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

B154845828

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| **FACILITY:** Post Foods | | **SRN / ID:** B1548 |
| **LOCATION:** 275 Cliff Street, BATTLE CREEK | | **DISTRICT:** Kalamazoo |
| **CITY:** BATTLE CREEK | | **COUNTY:** CALHOUN |
| **CONTACT:** Cathy Sanford , Environmental Compliance Specialist | | **ACTIVITY DATE:** 08/22/2018 |
| **STAFF:** Monica Brothers | **COMPLIANCE STATUS:** Compliance | **SOURCE CLASS:** MAJOR |
| **SUBJECT:** Unannounced scheduled inspection | | |
| **RESOLVED COMPLAINTS:** | | |

**This was an unannounced scheduled inspection. This facility produces various types of cereal and is currently operating under MI-ROP-B1548-2014d. Staff, Monica Brothers and Cody Yazzie, arrived on-site at 9:15am and met with Rob Mason (EHS Manager) and Cathy Sanford (Environmental Compliance Specialist). Upon arrival, the various stacks were observed, and no visible emissions, besides steam, were seen. We could smell cereal production odors, but nothing out of the ordinary. Cathy first took us to Rob's office where we discussed some preliminary questions and looked at some records.**

**Rob briefly went over the layout of the facility and where each process was located on the property. Building 17 is now used only for "mix and pack", meaning that there is no cooking of cereals. Building 29 is dedicated to making only varieties of Honey Bunches of Oats. This is the process that required them to get the oxidizer because of the high alcohol content of the oatmeal flavoring they use in some of the HBO varieties. Building 20/32 is where they make Honeycomb, granola, and Grape Nuts. Rob said that they are currently working on getting ready to make cereals with a peanut butter coating. Because of the allergen risk with peanut butter, they are doing some construction in this building to create a partition between the peanut butter process and the other processes in that building. Rob said that the peanut butter coating will have to be constantly heated in order for it to be liquified enough to be sprayed onto the cereals. I asked Rob how they were planning on heating the large drums of peanut butter, and he said that it will likely be from steam from the boilers they already have. Building 4 is where the bran flakes and rice cereals, like Raisin Bran, Fruity Pebbles, and Cocoa Pebbles, are made.**

**Grain is hauled into the facility by railcar and stored in large silos. They also get shipments of liquid sugar. The grains then go to Building 20 where they get milled into flour. This flour then gets distributed amongst the various production buildings by an "airveying" system that uses pneumatic pressure to push the flour to the desired location. The cereal-making process starts at the top of each building and works its way down each floor until it gets packaged at ground-level. This process could involve grain-handling, conveying, cleaning, milling, cooking, drying, and coating. There are various pick-up points for particulate matter and VOCs that send the emissions to rotoclones, baghouses, and/or the thermal oxidizer for control before it is emitted to the outside air. The cereal is then dried and packaged. They use hotmelt, exempt under Rule 287(2)(i) and inkjet printers, exempt under Rule 287(2)(c) during packaging, although much of the printing is now done by lasers.**

**During the facility tour, we made our first stop at Building 29. The process was down because a piece of equipment was being repaired, so when I viewed the oxidizer temperature, it was only at 343°F. This is acceptable for when they are cleaning or are not operating the process. We viewed one of the wet collectors, which is better at controlling emissions that tend to be sticky than a rotoclone or baghouse. The pressure gauge on the unit was reading 3.5 inches of $H_20$. We then went onto the roof to see some of the stacks. All of the stacks are numbered, and the CAM stacks are labeled in blue. I observed stacks 2922 and 2914 while on the roof, and no visible emissions were observed.**

**Rob then showed us the Building 6 emergency generator. The hours meter read 453.2 hours, but Rob said that they haven't operated it in years. Records showed that it did not run at all during 2017 or 2018. Next, we went to see the boilers. They have three boilers, 1,3, and 4, however, only two, 1 and 4 are operational. Boiler 3 has been disconnected from any previously available fuel line. They use only natural gas in Boilers 1 and 4 and have not used diesel in them for years. They still have the old diesel storage tanks, but they are empty and not functional. Boiler 1 was operating at the time of the inspection, and it was running at 16,210 lbs steam/hour. Boiler 1 is a Babcock and Wilcox unit that was installed in 1947 and has a rating of 125,000 lbs steam/hour, and Boiler 4 is also a Babcock and Wilcox unit, installed in 1937, with a rating of 115,000 lbs steam/hour.**

**Rob took us inside Building 32 where Honeycomb was being made. This building contains the immersion cleaner, which is the only cold cleaner that is different from the other 9 at the facility. A description of the unit along with the SDS of the cleaning solution it uses is attached to this report. We saw another cold cleaner in the building as well. The lid was closed, and the rules were posted. There was also a small sandblasting unit in this building. It was completely enclosed and vented internally. This is considered exempt under Rule 285(2)(l)(vi).**

