

Source Inspection Report

COMPANY: PACMoore Products, Inc.
 1844 Summer Street
 Hammond, Indiana 46320
 (219) 932-2666

| *Violation(s) Observed (Y/N)? | |
|--------------------------------------|----|
| State | No |
| Local | No |

| | |
|-------------------------------------------------------------------------------------------|--------------------------------------|
| SOURCE ID NUMBER: 089-00476 | INSPECTION DATE: May 13, 2016 |
| SOURCE CLASSIFICATION: Local/State Registration | LEVEL: Annual |
| OPERATION PERMIT TYPE: Local/State Registration | TYPE: 2 |
| OPERATION PERMIT NO(s): Local: 03716-03722 State Registration: R089-16975-00476 | |
| ISSUE DATE(s): Local: February 4, 2016 State Registered: January 31, 2003 | INSPECTOR: Michael Zabrecky |
| PERMIT REVISION DATE: N/A | |

REPORT WRITTEN BY: Michael Zabrecky

FACILITIES INSPECTED: Entire Plant

PERSON(s) INTERVIEWED: Brent Knepper, Corporate Safety Manager

INSPECTION OBJECTIVE(s):

To determine PACMoore Products, Inc.'s compliance to applicable State and local air pollution regulations through observations, interviews with Company representatives, and review of records.

SUMMARY OF INSPECTION:

On May 13, 2016, an Annual Inspection was conducted at PACMoore Products, Inc. This facility holds seven (7) operation permits from this Department.

See the table below for the permitted items, the operating status, and the pressure drop readings of each of the unit's control equipment.

| The Permitted Items: | Control Equipment: | Operation Status | ΔP: |
|-----------------------------------------------------|---------------------------------------------------------|-------------------------|------------------------|
| Blending Station | Shick Dust Collector | Operating | 1.0 "H ₂ O |
| Bulk Receiving & Packaging System | Camco, Inc. Cartridge Bin Vent Filter (Model C-26-6-BV) | Operating | 13.0 "H ₂ O |
| Bulk Unloading & Blending System | MikroPul Bin Vent Filter (Model CFV-6) | Not Operating | -- |
| Packaging Station | Torit Dust Collector | Operating | 1.0 "H ₂ O |
| Sifting and Re-Packaging System | Mikro-Pulsaire Dust Collector (Model 21-61-100) | Operating | 1.0 "H ₂ O |
| Sodium Sulfate Bulk Unloading and Packing Operation | Mikro-Pulsaire Dust Collector | Not Operating | -- |
| Paper Bag Recycling System | Mac-MactiFlow 3MTF-36 Dust Collector | Operating | 4.5 "H ₂ O |

The entire plant was inspected. No violations or visible emissions observed.

*Compliance Status is limited to those facilities observed during the inspection, under the conditions at the time of the inspection, and to the applicable air pollution regulations enforceable by this Agency.

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A Compliance determination is still pending on the Bulk Receiving and Packaging System due to a high pressure drop reading being noted during the inspection. The Inspector asked that someone from PACMoore Products, Inc. phone this Department, once repairs have been made, so that a follow-up inspection can be conducted.

ENTRY INTERVIEW:

Upon entry, I met with Brent Knepper, Corporate Safety Manager for PACMoore Products, Inc. I informed him that this is an Annual Inspection, and that I wanted to inspect the State Registered and local permitted items.

INSPECTION OBSERVATION(s):

The potential to emit (as defined in 326 IAC 2-7-1 (30)) of Particulate Matter is less than 100 tons per year, therefore, the source is not subject to the provisions of 326 IAC 2-7. The potential to emit of Particulate Matter is greater than 5 tons per year and less than 25 tons per year, therefore, the source is subject to the provisions of 326 IAC 2-5.5 (Registration).

1. Process Equipment: Blending Station
Blending Station
Shick Dust Collector
2. Process Description:
This unit is used to blend various materials at a maximum design rate of 5,000 lbs/hr. The dust generated from the manual bag dumping operation is controlled by a Shick Dust Collector with a manufacturer's guaranteed control efficiency of 99.9%.
3. Pollutants Emitted:
Total suspended particulates (TSP)
4. Control Equipment:
Shick Dust Collector
5. Applicable Rules:
326 IAC 2-5.5 (Registration), 326 IAC Article 2 (Permit Review Rules), and Hammond Ordinances #7102 (Hammond Environmental) and #3522 (as Amended), (Hammond Air Pollution Control)
6. Emission Limitations:
TSP = 0.0002 lbs/hr = 0.0011 Tons Per Year (TPY)
7. Other Permit Requirements:
See the General and Special Operation Permit Conditions for 2016.
8. Observations:
The Station was in operation processing food grade powders. The pressure drop reading off the Shick Dust Collector was read at 1.0 "H₂O. No visible emissions or modifications observed.
9. Records Review:
Copies of the following were obtained for review:
See Special Operation Permit Condition #2 for 2016.

