

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

B161548409

FACILITY: Sara Lee Frozen Bakery, LLC		SRN / ID: B1615
LOCATION: 2314 SYBRANDT ROAD, TRAVERSE CITY		DISTRICT: Cadillac
CITY: TRAVERSE CITY		COUNTY: GRAND TRAVERSE
CONTACT: Catherine Ortiz-Wiegele, EHS Manager		ACTIVITY DATE: 03/20/2019
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Inspection and Records Review		
RESOLVED COMPLAINTS:		

On Wednesday, March 20, 2019, Caryn Owens of the DEQ-AQD conducted a scheduled on-site inspection of Sara Lee Frozen Bakery (SRN: B1615) located on Sybrant Road in Traverse City, Grand Traverse County, Michigan. More specifically, the site is located on the north side of Sybrant Road, approximately 1/10 mile north of the Cass Road and South Airport Road intersection. The purpose of this inspection was to determine the facility's compliance with permit to install (PTI) 189-14A. Sara Lee Frozen Bakery has opted out of major source applicability by limiting operational and/or production potential to emit (PTE) below major source thresholds. The site is not currently subject to known federal air quality regulations.

#### **Evaluation Summary**

Based on the activities covered during this field inspection, the facility appears to be in compliance with PTI 189-14A. Review of the records for the facility indicates the facility was in compliance with emission limits in accordance with the current PTI. No further actions are necessary at this time. Specific permit conditions that were reviewed are discussed below.

#### **On-site Inspection:**

During the field inspection, the weather conditions were cloudy, approximately 35 degrees Fahrenheit, with calm winds from the south-southwest. Upon arrival, I stopped at the security desk and showed my drivers license and asked to see Ms. Catherine Ortiz, the EHS Manager of the facility. Ms. Ortiz came to escort me throughout the facility. The site consisted of one main building and a few outbuildings on the northern side of the property. Inside the main building at the site, consisted of pie manufacturing lines, where the activities included: cooking the filling; adding the filling to the crust; baking and/or freezing the pie; then packaging the pies for retail. There are seven pie lines that emit volatile organic compounds (VOCs) from the flavorings used in the pies. There were formerly eight pie lines, but the Cheesecake Production line and the Ice Box Pie Production Line were combined. There are two different areas of the facility; one with white coats, and one area with blue coats, but the sanitation procedures are similar. The facility provided rubber boots to put over my steel toe shoes. Also a hair net, safety glasses, hard hat, hearing protection, clip board and attached pen were supplied to me even though I had my own, to keep the areas sanitized and to be easily found in case something fell in the food products. The facility requires a specific coat (white or blue) depending on where you are at the facility. I was required to wash my hands for 20 seconds and have my rubber boots scrubbed prior to entering the food prep areas at the facility.

Ms. Ortiz and I began the field inspection in the white-coat area which is the ready to eat pie lines. The prebake Pie Line (Line #1) was processed in the white coat area, but cooked in the blue coat area. Since the previous inspection, a new closed-loop glycol dehydrator system was installed by the Line 5 (Hi Pie Line), which replaced aa glycol dehydrator (EUGD01). Also, the facility had a pizza crust line, but that has been decommissioned and majority of the equipment has been sold to other companies.

There are two natural gas fired ovens that the company is claiming exemption R 336.1282(2)(b)(i). Additionally, there are ink jet coaters for labeling packages prior to sales and the company is claiming exception R 336.1287 (2)(c).

#### **PTI Compliance Evaluation:**

**FGDEHY1:** Formerly three glycol dehydrators used for removing moisture from the air in the freezers. EUGD01 has been removed from the facility and replaced by a closed loop glycol dehydrator system that has no emissions.

There are no **Emission Limits, Materials Limits, Process/Operational Restrictions, Design/Equipment Parameters, Testing/Sampling, Reporting, or Other Requirements** associated with FGDEHY1.

**Monitoring/Recordkeeping:** The facility maintains a current listing of the chemical composition of the glycol solution for FGDEHY. The VOC concentrations from January 1, 2018 through December 31, 2018 were 2.256 tons per year from EUGD02, and 0.503 tons per year for EUGD03.

**Stack/Vent Restrictions:** Based on visible observations during the field inspection, the stacks for FGDEHY1 appeared to be in compliance with permitted limits.

**FGFACILITY:** This flexible group includes all process equipment including equipment covered by other permits, grand-fathered equipment, and exempt equipment.

**Emission Limits:** FGFACILITY is limited to 90 tons of VOCs per 12-month rolling time period. Based on the records reviewed from January 1, 2018 through December 31, 2018, the highest emissions for FGFACILITY were 7.61 tons of VOCs per 12-month rolling time period.

**Materials Limits:** FGFACILITY is limited to 356,000 pounds per year of total VOC containing flavoring processed in the ovens and kettles per 12-month rolling time period. Based on the records reviewed from January 1, 2018 through December 31, 2018, the highest amount of VOC containing flavorings used was for FGFACILITY was 10459 pounds of total VOC containing flavoring.

There are no **Process/Operational Restrictions, Design/Equipment Parameters, Testing/Sampling, Reporting, Stack/Vent Restrictions, or Other Requirements** associated with FGFACILITY

**Monitoring/Recordkeeping:** The facility records monthly and 12-month rolling time period calculations for VOCs on a spreadsheet. Additionally, the facility maintains a current listing of each chemical composition of each flavoring material used in the process. Monthly calculations are derived from the gallons of pounds of each VOC containing flavoring processed in the kettles and/or ovens to determine monthly VOC emissions which were previously reported under Emission Limits above. The records are attached.

NAME Camp Owens DATE 3/20/19 SUPERVISOR [Signature]