**Lastly, we went inside Building 4 and saw that they were making Cocoa Pebbles at that time. We observed rotoclones 487 and 477, and Rob said that all of the rotoclones were equipped with low-flow alarms to alert them if the rotoclone was malfunctioning.**

**I asked Rob if they were planning on conducting any stack testing in the near future, and he said that they would likely be testing the 2096 wet scrubber in October. He said that they would also try to do the oxidizer testing then as well.**

**Below are the conditions of MI-ROP-B1548-2014d and my associated comments on the facility's compliance. In conclusion, the facility seemed to be in compliance at the time of inspection.**

SOURCE WIDE CONDITIONS

**I.1 and 2: Records show that the facility is under the 225 TPY (12-month rolling) limits for PM and PM-10.**

**II.2: Records show that the facility is under the 527.6 million cubic feet of natural gas limit (12-month rolling).**

**III.3: The facility has a Malfunction Abatement Plan and Preventative Maintenance Plan for their pollution control equipment.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: The facility is maintaining natural gas usage records monthly and in a 12-month rolling format. Fuel oil is no longer used at the facility.**

**VI.3: The facility is maintaining monthly and 12-month rolling PM emission calculations.**

**VI.4: The facility is maintaining records of all preventative maintenance done on equipment.**

**VII 1 through 4: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

EU1725

**I.1: Building 17 is currently being used for only "mix-and-pack", so no VOCs are being emitted. The facility is therefore under the 1.6 TPY (12-month rolling) limit.**

**I.2 and 3: Testing for particulate has not been requested at this time.**

**I.4: No Method 9 readings were completed during the inspection.**

**III.1: The facility is in compliance with the hours of operation restriction of 8,160 per 12-month rolling time period.**

**IV.1: The wet scrubber is installed and seems to be operated in a satisfactory manner.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: MSDS or manufacturer's formulation data is available at the facility.**

**VI.3: The facility is maintaining records of each flavorant used and its VOC content as required. The facility last used a VOC flavorant in this process back in 2014. Building 17 is currently being used for "mix and pack" only, so no VOCs are being emitted.**

**VI.4: Visible emissions are being done by maintenance and are kept on file. They are keeping track of**

**corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.5: The facility is maintaining records of hours of operation.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1: Staff did not view every stack at the facility during inspections but will assume it meets the requirements.**

FG-477 Coating

**I.1: Records show that the facility is under the 25.0 TPY (12-month rolling) limit for VOC emissions.**

**I.2 through 8: Particulate testing has been completed in the past.**

**I.9: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,160 hours of operation (12-month rolling) limit for this flexible group.**

**IV.1: The wet rotoclones and Aerodyne collectors are installed and seem to be operating in a satisfactory manner.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: MSDS or manufacturer's formulation data is available at the facility.**

**VI.3: The facility is maintaining records of each flavorant used and its VOC content as required. The facility is doing the required VOC emissions calculations monthly and 12-month rolling.**

**VI.4: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.5: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 3: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

FG-488 Coating

**I.1: Records show that the facility is under the 7.4 TPY (12-month rolling) limit for VOC emissions.**

**I.2 through 9: The facility appears to be meeting the various PM limits. Testing was conducted on EU494 and EU488 in 2017.**

**I.10: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The wet scrubber and horizontal dust separation unit are installed and seem to be operating in a satisfactory manner.**

**V.1: PM and PM-10 emissions were tested for EU494 and EU488 in 2017.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: MSDS or manufacturer's formulation data is available at the facility.**

**VI.3: The facility is maintaining records of each flavorant used and its VOC content as required. The facility is doing the required VOC emissions calculations monthly and 12-month rolling.**

**VI.4: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.5: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 6: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required. Prior to the PM testing, the facility submitted test protocols, notified the appropriate AQD staff, and submitted the test reports required by these conditions.**

**VIII.1 through 3: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

FG-2028 Coating

**I.1: Records show that the facility is under the 25.0 TPY (12-month rolling) limit for VOC emissions.**

**I.2 through 9: The facility appears to be meeting the various PM limits.**

**I.10 and 11: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The wet scrubber is installed and seems to be operating in a satisfactory manner.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: MSDS or manufacturer's formulation data is available at the facility.**

**VI.3: The facility is maintaining records of each flavorant used and its VOC content as required. The facility is doing the required VOC emissions calculations monthly and 12-month rolling.**

**VI.4: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.5: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 3: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

FG2983CoatOxdOn

**I.1: Records show that the facility is under the 25.6 TPY (12-month rolling) limit for VOC emissions. Testing of VOC emissions will have to be conducted at some point during the term of the permit.**

