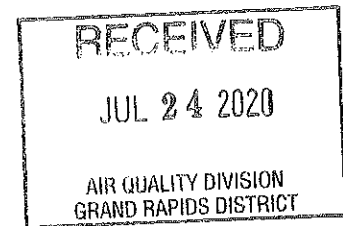


Scott Evans  
Environmental Quality Analyst  
EGLE, AQD, Grand Rapids District  
350 Ottawa Avenue, NW, Unit 10  
Grand Rapids, Michigan 49503



RE: April 30, 2020 Violation Notice – Keebler Company Grand Rapids Bakery  
Notification of Stack Testing August 22-24, 2020

Dear Mr. Evans,

The Keebler Company Grand Rapids Bakery located at 310 28<sup>th</sup> Street SE will be performing stack testing to evaluate the emission rate of propylene glycol. This correspondence serves to provide a 30-day notification that testing is scheduled to occur on August 22 – 24, 2020.

In the facility's response to the April 30 Violation Notice, the Grand Rapids Bakery proposed to conduct sampling and analysis of a number of propylene glycol rich flavorings using US EPA Method 24 to obtain a VOC-content for the flavorings. This effort has been completed and did not provide the expected results. Essentially all of the materials volatilized producing near 100% VOC-content results for each of the propylene glycol-containing flavorings tested.

As identified in its initial Violation Notice response, the Grand Rapids Bakery is moving to perform stack testing to re-prove the 20 percent propylene glycol emission factor. The facility has contracted with Mostardi Platt of Elmhurst, Illinois to perform stack testing at the facility to replicate the 2008 stack testing that originally established the propylene glycol emission factor.

Mostardi Platt will be arriving on site on August 21<sup>st</sup> for equipment set-up and will begin testing on August 22<sup>nd</sup> to coincide with the next scheduled run of the same product made during the 2008 stack testing. This testing is expected to continue through the first shift on August 24<sup>th</sup> when the product run is scheduled to be complete.

The testing will include:

- Three one-hour propylene glycol test runs performed at each of the Oven 2 emission stacks in accordance with United States Environmental Protection Agency (USEPA) Modified Method 323, Title 40, Code of Federal Regulations, Part 60 (40 CFR 60), Appendix A. The chilled reagent water will be analyzed by USEPA Method 8015D (SW-846).
- Four volumetric flow rate determinations performed at each of the Oven 2 emission stacks in accordance with USEPA Methods 1, 2, 3, and 4, 40 CFR 60, Appendix A. Flows will be conducted concurrently with the Modified Method 323 sampling for the purpose of determining a mass emission rate for propylene glycol.
- The tested propylene glycol emission rates will be compared against the mass of propylene glycol added to the product to arrive at a propylene glycol emission factor.

If you have any questions regarding the proposed testing methodology, please contact John Nestor of Mostardi Platt at [jnestor@mp-mail.com](mailto:jnestor@mp-mail.com) or 630.973.0411, If you have any questions regarding the testing

Scott Evans

July 21, 2020

schedule, please contact Danielle Poma, site Environmental, Health and Safety Manager, at [danielle.poma@kellogg.com](mailto:danielle.poma@kellogg.com) or 616.247.4458.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Altman".

Daniel Altman  
Senior Manager, Plant Operations  
Keebler Company

Attachment

cc: Jenine Camilleri, EGLE  
Christopher Ethridge, EGLE  
Heidi Hollenbach, EGLE  
Karen Kajiya-Mills, EGLE