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is placed in a bin. There is one mixer bin for the bread line and one mixer bin for the bun line. From there it enters a pipe and moves to a hopper, where it passes through an extruder. The dough balls then pass through flour so that they do not stick and are placed in a pan to be shaped properly as either buns or loaves of bread. The dough enters the proof box, where it rises again, as heat and humidity is added at a temperature of about 130 F.

After rising for about an hour, the dough is transported to one of two ovens. Along this path, sesame seeds are added to the product as needed. The dough moves on a conveyor and is unloaded on the bottom. The product bakes in the natural gas fired oven at approximately 440 F. The baking time varies based on the product. Using a vacuum process, the bread or buns are de-panned, and all crumbs are sucked away. A robot arm pulls the pans away after the bread or buns are removed. The bread or buns travel on a conveyor system for to cool. Again the cooling time varies based on the product. During this time, the bread or buns pass through two metal detectors and then move to the packaging area. The bread or buns pass through a slicer and are manually checked for quality control. A puff of air is blown into the bags to open them. Then the buns enter the bag. The sell by date is printed on the bag, a metal twist tie is mechanically added, and the buns or bread loaves are placed on pallets to be shipped to the stores. Generally, the process for baking buns from dough to final product is about 1.5 hours and the process for baking loaves of bread from dough to final product is about 2.5 hours.

INSPECTION NARRATIVE

I arrived at 9:30 am to begin this unannounced inspection. Fresh baked bread odors were detected inside the facility. I met with Jaeseung (Jay) Whiting, Plant Manager and Mr. Bill Martin, Engineer. Initially, we discussed the process at the facility. I also explained that the facility was operating under Rule 208A, which limits the emissions so that the facility would be considered a synthetic minor source. Next Mr. Whiting and Mr. Martin gave me a detailed tour of the facility, explaining the process. The facility was on a weekly shut down, where the line is cleaned and any maintenance needed on the line is performed. Whenever a line is shut down for more than 12 hours, the line is wet cleaned. Otherwise, the lines are spot cleaned as needed.

APPLICABLE RULES/PERMIT CONDITIONS

This facility appears to have a potential to emit (PTE) greater than the threshold for a true minor source. This facility has chosen to operate with the emission limiting rule of 208A. Rule 208A is in the process of being rescinded. I explained to the company that they will need to have an opt-out permit in place before the rule is rescinded. Mr. Martin said that he was aware that Mr. David Kent was in the process of completing the permit application. Mr. Martin said that he would be contacting Mr. Kent directly after my inspection to determine where Mr. Kent was in the permitting process.

This facility operates two ovens used to bake food for human consumption. These ovens are exempt from permitting by Rule 282 (a)(v). Based on the information tag, the oven for the bun line operates at 4.92 MMBTU and the oven for the bread line operates at 7.29 MMBTU. The facility also operates two boilers, which operate on natural gas. The natural gas fired boilers are 7.29 MMBTU and 1.260 MMBTU, and are therefore exempt from permitting based on Rule 282 (b)(i).

Currently this facility is operating as a synthetic minor source because of Rule 208a. The registration for this requirement was received on February 16, 2016. During 2015 the facility reported the following emissions:

CO	0.7035 tons
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7/22/2016

NO _x	3.32 tons
PM ₁₀	0.064 tons
PM _{2.5}	0.064 tons
SO ₂	0.016 tons
VOC	49.12 tons

For a facility to meet the requirements for Rule 208a, they must emit less than 50% of the major threshold limits. All of these values reported in MAERS are below this limit. VOC emissions are to be limited to less than 50 tons per year, and the facility is meeting this limit based on these reported values. These emissions meet the requirements for the facility to operate under Rule 208a.

The largest source of VOC emissions come from the bread line and the bun line. During 2015, The bun line emitted 22.8 tons VOC and the bread line emitted 26.33 tons.

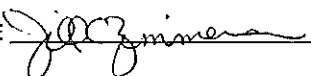
MAERS REPORT REVIEW

The MAERS for reporting year 2015 was received on February 8, 2016 and was audited on March 4, 2016. The report appeared to have been completed accurately and no errors were discovered.

On February 23, 2016 after reviewing the MAERS, I contacted Mr. David Kent and Mr. John Popp to explain the facility's option when Rule 208A is rescinded. Mr. Popp's email was returned as unbelievable, so I then emailed Ms. Robin McCallum, who was also listed as a contact through MAERS. Mr. Kent responded that he would be working on a permit application for all of the Aunt Millie's facilities located in Michigan. On Friday June 17, 2016 Mr. Kent emailed me after my inspection to ensure that I had received all necessary information. I again explained to Mr. Kent that this facility would need to obtain a permit before Rule 208A is rescinded.

FINAL COMPLIANCE DETERMINATION

This facility appears to be in compliance with all applicable state and federal rules at the time of this inspection. The facility has been informed multiple times about Rule 208a being rescinded. The facility has stated that they are in the process of applying for an Opt-Out permit. At the time that this report was written, no permit application has been received.

NAME  DATE 7/22/16 SUPERVISOR JK

7/22/2016