

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

B154863555

<b>FACILITY:</b> Post Foods		<b>SRN / ID:</b> B1548
<b>LOCATION:</b> 275 Cliff Street, BATTLE CREEK		<b>DISTRICT:</b> Kalamazoo
<b>CITY:</b> BATTLE CREEK		<b>COUNTY:</b> CALHOUN
<b>CONTACT:</b> Rob Mason , Environmental Engineer		<b>ACTIVITY DATE:</b> 05/25/2022
<b>STAFF:</b> Monica Brothers	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MAJOR
<b>SUBJECT:</b> Unannounced scheduled inspection		
<b>RESOLVED COMPLAINTS:</b>		

This was an unannounced scheduled inspection. Staff, Monica Brothers and Amanda Cross arrived on-site at 9:00 am and met with Rob Mason the EHS Manager. Upon arrival, the various stacks were observed, and no visible emissions, besides steam, were seen. Cereal production odors were observed, but nothing out of the ordinary. Cathy Sanford, the Environmental Compliance Specialist for Post, sent me all of the recordkeeping documents after the on-site inspection, since she was not at the facility that day.

This facility produces various types of cereal and is currently operating under MI-ROP-B1548-2020a. Building 17 is used only for “mix and pack”, meaning that there is no cooking of cereals. Building 29 is dedicated to making only varieties of Honey Bunches of Oats. This is the process that required them to get the oxidizer because of the high alcohol content of the oatmeal flavoring they use in some of the HBO varieties. Building 20/32 is where they make Honeycomb, granola, and Grape-nuts. Building 4 is where the bran flakes and rice cereals, like Raisin Bran, Fruity Pebbles, and Cocoa Pebbles, are made.

Grain is hauled into the facility by railcar and stored in large silos. They also get shipments of liquid sugar. The grains then go to Building 20 where they get milled into flour. This flour then gets distributed amongst the various production buildings by an “airveying” system that uses pneumatic pressure to push the flour to the desired location. The cereal-making process starts at the top of each building and works its way down each floor until it gets packaged at ground-level. This process could involve grain-handling, conveying, cleaning, milling, cooking, drying, and coating. There are various pick-up points for particulate matter and VOCs that send the emissions to rotoclones, baghouses, and/or the thermal oxidizer for control before it is emitted to the outside air. The cereal is then dried and packaged. They use hotmelt, exempt under Rule 287(2)(i) and inkjet printers, exempt under Rule 287(2)(c) during packaging, although much of the printing is now done by lasers.

During the facility tour, we went the powerhouse where their three boilers are located. Boiler 1 was running at 32.9 klbs steam/hour at the time of inspection. They have three boilers, 1,3, and 4, however, only two, 1 and 4 are operational. Boiler 3 has been disconnected from any previously available fuel line. They use only natural gas in Boilers 1 and 4 and have not used diesel in them for years. They still have the old diesel storage tanks, but they are empty and not functional. Boiler 1 is a Babcock and Wilcox unit that was installed in 1947 and has a rating of 125,000 lbs steam/hour, and Boiler 4 is also a Babcock and Wilcox unit, installed in 1937, with a rating of 115,000 lbs steam/hour. Rob mentioned that they may be thinking about replacing these two boilers with a number of smaller boilers in the near future.

We also went into Building 29 and observed two Trimer wet scrubbers, one of the baghouses, and the 2910 stack. No visible emissions were seen coming from the stack at that time. We also took a look at the thermal oxidizer that is on the roof of Building 29. The thermal oxidizer is required to have a minimum temperature of 550°F, and during the inspection the inlet temperature was 597°F and the outlet was 695°F. We then went to see Building 4 where Fruity Pebbles and Cocoa Pebbles are made. We observed the following baghouses: 421, 427, 435, and 428, as well as three rotocolones on the roof. This pollution control equipment seemed to be functioning properly during the inspection. We then went into Building 20/32 where Honeycomb and Grape-nuts are made. There is also some milling that is done in this building. We observed the Donaldson Torit for Grape-nuts, which was reading 1.1 inches of water, along with the 2009 stack. We also viewed the 20112, 2008, and 2007 baghouses, 2024 Trimer, and 2008, 2007, 20102, and 20106 stacks. The roof of this building had a little bit of cereal debris on it, likely from a previous upset. No visible emissions were seen coming from the stacks surrounding the debris during the time of the inspection. Rob said that he would get someone up there to clean it up. This building also contains the immersion cleaner, which is the only cold cleaner that is different from the other 9 at the facility. We saw another cold cleaner in the building as well. The lid was closed, and the rules were posted. All of the parts washers are maintained by Safey-Kleen. There was also a small sandblasting unit in this building. It was completely enclosed and vented internally. This is considered exempt under Rule 285(2)(l)(vi).

