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

B161535528

FACILITY: HILLSHIRE BRANDS COMPANY		SRN / ID: B1615
LOCATION: 2314 SYBRANDT ROAD, TRAVERSE CITY		DISTRICT: Cadillac
CITY: TRAVERSE CITY		COUNTY: GRAND TRAVERSE
CONTACT:		ACTIVITY DATE: 06/28/2016
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Inspect	on and records review	
RESOLVED COMPLAINTS:		

On Tuesday, June 28, 2016, Caryn Owens of the DEQ-AQD conducted a scheduled on-site inspection of The Hillshire Brands Company (Hillshire) 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. Hillshire has opted out of major source applicability by limiting operational and/or production limits potential to emit (PTE) to be 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 partly cloudy, with winds from the north-northeast, approximately 10 miles per hour, and 70 degrees Fahrenheit. 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. I handed Ms. Ortiz an inspection brochure at the time of the inspection. 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, which consisted of cooking the filling; adding the filling to the crust; baking and/or freezing the pie; then packaging the pies for retail. There are eight pie lines that emit volatile organic compounds (VOCs) from the flavorings used in the pies. 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 steel toe rubber boots to put over my safety 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. These lines included Auto Prod (Line 3); the Baked Meringue (Line 4); Cheesecake Prod Line (Line 8); Ice Box Line (Line 7); and Pre-Bake Prod Line (Line 1). I inspected where the filling is cooked, but they were not cooking filling during the inspection. According to Ms. Ortiz, every product has a bar code associated with it, and when it is added as an ingredient, the barcode is scanned with the amount of each ingredient, and that travels with the pie throughout its entire way through the production until the final product is packaged, and the final barcode for that specific pie can be traced back to each specific ingredient and amount used.

The second area of the facility I went to was the blue coat area that contained Lines 5, Line 6, and Line 2. These lines consisted of: Hi Pie Prod line (Line 5); Open face Prod (Line 6); and Fruit Pie Prod (Line 2). Ms. Ortiz also showed me the location of the three glycol dehydrators which are used in freezer warehouses, to remove moisture from the air. Only one of the glycol dehydrators was operating during the inspection because the facility was prepping for an annual maintenance outage that would be taking place the following week after this inspection, and the facility was clearing out the main warehouse storage area.

## **PTI Compliance Evaluation:**

**FGDEHY1:** Three glycol dehydrators used for removing moisture from the air in the freezers.

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

<u>Monitoring/Recordkeeping:</u> The facility maintains a current listing of the chemical composition of the glycol solution for FGDEHY. The amount of VOCs from May 2015 through May 2016 was 0.18 tons per year from EUGD01, 2.83 tons per year from EUGD02, and 1.63 tons per year for EUGD03.

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

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

<u>Emission Limits</u>: FGFACILITY is limited to 90 tons of VOCs per 12-month rolling time period. Based on the records reviewed from May 2015 through May 2016, the highest emissions for FGFACILITY were 7.80 tons of VOCs per 12-month rolling time period.

<u>Materials Limits:</u> 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 May 2015 through May 2016, the highest amount of VOC containing flavorings used was for FGFACILITY was 95,628 pounds of total VOC containing flavoring per 12-month rolling time period.

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

<u>Monitoring/Recordkeeping:</u> The facility records VOC monthly and 12-month rolling time period calculations 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, and determine monthly VOC emissions which were previously reported under Emission Limits above. The records are attached.