

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N807971269

FACILITY: Kellanova Mfg. LLC		SRN / ID: N8079
LOCATION: 3750 ROGER B CHAFFEE BLVD, WYOMING		DISTRICT: Grand Rapids
CITY: WYOMING		COUNTY: KENT
CONTACT: Nancy Rumschlag , Environmental Health and Safety Manager		ACTIVITY DATE: 03/14/2024
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY24 On-Site Inspection		
RESOLVED COMPLAINTS:		

Introduction

On March 14, 2024, State of Michigan Department of Environment, Great Lakes, and Energy Air Quality Division staff member Scott Evans (SE) conducted an on-site inspection of the Kellanova Mfg. LLC facility located at 3750 Roger B. Chaffee Blvd. in Wyoming, Michigan, to assess compliance with permitted and other applicable air quality rules and regulations. Kellanova is a producer of various baked goods including granola bars and Rice Crispy Treats. Processes include mixing, cooling, and cutting of food products. There are no ovens utilized at this facility. This facility is an opt out facility for VOCs and has one active Permit to Install (PTI): PTI No. 203-08F.

On the day of the inspection, a perimeter observation was conducted prior to entering the facility. There were no observed visible emissions (VEs) or odors. After entering the facility, SE was greeted by facility staff EHS Manager Nancy Rumschlag. A discussion covering the intent of the day's visit preceded an on-site inspection.

PTI No. 203-08F

This PTI includes requirements for one flexible group (FG): FGFACILITY.

FGFACILITY

This FG includes all process equipment including equipment covered by other permits, grand-fathered equipment, and exempt equipment.

This FG has three emission limits as follows:

Pollutant	Limit	Time Period / Operating Scenario	Highest Recorded	Compliance (Y/N)
1. VOCs	Less than 90.0 tpy	12-month rolling time period as determined at the end of each calendar month	1.15 tpy April 2023	Y
2. VOCs	2,213 lb/day	Calendar day	< 1 ton All recorded days	Y
3. Furfural (CAS No. 98-01-1)	0.14 tpy	12-month rolling time period as determined at the end of each calendar month	0 Not currently in use	Y

The above compliance determinations were made using provided records as discussed below.

This FG has four recordkeeping requirements. The first states that records must be maintained in an acceptable format and available upon request no later than the final day of the calendar month for the previous month. Records were provided on March 14, 2024, and were in an acceptable format.

The second recordkeeping requirement states that daily records of the following must be maintained:

- Amount of each VOC-containing material used.
- Amount of each VOC-containing material reclaimed (if any).
- Daily VOC emissions calculations using the equation:



Records were provided and used to verify the above daily VOC emission limit compliance. Records are included with this report.

The third recordkeeping requirement requires that the following monthly records be maintained:

- The amount of VOC emissions, in tons per calendar month, from all VOC-containing flavoring materials used.
- The amount of VOC emissions, in tons per calendar month, from all VOC-containing cleaning and sanitizing product used.
- The amount of VOC emissions, in tons per calendar month, from all activities other than flavoring and cleaning and sanitizing product used.
- The amount of VOC emissions, in tons per calendar month, from all activities combined.
- The amount of VOC emissions, in tons per 12-month rolling time period as determined at the end of each calendar month, from all activities combined.

Records were provided and used to verify the above annual VOC emission limit compliance. Records are included with this report.

The fourth recordkeeping requirement requires that the following monthly records be maintained:

- Pounds of each furfural (CAS No. 98-01-1) containing material used.
- Where applicable, pounds of each furfural (CAS No. 98-01-1) containing material reclaimed.
- The furfural (CAS No. 98-01-1) content in percentage by weight of each material used.
- Furfural (CAS No. 98-01-1) mass emission calculations determining the monthly emission rate in tons per calendar month.
- Furfural (CAS No. 98-01-1) mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

Records were provided and used to verify the above annual furfural emission limit compliance. Records are included with this report.

Exempt Equipment

This facility has one new natural gas-fired boiler that was installed since the last inspection in 2020 with a maximum potential input of 6.12mmBtu. This boiler is exempt from air permitting requirements by Rule 282(2)(b)(i). This boiler is not subject to New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart Dc as it has a maximum heat input of less than 10mmBtu. Since this

boiler is natural gas-fired, it is not subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart JJJJJ.

The facility has one emergency generator on site. This generator is natural gas-fired with a maximum heat input of 265,000 Btu. It was installed in 2017 and is exempt from air permitting requirements by Rule 285(2) (g). This generator is subject to NSPS 40 CFR Part 60 Subpart IIII. The facility appears to be in compliance with the applicable NSPS requirements as it is an emergency generator and records of operation are maintained by the facility. No hours of emergency use were reported with all operations being for routine test runs and within allowed time limits. This generator is subject to NESHAP 40 CFR Part 63 subpart ZZZZ. Compliance with this NESHAP is demonstrated by compliance with NSPS 40 CFR Part 60 Subpart IIII.

Conclusion

At the conclusion of this inspection the facility appears to be compliant with all permitted requirements as well as all other applicable air quality rules and regulations.

NAME Scott Cerna DATE 3/29/2024 SUPERVISOR [Signature]