriate exemption identification.

The existing fryer is located on the north end of the upper roof. I observed a large quantity of grease staining in the area and learned that the equipment had malfunctioned for approximately a month where emissions of oil were happening without their knowledge. They have since put measures in place so that cannot happen again. However, it is unclear whether or not the Rule 285(dd) exemption is appropriate. The old fryer will be included in the Rule 278a request for appropriate exemption identification.

The new fryer is located on the south end of the upper roof. This area is clean, and no emissions were observed on the roof. Nonetheless, the new fryer will be included in the Rule 278a request for appropriate exemption identification.

#### Opt-out PTI No. 126-09A

The emission limits contained in this permit apply source-wide to the entire facility. Each individual HAP is limited to less than 9.0 tons per 12-month rolling time period. The highest reported individual HAP is acetaldehyde at 1.050 tons for the time frame of July 2017 through June 2018. Aggregate HAPs are limited to less than 22.5 tons per 12-month rolling time period. Reported aggregate HAP emissions are 1.527 tons for the time frame of July 2017 through June 2018. VOCs are limited to less than 90.0 tons per 12-month rolling time period. Reported VOC emissions are 21.312 tons for the time frame of July 2017 through June 2018.

The permittee shall not produce more than 116,948,847 pounds of bread per 12-month rolling time period. Reported pounds of bread produced for the time frame of July 2017 through June 2018 is 38,175,378 pounds.

It appears as though the company is keeping a listing of chemicals and emissions associated with them adequately, as identified in the attached recordkeeping. This will be more thoroughly evaluated during the next compliance inspection.

**CONCLUSION**

Hearthside Food Solutions, H2 facility was in non-compliance at the time of the inspection.

NAME April C. Longman

DATE 3-7-18

SUPERVISOR AC