At the end of the tour, as we were walking back to the office area, we saw a stack that had some bluish smoke coming out of it. It was not consistent and came in bursts. Rob said that he would check to see what was going on with that emission unit. After the inspection Rob emailed me and said that the stack that had the blue smoke was Stack 29120, which is for a flake dryer in Building 29. He said that during the inspection, maintenance personnel were doing some maintenance work and welding on the unit. He said that they had finished the maintenance and the stack exhaust looked clean. Cathy Sandford also sent me a video of the stack following the maintenance activity and no visible emissions were seen.

Below are the conditions of MI-ROP-B1548-2020a and my associated comments on the facility's compliance. In conclusion, the facility seemed to be in compliance at the time of inspection.

#### SOURCE WIDE CONDITIONS

I.1 and 2: Records show that the facility is under the 225 TPY (12-month rolling) limits for PM and PM-10.

II.2: Records show that the facility is under the 527.6 million cubic feet of natural gas limit (12-month rolling).

III.3: The facility has a Malfunction Abatement Plan and Preventative Maintenance Plan for their pollution control equipment.

VI.1: The facility is maintaining records and in an acceptable format.

VI.2: The facility is maintaining natural gas usage records monthly and in a 12-month rolling format. Fuel oil is no longer used at the facility.

VI.3: The facility is maintaining monthly and 12-month rolling PM emission calculations.

**VI.4:** The facility is maintaining records of all preventative maintenance done on equipment.

**VII 1 through 4:** The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.

#### **EU1725**

**I.1:** Building 17 is currently being used for only “mix-and-pack”, so no VOCs are being emitted. The facility is therefore under the 1.6 TPY (12-month rolling) limit.

**I.2 and 3:** Testing for particulate has not been requested at this time.

**I.4:** No Method 9 readings were completed during the inspection.

**III.1:** The facility is in compliance with the hours of operation restriction of 8,160 per 12-month rolling time period.

**IV.1:** The wet scrubber is installed and seems to be operated in a satisfactory manner.

**VI.1:** The facility is maintaining records and in an acceptable format.

**VI.2:** MSDS or manufacturer’s formulation data is available at the facility.

**VI.3:** The facility is maintaining records of each flavorant used and its VOC content as required. The facility last used a VOC flavorant in this process back in 2014. Building 17 is currently being used for “mix and pack” only, so no VOCs are being emitted.

**VI.4:** Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.

**VI.5:** The facility is maintaining records of hours of operation.

**VII 1 through 3:** The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.

**VIII.1:** Staff did not view every stack at the facility during inspections but will assume it meets the requirements.

#### **FG-477 Coating**

**I.1:** Records show that the facility is under the 25.0 TPY (12-month rolling) limit for VOC emissions.

**I.2 through 8:** Particulate testing has been completed in the past.

**I.9:** No Method 9 readings were completed during the inspection.

**III.1:** Records show that the facility is under the 8,160 hours of operation (12-month rolling) limit for this flexible group.

