

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

N807933848

FACILITY: KEEBLER COMPANY		SRN / ID: N8079
LOCATION: 3750 ROGER B CHAFFEE BLVD, WYOMING		DISTRICT: Grand Rapids
CITY: WYOMING		COUNTY: KENT
CONTACT: Stephanie Bentley , Environmental Health and Safety Manager		ACTIVITY DATE: 03/22/2016
STAFF: David Morgan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

At 11:00 A.M. on March 22, 2016, Air Quality Division (AQD) staff Dave Morgan conducted an unannounced scheduled inspection of the Keebler Company located at 3750 Roger B. Chaffee Boulevard in Wyoming. 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. 203-08D. Accompanying AQD staff on the inspection was Stephanie Bentley, Environmental Health and Safety Manager. A copy of the DEQ Inspection Brochure was presented at the beginning of the inspection.

**FACILITY DESCRIPTION**

This Keebler plant manufactures snack bars through mixing, extruding, flavoring and packaging grain-based food products. The facility consists of two process lines, one natural gas-fired boiler, four storage tanks, and various sanitation and cleaning operations. The facility is considered a synthetic minor source for VOC emissions. It is noted that this facility is an extension of the Keebler operations at 3300 Roger B. Chaffee Boulevard.

**COMPLIANCE EVALUATION**

**EU-PL01 & EU-PL02:**

Product Line 1 (EU-PL01) consists of 4 kettles, 1 mixer, 1 forming area, a cooling tunnel, a cutting area, 2 confectioners coating tanks with striping capability, cooling, and a packaging area. Product Line 2 (EUPL02) consists of 4 kettles, 1 mixer, 1 forming area, a cooling tunnel, a cutting area, 3 confectioners coating tanks with enrobing and striping capability, cooling, and a packaging area. In the process, liquid ingredients including oils, sugars, and flavorings are mixed into a slurry. Dry ingredients are then mixed with the slurry, formed and cooled in a tunnel. The only heated part of the process is in the mixing vessels. Both lines are permitted under PTI No. 203-08D. Product Line 1 has not operated since the last AQD inspection in 2012. Neither line was operating at the time of the inspection. It is noted that PTI No. 203-08D does not contain any specific equipment, process, or stack requirements.

Emissions from these process lines consist primarily of VOCs in the form of ethanol and propylene glycol from flavorants added to the product.

**FGSANITATION:**

Cleaning and sanitizing products are used extensively around the facility to maintain a sanitary environment for the safe production of ready to eat food products. Many of the chemicals used for these purposes are either used at sanitation stations or in equipment cleaning operations. Under PTI No. 203-08D there are no specific equipment or process requirements for these emission units.

**EXEMPT EQUIPMENT:**

The facility has several emission units exempt from permitting including a natural gas-fired boiler with a rated capacity of 5 million BTU/hr which is exempt under Rule 282(b), a cold cleaner exempt under Rule 281(h), and printing operations which are exempt under Rule 287(c). There are no emergency generators at this facility.

**Recordkeeping:**

The company is maintaining all emission records in accordance with permit requirements using an Excel spreadsheet. Records for 2015 were provided for all emission units. The company provided updated records which were consistent with information reported in MAERS. Company records demonstrate that emissions are well below permitted limits. Below is a table summarizing emissions for the facility from March 2015 through February 2016.

Equipment	Pollutant	Emissions Limit	Actual Emissions	Compliance (Yes/No)	Comment
EUPL-01	VOC	62.0 tpy	0.0 tpy	YES	
EUPL-02	VOC	40 tpy	2.51 tpy	YES	
	triacetin	4.8 tpy	0.36	YES	

FGSANITIZING	VOC	17.8 tpy	2.53 tpy	YES	
	VOC	90 tpy	5.56 tpy	YES	
FGFACILITY	VOC	2,213 lb/day	<512 lb/day	YES	
	furfural	0.14 tpy	0.0 tpy	YES	

Records are attached to this report.

**SUMMARY**

Keebler appears to be in compliance with applicable permit limits and requirements.

NAME 

DATE 4/12/16

SUPERVISOR PAAB