



MEMO

DATE: July 22, 2022
TO: MEMO TO FILE
FROM: Jon Ryk, ES *JR*
RE: Complaint Investigation
FOCD Complaint ID: 31014 / FOCD Staff Action IDs: 161083 & 160640
FACILITY: PB Leiner USA
FACILITY ID: 82-01-064

Friday, July 22, 2022:

0820: In area of PB Leiner USA to investigate complaint. I did not see any evidence of visual emissions from the stacks at the facility when observing from off-site.

~0830: At the Super 8 hotel adjacent and north of the PB Leiner facility. I could not see evidence of visual emissions from the PB Leiner facility when making observations from this location. I entered the Super 8 facility and spoke with Cathy Callahan, an employee of Super 8 and asked if they had any complaints or issues with materials getting on cars from the adjacent PB Leiner facility. She mentioned that she could not recall any issues of stuff on cars but that the odors can be so bad that they cannot use some of the upper rooms at the facility and they cannot open the upper windows at the Super 8 due to odors from the PB Leiner facility.

~0840: at the Builders First Choice facility located adjacent and south of the PB Leiner facility. I spoke with Rich Goodwin who mentioned that they have not had issues with stuff getting on vehicles from the adjacent PB Leiner facility but that the odors are really bad when they are cleaning tanks, especially on hot days. I also obtained verbal permission from Rich Goodwin to go into the back area of the Builders First Choice facility so that I could make observations of the tissue loadout area of the PB Leiner facility. No odors were noted from the Builders First Choice property.

~0850: Arrived at the PB Leiner facility to further investigate. I noticed strong odors upon parking in the visitor parking area near the office. I met with Mr. Andy Murdock, Environmental Safety and Health specialist at PB Leiner to further investigate the complaint. I ended up doing a complaint-initiated air quality compliance evaluation at the facility which is completed as a separate document. However, key findings related to the complaint are outlined also in this memo.

While I was waiting to meet with Andy, I spoke with an anonymous employee at the facility who mentioned that the stuff getting on the cars was like a gelatin and that it has been worse since the parking is in front of (on the north side of) the building.

The PB Leiner facility makes gelatin from pig skins. The collagen from the pig skins is processed into gelatin. A by-product of the process is protein solids ("tissue") that is processed and dried and then sent to a silo for storage until it is loaded out into trucks to be sent to another company that uses the "tissue" to make dog food.

I first discussed the tissue loadout area since that has had a prior complaint back in 2012. Andy informed me that they use the tissue loadout about once or twice a week. The tissue loadout area is not completely enclosed. He indicated that there are slats on the east and west walls and there is a telescoping spout that are present to minimize emissions. There is a dust collector on the loadout which sends tissue back to the silo. I asked Mr. Murdock if there was any alarm on the dust collector for the tissue loadout if the dust collector did not startup when loading out and he mentioned there was not. He stated that operators would have to rely on visual observations of emissions coming from the emission point to know if the dust collector was not working. The trucks are loaded out typically on Tuesdays and Thursdays. Mr. Murdock indicated that they can have dust issues from the tissue loadout area if there is a north or south wind since those ends are open. I mentioned that having the area fully enclosed would help reduce the dust issues from the tissue loadout and that possibly having a water curtain around the area could also help.

We discussed the plant processes and the potential emission points that could be causing the issues of material from the plant getting on vehicles. Mr. Murdock informed me that they were aware of issues with some of the baghouses which necessitated replacing the cartridges in the baghouses. He informed me that they used to have bags in the baghouses but had replaced them with cartridges which, along with supply chain issues, had made getting the replacement cartridges more difficult. He stated that they had already changed out cartridges for the baghouse associated with EP-12 (Barrel Filling and Regrinding) last October and that they had changed out cartridges for EP-4 (Fine Grind) about two years ago. He went on to say that they had cartridges that arrived this week for EP-3 (Product Grind, North and South Blending) and EP-5 (Mixed Lot Packaging). He informed me that they are scheduled to have the cartridges for the baghouse for EP-5 replaced Wednesday, July 27, 2022 and that they are scheduled to have the cartridges for the baghouse for EP-3 replaced Thursday, July 28, 2022.

I then toured the facility with Mr. Murdock and performed an air quality compliance evaluation. While on the roof of the facility there were areas where there was evidence of accumulation of some of the gelatin material on the roof as well as some other areas of staining and/or accumulation of material on the roof. Areas with accumulations of material included the area near EP-5 and the west edge of that roofline; The area near EP-12 and the west edge of that roofline; the north edge of the roofline that has the boiler stacks (EP-1 and EP-2); The northern portion of part of the roofline

for the office area; the northwest corner of the roofline to the north of the EP-3 stack; and the area of the roof near the EP-6 stack (Old Scrubber DAF Room). These areas are shown in the photos as well as the aerial photo of the facility following the photos.

Unfortunately, there was no tissue loadout being done on the date of the visit so I asked Mr. Murdock to let me know when they might be loading out tissue so I could make observations while tissue loadout is being done.

I collected the following samples off of some cars in the parking lot for potential analysis to see if the material was from the tissue loadout or the finishing area emission points (EP 3, EP-12, EP-4 or EP-5) that would be possible sources of gelatin dust:

- Dust from Dk Blue SUVs NE Parking Lot (Collection Time: 1100)
- Dust from Gray Jeep N Parking Lot (Collection Time: 1130)

Mr. Murdock was asked to send information on their preventative maintenance, records associated with the different emission points

See the following page for photos taken while at the property.

