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

A247657783			
FACILITY: Roskam Baking Company		SRN / ID: A2476	
LOCATION: 3035 32ND ST SE, GRAND RAPIDS		DISTRICT: Grand Rapids	
CITY: GRAND RAPIDS		COUNTY: KENT	
CONTACT: Scott Reed , Manager		ACTIVITY DATE: 03/19/2021	
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR	
SUBJECT: Air quality inspection			
RESOLVED COMPLAINTS:			

## Intro

On Friday, March 19, 2021, Michigan Department of Environment, Great Lakes and Energy (EGLE) Air Quality Division (AQD) staff Scott Evans (SE) conducted a scheduled, on-site air quality inspection of the Roskam Baking Co. facility located at 3035 32<sup>nd</sup> St. SE in Grand Rapids, MI, to assess compliance with air quality regulations. This was an announced inspection in order to ensure proper safety compliance during the ongoing COVID-19 pandemic including obtaining proper PPE such as masks as well as ensuring proper social distance could be maintained while working with facility staff.

This Roskam facility is a baking facility that produces chocolate and marshmallows for various candy and other food products. Historically the facility also produced various granola products, but these activities are no longer in operation. During the inspection it could be seen that granola production equipment had either been shut down or removed, leaving the lines inoperable. As of the time of the inspection, the facility had one chocolate and two marshmallow lines active that included various mixing, melting, forming, and packaging processes.

This facility once also included a second building as part of operations. However, since the last visit by AQD to the facility, this second building has been sold and is no longer part of the Roskam Baking Co.

## **Compliance Evaluation**

Upon arrival at the facility, SE observed no signs of visible emissions. There were no odors outside of the building, however upon entry into the lobby there were faint smells of candy products.

As mentioned, this facility has three active food production lines that produce various candy products. All equipment involved in these processes were found to be exempt from permitting requirements under the following rules:

- Heating and melting process equipment is exempt from permitting requirements under Rule 282(2)(a) (v).
- Various pieces of mixing, stirring, conveying, and packaging equipment are exempt under Rule 285(2) (dd)(ii) and Rule 285(2)(dd)(iii), depending on if the equipment vents to the interior facility atmosphere or to one of the baghouses installed in the facility to control food particulate.
- The facility has multiple baghouses installed to control dust from food products such as flour and sugars for interior environment comfort in the facility that are exempt under Rule 285(2)(f).
- The facility has multiple large containers for various food ingredients such as oils, honey, and sugars that are all exempt under Rule 284(2)(i) or Rule 284(2)(k) depending on if the ingredient is a liquid or a solid.

All production equipment at the facility appeared to be well maintained and operating properly. Additionally, all baghouses were operating properly and were equipped with appropriate pressure drop monitoring gauges that indicated proper function.

The chocolate and marshmallow manufacturing lines do have equipment and processes with the potential to release volatile organic compounds (VOCs) from VOC-containing ingredients such as alcohols or flavorants. However, at the time of the inspection, no VOC-containing ingredients were used for any of the products produced within the facility. Documentation of currently used ingredients is attached to this report.

The facility has two boilers on site. Both are 347,000 Btu, Clever Brooks, natural gas fired boilers, which are exempt from air permitting requirements under Rule 282(2)(b)(i). At the time of the inspection, one boiler had been dismantled, but was still on site. Neither boiler is subject to New Source Performance Standards (NSPS) 40 CFR Part 60 Subpart Dc as they both have a heat capacity that is below 10 MMBtu. Neither boiler is subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart JJJJJJ as they are natural gas fired.

## Conclusion

At the conclusion of the inspection the facility appeared to be compliant with all applicable air quality regulations.

NAME

Scott Evans DATE 4/22/2021 SUPERVISOR HH