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10. Compliance Status: No violations observed or determined during the plant inspection. No violations noted during review of records.
1. Process Equipment: **Bulk Receiving & Packaging System**
75 HP Motor
Storage Silo
Rotary Airlock Feeder
Camco, Inc. Cartridge Bin Vent Filter
2. Process Description:
Product (assorted food grade powders) will be unloaded from railcars or bulk trucks by being blown with a 75 horsepower pressure blower into a storage silo. The storage silo will be equipped with a Camco, Inc. Cartridge Bin Vent Filter (Model C-26-6-BV) with GORE-TEX LIGHT-PULSE Filters used to control particulate emissions and rated at 99.72% control efficiency. The maximum pneumatic unloading rate will be 30,000 lbs/hr. The product received in the storage silo will pass through a rotary air lock feeder and be sifted through a screen. Product will then be packaged in either bags or supersacs.
3. Pollutants Emitted:
Particulate Matter (PM)
4. Control Equipment:
Camco, Inc. Cartridge Bin Vent Filter
5. Applicable Rules:
326 IAC 2-5.5 (Registration), 326 IAC Article 2 (Permit Review Rules), and Hammond Ordinances #7102 (Hammond Environmental) and #3522 (as Amended), (Hammond Air Pollution Control)
6. Emission Limitations:
PM = 0.0012 lbs/hr = 0.0053 Tons Per Year (TPY)
7. Other Permit Requirements:
See the General and Special Operation Permit Conditions for 2016.
8. Observations:
The System was in operation and processing food grade powders.

The pressure drop reading off its bin vent filter collector was recorded at 13.0 "H₂O, and the readings appeared high and "pegged" to the right side of the manometer's dial. The Inspector then mentioned his observations to the Safety Manager, but wanted to view the Special Conditions and maintenance schedules for the unit first.

It was determined by record check, and with discussions with company personnel that the normal readings should have been around 5.0 "H₂O. It was further suggested by Maintenance that the lines connected to the manometer could have been "plugged", thus resulting in high readings off the collector.

No visible emissions or modifications observed during the System's operation.

The inspector was told also that repairs on the manometer had been initiated.
9. Records Review: Copies of the following were obtained for review:
See Special Operation Permit Condition #2.

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10. Compliance Status:
The compliance status is pending and will be determined during a follow-up inspection. No violations noted during review of records.
1. Process Equipment: Bulk Unloading and Packaging System
Receiving Hopper
Bag dump station & a blender
MikroPul Bin Vent Filter (Model CFV-6)
2. Process Description:
This system includes a receiving hopper, bag dump station, and a blender. The maximum design rate of pneumatic unloading of cornstarch or other food grade powders is 7,200 lbs/hr. Particulate emissions generated during the unloading and bag dumping processes are controlled by a MikroPul Bin Vent Filter (Model CFV-6) with a manufacturer's guaranteed control efficiency of 99.99%.
3. Pollutants Emitted:
Total suspended particulates (TSP)
4. Control Equipment:
MikroPul Bin Vent Filter (Model CFV-6)
5. Applicable Rules:
326 IAC 2-5.5 (Registration), 326 IAC Article 2 (Permit Review Rules), and Hammond Ordinances #7102 (Hammond Environmental) and #3522 (as Amended), (Hammond Air Pollution Control)
6. Emission Limitations and Standards:
TSP = 0.000086 lbs/hr = 0.000378 Tons Per Year (TPY)
7. Other Permit Requirements:
See the General and Special Operation Permit Condition for 2016.
8. Observations:
The System was not in operation. No visible emissions or modifications observed.
9. Records Review:
Copies of the following were obtained for review:
See Special Operation Permit Condition #2.
10. Compliance Status:
No violations observed or determined during the plant inspection. No violations noted during review of records.
1. Process Equipment: Packaging Station
Packaging Station
Torit Dust Collector
2. Process Description:
This unit is used to package various materials at a maximum rate of 7,500 lbs/hr. A Torit Dust Collector is used to control dust particles generated from the manual dumping operation. The manufacturer's guaranteed control efficiency

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for the dust collector is 99.9%.

3. Pollutants Emitted:
Total suspended particulates (TSP)
4. Control Equipment:
Torit Dust Collector
5. Applicable Rules:
326 IAC 2-5.5 (Registration), 326 IAC Article 2 (Permit Review Rules), and Hammond Ordinances #7102 (Hammond Environmental) and #3522 (as Amended), (Hammond Air Pollution Control)
6. Emission Limitations:
TSP = 0.0006 lbs/hr = 0.0026 Tons Per Year (TPY)
7. Other Permit Requirements:
See the General and Special Operation Permit Conditions for 2016.
8. Observations:
The unit was in operation processing food grade powders. The pressure drop reading off the collector was read at 1.0 "H2O. No visible emissions or modifications observed.
9. Records Review:
Copies of the following were obtained for review:
Special Operation Permit Condition #2.
10. Compliance Status:
No violations observed or determined during the plant inspection. No violations noted during review of records.
1. Process Equipment: **Sifting and Re-Packaging System**
Sifter Hopper
Vacuum Receiver
Packaging Hopper
Mikro-Pulsaire Dust Collector (Model 21-61-100)
2. Process Description:
This system is used to sift and re-bag cornstarch, soy protein, and other food grade products. The maximum design rate of material processed through the system is 7,500 lbs/hr. The material is first dumped into the sifter hopper, sifted, vacuum pumped into the vacuum receiver, and finally dropped into the packaging hopper where it is packaged into bags. Particulate emissions from the sifting hopper and the packaging hopper are controlled by a Mikro-Pulsaire Dust Collector (Model 21-61-100) with a manufacturer's control efficiency of 99.9%.
3. Pollutants Emitted:
Total suspended particulates (TSP)
4. Control Equipment:
Mikro-Pulsaire Dust Collector (Model 21-61-100)
5. Applicable Rules:
326 IAC 2-5.5 (Registration), 326 IAC Article 2 (Permit Review Rules), and Hammond Ordinances #7102 (Hammond Environmental) and #3522 (as Amended),