**IV.1:** The wet rotoclones and Aerodyne collectors are installed and seem to be operating in a satisfactory manner.

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: MSDS or manufacturer's formulation data is available at the facility.**

**VI.3: The facility is maintaining records of each flavorant used and its VOC content as required. The facility is doing the required VOC emissions calculations monthly and 12-month rolling.**

**VI.4: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.5: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 3: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

#### **FG-488 Coating**

**I.1: Records show that the facility is under the 7.4 TPY (12-month rolling) limit for VOC emissions.**

**I.2 through 6: The facility appears to be meeting the various PM limits. Testing was conducted on EU494 and EU488 in 2017.**

**I.7: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The wet scrubber and horizontal dust separation unit are installed and seem to be operating in a satisfactory manner.**

**V.1-2: No testing has been requested.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: MSDS or manufacturer's formulation data is available at the facility.**

**VI.3: The facility is maintaining records of each flavorant used and its VOC content as required. The facility is doing the required VOC emissions calculations monthly and 12-month rolling.**

**VI.4: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.5: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 4: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required. Notification of the modification of Wet Scrubber 488 was received by EGLE on 7-16-2020.**

**VIII.1 through 3: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

**FG-2028 Coating**

**I.1: Records show that the facility is under the 25.0 TPY (12-month rolling) limit for VOC emissions.**

**I.2 through 9: The facility appears to be meeting the various PM limits.**

**I.10 and 11: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The wet scrubber is installed and seems to be operating in a satisfactory manner.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: MSDS or manufacturer's formulation data is available at the facility.**

**VI.3: The facility is maintaining records of each flavorant used and its VOC content as required. The facility is doing the required VOC emissions calculations monthly and 12-month rolling.**

**VI.4: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.5: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 3: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

**FG2983CoatOxdOn**

**I.1: Records show that the facility is under the 25.6 TPY (12-month rolling) limit for VOC emissions. Testing of VOC emissions was successfully conducted on 6-17-2020.**

**I.2: The facility appears to be meeting the PM-10 limit. Testing of PM emissions was conducted in 2017.**

**I.3: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The wet rotoclone is installed and seems to be operating in a satisfactory manner.**

**IV.2: The catalytic oxidizer is installed and seems to be operating in a satisfactory manner. The temperature log for the oxidizer showed that temperatures were above the minimum 550°F most of the time. When the temperatures were below this value, they reported this as a malfunction**

and deviation on their certifications. During each malfunction, the PMP was implemented, and corrective actions were taken.

**V1 through 3:** The facility tested for VOC combined capture and destruction efficiency in 2019, but test results showed that it was under the 85.5 % minimum set forth in their ROP. They re-tested again on 6-17-2020 after making some tweaks to VOC capture system, and this time, they were in compliance with the 85.5% minimum.

**VI.1:** The facility is maintaining records and in an acceptable format.

**VI.2:** MSDS or manufacturer's formulation data is available at the facility.

**VI.3:** The facility is maintaining records of each flavorant used and its VOC content as required. The facility is doing the required VOC emissions calculations monthly and 12-month rolling. They are also maintaining any start-up and shutdown records of the oxidizer and records of cereal being produced.

**VI.4:** Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.

**VI.5:** The facility is maintaining records of hours of operation on a 12-month rolling basis.

**VI.6:** The facility has a device that continuously monitors and records the temperature of the catalytic oxidizer.

**VI.7:** The facility is prepared to implement the PMP should the temperature ever drop below 550°F during operation.

**VI.8:** Staff will assume that facility is restoring the process and controls to normal operation as quickly as possible should and excursion or exceedance occur.

**VI.9:** It seems like the facility is maintaining the temperature monitoring device of the catalytic oxidizer in a satisfactory manner.

**VI.10:** The facility is maintaining records of maintenance and/or corrective actions taken on the catalytic oxidizer.

**VII.1 through 5:** The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.

**VIII.1:** Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.

**IX.1 and 2:** The facility appears to be complying with the requirements of CAM.

#### **FG2983CoatOxdOff**

**I.1:** Records show that the facility is under the 4.0 TPY (12-month rolling) limit for VOC emissions.

**I.2 through 7:** The facility appears to be meeting the various PM limits.

**I.8 and 9:** No Method 9 readings were completed during the inspection.

**III.1** Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.

**IV.1:** The wet rotoclone is installed and seems to be operating in a satisfactory manner.

**VI.1:** The facility is maintaining records and in an acceptable format.

**VI.2:** SDS or manufacturer's formulation data is available at the facility.

**VI.3:** The facility is maintaining records of each flavorant used and its VOC content as required. The facility is doing the required VOC emissions calculations monthly and 12-month rolling.

