



Good Things From Fresh Bread



July 31, 2017

April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
Michigan Department of Environmental Quality
Grand Rapids District Office
350 Ottawa NW, Unit 10
Grand Rapids, Michigan 49503-2341

Subject: Violation Notice Dated July 11, 2017

Reference: Roskam Baking Company
2600 29th Street SE
Grand Rapids, Michigan 49512

Dear Ms. Lazzaro:

We are writing in response to the Violation Notice dated July 11, 2017 (the *VN*) that was sent to Roskam Baking Company (*RBC*) relating to the pretzel and popcorn production lines at *RBC*'s "Mazda" facility, which is located at 2600 29th Street SE, Grand Rapids, Michigan.

Below is the information you requested, including our understanding of the relevant changes in manufacturing practices that occurred and the corrective actions that *RBC* is undertaking to address the identified issues.

1. Pretzel Baking Lines – Identification of Issue

It is our understanding that there has been entrainment of pretzel dust in the cooler exhaust from the two pretzel baking lines. Upon investigation, we discovered that the cooler exhaust rate for those lines was increased in approximately August 2016 to provide additional cooling capability. This change corresponded to the manufacture of a new pretzel product, which began at that time. The higher exhaust flow rate apparently led to the pretzel dust being dislodged from the production line, entrained by the higher velocity airflow, and exhausted to atmosphere.

Pretzel Baking Lines – Corrective Actions

RBC is implementing short-term and long-term corrective actions. In the short term, *RBC* has reduced the exhaust rate of each pretzel line cooler to its original setting to prevent the pretzel dust from becoming entrained in the exhaust

stream. For the long term, RBC has engaged W. Soule Corporation, Thermal Tech Engineering, and Reading Bakery Systems to design and evaluate modifications to the lines to prevent a recurrence of the pretzel dust entrainment. Their recommendations to date have included installation of add-on dust control equipment on the exhausts from both of the pretzel line coolers, and process modifications including conditioning of the cooling air and extension of the cooling sections to provide adequate cooling at reduced air flow rates. These recommendations are being considered and we plan to have them implemented no later than September or October 2017.

The reduction in cooler exhaust air flow has corrected the dust emission problem while operating at the currently reduced production rate. The future installation of dust control equipment and/or modifications to the cooling sections will allow for increased production rates in the future without dust emissions impacting the atmosphere.

2. Popcorn Production Lines – Identification of Issue

As with the pretzel baking lines, there was change to the popcorn production lines that we understand has led to the discharges identified in the VN. The timing of those changes remains under review, but on the basis of what we have learned to date, we understand that the settings of the popcorn coating operation had been increased within the past year in an effort to increase the production rate of the popcorn production line. As a result of the increased coating rate, we believe some of the coating became airborne and emitted to the atmosphere through the general room exhaust systems.

Popcorn Production Lines – Corrective Actions

RBC is implementing short-term and long-term corrective actions. In the short term, RBC has reduced the coating application rate of the production equipment to its initial settings, thereby precluding the coating from becoming airborne. In the long term, specifications have been confirmed and RBC has ordered new AutoJet Technologies coating application equipment from Spraying Systems Co. that employs an application technology that will not allow the coating to become airborne at higher production rates.

The new coating equipment is scheduled to be delivered and installed by the end of August 2017. In addition, please note that the popcorn production equipment utilizes knockout boxes on the exhausts to remove any entrained pieces of popcorn and prevent their emission to atmosphere.

Please note that when these production lines were installed at our Mazda facility, they operated in a manner consistent with good air pollution practice for minimizing

emissions, and in conformance with the exemption criteria under Michigan Air Pollution Control Rules 282 and 285. As a result, RBC understood that a Rule 201 Permit to Install was not required.

Specifically, Rule 282(2)(a)(v) applies to the pretzel baking operation and the caramel coating cooking process of the popcorn production line, and Rules 285(2)(dd)(ii) and (iii) apply to the popcorn popper and the associated material handling and mixing processes for both lines. The maximum design natural gas heat input for all equipment on these lines is less than 10 MMBTU/hour.

The provisions under these rules that apply to RBC's production lines are as follows:

Rule 282(2)(a)(v):

R 336.1282 Permit to install exemptions; furnaces, ovens, and heaters.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(a) Any of the following processes or process equipment which are electrically heated or which fire sweet gas fuel or no. 1 or no. 2 fuel oil at a maximum total heat input rate of not more than 10,000,000 Btu per hour:

(v) Bakery ovens and confection cookers where the products are edible and intended for human consumption.

Rule 285(2)(dd)(ii) and (iii):

R 336.1285 Permit to install exemptions; miscellaneous.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(dd) Equipment for handling, conveying, cleaning, milling, mixing, cooking, drying, coating, and packaging grain-based food products and ingredients which meet any of the following:

(ii) Equipment has emissions that are released only into the general in-plant environment.

(iii) Equipment has externally vented emissions controlled by baghouse, cyclone, rotoclone, or scrubber which is installed, maintained, and operated in accordance with the manufacturer's specifications or the owner or operator shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in the manner consistent with good air pollution control practices for minimizing emissions. The air cleaning device shall be equipped with a device to monitor appropriate indicators of performance, for example, static pressure drop, water pressure, and water flow rate.

With the implementation of the short- and long-term corrective actions described above, these production lines are operating and will continue to operate in a manner consistent with good air pollution practice for minimizing emissions. Accordingly, RBC requests that the facility once again be considered eligible to continue operating under these exemptions without a requirement for a Rule 201 permit.

RBC strives to be a good neighbor and will continue to take the steps necessary to ensure that it operates in conformance with good air pollution control practice and in compliance with all applicable environmental regulatory requirements.

Each of the corrective actions described above will continue to be implemented expeditiously, and we will provide you with a follow-up notification once the future corrective actions have been completed.

If you have any questions, please contact me at (616) 419-1862, or Mark Horne of Environmental Partners at (616) 928-9128.

Sincerely,
ROSKAM BAKING COMPANY



Steve Formisina
Facilities Manager

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