

Good Things From Fresh Bread



August 24, 2017

April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
Michigan Department of Environmental Quality
Grand Rapids District Office
350 Ottawa NW, Unit 10
Grand Rapids, Michigan 49503-2341

Subject: Violation Notice Dated July 11, 2017 – Update on Corrective Actions

Reference: Roskam Baking Company
2600 29th Street SE
Grand Rapids, Michigan 49512

Dear Ms. Lazzaro:

We are writing as a follow-up to our July 31, 2017 response regarding the subject Violation Notice (VN). Below are described the status and updates to the corrective actions that the Roskam Baking Company (RBC) is evaluating and undertaking to address the issues identified in the subject VN:

1. Pretzel Baking Lines – Corrective Actions

As described in our response to the subject VN, RBC has reduced the exhaust rate of both pretzel line coolers to their original setting to prevent pretzel dust from becoming entrained in the exhaust stream. Periodic inspections of the pretzel lines exhausts and the building roof have confirmed that this measure has been effective for both of the pretzel baking lines.

Options being evaluated for long term solutions include installation of add-on dust control equipment (fabric filters, perhaps preceded by inertial separators) on the pretzel line cooler exhausts, as well as process modifications such as conditioning (cooling) of the cooling air and/or extension of the cooling sections. We have been advised that with sufficient extension of the cooling sections, adequate cooling may be possible without the benefit of any cooler exhaust. If this is the case, the cooling exhaust fans will be shut down and removed and the roof openings sealed following installation of the cooling section extensions.

Installation of cooling section extensions appears to be the most viable option at this point. A final decision is expected to be made by the end of this month, and the changes implemented by the end of October or November 2017.

2. Popcorn Production Lines – Corrective Actions

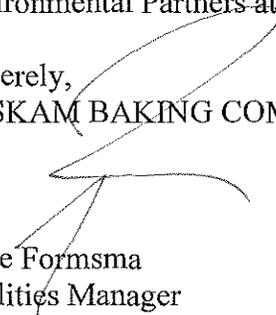
As described in our response to the subject VN, RBC temporarily reduced the coating application rate of the production equipment to the initial settings, thereby precluding the coating from becoming airborne. The new AutoJet Technologies coating application equipment from Spraying Systems Co. has now been delivered and installed. This new equipment employs an application technology that does not result in the coating becoming airborne over the range of our production rates. We believe this measure has successfully addressed this issue.

As mentioned in our response to the VN, RBC strives to be a good neighbor and will continue to take the steps necessary to ensure that it operates in conformance with good air pollution control practice and in compliance with all applicable environmental regulatory requirements.

Implementation of the corrective actions described above will continue expeditiously, and we will update you with our progress as future corrective actions are completed.

If you have any questions, please contact me at (616) 419-1862, or Mark Horne of Environmental Partners at (616) 928-9128.

Sincerely,
ROSKAM BAKING COMPANY



Steve Formsma
Facilities Manager

cc/via e-mail: Heidi Hollenbach, DEQ AQD
Mary Ann Dolehanty, DEQ AQD
Christopher Ethridge, DEQ AQD
Thomas Hess, DEQ AQD
Mark A. Horne, P.E., Environmental Partners, Inc.