JPR: N:\Environmental Services\Field Services\ESD06-Wash-Fo6\JRYK\AQ\2022\PB Leiner 82-01-064 - Complaint 31014\7-22-22 Complaint Investigation Memo -PB Leiner USA - Davenport.doc

Attachments: 1) Site Investigation Photographs; 2) Aerial Photo of Facility

Pictures: PB Leiner - Davenport 7-22-22 (1)-(18)

Xc. Mark Fields, Iowa DNR Air Quality Bureau (via email)
Lucas Tenborg, Iowa DNR Air Quality Bureau (via email)

Site Photographs



View area of roof near EP-5 showing gelatin debris on the roof



View area of roof near EP-5 showing gelatin debris on the roof.



View looking east along the north edge of the roof over the Boiler Room.



View looking northeast from the roof over the Boiler Rooms at the roof over the office area showing gelatin material on the top of the office roof.



View looking northwest at area of roof around EP-12 showing gelatin material along the west edge of the roof.



View looking west at roof drain inlet in the northwest corner of the roof near EP-12.

Site Photographs



View looking south from EP-12 (left stack) along the west edge of the roofline by EP-12. EP-18 and EP-19 can be seen in the background (from left to right, respectively).



View looking north-northwest at materials on the roof near EP-6 - Old Scrubber Stack (upper right).



View looking north at the tissue loadout (EP-23) from the south.



View looking up at the telescoping chute at the tissue loadout (EP-23).

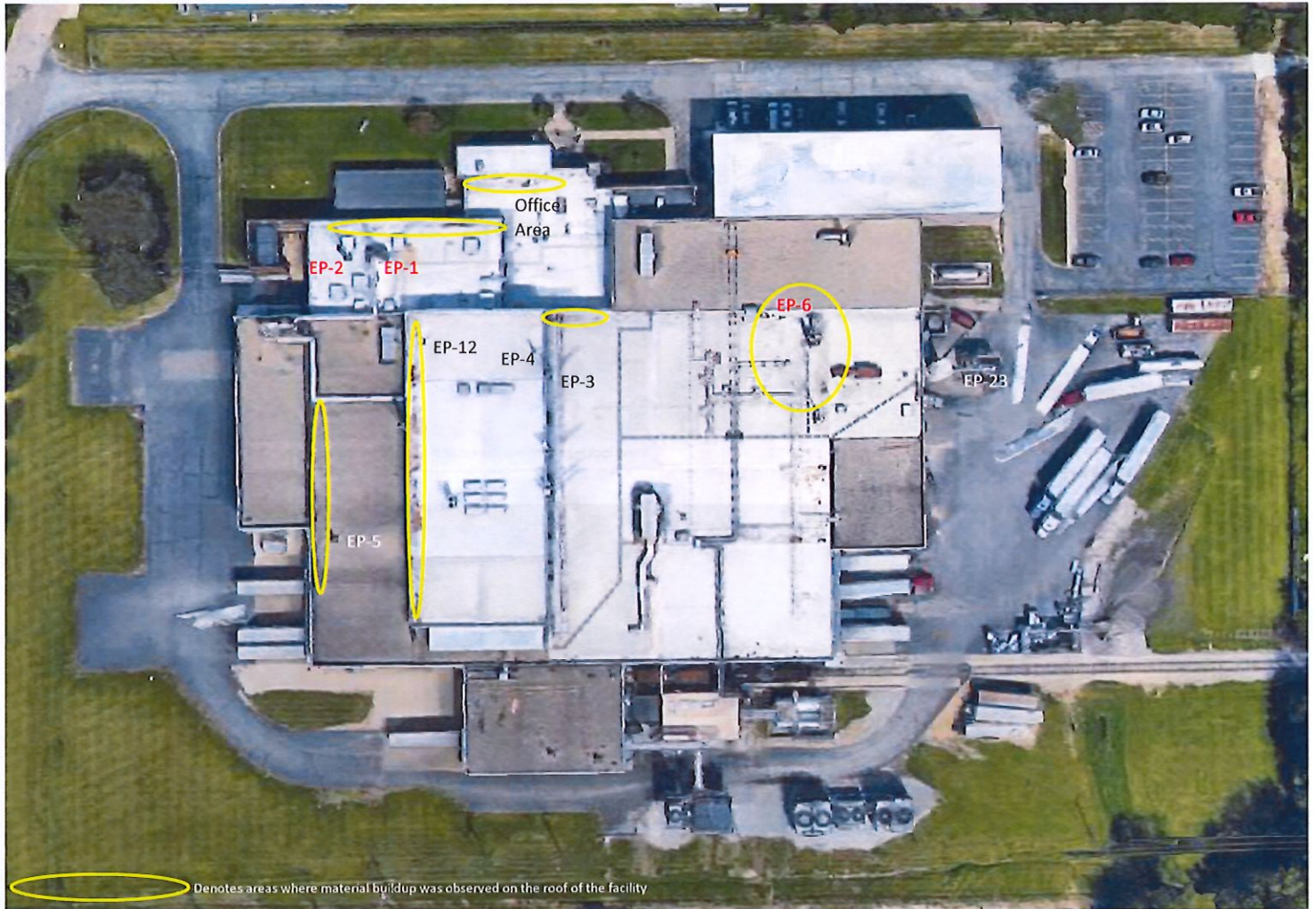


View of small pile of tissue debris located directly below the chute at the tissue loadout (EP-23).



View looking south at the facility from the adjacent Super 8 facility to the north.

Aerial Photo of Facility



Areas with accumulations of material included the area near EP-5 and the west edge of that roofline; The area near EP-12 and the west edge of that roofline; the north edge of the roofline that has the boiler stacks (EP-1 and EP-2); The northern portion of part of the roofline for the office area; the northwest corner of the roofline to the north of the EP-3 stack; and the area of the roof near the EP-6 stack (Old Scrubber DAF Room). These areas are shown in the photos as well as the aerial photo of the facility following the photos.