

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

A219855922

FACILITY: Keebler Company		SRN / ID: A2198
LOCATION: 3300 Roger B. Chaffee Blvd, WYOMING		DISTRICT: Grand Rapids
CITY: WYOMING		COUNTY: KENT
CONTACT: Nancy Sygnavong , Environmental Health and Safety Manager		ACTIVITY DATE: 08/27/2020
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled, announced air quality inspection.		
RESOLVED COMPLAINTS:		

Introduction

On August 27, 2020, a scheduled and announced air quality inspection of the Keebler Company facility located at 3300 Roger B Chaffee Blvd in Wyoming Michigan was conducted by Air Quality Division inspector Scott Evans (SE). This inspection was announced due to the ongoing COVID-19 pandemic to ensure all parties were properly prepared and able to meet necessary safety precautions. The intent of the inspection was to assess facility compliance with Permit to Install (PTI) No. 202-08B and all other applicable air quality regulations.

This facility produces primarily non-baked snack products such as granola bars, cereal bars, and rice treats. Any baked components of these products are baked at other facilities and sent to this facility in their final, cooked state. The food products are mixed together using large mixing kettles, spread out and sliced through automated processes, and then packaged into pre-printed packaging wrappers and boxes.

Upon arrival at the facility on the day of the inspection, there were no visible emissions or odors observed at or around the facility. After the initial observations of the perimeter, SE entered the facility and was greeted by a security guard. After watching a safety video and being provided necessary Personal Protective Equipment (PPE) by the guard for both food safety and COVID-19 safety, SE met with Environmental Health and Safety Manager Nancy Sygnavong (NS) and Plant Manager Linda Anderson (LA). After discussing the purpose of the inspection and what it would entail, a walking inspection of the facility began.

PTI No. 202-08B

This permit was approved on February 27, 2019. It includes two emission units and one flexible group, as described below:

- EU-Cleaners – Cleaners used for non-janitorial cleaning that contain VOCs.
- EU-Sanitizers – Sanitizers used for non-janitorial cleaning that contain VOCs.
- FG-Sanitation – Non-Janitorial cleaning and sanitizing. This flexible group is associated with both emission units above.

FG-Sanitation

This flexible group covers non-janitorial cleaning and sanitizing, including activities associated with EU-Cleaners and EU-Sanitizers. There is no associated pollution control equipment. There is one established emission limit but no material limits for this flexible group:

- 24.3 tons per year (tpy) of VOCs on a continuous 12-month rolling time period

Review of records to demonstrate compliance is discussed further below.

The facility is required to capture and store all waste cleaning and sanitizing materials that are not rinsed into sewer disposal, evaporated into the air, or deposited onto wipes. During the inspection, compliance with this requirement could be observed by witnessing the storage containers used for all cleaning and sanitizing equipment. As required, containers were properly lidded and sealed when not in use.

For cleaning and sanitizing material VOC content, if requested, the facility is required to test for VOC content to verify the accuracy of the listed content. However, at the time of the inspection, VOC content was being determined using manufacturer specifications and there was no apparent need for verification.

The facility is required to complete VOC emission calculations on a monthly basis and maintain for at least five years. The facility is required to keep manufacturer data on all cleaning and sanitizing materials as well as the following pieces of information:

- Amount of each VOC-containing cleaner and sanitizer used (Monthly).
- VOC content of each cleaner and sanitizer.
- VOC emissions (Monthly) using the equation that appears in PTI No. 202-08B.

- VOC emissions (Annual) on a 12-month rolling basis using the equation that appears in PTI No. 202-08B.

As required, the facility had the necessary manufacturer data on hand to demonstrate VOC content. Upon request, the facility also provided records for the above requirements for the time period of January 2019 to August 2020. A review of these records yielded the following results:

- 1,148 lbs of VOC containing cleaners and sanitizers used in October 2019 (Highest monthly usage)
- Individual VOC % content for each cleaner and sanitizer (Highest = 85% VOCs in Alpet E3 Plus)
- 0.57 tons of VOCs emitted in October 2019 (Highest single month emissions)
- 5.13 tpy of VOC emissions as of May 2020 (highest 12-month rolling time period)

As demonstrated by these records, the facility was well within compliance of the emission limit as outlined in PTI No. 202-08B.

Exempt Equipment and Other Items

This facility has two boilers on site. Both boilers are natural gas fired.

One boiler was installed in 1988 and has a maximum heat capacity of 21 mmBTU. This boiler is exempt from air permitting requirements by Rule 282(2)(b)(i). This boiler is not subject to New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart Dc as it was installed prior to June 9, 1989. This boiler is not subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart JJJJJJ as it is a gas-fired boiler.

The other boiler was installed in 1993 and has a maximum heat capacity of 21 mmBTU. This boiler is exempt from air permitting requirements by Rule 282(2)(b)(i). This boiler is subject to NSPS 40 CFR Part 60 Subpart Dc as it was installed after June 9, 1989. It is not subject to NESHAP 40 CFR Part 60 Subpart JJJJJJ as it is a gas-fired boiler.

The facility has one emergency generator on site. This generator was installed in 2004 and has a maximum heat capacity of 265,000 BTU. This generator is not subject to NSPS 40 CFR Part 60 Subpart IIII as it was installed prior to 2007. This generator is subject to NESHAP 40 CFR Part 63 Subpart ZZZZ, however requirements for this NESHAP are that the generator follow guidelines established in NSPS 40 CFR Part 60 Subpart IIII. Therefore, there are no additional requirements for this generator.

Conclusions

At the conclusion of the inspection, the facility appeared to be in compliance with all requirements outlined in PTI No. 202-08B as well as all other applicable air quality regulations.

NAME Scott Evans DATE 10/29/2020 SUPERVISOR HH