**I.2: The facility appears to be meeting the PM-10 limit. Testing of PM emissions was conducted in 2017.**

**I.3: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The wet rotoclone is installed and seems to be operating in a satisfactory manner.**

**IV.2: The catalytic oxidizer is installed and seems to be operating in a satisfactory manner. Cathy**

**showed me the temperature log for the oxidizer, and temperatures were above the 550°F minimum while the process was running.**

**V1 through 3: The facility will have to test for VOC control efficiency from the wet rotoclone and VOC destruction efficiency of the catalytic oxidizer during the term of the permit. They may try to do it this Fall 2018, but nothing is yet set in stone.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: MSDS or manufacturer's formulation data is available at the facility.**

**VI.3: The facility is maintaining records of each flavorant used and its VOC content as required. The facility is doing the required VOC emissions calculations monthly and 12-month rolling. They are also maintaining any start-up and shutdown records of the oxidizer and records of cereal being produced.**

**VI.4: The permitted is maintain records and in an acceptable format.**

**VI.5: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.6: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VI.7: The facility has a device that continuously monitors and records the temperature of the catalytic oxidizer.**

**VI.8: The facility is prepared to implement the PMP should the temperature ever drop below 550°F during operation.**

**VI.9: Staff will assume that facility is restoring the process and controls to normal operation as quickly as possible should and excursion or exceedance occur.**

**VI.10: It seems like the facility is maintaining the temperature monitoring device of the catalytic oxidizer in a satisfactory manner.**

**VI.11: The facility is maintaining records of maintenance and/or corrective actions taken on the catalytic oxidizer.**

**VII.1 through 5: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VII. 6 through 8: Prior to the testing mentioned above, the facility will have to submit test plans as well as a report of the results once testing has been completed. The facility did submit the required test protocol and results of the PM testing in 2017.**

**VIII.1: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

**IX.1 and 2: The facility appears to be complying with the requirements of CAM.**

**FG2983CoatOxdOff**

**I.1: Records show that the facility is under the 4.0 TPY (12-month rolling) limit for VOC emissions.**

**I.2 through 7: The facility appears to be meeting the various PM limits.**

**I.8 and 9: No Method 9 readings were completed during the inspection.**

**III.1 Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The wet rotoclone is installed and seems to be operating in a satisfactory manner.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: SDS or manufacturer's formulation data is available at the facility.**

**VI.3: The facility is maintaining records of each flavorant used and its VOC content as required. The facility is doing the required VOC emissions calculations monthly and 12-month rolling.**

**VI.4: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.5: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 3: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

FG-20108 Baking

**I.1: Records show that the facility is under the 25.8 TPY (12-month rolling) limit for VOC emissions. Compliance testing has been conducted to verify emissions.**

**I.2 through 13: The facility appears to be meeting the various PM limits. Compliance testing has been conducted to verify emissions.**

**I.14: No Method 9 readings were completed during the inspection.**

**II.1: Records show that the facility is in compliance with the 18,500 tons per year limit for the production of Base Grape Nuts based on a 12-month rolling time period.**

**III.1: Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.**

**III.2: The facility submitted a Malfunction Abatement Plan.**

**IV.1: The particulate control equipment is installed and seems to be operating in a satisfactory manner.**

**V.1: The facility conducted compliance testing for VOC and the various PM limits within the required time frames.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: The facility is maintaining monthly and 12-month rolling records of base Grape Nut production and VOC emissions.**

**VI.3: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.4: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VII.4: The facility notified the AQD when they commenced trial operation of the process.**

**VIII.1 through 4: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

FG-3210 Coating

**I.1: Records show that the facility is under the 6.0 TPY (12-month rolling) limit for VOC emissions.**

**I.2 through 5: The facility appears to be meeting the various PM limits.**

**I.7 and 8: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The cyclone and wet scrubber are installed and seem to be operating in a satisfactory manner.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: SDS or manufacturer's formulation data is available at the facility.**

**VI.3: The facility is maintaining records of each flavorant used and its VOC content as required. The facility is doing the required VOC emissions calculations monthly and 12-month rolling.**

**VI.4: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.5: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 2: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

FG-32104 Coating

**I.1: Records show that the facility is under the 18.0 TPY (12-month rolling) limit for VOC emissions.**

**I.2 through 9: The facility appears to be meeting the various PM limits.**

**I.10 and 11: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The wet rotoclone is installed and seems to be operating in a satisfactory manner.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: SDS or manufacturer's formulation data is available at the facility.**

**VI.3: The facility is maintaining records of each flavorant used and its VOC content as required. The facility is doing the required VOC emissions calculations monthly and 12-month rolling.**

**VI.4: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.5: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 3: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

FGBLD-4 Rice/Bran

**I.1 through 56: The facility appears to be meeting the various PM limits.**

**I.57: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this**

**flexible group.**

**IV.1: The particulate controls are installed and seem to be operating in a satisfactory manner.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.3: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 33: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

**FG-17-20-32Cereal**

**I.1 through 69: The facility appears to be meeting the various PM limits. Testing still needs to be done on EU2096, but testing has been done on EU32115. Testing for EU2096 is tentatively scheduled for October 2018.**

**I.70 and 71: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The particulate controls are installed and seem to be operating in a satisfactory manner.**

**V.1: PM testing has been completed for EU32115, but EU2096 still needs to be tested. Testing for EU2096 is tentatively scheduled for October 2018.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.3: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 6: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required. Prior to the PM testing mentioned above for EU2096, the facility will have to submit test plans as well as a report of the results once testing has been completed. The facility did submit the PM testing protocol and results for EU32115 as required by this condition.**

**VIII.1 through 39: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

**FGBLD-29 Cereal**

**I.1 through 77: The facility appears to be meeting the various PM limits. Testing on EU2930 was conducted in 2017.**

**I.78: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The particulate controls are installed and seem to be operating in a satisfactory manner.**

**V.1: PM testing was conducted on EU2930 in 2017.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.3: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 6: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required. Test protocol and test results were submitted to the DEQ for the EU2930 PM testing in 2017.**

**VIII.1 through 37: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

**FG32BLD-CCP**

**I.1 through 34: The facility appears to be meeting the various PM limits.**

**I.35: No Method 9 readings were completed during the inspection.**

**IV.1: The particulate controls are installed and seem to be operating in a satisfactory manner.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 11: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

**FGGrainReceiving**

**I.1 through 10: The facility appears to be meeting the various PM limits.**

**I.11: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,424 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The particulate controls are installed and seem to be operating in a satisfactory manner.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.3: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VI.4: The facility is maintaining monthly records of maintenance activities performed on the EU1101 baghouse. They are following the MAP/PMP.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 5: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

**FG-Milling**

**I.1 through 39: The facility appears to be meeting the various PM limits.**

**I.40: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The particulate controls are installed and seem to be operating in a satisfactory manner.**

**V.1: The facility conducted PM testing for EU435 in 2017.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.3: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 28: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

**FGBOILERS**

**II.1: The facility has not burned fuel oil in the boilers for years.**

**II.2: Records show that the facility is consistently under the 1,000 million cubic feet of natural gas burned per 12-month rolling time period.**

**III.1: The facility burns only pipeline quality natural gas in the boilers.**

**III.2: They do not use No.2 fuel oil and haven't in years.**

**V.1 and 2: The fuel oil tanks are empty so the facility hasn't needed to verify the sulfur content of fuel oil deliveries.**

**V.2: See comment under V.1 above.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: The facility is maintaining 12-month rolling records of natural gas usage. As mentioned, fuel oil is not being combusted.**

**VI.3: Since the fuel oil tanks are empty, records of fuel oil analysis are not being kept.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

**FGCAM-UNITS**

**VI.1: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.2: Staff will assume that the facility restores the emission units subject to CAM as quickly as possible if any excursion or exceedences should occur.**

**VII.1 through 5: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**IX.1 and 2: The facility appears to be complying with the requirements of CAM.**

**FG-MACT4Z-EMERG**

**Staff did not make any compliance determination with regards to this emission unit which entails the RICE MACT ZZZZ since the DEQ is not delegated to enforce it at area sources of HAPS. However, the facility is keeping records of operating hours for each unit. They have not operated EU_6_Gen since before 2017.**

**FG-RULE 287(c)**

**The facility has some ink jet printers that are being operated under the Rule 287(2)(c). Records show that they are under the 200 gallon per month limit. The hot melt process falls under the Rule 287(2)(i) exemption. They are keeping the appropriate records and submitting the necessary reports as required by this flexible group.**

**FGRULE290**

**The facility has not operated the emission unit (EU32121), which was the only emission unit operating under the Rule 290 exemption, for the past few years.**

**FGCOLDCLEANERS**

**Staff saw two of the ten cold cleaners at the facility during the inspection. Staff observed the immersion cold cleaner, which is the only cold cleaner that is different from the rest, and also one of the cold cleaners in Building 32. The lids were closed, and the rules were posted. All of the units are maintained and serviced by Safety-Kleen. See attached spreadsheet for their date if installation, size, location, solvent used, etc. The cold cleaners seem to be in compliance with the conditions of this flexible group.**

NAME Monica Ristow DATE 9/26/18 SUPERVISOR MQ 9/27/2018