



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

November 21, 2014

Shane Menafee
Corporate Environmental Director
Michael Foods
301 Carlson Parkway
Suite 400
Minnetonka, MN 55305

Subject: **Letter of Non-Compliance** – Failure to Maintain Baghouse Maintenance Records
Air Quality Inspection, Britt Facility, Facility No. 41-01-017

Dear Mr. Menafee:

David Miller, an Environmental Specialist with this office, conducted an air quality inspection of the subject facility on November 19, 2014. Equipment and control equipment which was operating, and/or equipment and control equipment with recordkeeping requirements, were evaluated for compliance with air quality regulations. A field inspection report was completed and is enclosed for your file.

The facility was found to be non-compliant in that baghouse maintenance records are not being kept as required by the Permit. Mr. Miller discussed the required recordkeeping with you, and the facility must begin maintaining these records.

The enclosed report addresses only the known emission points at your facility. Please be aware that construction permits are needed for new, altered or modified equipment or control equipment that emits pollutants to the atmosphere. You are also required to notify the DNR of any existing equipment at your facility that is not listed on the enclosed report. This equipment or control equipment may require an as-built permit(s) from the DNR.

Should you have questions regarding this inspection or other matters, please contact Mr. Miller at david.miller@dnr.iowa.gov or 641 424-4073.

Sincerely,

FIELD SERVICES AND COMPLIANCE BUREAU

A handwritten signature in black ink, appearing to read "Jeffrey B. Vansteenburgh".

Jeffrey B. Vansteenburgh
Field Office Supervisor

JBV/dlm
Enclosure - Air Quality Inspection Report

c: Air Quality Bureau

**IOWA DEPARTMENT OF NATURAL RESOURCES
 ENVIRONMENTAL PROTECTION DIVISION
 AIR QUALITY COMPLIANCE INSPECTION
 FIELD OFFICE # 2**

FACILITY # 41-01-005

- 1. Company Name: Michael Foods, Inc.
- 2. Company Address: 1260 Highway 18, Britt, IA 50423
- 3. Plant Address: 1260 Highway 18, Britt, IA 50423
- 4. Process and/or Product Type: Egg Processing & Drying

5. Check Pollutant(s), Air Program Code(s), State Pollutant/Classification(s) as a total plant as they correspond with each other:

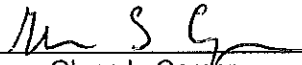
Pollutant(s)	NSPS	PSD PERMIT	MACT NESHAP	TITLE V STATUS			Violation
				A	B	SM	
VOC	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
NO _x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO _x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PM ₁₀	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OTHER(S)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

VISIT NUMBER: 1

- 6. Inspection Type: Routine
- 7. Inspection Date: November 19, 2014
- 8. Time Arrive: 1:00 PM
- 9. Wind Speed & Direction: NNW 20 MPH
- 10. Sky Conditions: Partly Cloudy
- 11. Inspection status: Complete
- 12. Time Depart: 2:10 PM

13. Persons Contacted: Shane Menefee Phone: 952 258-4817
Corporate Environmental Director

14. Inspector's Signature:  Date: November 21, 2014
 David Miller

15. Division Approval By:  Date: 11/21/14
 Glenn L. Carper

AIR QUALITY INSPECTION
 EMISSION POINT - SPECIFIC CONDITIONS - Page 1
 Inspector Initials *[Signature]*

FACILITY NAME: **Michael Foods, Inc.**
 FACILITY NUMBER: **41-01-005**
 INSPECTION DATE: **November 19, 2014**