**VI.4:** Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.

**VI.5:** The facility is maintaining records of hours of operation on a 12-month rolling basis.

**VII 1 through 3:** The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.

**VIII.1 through 3:** Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.

#### **FG-20108 Baking**

**I.1:** Records show that the facility is under the 25.8 TPY (12-month rolling) limit for VOC emissions. Compliance testing has been conducted to verify emissions.

**I.2 through 13:** The facility appears to be meeting the various PM limits. Compliance testing has been conducted to verify emissions.

**I.14:** No Method 9 readings were completed during the inspection.

**II.1:** Records show that the facility is in compliance with the 18,500 tons per year limit for the production of Base Grape Nuts based on a 12-month rolling time period.

**III.1:** Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.

**III.2:** The facility submitted a Malfunction Abatement Plan.

**IV.1:** The particulate control equipment is installed and seems to be operating in a satisfactory manner.

**VI.1:** The facility is maintaining records and in an acceptable format.

**VI.2:** The facility is maintaining monthly and 12-month rolling records of base Grape Nut production and VOC emissions.

**VI.3:** Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.

**VI.4:** The facility is maintaining records of hours of operation on a 12-month rolling basis.

**VII 1 through 3:** The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.

**VIII.1 through 4:** Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.

#### **FG-3210 Coating**

**I.1:** Records show that the facility is under the 6.0 TPY (12-month rolling) limit for VOC emissions.

**I.2 through 5:** The facility appears to be meeting the various PM limits.

**I.7 and 8:** No Method 9 readings were completed during the inspection.

**III.1:** Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.

**IV.1:** The cyclone and wet scrubber are installed and seem to be operating in a satisfactory manner.

**VI.1:** The facility is maintaining records and in an acceptable format.

**VI.2:** SDS or manufacturer's formulation data is available at the facility.

**VI.3:** The facility is maintaining records of each flavorant used and its VOC content as required. The facility is doing the required VOC emissions calculations monthly and 12-month rolling.

**VI.4:** Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.

**VI.5:** The facility is maintaining records of hours of operation on a 12-month rolling basis.

**VII 1 through 3:** The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.

**VIII.1 through 2:** Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.

#### **FG-32104 Coating**

**I.1:** Records show that the facility is under the 18.0 TPY (12-month rolling) limit for VOC emissions.

**I.2 through 9:** The facility appears to be meeting the various PM limits.

**I.10 and 11:** No Method 9 readings were completed during the inspection.

**III.1:** Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.

**IV.1:** The wet rotoclone is installed and seems to be operating in a satisfactory manner.

**V.1: The facility will be required to test PM, PM10 and PM2.5 from EU32104 during this next ROP term. This testing has not yet been conducted.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: SDS or manufacturer's formulation data is available at the facility.**

**VI.3: The facility is maintaining records of each flavorant used and its VOC content as required. The facility is doing the required VOC emissions calculations monthly and 12-month rolling.**

**VI.4: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.5: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 3: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

#### **FGBLD-4 Rice/Bran**

**I.1 through 54: The facility appears to be meeting the various PM limits.**

**I.55: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The particulate controls are installed and seem to be operating in a satisfactory manner.**

**V.1: No testing has been requested.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.3: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 32: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

#### **FG-17-20-32Cereal**

**I.1 through 67: The facility appears to be meeting the various PM limits. Testing has been conducted on EU32115 and EU2096 and both results showed compliance with their respective limits.**

**I.68 and 69: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The particulate controls are installed and seem to be operating in a satisfactory manner.**

**V.1: PM testing has been completed for EU2096 and EU32115. During the term of this ROP, they will be required to test EU2035, EU2092, EU32101, EU32102, and EU32109.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.3: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 38: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

#### **FGBLD-29 Cereal**

**I.1 through 77: The facility appears to be meeting the various PM limits.**

**I.78: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The particulate controls are installed and seem to be operating in a satisfactory manner.**

