

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

N807955290

FACILITY: KEEBLER COMPANY		SRN / ID: N8079
LOCATION: 3750 ROGER B CHAFFEE BLVD, WYOMING		DISTRICT: Grand Rapids
CITY: WYOMING		COUNTY: KENT
CONTACT: Nancy Sygnavong , Environmental Health and Safety Manager		ACTIVITY DATE: 08/27/2020
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled air permit compliance inspection		
RESOLVED COMPLAINTS:		

Introduction

On Thursday, August 27, 2020, district staff Scott Evans (SE) conducted an announced, scheduled inspection of the Keebler Facility located on 3750 Roger B Chaffee Blvd in Wyoming, Michigan. The purpose of this inspection was to assess the facility's compliance with opt-out Permit to Install (PTI) No. 203-08F. This inspection was an announced to ensure that proper safety measures could be met and that necessary staff would be present at the facility during the inspection due to the COVID-19 pandemic.

This facility produces food products such as various types of granola bars and Rice Krispy Treats. It has two production lines that utilize mixers, coolers, and cutters to produce the food. No ovens are used in these production lines.

On the day of the inspection, SE arrived at approximately 9:00 am. A quick drive around the perimeter confirmed that there were no visible emissions or noticeable odors coming from the facility. Upon arriving at the facility, SE was greeted by the door guard who informed him that the contact points were at another facility down the road. At this meeting point, SE entered and was instructed to don proper personal protective equipment (PPE) for both food quality assurance and for disease prevention during the COVID-19 pandemic. SE was then met by Environmental Health and Safety Manager Nancy Sygnavong (NS) and Plant Manager Linda Anderson (LA). A brief discussion was had regarding the purpose of the visit. SE then returned to the facility on 3750 Roger B Chaffee Blvd accompanied by NS and LA who oversee the facility.

At the time of the inspection, the facility had been shut down since early 2020 due to low product demand. The inspection was still conducted to confirm equipment presence and determine if any significant changes had occurred compared to what was encompassed by PTI NO. 203-08F. Records for the facility were reviewed for the most recent 12-month period while the facility was in operation. The facility wished to maintain this active PTI as they intend to resume operations in the future.

PTI No. 203-08F

This permit covers only one flexible group: FGFACILITY. This flexible group is subject to three emission limits and no material limits, as listed below:

- 90.0 tons per year (tpy) of Volatile Organic Compounds (VOCs) to opt-out of Title V permitting
- 2,213 lbs/day of VOCs
- 0.14 tpy of furfural

The facility is expected to maintain records that demonstrate compliance with these limits for a period of no less than five years' time.

Upon request, the facility provided records for the most recent 12-month period of activity within the facility. The records that were required are listed below:

- Daily usage of VOC-containing material
- Daily VOC-containing material reclaimed (if any)
- Daily VOC emissions using the equation presented in PTI No. 203-08F
- Monthly VOC emissions from flavoring materials
- Monthly VOC emissions from cleaning material
- Monthly VOC emissions from sources other than flavorings or cleaning materials
- Monthly VOC emissions in total
- Annual VOC emissions (12-month rolling format)
- Monthly usage of furfural-containing material
- Monthly furfural-containing material reclaimed (if any)
- Furfural content by weight percentage of materials used
- Monthly furfural emissions

- Annual furfural emissions (12-month rolling format)

All records were provided in an acceptable format for review including manufacturer data on VOC and Furfural content of all applicable materials. It is worth noting that VOC emissions from flavorings (not from cleaning materials or other sources) and all furfural usage rounded to 0.0 tons for all monthly calculations. Based on manufacturer data and usage data, this appears accurate.

The records were reviewed, and the results of this review are listed below in reference to the emission limits established within the PTI:

- Annual VOC emissions (limit 90.0 tpy)
 - o Highest individual month from all sources: 0.33 tons in January 2019
 - o Highest 12-month rolling annual from all sources: 1.15 tons as of December 2019
 - o In compliance with limit
- Daily VOC emissions (limit 2,213 lbs/day)
 - o Daily records were provided; however, a detailed review of 365 days worth of daily data was not necessary as the highest monthly total was well below this daily limit as illustrated above.
 - o In compliance with limit
- Annual Furfural emissions (limit 0.14 tpy)
 - o All monthly totals rounded to 0.0 tons
 - o All 12-month rolling calculations rounded to 0.0 tons
 - o In compliance with limit

Based on the above records review, the facility appears to have been well within compliance ranges of all permitted limits while in operation. Though the facility is not currently active, all equipment appeared to have been unchanged since the halt in production. The facility was advised to inform the department upon the facility's return to operation so that a review of records or visual inspection could be conducted if deemed necessary.

Exempt Equipment and Other Items

At the facility was one steam boiler. This boiler is natural gas-fired with a maximum potential input of 42 mmBtu. This boiler is exempt from air permitting requirements by Rule 282(2)(b)(i). It was installed in 2007. Due to this size and install date, this boiler is subject to New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart Dc. The facility appears to be in compliance with all NSPS requirements. Since this boiler is natural gas-fired, it is not subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart JJJJJJ.

The facility has one emergency generator on site. This generator is natural gas-fired with a maximum heat input of 265,000 Btu. It was installed in 2017 and is exempt from air permitting requirements by Rule 285(2)(g). This generator is subject to NSPS 40 CFR Part 60 Subpart IIII. The facility appears to be in compliance with the applicable NSPS requirements as it is an emergency generator and records of operation are maintained by the facility. This generator is subject to NESHAP 40 CFR Part 63 subpart ZZZZ. Compliance with this NESHAP is demonstrated by compliance with NSPS 40 CFR Part 60 Subpart IIII.

Conclusions

At the conclusion of this inspection, the facility appeared to be in compliance with air quality requirements as outlined in PTI No. 203-08F and all other applicable air quality regulations.

NAME Scott Evans

DATE 9/23/2020

SUPERVISOR HH