Egg Spray Dryer #1 Emission Point ID Number: EU EV-01 Permit: 10-A-079 Control Equipment: Baghouse Operating Status: Not Operating Opacity: NA	In Compliance	Out of Compliance (Comments)	Not Applicable or Unable to Evaluate												
<p><u>Emission Limits</u></p> <p>Pollutant: Particulate Matter (PM) Emission Limit(s): 2.3 lb/hr 0.1 gr/dscf Authority for Requirement: 567 IAC 23.3(2)"a" Construction Permit 10-A-079</p> <p>Pollutant: PM₁₀ Emission Limit(s): 2.3 lb/hr Authority for Requirement: NAAQS Construction Permit 10-A-079</p> <p>Pollutant: Opacity Emission Limit(s): 40 % Authority for Requirement: 567 IAC 23.3(2)"d" Construction Permit 10-A-079</p>	<p style="text-align: center;"><input type="checkbox"/></p> <p style="text-align: center;"><input type="checkbox"/></p> <p style="text-align: center;"><input type="checkbox"/></p>	<p style="text-align: center;"><input type="checkbox"/></p> <p style="text-align: center;"><input type="checkbox"/></p> <p style="text-align: center;"><input type="checkbox"/></p>	<p style="text-align: center;"><input checked="" type="checkbox"/></p> <p style="text-align: center;"><input checked="" type="checkbox"/></p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>												
<p>An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).</p> <p>Comments:</p> <p><u>Emission Point Characteristics</u> This emission point shall conform to the specifications listed below:</p> <table border="0"> <thead> <tr> <th style="text-align: left;">Parameter</th> <th style="text-align: left;">Value</th> </tr> </thead> <tbody> <tr> <td>Stack Height, (ft, from the ground)</td> <td>60.7</td> </tr> <tr> <td>Discharge Style</td> <td>Vertical with Rain Cap</td> </tr> <tr> <td>Stack Opening, (inches, dia.)</td> <td>38</td> </tr> <tr> <td>Exhaust Temperature (°F)</td> <td>106</td> </tr> <tr> <td>Exhaust Flowrate (scfm)</td> <td>27,500</td> </tr> </tbody> </table> <p>The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.</p>	Parameter	Value	Stack Height, (ft, from the ground)	60.7	Discharge Style	Vertical with Rain Cap	Stack Opening, (inches, dia.)	38	Exhaust Temperature (°F)	106	Exhaust Flowrate (scfm)	27,500	<p style="text-align: center;"><input checked="" type="checkbox"/></p>	<p style="text-align: center;"><input type="checkbox"/></p>	<p style="text-align: center;"><input type="checkbox"/></p>
Parameter	Value														
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AIR QUALITY INSPECTION
 EMISSION POINT - SPECIFIC CONDITIONS - Page 2
 Inspector Initials *[Signature]*

<p>Egg Spray Dryer #1</p> <p>Emission Point ID Number: EU EV-01 Permit: 10-A-079</p> <p>Control Equipment: Baghouse</p> <p>Operating Status: Not Operating Opacity: NA</p>	In Compliance	Out of Compliance (Comments)	Not Applicable or Unable to Evaluate
<p><u>Operating Limits</u> Operating limits for this emission unit shall be:</p> <p>A. The permittee shall operate and maintain the bag filter in accordance with the recommendation of the manufacturer.</p> <p>Comments: Baghouses may be properly maintained, but no records are kept.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><u>Operating Condition Monitoring</u> All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:</p> <p>A. The permittee shall maintain records on the maintenance performed on the bag filter.</p> <p>Comments: No baghouse maintenance records were available.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<p>Egg Spray Dryer #2</p> <p>Emission Point ID Number: EP-02 Permit: 14-A-001</p> <p>Control Equipment: Baghouse (CE-02)</p> <p>Operating Status: Not Operating Opacity: NA</p>	In Compliance	Out of Compliance (Comments)	Not Applicable or Unable to Evaluate
<p><u>Emission Limits</u></p> <p>Pollutant: Particulate Matter (PM) Emission Limit(s): 2.14 lb/hr 0.1 gr/dscf Authority for Requirement: 567 IAC 23.3(2)"a" Construction Permit 14-A-001</p> <p>Pollutant: PM₁₀ Emission Limit(s): 2.14 lb/hr Authority for Requirement: PTE Limit Construction Permit 14-A-001</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Pollutant: PM₁₀ Emission Limit(s): 2.14 lb/hr Authority for Requirement: PTE Limit Construction Permit 14-A-001</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

AIR QUALITY INSPECTION
 EMISSION POINT - SPECIFIC CONDITIONS - Page 6
 Inspector Initials _____

	In Compliance	Out of Compliance (Comments)	Not Applicable or Unable to Evaluate
<p><i>Natural Gas Boiler</i></p> <p>Emission Point ID Number: EP-03 Permit: 14-A-002</p> <p>Control Equipment: None</p> <p>Operating Status: Not Operating Opacity: NA</p> <hr/> <p><u>Operating Condition Monitoring</u></p> <p>All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. These records shall show the following:</p> <p style="margin-left: 40px;">C. The operator shall maintain one of the following fuel records: Amount of fuel combusted during each operating day Amount of fuel combusted during each calendar month Amount of fuel delivered to the property each calendar month</p> <p>Comments: <i>Daily fuel usage records were reviewed.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>