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(Hammond Air Pollution Control)

6. Emission Limitations:
TSP = 0.0015 lbs/hr = 0.0066 Tons Per Year (TPY)
7. Other Permit Requirements:
See the General and Special Operation Permit Conditions for 2016.
8. Observations:
The System was in operation and processing food grade powders. No visible emissions or modifications observed.
9. Records Review:
Copies of the following were obtained for review:
See Special Operation Permit Condition #2.
10. Compliance Status:
No violations observed or determined during the plant inspection. No violations noted during review of records.
1. Process Equipment: Sodium Sulfate Bulk Unloading and Packing Operation
Vacuum Filter Receiver
Mikro-Pulsaire Dust Collector
2. Process Description:
Sodium Sulfate, in course granular form, received in bulk hopper railcars, will be pneumatically conveyed into the Filter Receiver at a maximum unloading rate of 30,000 lbs/hr. From the Receiver, the material will be packaged in Semi-Bulk (Super-Sac) containers of 1,000 or 2,000 lbs per bag. Emissions from the unloading operation shall be controlled by a Mikro-Pulsaire Dust Collector rated at 99.9% control efficiency.
3. Pollutants Emitted:
Total suspended particulates (TSP)
4. Control Equipment:
Mikro-Pulsaire Dust Collector
5. Applicable Rules:
326 IAC 2-5.5 (Registration), 326 IAC Article 2 (Permit Review Rules), and Hammond Ordinances #7102 (Hammond Environmental) and #3522 (as Amended), (Hammond Air Pollution Control)
6. Emission Limitations:
TSP = 0.02 grains per dry standard cubic feet (gr/dscf) with a discharge flowrate of 800 ACFM and discharge temperature of 200°F (equivalent to 0.110 lbs/hr).
7. Other Permit Requirements:
See the General and Special Operation Permit Conditions for 2106.
8. Observations:
The unit was not in operation. No modifications were observed.

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9. Records Review:
Copies of the following were obtained for review:
See Special Operation Permit Condition #2.
 10. Compliance Status:
No violations observed or determined during the plant inspections. No violations noted during review of records.
 1. Process Equipment: Paper Bag Recycling System
Five (5) Dump Stations
Baler
Mac-MactiFlow 3MTF-36 Dust Collector
 2. Process Description:
This system consists of five (5) dump stations each with a 14 inch pipe and slide gate for the disposal of used paper bags from dried food ingredients at a maximum design rate of 100 pounds of paper bags/hr. The bags are sucked into the pipe, through a material handling fan, blown into a cyclone, and into a baler. Emissions from this operation will be controlled by a dust collector (Mac-MactiFlow 3MTF-36).
 3. Pollutants Emitted:
Particulate matter (PM) and particulate matter_{10 microns} (PM₁₀)
 4. Control Equipment:
Mac-Mactiflow 3MTF-36 dust collector
 5. Applicable Rules:
326 IAC 6-3-2(e)(2)(Particulate emission limitations, work practices, and control technologies), 326 IAC 2-5.5 (Registration), 326 IAC Article 2 (Permit Review Rules), and Hammond Ordinances #7102 (Hammond Environmental) and #3522 (as Amended), (Hammond Air Pollution Control)
 6. Emission Limitations:
PM = 0.551 lbs/hr = 2.41 Tons Per Year (TPY)
PM₁₀ = 0.551 lbs/hr = 2.41 TPY
 7. Other Permit Requirements:
See the General and Special Operation Permit Conditions for 2016.
 8. Observations:
The System was in operation. No visible emissions or modifications observed.
 9. Records Review:
Copies of the following were obtained for review:
See Special Operation Permit Condition #2.
 10. Compliance Status:
No violations observed or determined during the plant inspection. No violations noted during review of records.

CONCLUSION(s)/RECOMMENDATION(s):

The entire plant was inspected. No violations or visible emissions observed.

A Compliance determination is still pending on the Bulk Receiving and Packaging System

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due to a high pressure drop reading being noted during the inspection. The Inspector asked that someone from PACMoore Products, Inc. phone this Department, once repairs have been made, so that a follow-up inspection can be conducted.