

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

P011037378

FACILITY: Roskam Baking Company		SRN / ID: P0110
LOCATION: 2600 29th St. SE, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Rodney Velting , Facilities Supervisor		ACTIVITY DATE: 10/26/2016
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, self-initiated Inspection as a result of a complaint.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced inspection in response to a complaint. The complaint was regarding fallout doing damage to vehicles in the area. I met with several Roskam Baking Company staff including, Justin Lafferty, Rodney Velting and others. Once we were all gathered, I informed them of the complaint and that it had prompted this inspection.

Roskam Baking Company (Roskam), 29th Street facility is a pretzel and caramel corn manufacturing operation. The file contains a May, 2010 exemption document that details the operations at the facility. Operations include two pretzel baking snack production lines, a popcorn snack production line and packaging. The pretzel line includes dough preparation, proofing, caustic cookers and baking ovens. The popcorn line includes a popcorn popper, tumbler and caramel applicator. Since 2010, an additional popcorn line has been added. Additional support equipment includes liquid and powder storage and conveyance systems and a natural gas fired boiler.

The internal in-plant operations looked as expected, and I specifically wanted to look at the caustic (SDS attached) application area as well as the salt application area of the pretzel line, since there are emissions vented externally at this area. Even though it was raining heavily, I requested to go on the roof.

Once we got to the roof, we looked first at the popcorn line exhaust systems. There was visible material on the roof, and the vanes in the stack were coated with material. It was not known at the time exactly when the area was cleaned last.

Next we observed the roof around the pretzel lines. There was a significant accumulation of material on the roof and surrounding area that was white in appearance. I received permission to take a sample for comparison to the sample I had taken off the vehicle at the complainants. Due to the inclement weather, the roof was very slippery and we did not stay up there very long. Upon going back inside, I stated that I wanted to come back on a dry day and observe the area again. I recommended that the roof be cleaned and monitored to see how long it takes to get that much material accumulation.

A follow-up inspection is planned for Thursday November 3rd to observe the roof conditions when it is not raining and slippery.

Roskam staff also suggested that AQD staff continue to look at other facilities in the area to see if there is a different cause for the fallout. I indicated that I will, but since Roskam was specifically identified in the complaint, I started with them. If necessary, the investigation into the cause to the fallout will be widened.

During the follow-up site visit conducted on November 3, 2016, Mr. Velting met me and we went directly up to the roof. There was still pretzel material present, which due to the recent rain has not been able to be cleaned all up. Justin Lafferty joined us so we could talk about the pretzel line configuration. I stated that the exemption from permitting that they are currently utilizing for both the pretzel line and the popcorn line, Rule 285(dd), requires a filter on any equipment that is externally vented. The expectation of the AQD is that Roskam reconfigure the exhausts on each pretzel and popcorn line to eliminate the pieces of pretzel and corn that are going out the stack. The pieces are large enough that they do not appear to be leaving the roof; however, the requirement of the permit exemption is specific to a filter so that no issues occur.


I asked to be escorted over to the new popcorn line. There was a bit of smoke seen being emitted from the stack, (less than 10%) and I asked if oil was used. I was told that the corn is only air popped. As we approached, I saw a pile of popcorn material on the roof. The end of the stack was horizontal, with a

type of screen that had been moved to the side. I reiterated the requirement for a filter as specified in permit exemption Rule 286(dd). Mr. Lafferty stated that they had placed a filter farther down in the process stack, and it no longer has any popcorn particles being emitted. The pile of material apparently had not been cleaned.

We left the roof, and went down to see the boiler so that the size of it could be verified. I mentioned that boilers larger than 10.0 MMBtu/hr are subject to a NSPS, and the consultant had identified the size as 15.4 MMBtu. When we arrived, it was identified as an 8.957 MMBtu/hr natural gas fired Fulton Boiler.

I informed Mr. Velting that at this point I don't think it's Roskam causing the vehicle damage, and more investigations will be conducted in the area. Based on the laboratory report, the first sample taken from the complainant's property was inconclusive and I was planning to take another one. The second laboratory results hopefully will provide insight into the issue. I stated I would send him both photos of the vehicle and the new lab report when available.

The expectation is that Roskam Baking Company completely eliminate the discharge of product onto the roof to fully comply with the permit exemption. I informed Mr. Velting that I would be back within the year to conduct another inspection and to verify the filters are in place as required.

NAME 

DATE 11-7-16

SUPERVISOR 