



MEMO

DATE: July 27, 2022
TO: MEMO TO FILE
FROM: Jon Ryk, ES *JRM*
RE: Complaint Investigation
FOCD Complaint ID: 31314 / FOCD Staff Action ID: 162242
FACILITY: PB Leiner USA
FACILITY ID: 82-01-064

Tuesday, September 27, 2022:

1027: At PB Leiner USA to investigate complaint. I did not see any evidence of visual emissions from the stacks at the facility upon arrival other than what appeared to be steam coming from one of the boiler stacks.

Upon arrival I met with Andy Murdock, Environmental Health & Safety Coordinator. I discussed the complaint with Andy and asked about any upsets or incidents with respect to the emission points that he may have noticed. He informed me that they had addressed many of the items from my August 24, 2022 NOV including cleaning the roof off, addressing the issue with the fan on the tissue loadout (EP23) which was corrected the same day, and doing follow up wet bulb testing on EP-3, EP-4, EP-5 and EP-12. They also opened up EP-4 and no dust was seen on the clean side of the baghouse. Mr. Murdock had suspected the EP-15 could be a possible cause since the cartridges on that emission point had not been changed out since 2019. This emission point handles the gelatin mix lot area. He indicated there was no signs of issues on the magnahelic gauge for the baghouse for EP-15 and no telltale signs seen. Some of these items were also mentioned in the response from PB Leiner dated September 12, 2022 (specifically regarding the requirements in the August 24, 2022 NOV to PB Leiner.

Regarding the tissue loadout, there is a purchase order in to replace the slats on the east and west sides and also some on the south side.

As far as operation and maintenance, they are now taking daily magnahelic readings for the dust collectors and checking the cartridges quarterly. He indicated that they are working on the Operation & Maintenance (O&M) Plan for the control units but he was concerned that the O&M Plan would not be complete by the September 20, 2022 deadline that was indicated in the August 24, 2022 NOV. I mentioned that we should be able to extend the deadline for the O&M Plan and asked that he send a written request to do so and indicated that sending it via email is fine.

Since the complaint seemed to indicate an issue with gelatin dust and specifically mentioned an incident on September 20, 2022, I asked to see the records of the magnahelic readings as well as any maintenance orders for that

day. Mr. Murdock did not have records for the magnahelic readings for September 20, 2022 but provided magnahelic readings for September 16, 17, 19, 24, 25, and 26. Review of the magnahelic readings indicated that the readings were within the operating limits with the exception of readings for September 21 and 22 for the Straight Lot / Steadman 1 Dust Collector #1 which corresponds to Emission Point EP-3. These readings at 0.75 inches of water which is below the lower operating limits of 1 inch of water (the operating range for the unit is 1 to 4 inches of water). Mr. Murdock was unable to find an associated maintenance order for the unit for being out of the operating limit. Review of subsequent magnahelic readings indicated that the readings were up to the lower limit of the operating range (1 inch of water) by September 24, 2022. However, he did indicate that there is also an after filter on the emission point which is after the baghouse. He seemed to think that the emission point which may be causing the gelatin dust issue is EP-15 since it has gone the longest time without having the cartridges replaced. They were last replaced in 2019.

We discussed what the facility could possibly due in the event that the control equipment is not operating effectively our is out of the range of the operating limits and Andy mentioned that a key factor is that they cannot really ramp down the processes for the grinding, filling and packaging without causing upsets earlier in the process since the gel from the initial processing can solidify and block pipes if the processing is slowed. We also discussed the possibility of getting cartridges that will capture finer particulates and Andy indicated that he is seeking input from his supplier on that. Mr. Murdock also discussed that if the cartridges are all working as required but there is gelatin dust still getting through then there might be some kind of breach in the hole plate, the plate that the cartridges go through which separates the clean side from the dirty side of the baghouse. Mr. Murdock mentioned that he is working on ordering the cartridges for the control equipment for the EP-15 (Mixed Lot Transfer) dust collector, but that the lead time to get the replacement cartridges could be around a month. We also discussed the possibility of putting after filters on the other emission points, similar to those that are already on the EP-3 and EP-4 emission points but that getting those ordered and installed would probably take longer than getting the cartridges for the EP-15 baghouse.

After meeting with Andy Murdock, I checked some of the darker colored vehicles in the parking area north of the facility and was able to see particulates on them. Samples obtained from prior sampling in July and August, 2022 were submitted to the State Hygienic Lab in Coralville for light microscopy analysis indicated that dust from the vehicles in the north lot included particulates that were similar to the particulates from the cartridge filters for EP-3 and 5, and to the dust from the tissue loadout.

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 Complpt received 9-23-22\9-27-22 Complaint Investigation Memo -PB Leiner USA - Davenport.doc

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

Pictures: PB Leiner - Davenport 9-27-22 (1)-(4)

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

Site Photographs



View of dust on vehicle to the north of the PB Leiner Offices.



View of dust on vehicle to the north of the PB Leiner Offices.



View of dust on vehicle to the north of the PB Leiner Offices.



View of dust on vehicle to the north of the PB Leiner Offices.

Aerial Photo of Facility

