

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

B161561197

FACILITY: Sara Lee Frozen Bakery, LLC		SRN / ID: B1615
LOCATION: 2314 SYBRANDT ROAD, TRAVERSE CITY		DISTRICT: Cadillac
CITY: TRAVERSE CITY		COUNTY: GRAND TRAVERSE
CONTACT:		ACTIVITY DATE: 12/14/2021
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On-site Inspection and Records Review		
RESOLVED COMPLAINTS:		

On Tuesday, December 14, 2021, Caryn Owens of the Department of Environment, Great Lakes, and Energy (EGLE) – Air Quality Division (AQD) conducted an on-site inspection of Sara Lee Frozen Bakery (SRN: B1615) located on Sybrant Road in Traverse City, Grand Traverse County, Michigan. More specifically, the site is located on the north side of Sybrant Road, approximately 1/10 mile north of the Cass Road and South Airport Road intersection. The purpose of this inspection was to determine the facility’s compliance with permit to install (PTI) 189-14A. Sara Lee Frozen Bakery has opted out of major source applicability volatile organic compounds (VOCs) by limiting operational and/or production potential to emit (PTE) below major source thresholds. The site is not currently subject to known federal air quality regulations.

Evaluation Summary

Based on the activities covered during this field inspection, the facility appears to be in compliance with PTI 189-14A. Review of the records for the facility indicates the facility was in compliance with emission limits in accordance with the current PTI. No further actions are necessary at this time. Specific permit conditions that were reviewed are discussed below.

On-site Inspection:

During the field inspection, the weather conditions were cloudy, approximately 42 degrees Fahrenheit, with winds from the southeast approximately 5-10 miles per hour. Upon arrival, I stopped at the security desk and showed my drivers license and asked to see Ms. Robin Curcio, the EHS Manager of the facility. The site consisted of one main building and a few outbuildings on the northern side of the property. Ms. Curcio and I obtained the following records for the facility: Monthly VOC emissions for each line at the facility; monthly VOC totals for each area of the plant; the flavor usage for the month of August, and Glycol Usage Calculations. During the field inspection, the plant was on their yearly shut down which is typically from Thanksgiving until January 2nd. The facility takes care of maintenance issues, goes through inventory, and thoroughly sanitizes the plant. We walked through the plant to see if there were any changes from the last inspection. The Hi Pie Production Line is not operating, but the other lines are similar to the last inspection. The pie manufacturing lines include a prebake line, Fruit pie line, Autoprod line, Cheesecake line, Baked Meringue line, and open face line. The areas of the plant that emit VOC emissions are in the cooking kitchens where the flavorings are used, two glycol dehydrators for the Hi Rise and Open face pie lines, and the inks used for packaging.

There are two natural gas fired ovens that the company is claiming exemption R 336.1282(2)(b)(i). Additionally, there are ink jet coaters for labeling packages prior to sales and the company is claiming exception R 336.1287(2)(c). Additionally, a fire pump is located on the southwest corner of the site is serviced by a 3rd party and operated once a week to verify it operates correctly during an emergency. The company claims the diesel fire pump meets exemption R 336.1285(2)(g).

PTI Compliance Evaluation:

FGDEHY1: Formerly three glycol dehydrators used for removing moisture from the air in the freezers. EUGD01 has been removed from the facility and replaced by a closed loop glycol dehydrator system that has no emissions.

- There are no **Emission Limits, Materials Limits, Process/Operational Restrictions, Design/Equipment Parameters, Testing/Sampling, Reporting, or Other Requirements** associated

with FGDEHY1.

- **Monitoring/Recordkeeping:** The facility maintains a current listing of the chemical composition of the glycol solution for FGDEHY. The hi rise glycol dehydrator used 2,156 pounds of glycol and the open face line used 4,893 pounds of glycol from January 1, 2021 through December 1, 2021.
- **Stack/Vent Restrictions:** Based on visible observations during the field inspection, the stacks for FGDEHY1 appeared to be in compliance with permitted limits.

FGFACILITY: This flexible group includes all process equipment including equipment covered by other permits, grand-fathered equipment, and exempt equipment.

- **Emission Limits:** FGFACILITY is limited to 90 tons of VOCs per 12-month rolling time period. Based on the records reviewed from January 1, 2021 through December 14, 2021, the VOC emissions for FGFACILITY were 9.72 tons of VOCs per 12-month rolling time period.
- **Materials Limits:** FGFACILITY is limited to 356,000 pounds per year of total VOC containing flavoring processed in the ovens and kettles per 12-month rolling time period. Based on the records reviewed from January 1, 2021 through December 14, 2021, the amount of VOC containing flavorings used was 12,358.34 pounds of total VOC containing flavoring per 12-month rolling time period.
- There are no **Process/Operational Restrictions, Design/Equipment Parameters, Testing/Sampling, Reporting, Stack/Vent Restrictions, or Other Requirements** associated with FGFACILITY
- **Monitoring/Recordkeeping:** The facility records monthly and 12-month rolling time period calculations for VOCs on a spreadsheet. Additionally, the facility maintains a current listing of each chemical composition of each flavoring material used in the process. Monthly calculations are derived from the gallons of pounds of each VOC containing flavoring processed in the kettles and/or ovens to determine monthly VOC emissions which were previously reported under Emission Limits above. The records are attached.

NAME _____

DATE _____

SUPERVISOR_____