

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

B154836537

FACILITY: Post Foods		SRN / ID: B1548
LOCATION: 275 Cliff Street, BATTLE CREEK		DISTRICT: Kalamazoo
CITY: BATTLE CREEK		COUNTY: CALHOUN
CONTACT: Rob Mason, Environmental Engineer		ACTIVITY DATE: 08/26/2016
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Unannounced Scheduled Inspection		
RESOLVED COMPLAINTS:		

On August 26, 2016 AQD Staff (Matt Deskins and Monica Brothers) went to conduct an unannounced scheduled inspection of the Post Foods facility located in Battle Creek, Calhoun

County. Post Foods is a cereal manufacturer and considered a major source under the AQD and the Federal Title V regulations. They currently are operating their various manufacturing processes under Renewable Operating Permit (ROP) No. MI-ROP-B1548-2014b. The purpose of the inspection was to determine their compliance with their ROP and any other federal or state air regulations that the AQD is delegated to enforce. Staff departed for the facility at approximately 8:45 a.m.

Staff arrived in the vicinity of the facility at approximately 9:30 a.m. As staff proceeded down Cliff Road heading toward Post's visitor parking lot, staff observed the various buildings on the Post property to see if any VEs could be detected. Outside of steam, staff did not observe anything unusual at that time. After arriving at the visitor parking lot, staff proceeded over to the guard house where they introduced themselves to the guard (Jim), stated the purpose of the visit, showed Jim our I.D.s, and then signed in. Jim asked staff who they needed to see and staff responded by saying Rob Mason (EH&S Manager). Jim then contacted Rob who then came to the guard house several minutes later to greet staff. Staff introduced themselves to Rob and mentioned the purpose of the visit. Rob then led staff to where his office was located to begin the inspection.

Once at Rob's office, staff exchanged business cards with him and staff also gave him copies of the DEQ Environmental Inspection Brochure as well as the Boiler Informational Pamphlet. Staff mentioned to Rob that the DEQ isn't delegated to enforce the new federal boiler regulations but the pamphlet contains a lot of helpful links for companies that want to make sure they are in compliance with the regulation. Rob thanked staff for the information and then asked where staff would like to begin. Staff mentioned that since they were both there for the first time for an inspection, that maybe we should start by going over facility lay out and their operations. Rob then printed out a couple copies of the Post facility that included the building lay outs (See Attached). The following is a brief summary of the operations at Post. According to Rob, Post employs approximately 600 people and they operate 24/7. All they do is make cereal and they have five buildings dedicated to its production. Each building can make up to five cereals but currently building #29 is strictly dedicated to Honey Bunches of Oats, building #20/32 makes Grape Nuts, Honeycomb, Alphabets, Waffle Crisp, and Granola, building #4 makes Fruity Pebbles and Bran Flakes such as Raisin Bran, building #17 makes Golden Crisp and it also houses the operations for blending raisins, dates, and pecans with flakes. Rob went on to say that Honey Bunches of Oats is the biggest generator of VOCs because the oatmeal and cinnamon flavorant they use is 80% alcohol. He said that they were using so much of it that they had to install the oxidizer to control the emissions from when the flavorant is being sprayed on and when the cereal is being dried. Rob then stated that Post just bought Multi-Meal which was based out of Minnesota. He said that Multi-Meal makes the

copycat cereals and now that they bought them, Golden Crisp will probably be made at one of their plants. Staff then asked Rob about the basic production processes that take place in each building. The following is a basic description of what takes place in each building.

According to Rob, various grains are hauled into the facility by railcar and are stored in huge silos. From the silos the grain will go to building 20 where the main milling of it will be done to make the flour to be used. The flour is then moved to each production building through piping under pneumatic pressure (Airveying). Each building has a certain number of floors/levels and the cereal making process starts at the top level of each building and works its way down to the 1st floor. Each building also has its own grain handling, conveying, cleaning, milling, cooking, drying, coating, and packaging processes. Each building makes its own flakes and bran depending on the cereal. Once the cereal flakes or bran have been made and dried, various colorants, flavorants, and vitamins will be sprayed on them depending on the cereal or bran being made. After those items have been sprayed on they will again go through dryers and the cereal will ultimately be packaged in bags and put into boxes. The majority of the labeling on the boxes is done by a laser printer but Rob stated they still have ink jets available should the laser printers go down. The emissions for all the cereal production processes are controlled by either baghouses, cyclones, wet rotoclones, oxidizers, etc. or a combination of the aforementioned. Rob said he wishes they could replace the wet controls with regular baghouses because it costs a lot of money to pay the city for the water as well as the discharge of it. We then went on a tour of some of the production buildings and the following is what staff observed.

Our first stop was going to be at building #29. On our way out there, Rob showed us the building where the founder of Post (C.W. Post) first started cereal production back in 1895. He then took us through the building that was used as kind of a gathering/recreation spot for his employees back in the day. Rob also pointed out building #2 which they call the trades building and houses the pipe fitters, electricians, etc. Staff then asked about the Research and Lab building and Rob stated that was the one negative of Post buying Multi-Meal, they closed the lab and all the staff that worked in those departments were either laid off or transferred to Minnesota. We then entered building #29 that makes Honey Bunches of Oats. In that building, we viewed the various production processes as well as the flavorant spray operation and dryer. These two operations are controlled by the oxidizer. We then went up to the roof to view the oxidizer. Staff couldn't tell what temperature it was operating at but Rob said we could get that information in a control room on another level where it is monitored. Later, it was determined that it was operating at 658 degrees F. After looking at the oxidizer and while still on the roof, staff could observe the stacks on most of the other buildings. Almost all the stacks are labeled and Rob said the ones with blue labels are the ones that are CAM subject. He said all VE readings are done by maintenance personnel at the start of 2nd shift.

Our next stop was at building #20. In that building, Honeycomb and Grape Nuts were being made although the Grape Nuts line was currently shutdown. We took a walk through of the process which was set up similar to building #29. During the walk we were able to see various baghouses, wet scrubbers, and baghouses that are being used to control emissions.

Our next stop was at building #32. In this building they were making granola type cereals such as Waffle Crisp and Waffle Crunch. While checking out the stacks on the roof of this building we noticed particulate and quite a bit of it coming out of a stack. We then went to see which stack it was and it was Stack 20101. We then proceeded down to the control room on another floor so Rob could let some employees there know about the malfunction. The

employees stated that they were aware of the malfunction and were working on shutting down the process. One of the employees said something went wrong with the wet rotoclone and they will be looking into the matter. Staff doesn't know how long the malfunction had occurred for but staff didn't notice any VEs from any stacks on the drive in, as mentioned previously.

Staff then went to lunch.

After returning from lunch and meeting back up with Rob, we resumed the inspection by going out to the Powerhouse building that houses the 3 boilers. According to Rob and employees that run the Powerhouse, they do not use diesel fuel in the boilers and haven't for years. Although the diesel storage tanks are still present, they are empty and have been cleaned out and all piping from them has been removed. The boilers are numbered 1, 3, and 4 and boiler 3 is no longer in use. They alternate running the other two with one always in use. Boiler 1 was manufactured by Babcock and Wilcox and was installed in 1947. It has a steam rating of 125,000 pounds per hour. It was reconstructed/modified back in 1977. Boiler 4 was also manufactured by Babcock and Wilcox and it was installed in 1937. It has a steam rating of at 115,000 pounds per hour. It was also reconstructed/modified back in 1977. Boiler 4 was operating while staff was present.

Staff then proceeded with Rob out building #4. This building was making Fruity Pebbles and we observed most of the processes that take place. It basically starts with cooking rice in several cookers with a colorant. Once the rice has been cooked, the various colors of rice will be mixed together. The rice will then go to an area where it will be flattened by a roller operation. The rice will then be toasted and then go to two large rotating plastic cylinders where flavorants and vitamins are sprayed on to it. The rice will then go through a dryer before being packaged up and boxed for shipment.

Staff's next stop was at the Engineering and Research building. We went here to view VE records and Preventative Maintenance (PM) Records. Staff reviewed numerous VE records as well work orders that show the PM that is done on all the pollution control equipment. Rob indicated that all there MSDS are kept on line now. They paid a company called Site Hawk to put them all on-line for them. After looking at the VE and PM records, staff headed back with Rob to his office. Do to what time it had become, staff asked if Rob would just e-mail him the rest of the records and staff would view them when they got time back at the office. Rob said he would and e-mailed them to staff the following week. Staff thanked Rob for his time and departed at approximately 3:45 p.m.

The following lists the various emission units/flexible groups contained in the ROP, the special condition number, and staff's comment(s) regarding them. Also see attached spreadsheets for the various records.

SOURCE WIDE CONDITIONS

I.1 and 2: The facility appears to be under the 225 ton per year emission limit based on a 12-month rolling time period.

II.2: The facility appears to be under the 527.6 million cubic feet of natural gas limit based on a 12-month rolling time period.

III.3: The facility has a Malfunction Abatement 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. Staff will assume that if they have installed or changed out any equipment under a permit exemption, that they've been submitting calculations that shows the equipment is equivalent emitting or a lower emitting unit.

EU1725

I.1: The facility hasn't used any VOC based flavorants on this process since 2014, so they are in compliance with the 1.6 ton per year VOC emission 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 operational. Staff will assume it is being maintained properly.

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

VI.2: MSDS or manufacturer's formulation data is available. All information is kept on-line now.

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.

VI.4: Visible emissions are kept on file. Maintenance personnel do them at the start of the 2nd shift.

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: The facility is in compliance with the 12-month rolling time period VOC limit of 25.0 tons.

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

IV.1: The wet rotoclones and Aerodyne collectors are installed and operational. Staff will assume they are being maintained properly.

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

VI.2: MSDS or manufacturer's formulation data is available. All information is kept on-line now.

VI.3: The facility is maintaining records of each flavorant used and its VOC content as required.

VI.4: Visible emissions are kept on file. Maintenance personnel do them at the start of the 2nd shift.

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 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: The facility is in compliance with the 12-month rolling time period VOC limit of 7.4 tons.

I.2 through 9: The facility appears to be meeting the various PM limits. Testing will have to be done at some during the term of the ROP.

I.10: 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 and dust collectors are installed and operational. Staff will assume they are being maintained properly.

V.1: PM and PM-10 emissions will have to be tested at some point during the term of the ROP.

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

VI.2: MSDS or manufacturer's formulation data is available. All information is kept on-line now.

VI.3: The facility is maintaining records of each flavorant used and its VOC content as required.

VI.4: Visible emissions are kept on file. Maintenance personnel do them at the start of the 2nd shift.

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

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, the facility will have to submit test plans as well as a report of the results once testing has been completed.

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: The facility is in compliance with the 12-month rolling time period VOC limit of 25.0 tons.

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: 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 operational. Staff will assume it is being maintained properly.

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

VI.2: MSDS or manufacturer's formulation data is available. All information is kept on-line now.

VI.3: The facility is maintaining records of each flavorant used and its VOC content as required.

VI.4: Visible emissions are kept on file. Maintenance personnel do them at the start of the 2nd shift.

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

FG2983CoatOxdOn

I.1: The facility is in compliance with the 12-month rolling time period VOC limit of 25.6 tons. 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 will have to be conducted at some point during the term of the permit.

I.3: 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 rotoclone is installed and operational. Staff will assume it is being maintained properly.

IV.2: The catalytic oxidizer is installed and operational. Staff will assume it is being maintained properly. It was operating well above the 550 degree Fahrenheit limit at 658 degrees during the inspection.

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. The facility will also have to verify PM-10 emissions.

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

VI.2: MSDS or manufacturer's formulation data is available. All information is kept on-line now.

VI.3: The facility is maintaining records of each flavorant used and its VOC content as required. 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 kept on file. Maintenance personnel do them at the start of the 2nd shift.

VI.6: The facility is maintaining records of hours of operation.

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

VI.8: It doesn't appear that the facility has had to use their PMP yet on the catalytic oxidizer since it hasn't dropped below 550 degrees F.

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: Staff will assume the facility is maintaining the temperature monitoring device of the catalytic oxidizer.

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 VOC and PM testing mentioned above, the facility will have to submit test plans as well as a report of the results once testing has been completed.

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: The facility is in compliance with the 12-month rolling time period VOC limit of 4.0 tons.

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

IV.1: The wet rotoclone is installed and operational. Staff will assume it is being maintained properly.

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

VI.2: MSDS or manufacturer's formulation data is available. All information is kept on-line now.

VI.3: The facility is maintaining records of each flavorant used and its VOC content as required.

VI.4: Visible emissions are kept on file. Maintenance personnel do them at the start of the 2nd shift.

