



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Natural Ovens Bakery, Manitowoc, WI

FROM: Justin Smith, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Supervisor
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Natural Ovens Bakery

Facility Location: 4300 County Road CR, Manitowoc, WI 54220

Date of Inspection: March 12, 2024

EPA Inspector(s):

1. Justin Smith, Environmental Engineer
2. Dakota Prentice, Environmental Engineer
3. Natalie Schulz, Environmental Engineer

Other Attendees:

1. Tami Gosz, General Manager
2. Vilis Butauskas, Compliance Officer (closing conference only via phone call)

Contact Email Address: tami.gosz@naturalovens.com

Purpose of Inspection: Evaluate compliance with VOC emission requirements in permit

Facility Type: Bread and Bun Bakery

Regulations Central to Inspection: Wisconsin State Implementation Plan in relation to Operation
Permit No. 436077070-F10

Facility Name: Natural Ovens Bakery
Facility Location: 4300 County Road CR, Manitowoc, WI 54220
Date of Inspection: March 12, 2024

Arrival Time: 8:40 AM CST

Departure Time: 10:00 AM CST

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☐ Provided Small Business Resource Information Sheet
- ☒ Small Business Resource Information Sheet not provided. Reason: Not a small business
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Natural Ovens Bakery representatives unless otherwise noted.

Process Description:

The process begins with the delivery of several raw materials. White flour, sugar, and soybean oil are delivered in bulk while other materials such as whole wheat flour, rye, yeast and salt are delivered either boxed or bagged.

Ingredients are weighed to ensure the recipe requirements are being met and placed in a mixer. All dough is made by use of the straight dough process. After the mixer, dough is then divided into smaller pieces and molded to the appropriate shape. Dough is then manually moved into a proof box. The proof box has two sections, one for bread and the other for buns. The proof box is vented within the building. After approximately 60 minutes in the proof box the dough is manually moved to either the Line 20 (bread line) or Line 22 (bun line). The bread and bun lines consist of 120-foot and 80-foot ovens, respectively. The timing in ovens varies between 22 and 32 minutes depending on the recipe being used. The ovens are vented to the atmosphere. Finished goods are either sent out immediately or are frozen before being shipped out. Finished goods are placed in pre-printed bags or clear bags with information on case pack label.

Staff Interview:

The facility exceeded their VOC emissions limit in 2023. The amount of yeast used in the process is recognized as the biggest contributor of VOC emissions. The facility is working on reducing yeast levels to reduce emissions. The facility also put in a request to Wisconsin Department of Natural Resources (WDNR) to increase VOC emission limits. The submitted request and application were requested by EPA for review.

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The facility produces approximately 150,000 pound of product a week and has been stable throughout the year. Production is typically bottlenecked by the ovens' capacity. There are no current plans for expansion. Approximately 15 years ago, the facility produced a variety of products but decided to switch to only bread and buns.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

EPA walked the facility and observed the process from dough mixing to packaging. EPA utilized a FLIR optical gas imaging camera during the tour. EPA observed fugitive emissions with the FLIR from the dough molder and from the proof box while doors were opened.

Photos and/or Videos: were taken during the inspection and are listed in Appendix A.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- VOC emission calculations spreadsheets for previous 3 years
- 2024 Construction Permit Application submitted to the WNDR

DIGITAL SIGNATURES

Report Author: Smith, Justin Digitally signed by Smith, Justin
Date: 2024.04.09 08:50:09 -05'00'

Section Supervisor: NATHAN FRANK Digitally signed by NATHAN FRANK
Date: 2024.04.12 16:32:57 -05'00'

APPENDICES

1. Appendix A: Digital Image Log and Digital Video Log

Facility Name: Natural Ovens Bakery
Facility Location: 4300 County Road CR, Manitowoc, WI 54220
Date of Inspection: March 12, 2024

2. APPENDIX A: DIGITAL IMAGE LOG AND DIGITAL VIDEO LOG

Inspector Name: Natalie Schulz **Archival Record Location:** ERC Enf_Natural Ovens Bakery_WI_24

Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	FLIR0127.mp4	March 12, 2024 9:34 AM central	Fugitive Emissions from Dough Molder
2	FLIR0128.mp4	March 12, 2024 9:36 AM central	Fugitive Emissions from Proof Box