

B4569
MAWILA

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

B456949590

FACILITY: AWREY BAKERIES, INC.		SRN / ID: B4569
LOCATION: 12301 FARMINGTON RD, LIVONIA		DISTRICT: Detroit
CITY: LIVONIA		COUNTY: WAYNE
CONTACT: Paul Fava , Director of Maintenance		ACTIVITY DATE: 05/09/2019
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : **May 9, 2019**

TIME OF INSPECTION : 10:30 am

NAICS CODE : 311813

INSPECTED BY : Jill Zimmerman

PERSONNEL PRESENT : Paul Fava, Director of Maintenance
Wendy Becerra

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 and smock. I wore steel toed shoes, and safety glasses during the onsite inspection. Special hearing protection was required that could be detected by a metal detector should it fall into the product.

COMPLAINT/COMPLIANCE HISTORY

No complaints have been received regarding this facility since the last inspection. A VN was issued to this facility after the 2018 inspection. This VN was resolved when the proper records were received by EGLE.

PROCESS EQUIPMENT AND CONTROLS

The facility has five boilers for the process operations, though only 4 boilers are able to operate. Boiler 3 is currently not operational and will most likely be sold for scrap metal. Only two boilers operate at one time, with the other two acting as a spare. These boilers were installed between 1966 and 1967. The boilers are natural gas fired and have not been modified since the last onsite inspection.

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, typically about 20 minutes per test run. 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. No new fuel has been

purchased since the last onsite inspection. A logbook is maintained in the maintenance office noting each time that the general is used and what operations are performed.

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 and initially met with Ms. Wendy Becerra. She investigated the reason for my inspection and determined that I should be meeting with Mr. Paul Fava. After ensuring that I was wearing the proper equipment to enter a food plant, we met with Mr. Fava near the generator.

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 walked outside to inspect the space generators. The generator was 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. The logbook noting the usage of the generator was reviewed during the onsite inspection and appeared to be properly maintained.

Next, we walked to the boiler room. The facility currently has five boilers, though only four are capable of operating. The facility operates two boilers at one time for production operations. The other two boilers are available for back-up as needed. The boilers operate on natural gas and were 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.

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. The remaining three ovens are located in the main oven room. These three ovens were not operating. All the ovens operate on natural gas and are controlled by a computer system.

The facility also operates a pan washer, which has a dryer unit that is fueled by natural gas. Currently the blower is not working and has been down for approximately 3 months. Pans are still being washer but are air drying. A new blower will be purchased in the future.

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 gluten free oven operates at 4,114,000 Btu/hr, the cookie oven operates at 800,000 Btu/hr, the Danish oven operates at 540,000 Btu/hr and the cake oven operates at 5,100,000 Btu/hr.

The pan washer uses an aqueous solution to wash the pans. This equipment is exempt from permitting by Rule 281 (k). A dryer, with a heat input of 16.5 MMBtu/hr, is exempt from permitting by Rule 281 (e).

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

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

Compliance – No changes have been made to the emission unit and stack since installation.

Compliance – 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 maintains a written log of the hours of operation for this unit.

NA – During the onsite inspection, the generator was not operating. Therefore, no VE could be evaluated during the onsite inspection.

Compliance – On July 17, 2019 I sent an email to Mr. Fava requesting a copy of the NOx emission records for the past year. These records area attached to this report. The facility emits about 7 pounds of NOx per month, and less than 85 pounds of NOx per year, based on the 12-month rolling time period.

Compliance – A fuel analysis was received to resolve the VN from 2018. No new fuel has been added since the last onsite inspection. Based on the attached fuel sheet, the fuel contains a maximum of 15 ppm of Sulfur. This is below the limit of 0.05% or 500 ppm.

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

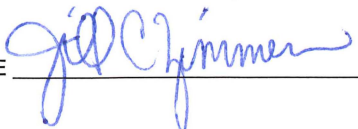
MAERS REPORT REVIEW

This report was received on March 11, 2019. 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, 2017 and 2018. An email received from the consultant, Biplab Roy, explained how the natural gas usage is calculated, and is attached to this report.

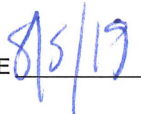
FINAL COMPLIANCE DETERMINATION

Awrey Bakery appears to be operating in compliance of state and federal regulation as well as the conditions of permit 197-00.

NAME



DATE



SUPERVISOR

