

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection**

N831738734

|                                      |                                   |                           |
|--------------------------------------|-----------------------------------|---------------------------|
| FACILITY: LABUDDE GROUP INC          |                                   | SRN / ID: N8317           |
| LOCATION: 3880 RAYL RD, AKRON        |                                   | DISTRICT: Saginaw Bay     |
| CITY: AKRON                          |                                   | COUNTY: TUSCOLA           |
| CONTACT: Joe Pomeroy , Plant Manager |                                   | ACTIVITY DATE: 01/06/2017 |
| STAFF: Benjamin Witkopp              | COMPLIANCE STATUS: Non Compliance | SOURCE CLASS: MINOR       |
| SUBJECT: Inspection                  |                                   |                           |
| RESOLVED COMPLAINTS:                 |                                   |                           |

On January 6, 2017 Ben Witkopp of the Michigan Department of Environmental Quality - Air Quality Division (MDEQ-AQD) stopped at LaBudde Group in Akron Michigan. The facility is located north of Akron at 3880 Rayl Road. The facility does not have any air use permits on file.

Joe Pomeroy is the Director of Operations but he was unavailable due to illness. I met with the Administrative Manager, Penney Taylor. The overall company acts as a commodity jobber and has operations in several states. Materials deemed waste by some are wanted by others with LaBudde acting as a broker. The Akron facility also processes material.

Penny said the primary materials handled at Akron are tomato pumice, vegetable soup peelings, coffee grounds, and dried sugar beet pulp. Other items may arrive if the need arises.

The facility has 2 three pass dryers which are direct heated by natural gas. Each dryer is equipped with a cyclone. Material being processed in either dryer is subsequently routed through a single cooling tube. If the material being dried is tomato pumice it then goes directly into a building on the east side of the parcel. Due to the presence of seeds, the tomato pumice undergoes additional processing in a hammermill in the main building on the east side of the parcel. If the material is vegetable soup peelings, or similar material, then it goes through the cooling tube and directly into super sacks. A tent building located north northeast of the dryers is used to house super sacks prior to shipping. Two, low, three sided structures are located south of the dryers. They are used to store material outside, and open to the elements, prior to drying.

A building located on the west side of the parcel is devoted to storing dried sugar beet pulp. The pulp is received starting in September and ending in March but it is shipped out throughout the year. The building has a screener controlled by a cyclone on the northeast corner. Material collected by the cyclone is emptied and composted. Bulk loading of screened pulp into trucks is accomplished by dumping the pulp into a large hopper in the building and subsequent conveyance outside. There was quite a bit of opacity at the time as a truck was being nearly fully loaded. This could easily be remedied by using a flexible tube on the end of the conveyor and having a shorter drop distance.

The building on the east side of the parcel houses various operations which are separated by a wall running east and west. A hammermill and screener are located south of the wall while an automatic bagger, super sack bagger, office area, and maintenance area are on the north side.

The dried and cooled tomato pumice is transferred into a hammermill inside the building. After the hammermill operation, the material is sent to the super sack bagger. Emissions are controlled by a roof top mounted cyclone and baghouse. On the east side of the building a loader is used to load dried beet pulp into a screener on an as required basis. The screener sorts out sizes - "overs" which are larger than a quarter and therefore too large for horses but suitable for cattle, - less than a quarter, which is desired for horses, and fines. The overs and fines are subsequently sold in bulk. The rest is bagged in an automatic bagger located on the north side of the wall. Screening was occurring at the time and the area south of the wall was very dusty. There is a hole in the east wall of the area that has a slowly rotating fan in it. The automatic bagging was being operated. The bagger does not have any controls. It has an exhaust pickup that routes any dust up and out the west side wall, near the buildings roofline.

A parts cleaner is located in the maintenance area. It is basically a small tank with a lid. The solvent is diesel fuel. The unit would be exempt from permitting via rule 281 2 (h). No operating instructions were posted which violates Rule 707(4).