



GRETCHEN WHITMER  
GOVERNOR

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



AARON B. KEATLEY  
ACTING DIRECTOR

June 22, 2023

Danielle Poma  
Keebler Company  
310 28<sup>th</sup> Street SE  
Grand Rapids, Michigan 49548

SRN: B4395, Kent County

Dear Danielle Poma:

**VIOLATION NOTICE**

On May 9, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received correspondence from Lee Johnson of Honigman LLP on behalf of Keebler Co. located at 310 28<sup>th</sup> Street SE, Grand Rapids, Michigan. The purpose of this correspondence was to inform the AQD that Keebler Co. had identified unexpected emissions of acetaldehyde and formaldehyde while conducting stack testing on Oven No. 2 to assess 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 206-08J.

In reviewing the correspondence, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Facility Wide	PTI No. 206-08J, FGFacility, Special Condition I.4	Exceedance of facility wide 0.9 ton per year acetaldehyde emission limit.

The testing data provided indicates that emissions of acetaldehyde exceed the emission limit of 0.9 tons per year, based on a 12-month rolling time period, which is a violation of PTI number 206-08J, FGFacility, Special Condition I.4.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 13, 2023 (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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In addition to the above, please provide the stack test emissions data collected from Oven No. 2 for formaldehyde and acetaldehyde as well as any other Hazardous Air Pollutants not included in the stack test report. Also, please provide facility-wide Potential to Emit calculations for all individual and aggregate Hazardous Air Pollutants. This information should be submitted with the Violation Notice response due on July 13, 2023.

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 Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Keebler Co. 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 demonstrated through the voluntary provision of this information by Keebler Co. 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: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Heidi Hollenbach, EGLE