



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

April 30, 2020

Ms. Danielle Poma
Keebler Company
310 28th Street SE
Grand Rapids, Michigan 49548

SRN: B4395, Kent County

Dear Ms. Poma:

VIOLATION NOTICE

On February 21, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Keebler Company located at 310 28th Street SE, Grand Rapids, Michigan. The purpose of this inspection was to determine Keebler Company's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 206-08H.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUOVEN2 - 9.6 MMBTU/hr natural gas fired oven used for baking	PTI No. 206-08H, EUOVEN2, Special Condition (SC) I.1	Exceeded Volatile Organic Compounds (VOC) emission limit

The records provided demonstrate that calculated emissions of VOCs from the EUOVEN2 process equipment are 48.72 tpy as of December 2019. This exceeds the requirement of PTI No. 206-08H, EUOVEN2, SC I.1, which limits the emissions of VOCs to 25.0 tpy.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 21, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Keebler Company believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Keebler Company. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Scott Evans
Environmental Quality Analyst
Air Quality Division
616-450-2072

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE