

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

B439530403

FACILITY: KEEBLER CO		SRN / ID: B4395
LOCATION: 310 28TH ST SE, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Steve Curry , Environmental Health Safety and Security Manager		ACTIVITY DATE: 07/30/2015
STAFF: David Morgan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

At 1:45 A.M. on July 30, 2015, Air Quality Division staff Dave Morgan conducted an unannounced scheduled inspection of the Keebler Company located at 310 28th Street in Grand Rapids. The purpose of the inspection was to determine the facility's compliance with state and federal air pollution regulations as well as Permit to Install No. 206-08F. Accompanying AQD staff on the inspection was Steve Curry, Environmental Health Safety and Security Manager, and Mike Phelps, Facility Engineer.

FACILITY DESCRIPTION

This Keebler facility manufactures cookies, crackers, and toaster pastries. The bakery operates six oven lines permitted under PTI No. 206-08F. This facility is considered a synthetic minor source for VOC emissions.

COMPLIANCE EVALUATION

There are six process lines (Oven 1B, 2, 4, 5, 6 and 7) permitted under PTI No. 206-08F. Each process line consists of conveying, mixing, extruding, form filling, flavoring, baking and packaging grain-based food products. In the mixing areas (there are two), dry ingredients are pneumatically piped from bulk containers to the mixing vessels. Dust collectors are used to collect fines from the dry ingredient handling. Some mixing vessels also have sock filtration to reduce fine particulate release. Liquid ingredients including flavorants, oil, etc. are mixed with the dry ingredients to form the dough. The dough is then formed and sheeted and conveyed through the baking oven. There have been no equipment changes requiring an air use permit.

Certain flavorings contain VOCs (in the form of alcohols like ethyl alcohol and propylene glycol) which are volatilized during baking and exhausted via the oven stacks. The company is keeping all records in accordance with permit requirements. According to calculations provided by the company, records for July 2014 through June 2015 were as follows:

Equipment	Pollutant	Emissions Limit	Actual Emissions	Compliance (Yes/No)	Comment
EUOven1B (11.58 mmBtu/hr)	VOC	25 tpy	5.71 tpy	YES	
EUOven2 (9.6 mmBtu/hr)	VOC	25 tpy	13.73 tpy	YES	
EUOven4 (15 mmBtu/hr)	VOC	20 tpy	1.21 tpy	YES	
	Ammonia	9.3 tpy	0.59 tpy	YES	
EUOven5 (15 mmBtu/hr)	VOC	20 tpy	2.23 tpy	YES	
	Ammonia	9.3 tpy	0.30 tpy	YES	
EUOven6 (15.7 mmBtu/hr)	VOC	19 tpy	0.44 tpy	YES	
	Ammonia	21 tpy	3.37 tpy	YES	
EUOven7 (11 mmBtu/hr)	VOC	52 tpy	6.03 tpy	YES	
EUDEHUM	NA	NA			
EUSANITIZING	VOC	1,000 lbs/mnth	<760 lbs/month	YES	
EUCLEANING	VOC	1,000 lbs/mnth	<6 lbs/month	YES	
FGFACILITY	VOC	90 tpy	33.61 tpy	YES	
	VOC	2090 lb/day	<620 lb/day	YES	Highest VOC day occurred in November 2014
	Benzaldehyde	3.46 tpy	0.17 tpy	YES	

All emissions from the facility are well below permitted limits. Lastly, there were no visible emissions from the facility. The company verified through measurement that all stacks are meeting permit requirements.

SUMMARY

The Keebler Company appears to be in compliance with all applicable requirements. Attached are records obtained during the inspection.

NAME



DATE

8/21/15

SUPERVISOR

PHB