

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

P011755031

<b>FACILITY:</b> Roskam Baking Co		<b>SRN / ID:</b> P0117
<b>LOCATION:</b> 5353 and 5565 Broadmoor, KENTWOOD		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> KENTWOOD		<b>COUNTY:</b> KENT
<b>CONTACT:</b> Steve Formsma , Facilities Manager		<b>ACTIVITY DATE:</b> 08/07/2020
<b>STAFF:</b> Scott Evans	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Scheduled, announced, compliance inspection.		
<b>RESOLVED COMPLAINTS:</b>		

**Introduction**

On Friday, August 7, 2020, an announced, scheduled inspection was conducted at the Roskam Baking Company facility located at 5565 Broadmoor Avenue SE in Grand Rapids, Mi. This inspection was announced due to the COVID-19 pandemic and the necessity of prior contact with the facility to ensure proper safety measures could be met and that staff would be on site as needed to conduct the inspection. This inspection was conducted by AQD Staff Scott Evans (SE), who was accompanied by facility representatives Steve Formsma (SF), Dave Sikenga (DS), and Maddy Mazorowicz (MM). The purpose of this inspection was to establish compliance with air quality regulations and the requirements established in Permit to Install (PTI) No. 131-18.

This Roskam Baking Company facility has two buildings that produce various baked goods including pita chip snacks, baked crackers, and frozen waffles. These products are produced by utilizing large mixing vats for dough production, running the raw product through large ovens, seasoning as necessary, and then packaging the products on site. Frozen products are then stored in large cooling units as needed prior to shipping.

Upon arrival at the facility at approximately 8:45 am on the day of the inspection, no signs of visible emissions were observed. No nuisance odors were detected, though the occasional smell of baked products was noticeable intermittently. After introductions and a short meeting to discuss the purpose of the visit, a visual inspection was conducted of both buildings.

**PTI No. 131-18**

PTI No. 131-18 is the only currently active permit for this facility. It contains special conditions for the entire source (FGFACILITY). This flexible group encompasses all exempt equipment located at the facility. There is no pollution control equipment associated with this flexible group.

**FGFACILITY**

This flexible group contains four emission limits, all based on a 12-month rolling time period:

- VOCs limited to 89.9 tpy
- NO<sub>x</sub> limited to 89.9 tpy
- Individual HAPs limited to 8.9 tpy
- Aggregate HAPs limited to 22.4 tpy

This flexible group also has two material limits:

- Natural Gas Use limited to 1,739.5 million ft<sup>3</sup> per 12-month-rolling period
- Production of yeast raised baked bread limited to 145,919,936 lbs per 12-month-rolling period

PTI No. 131-18 also restricts the facility from operating all on-site engines for more than 300 hours per 12-month-rolling period.

When PTI No. 131-18 was first approved, the facility was required to test VOC and HAP emissions within 180 days of permit issuance. The facility satisfied this requirement in April of 2019 by conducting stack testing to determine VOC and HAP emissions. This testing was observed by AQD staff.

Records were provided for 2019 and 2020 (up through the day prior to the inspection) to demonstrate compliance with the emission and material limits established in PTI No. 131-18. Records determined compliance as follows:

- VOC Emissions – Limit 89.9 tpy
  - o Highest individual month – 2.29 tons in February 2019
  - o Highest annual period – 19.34 tons as of December 2019
  - o In compliance

- NO<sub>x</sub> Emissions – Limit 89.9 tpy
  - o Highest individual month – 2.68 tons in January 2019
  - o Highest annual period – 20.38 tons as of December 2019
  - o In compliance
- Individual HAP Emissions – limit 8.9 tpy
  - o Highest individual month – 304.6 lbs Acetaldehyde in April 2020
  - o Highest annual period – acceptable for all HAPs as demonstrated by aggregate levels
  - o In compliance
- Aggregate HAP Emissions – Limit 22.4 tpy
  - o Highest individual month – 0.25 tons in February 2019
  - o Highest annual period – 2.43 tons as of April 2020
  - o In Compliance
- Natural Gas Use – Limit 1,739.5 million ft<sup>3</sup> per 12-month-rolling period
  - o Highest individual month – 53.35 million ft<sup>3</sup> in January 2019
  - o Highest annual period – 401.63 million ft<sup>3</sup> as of December 2019
  - o In compliance
- Yeast raised baked bread production – Limit 145,919,936 lbs per 12-month-rolling period
  - o Highest individual month – 7.10 million lbs in April 2020
  - o Highest annual period – 77.54 million lbs as of April 2020
  - o In compliance
- Engine operation time – Limit 300 hours (all engines on site) per 12-month-rolling period
  - o Highest individual month – 16 hours in September 2019
  - o Highest annual period – 67 hours as of December 2019
  - o In compliance

### Exemptions and Other Items

Located at the facility are eight boilers, four in each building at the facility. All boilers are natural gas fired. Below are the specifications for the boilers in building one:

- Installed April 2009 – 16.7 mmBtu
- Installed August 2009 – 12.555 mmBtu
- Installed August 2009 – 12.555 mmBtu
- Installed April 2011 – 12.555 MMBtu

All four are exempt from air permitting requirements under Rule 282(2)(b)(i). All four boilers are subject to New Source Performance Standards (NSPS) 40 CFR Part 60 Subpart Dc. The facility appears to be compliant with the requirements of the NSPS through reporting of fuel usage included in provided records. Since all four boilers are natural gas-fired, they are not subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart JJJJJJ.

Below are the specifications for the boilers in building two:

- Installed November 2015 – 21 mmBtu
- Installed September 2017 – 21 mmBtu
- Installed September 2017 – 20.9 mmBtu
- Installed February 2019 – 21 mmBtu

All four are exempt from air permitting requirements under Rule 282(2)(b)(i). All four boilers are subject to New Source Performance Standards (NSPS) 40 CFR Part 60 Subpart Dc. Initial installation notifications are on file with the department. Since all four boilers at this area source are natural gas-fired, they are not subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart JJJJJJ.

The facility has one emergency generator in each building. Both generators are diesel fired engines and are exempt from air permitting requirements by Rule 285(2)(g), which exempts internal combustion engines of less than 10 MMBtu. Below are the specifications for these two generators:

- Installed 1987 – 4 mmBtu
- Installed 1983 – 5.35 mmBtu

Neither generator is subject to NSPS 40 CFR Part 60 Subpart IIII as they were installed prior to 2005. Neither generator is subject to NESHAP 40 CFR Part 63 Subpart ZZZZ as they are both existing units that are not contractually obligated to be available for >15 hours per calendar year and are for emergency use only.

The facility has one diesel fired fire pump engine on site for their fire suppression system. This engine was installed in 2007 and has a maximum heat input of 1.6 mmBtu. This engine is exempt from air permitting requirements by Rule 285(2)(g) as it is an internal combustion engine of less than 10 MMBtu. This engine is not

subject to NSPS 40 CFR Part 60 Subpart IIII as it is a fire pump engine that was installed prior to 2008. This engine is subject to NESHAP 40 CFR Part 63 Subpart ZZZZ. The facility is compliant with the NESHAP for this engine as compliance is demonstrated through compliance with NSPS 40 CFR Part 60 Subpart IIII, which does not apply to this engine.

**Conclusions**

At the completion of this inspection, the facility appears to be in compliance with all air quality regulations and PTI No. 131-18.

NAME Scott EvansDATE 9/30/2020SUPERVISOR SH