

B4569

MAW124

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

B456945959

FACILITY: AWREY BAKERIES, INC.		SRN / ID: B4569
LOCATION: 12301 FARMINGTON RD, LIVONIA		DISTRICT: Detroit
CITY: LIVONIA		COUNTY: WAYNE
CONTACT:		ACTIVITY DATE: 06/14/2018
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : June 14, 2018  
 TIME OF INSPECTION : 9:00 am  
 NAICS CODE : 311813  
 INSPECTED BY : Jill Zimmerman  
 PERSONNEL PRESENT : Paul Fava, Director of Maintenance  
 FACILITY PHONE NUMBER : 734-513-4276  
 FACILITY EMAIL : paul.fava@awrey.com; diane.lynch@awrey.com

### FACILITY BACKGROUND

Awrey's Bakery, LLC is located on Farmington Road between Schoolcraft Road and Plymouth Road in Livonia. The facility operates one shift per day, five days per week. In 2013 Minnie Marie Bakers, Inc purchased Awrey. The facility is a commercial bakery, making products under the Awrey name as well as items for other companies.

### REQUIRED PPE

Upon entering this facility, I was asked to sign an agreement that I would not enter the facility while wearing jewelry, watches, or any other items that could contaminate the food product. I was also asked to wear a hairnet. I wore steel toed shoes, and safety glasses during the onsite inspection.

### COMPLAINT/COMPLIANCE HISTORY

No complaints have been received regarding this facility since the last inspection. A cold cleaner contained halogenated solvents was removed from the facility in 2006 to return to compliance with 40 Code of Federal Regulations Part 63, Subpart T for National Emission Standards for Halogenated Solvent Cleaning.

### PROCESS EQUIPMENT AND CONTROLS

The facility has five boilers for the process operations. Only two boilers operate at one time, with a third one used as a spare. The remaining two boilers are no longer operational. These boilers were installed between 1966 and 1967.

The facility maintains one emergency generator. This 2000 kW generator was formally maintained by DTE, but DTE is no longer involved. This generator can run the entire plant, should there be a loss of power. The generator is run for less than one hour per month for routine maintenance. The generator operates on diesel. The second generator (500 kW) is still onsite. It has been disconnected and can therefore no longer be used. This generator is currently for sale.

There are 4 ovens for four different types of products. All the ovens run on natural gas. One oven is used to bake gluten free products and is in a different room from the other three

ovens. One oven is a belt oven used to bake cookies. One oven is used to bake Danishes and the last oven is used to bake cakes, such as the Saunders Bumpy Cake. No products are baked at this facility that involve rising doughs with yeast. The ovens are computer controlled and typically operates around 350 F. Cookies are typically baked at about 500 F. There is also a room used to mix the products before the baking process.

### **INSPECTION NARRATIVE**

I arrived at the facility on Monday June 11, 2018 at 2:00 pm. Mr. Fava was unavailable to meet with me at this time, and we arranged to meet on Thursday June 14, 2018 at 9:00 am.

When I arrived at the facility, I explained to Mr. Fava that I was interested in seeing all boilers, generators and ovens as well as any other equipment capable of creating emissions. We started our inspection in the boiler room. The facility currently has five boilers, though only three are capable of operating. The facility operates two boilers at one time for production operations. A third boiler is available as a back-up as needed. The boilers operate on natural gas and we installed between 1966 and 1967 based on the certifications located in the boiler room. The installation date for all the boilers is listed as January 1, 1968 in MAERS.

Next, we walked outside to inspect the generators. The generators were not operating at the time of the inspection. One generator, 500kW, is no longer connected to the process and is currently for sale. The other generator, 2000 kW, is capable of running the entire facility as needed, should the facility experience a power failure. Mr. Fava runs this generator for about less than an hour per month for maintenance purposes. Typically, the facility experiences a power failure about once per year. Mr. Fava was unaware that this generator was permitted since the permit was issued to DTE. Awrey has been purchased about four times in recent years, and the current owner preferred to operate the generator internally. Mr. Fava will begin to log all hours that the generator operates immediately.

The ovens were inspected next. The gluten free oven is located in a separate room to avoid cross contamination. This oven was not operating during the onsite inspection. In the main oven room, the remaining three ovens are located. Brownies were being baked in the cake oven. The other two ovens were not operating. All the ovens operate on natural gas and are controlled by a computer system.

### **APPLICABLE RULES/PERMIT CONDITIONS**

Based on the size of the boilers, all five boilers are exempt from PTI by Rule 282 (b)(i). All five boilers are rated at 5 MMBtu/hr and operate on natural gas. These boilers do report annual emissions in MAERS. The boilers at Awrey's are not subject to Subpart Dc because the installation dates are prior to June 9, 1989, and the rated heat input capacities are less than 10 MMBtu/hr.

The ovens are used only for commercial baking of edible goods, which makes them exempt PTI by Rule 282(a)(v). These ovens report annual emissions in MAERS. The installation date of the ovens listed in MAERS is January 1, 1968. No part of the baking process involves yeast. Therefore ethanol, an emission generated during the yeast process, is not emitted in this process.

The emergency generator (2000 kW) is operating under PTI 197-00. The Special Conditions are as follows:

1. NA – At this time, no notifications are required to be submitted to AQD.

2. Compliance – No changes have been made to the emission unit and stack since installation.
3. Noncompliance – The facility operates the until for less than one hour per month, which is less than the permit limit of 500 hours per 12-month rolling time period. Mr. Faza was unaware that he was required to maintain a written log of the hours of operation for this unit. Mr. Faza was unaware that the generator was operating under this permit. A copy of the permit has been shared via email with Mr. Faza. Beginning immediately, Mr. Faza agrees to maintain a written log of the hours of operation for this generator.
4. NA – During the onsite inspection, the generator was not operating. Therefore, no VE could be evaluated during the onsite inspection.
5. Noncompliance – No records were being maintained during the onsite since Mr. Faza was unaware of PTI 197-00. These records will be collected moving forward. However, based on the estimated hours of operation of less than one hour per month, the NOx emissions would be less than 16.8 tons per year, based upon a 12-month rolling time period.
6. Noncompliance – An email sent to Mr. Fava on 6/17/2018 requesting the sulfur content of the fuel. A second request sent to Mr. Fava and Ms. Diane Lynch on 6/25/2018 when no response was received from my first request. A copy of these emails is attached to this report.

The generators at Awrey's are not subject to Subpart IIII because the installation dates are prior to 2007.

#### MAERS REPORT REVIEW

This report was received on February 28, 2018. The reported emissions were reviewed and appear to have been reported accurately. The throughput and emissions for the boilers reporting group and the ovens reporting group were identical for both 2016 and 2017. These throughputs and emissions will be further evaluated during an onsite inspection in FY 2018.

#### FINAL COMPLIANCE DETERMINATION

Awrey Bakery appears to be operating in compliance regarding the operation of the boilers and ovens at the facility. The facility is not operating in compliance regarding the emergency generator. Mr. Faza has been made aware of the requirements in the permit and will be maintaining the required written logs. No response was received when I requested the sulfur content in the fuel used for the emergency generators. A Violation Notice will be issued to this facility.

NAME



DATE

9/14/18

SUPERVISOR

JK