**V.1: During the term of this ROP, they will be required to test EU2928 and EU2984.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.3: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 39: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

#### **FG32BLD-CCP**

**I.1 through 32: The facility appears to be meeting the various PM limits.**

**I.33: No Method 9 readings were completed during the inspection.**

**IV.1: The particulate controls are installed and seem to be operating in a satisfactory manner.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 10: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

#### **FGGrainReceiving**

**I.1 through 10: The facility appears to be meeting the various PM limits.**

**I.11: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,424 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The particulate controls are installed and seem to be operating in a satisfactory manner.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.3: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VI.4: The facility is maintaining monthly records of maintenance activities performed on the EU1101 baghouse. They are following the MAP/PMP.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 5: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

#### **FG-Milling**

**I.1 through 39: The facility appears to be meeting the various PM limits.**

**I.40: No Method 9 readings were completed during the inspection.**

**III.1: Records show that the facility is under the 8,160 hours of operation limit (12-month rolling) for this flexible group.**

**IV.1: The particulate controls are installed and seem to be operating in a satisfactory manner.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.3: The facility is maintaining records of hours of operation on a 12-month rolling basis.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1 through 27: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

### **FGBOILERS**

**II.1: The facility has not burned fuel oil in the boilers for years.**

**II.2: Records show that the facility is consistently under the 1,000 million cubic feet of natural gas burned per 12-month rolling time period.**

**III.1: The facility burns only pipeline quality natural gas in the boilers.**

**III.2: They do not use No.2 fuel oil and haven't in years.**

**V.1 and 2: The fuel oil tanks are empty so the facility hasn't needed to verify the sulfur content of fuel oil deliveries.**

**V.2: See comment under V.1 above.**

**VI.1: The facility is maintaining records and in an acceptable format.**

**VI.2: The facility is maintaining 12-month rolling records of natural gas usage. As mentioned, fuel oil is no longer being used.**

**VI.3: Since the fuel oil tanks are empty, records of fuel oil analysis are not being kept.**

**VII 1 through 3: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.**

**VIII.1: Staff did not view every stack at the facility during inspections but will assume that they meet the requirements.**

### **FGCAM-UNITS**

**VI.1: Visible emissions are being done by maintenance and are kept on file. They are keeping track of corrective actions that are done if VEs are observed and are following the MAP/PM plan.**

**VI.2: Staff will assume that the facility restores the emission units subject to CAM as quickly as possible if any excursion or exceedences should occur.**

**VI.3-4: The facility is maintaining records of monitoring data, monitor performance data, and corrective actions taken for CAM emission units.**

VII.1 through 5: The facility has been submitting the required deviation and Semi-Annual and/or ROP Certification reports as required.

IX.1 and 2: The facility appears to be complying with the requirements of CAM.

#### FG-MACT4Z-EMERG

The fire pump engine (EU\_52\_Fire) is tested each week by the facility's Fire Marshal. Post contracts Michigan CAT to perform the preventative maintenance work. It was last performed on June 9, 2021. They seem to be in compliance with MACT ZZZZ.

#### FG-RULE 287(c)

The facility has some ink jet printers that are being operated under the Rule 287(2)(c). Records show that they are under the 200 gallon per month limit. The hot melt process falls under the Rule 287(2)(i) exemption. They are keeping the appropriate records and submitting the necessary reports as required by this flexible group.

#### FGRULE290

There are two emission units under FGRULE290, EU20115 and EU-PB\_Coating. PM and VOC emissions calculations show that these emissions units are in compliance with the Rule 290 exemption.

#### FGCOLDCLEANERS

Staff saw two of the ten cold cleaners at the facility during the inspection. Staff observed the immersion cold cleaner, which is the only cold cleaner that is different from the rest, and also one of the cold cleaners in Building 32. The lids were closed, and the rules were posted. All of the units are maintained and serviced by Safety-Kleen. The cold cleaners seem to be in compliance with the conditions of this flexible group.

NAME Monica Brothers

DATE 9/21/22

SUPERVISOR RL 9/22/22