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 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: The facility is in compliance with the 12-month rolling time period VOC limit of 25.8 tons. 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: 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. They've been averaging a little over 11,000 tons.

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

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

IV.1: The particulate control equipment is installed and operational. Staff will assume it is being maintained properly.

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 kept on file. Maintenance personnel do them at the start of the 2nd shift.

VI.4: 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.

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: The facility is in compliance with the 12-month rolling time period VOC limit of 6.0 tons.

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

IV.1: The cyclone and wet scrubber are installed and operational. Staff will assume they are being maintained properly.

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

VI.2: MSDS or manufacturer's formulation data is available. All information is kept on-line now.

VI.3: The facility is maintaining records of each flavorant used and its VOC content as required.

VI.4: Visible emissions are kept on file. Maintenance personnel do them at the start of the 2nd shift.

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 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: The facility is in compliance with the 12-month rolling time period VOC limit of 18.0 tons.

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

IV.1: The wet rotoclone is installed and operational. Staff will assume it is being maintained properly.

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

VI.2: MSDS or manufacturer's formulation data is available. All information is kept on-line now.

VI.3: The facility is maintaining records of each flavorant used and its VOC content as

required.

VI.4: Visible emissions are kept on file. Maintenance personnel do them at the start of the 2nd shift.

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 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 57: The facility appears to be meeting the various PM limits.

I.57: 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 particulate controls are installed and operational. Staff will assume it is being maintained properly.

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

VI.2: Visible emissions are kept on file. Maintenance personnel do them at the start of the 2nd shift.

VI.3: 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 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 will have to be done at some point during the term of the ROP.

I.70 and 71: 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 particulate controls are installed and operational. Staff will assume they are being

maintained properly.

V.1: PM, PM-10, and PM 2.5 emissions will have to be tested at some point during the term of the ROP.

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

VI.2: Visible emissions are kept on file. Maintenance personnel do them at the start of the 2nd shift.

VI.3: The facility is maintaining records of hours of operation.

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, the facility will have to submit test plans as well as a report of the results once testing has been completed.

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 will have to be done at some point during the term of the ROP.

I.78: 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 particulate controls are installed and operational. Staff will assume they are being maintained properly.

V.1: PM, PM-10, and PM 2.5 emissions will have to be tested at some point during the term of the ROP.

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

VI.2: Visible emissions are kept on file. Maintenance personnel do them at the start of the 2nd shift.

VI.3: The facility is maintaining records of hours of operation.

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, the facility will have to submit test plans as well as a report of the results once testing has been completed.

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 operational. Staff will assume they are being maintained properly.

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

VI.2: Visible emissions are kept on file. Maintenance personnel do them at the start of the 2nd shift.

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

IV.1: The particulate controls are installed and operational. Staff will assume it is being maintained properly.

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

VI.2: Visible emissions are kept on file. Maintenance personnel do them at the start of the 2nd shift.

VI.3: 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 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 42: The facility appears to be meeting the various PM limits.

I.43 and 44: 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 particulate controls are installed and operational. Staff will assume it is being maintained properly.

V.1: The facility will be required to test PM, PM 2.5, and PM-10 emissions from EU435 during the term of this permit.

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

VI.2: Visible emissions are kept on file. Maintenance personnel do them at the start of the 2nd shift.

VI.3: 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 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: The facility has been in compliance with and stayed under the 1,000 million cubic feet of natural gas burned per 12-month rolling time period.

V.1: 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 kept on file. Maintenance personnel do them at the start of the 2nd shift.

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.

FG-RULE 287(c)

When in use, it is the facility's ink jet printers that are being operated under this exemption. They are ^{well} will under the 200 gallon per month limit.

FGRULE290

Staff was told that the facility hasn't used the emission unit (EU32121) operating under this permit exemption to make any cereals in over two years.

FGCOLDCLEANERS

Staff did not view all the cold cleaners at the facility and will assume that they all are meeting the conditions of this flexible group. The facility has 10 of them and they are all maintained and serviced by Safety Kleen. See attached spreadsheet for their date of installation, size, location, solvent used, etc.

INSPECTION SUMMARY: The facility appears to be in COMPLIANCE with the terms and conditions of ROP-MI-B1548-2014b at the present time.

Names: *Math Dahm*

Date: *9-14-16*

Supervisor: *MB 9/15/2016*

NAME _____

DATE _____

SUPERVISOR _____