

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection**

B439455330

FACILITY: BIMBO BAKERIES USA, INC.		SRN / ID: B4394
LOCATION: 210 28TH STREET, S.E., GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Walter Snidanko , Facility Manager		ACTIVITY DATE: 08/12/2020
STAFF: Scott Evans	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled air quality inspection.		
RESOLVED COMPLAINTS:		

Introduction

On Wednesday, August 12, 2020, AQD staff Scott Evans (SE) conducted an unannounced, scheduled inspection of the Bimbo Bakeries facility located at 210 28th Street SE in Grand Rapids, Michigan. The purpose of this inspection was to evaluate compliance with opt-out Permit to Install (PTI) No. 14-97D.

On the day of the inspection, SE approached the facility at approximately 3:00 in the afternoon. Upon a perimeter drive of the facility there were no signs of visible emissions coming from the facility. There were occasional odors of baked goods outside of the facility. After entering the facility and applying appropriate PPE including face masks in accordance with proper COVID-19 pandemic prevention, SE was met by Walter Snidanko (WS) and Dave Dotson (DD). After a brief meeting to discuss the purpose of the visit, DD lead SE on a walking inspection of the facility. Records for the facility were reviewed at a later date remotely as a further safety measure during the COVID-19 outbreak.

PTI No. 14-97D

This permit covers two emission units (EU001 and EU002) and two flexible groups (FGOVENS and FGFACILITY). During the walking inspection of the facility all equipment was visually inspected and all units and flexible groups were evaluated via records that were provided by the facility representatives.

EU001 & EU002

Both emission units consist of one natural gas-fired bread oven each. One line is used for bread loaf production and the other is used for the production of hamburger buns. EU001 is a 6.71 mmBtu oven and EU002 is a 4.05 mmBtu oven. Both ovens are subject to limits included in in the flexible group FGOVENS. During the visual inspection, both ovens were functioning properly.

FGOVENS

This flexible group encompasses both emission units EU001 and EU002. It includes one emission limit and two material limits based on a 12-month rolling time period as listed below:

- 94.9 tpy of Volatile Organic Compounds (VOCs)
- 59,350,000 lbs/yr of Bread
- 20,000,000 lbs/yr of Buns

To demonstrate compliance with the above limits, the records listed below are required to be kept by the facility:

- Pounds of Bread and Buns produced monthly
- Pounds of Bread and Buns produced annually (12-month rolling)
- Oven VOC monthly emissions
- Oven VOC annual emissions (12-month rolling)

The facility is required to use oven emission rates in accordance with USEPA Document No. 453/R-92-017. The facility appeared to be in compliance with this requirement based on the records provided.

All necessary records were provided by the facility via email. Below is an evaluation of the records provided and compliance determination for each applicable limit:

- VOC Emissions (94.9 tpy limit)
 - o EU001 Highest month: 1.91 tons in March 2020
 - o EU002 Highest month: 3.47 tons in June 2020
 - o Highest combined month: 5.08 tons in June 2020
 - o Highest 12-month rolling time period: 54.28 tons as of July 2020
 - o In compliance with limit
- Bread production (59,350,000 lbs/yr)
 - o Highest month: 5,220,476 lbs in March 2020
 - o Highest 12-month rolling time period: 51,414,000 lbs as of July 2020

- o In compliance with limit
- Bun Production
 - o Highest month: 2,100,509 lbs in June 2020
 - o Highest 12-month rolling time period: 20,667,200 lbs as of July 2020
 - o In exceedance of limit.

As demonstrated above, the applicable emission limit is met as is the material limit of bread production. However, the facility is not in compliance with the bun production material limit. A violation notice (VN) will be issued to the facility regarding this exceedance.

During the inspection, a visual inspection of the roof was conducted to evaluate status of the permitted stacks. Though stacks were not measured, all appeared to be in compliance with permitted restrictions.

FGFACILITY

This flexible group encompasses all equipment within the facility. It includes one emission limits and one material limit to opt the source out of Title V permitting as listed below:

- 96.56 tpy of VOCs based on a 12-month rolling time period
- 362.68 mmft³ of natural gas usage based on a 12-month rolling time period

To demonstrate compliance with the above limits, the facility is required to keep and maintain the following records for a period of ne less than five years:

- Natural Gas usage (monthly and 12-month rolling time period)
- VOC emissions (monthly and 12-month rolling time period)

As required, records were provided to the department. Below is an evaluation of these records as they apply to the above limits:

- VOC emissions (96.56 tpy limit)
 - o Highest month: 5.09 tons in June 2020
 - o Highest 12-month rolling time period: 54.45 tons as of July 2020
 - o In compliance with limit
- Natural Gas Usage (mmcf³)
 - o Highest month: 7.56 mmcf³ in December 2019
 - o Highest 12-month rolling time period: 61.22 mmcf³ as of July 2020
 - o In compliance with limit

As demonstrated above, the facility is in compliance of all limits established for FGFACILITY.

Exempt Equipment and Other Items

Located at the facility are two boilers with the below specifications:

- 8.4 mmBtu, natural gas-fired boiler installed in 1980
- 3.3 mmBtu, natural gas-fired boiler installed in 1964

Both boilers are exempt from air permitting requirement under Rule 282(2)(b)(i). Both boilers were installed prior to the year 1989 and so are not subject to the New Source Performance Standard 40 CFR Part 60 Subpart Dc. Since both boilers are natural gas-fired neither are subject to the National Emission Standard for Hazardous Air Pollutants 40 CFR Part 63 Subpart JJJJJJ.

The facility had one cold cleaning unit in the facility. At the time, the lid was open, however the unit was empty of any solvents or cleaning solutions. This unit is exempt from air permitting requirements under Rule 281(2)(h).

Conclusions

As described above, the facility was not in compliance with the material limit of 20,000,000 lbs/yr of Buns produced. A VN will be issued for the exceedance of the limit. Possible solutions will be discussed with facility representatives to correct this violation.

NAME Scott Evans DATE 9/24/2020 SUPERVISOR HH