

# Fact Sheet



## For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-01100062-2015**  
Application Received: **May 21, 2015**  
Plant Identification Number: **011-00062**  
Permittee: **Bimbo Bakeries USA, Inc.**  
Mailing Address: **1300 Adams Avenue, Huntington, WV 25704**

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Physical Location: Huntington, Cabell County, West Virginia  
UTM Coordinates: 371 km Easting • 4252 km Northing • Zone 17  
Directions: Interstate 64 to Adams Avenue exit; between Adams and Washington Avenues,  
and between 13th Street West and 14th Street West.

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### Facility Description

Bimbo Bakeries USA, Inc. operates a commercial bread baking facility. The principal pollutant emitted is VOC; emitted from the baking ovens as a result of yeast fermentation (of process sugars) and forming ethanol, carbon dioxide and other by-products. The baking ovens fire natural gas. Ancillary operations include pneumatic flour transfer to bulk storage silos, ink jet printing of product information, emergency generators, bulk edible oil storage and storage tanks (gasoline/diesel) for vehicle refueling.

SIC Code: 2051

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2013 Actual Emissions</b>
Carbon Monoxide (CO)	9.1	1.76
Nitrogen Oxides (NO <sub>x</sub> )	11.39	2.09
Particulate Matter (PM <sub>2.5</sub> )	8.65	5.61
Particulate Matter (PM <sub>10</sub> )	8.65	5.61
Total Particulate Matter (TSP)	8.65	5.61
Sulfur Dioxide (SO <sub>2</sub> )	0.10	0.01
Volatile Organic Compounds (VOC)	224.3	131.08

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2013 Actual Emissions</b>
Natural Gas Combustion HAPs	negligible	not reported

*Some of the above HAPs may be counted as PM or VOCs.*

## Title V Program Applicability Basis

This facility has the potential to emit 224.3 TPY of VOCs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Bimbo Bakeries USA, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	Particulate Matter emission limits
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Pre-construction permit
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR§21-5	Compliance Certification, Recordkeeping, and Reporting Requirements for Non-Coating Sources.
	45CSR§21-41	Test Methods and Compliance Procedures: General Provisions.
	45CSR30	Operating permit requirement.

	45CSR34	MACT
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 CFR Part 63, Subpart ZZZZ	Reciprocating Internal Combustion Engine MACT
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR§21-30	Solvent Metal Cleaning.
	45CSR§21-40	Other Facilities that Emit Volatile Organic Compound (VOC).

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

**Active Permits/Consent Orders**

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-2005D	January 27, 2014	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

**Determinations and Justifications**

This is a renewal of the Title V permit issued in 2010 and modified in 2011 (MM01, based on permit R13-2005C) and in 2014 (MM02, based on permit R13-2005D). The following changes to the permit will be made to the most recent permit modification:

- 1) Emission Units Table 1.1 – in 2011 the company requested an off-permit change related to the Emission Unit 4S for the replacement of three (3) existing silos with two (2) new flour silos. This change was made, and a year of modification (2011) was added to the Table.
- 2) Requirement 4.1.1 – a description “during normal operations” was removed from the citation to this requirement.
- 3) Requirement 4.4.3 – language in item (b) (45CSR§21-40.8.c) was replaced with the applicable condition 45CSR§21-40.8.b, because the condition 45CSR§21-40.8.c was already included with the requirement 4.1.7.
- 4) 40 C.F.R. 63 Subpart ZZZZ (Section 5.0) - note “The compliance date for this regulation is May 3, 2013. At that time, the bakery will ensure that the appropriate equipment (hour meter) is installed; appropriate plans and schedules are in place; and appropriate records are maintained.[40 CFR § 63.6595(a) and

**45CSR34]**” was removed because the hour meter was installed by the compliance date for 40CFR63 Subpart ZZZZ (May 3, 2013).

Requirements 5.1.1, 5.1.2, 5.1.3, 5.2.1, 5.2.3 and 5.4.1 were updated, and requirement 5.3.3 (footnote 2 of Table 2d) was added according to the latest version of 40 C.F.R. 63 Subpart ZZZZ.

### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. 45CSR10 - R13-2005D cites Section 10.3, as a requirement for the ovens. The ovens at this facility are direct heat exchangers and are therefore considered to be manufacturing processes not fuel burning units. The applicable rule is Section 10.4, however, the ovens are exempt in accordance with 45CSR§10-4.1.e because the ovens have the potential to emit less than 500 pounds per year of sulfur oxides.
- b. 45CSR16 and 40 CFR Part 60 Subpart IIII - The compression ignition (CI) internal combustion engines (ICE) were not constructed, modified, or reconstructed after July 11, 2005, therefore 40 CFR Part 60, Subpart IIII is not applicable.
- c. 40 CFR 64 - The baking ovens are subject to emissions limitations for criteria pollutants, but do not utilize control devices to achieve compliance. The Materials (flour) handling system utilizes a control device for PM, but pre-control device emissions of PM are not major. Therefore, in accordance with 40 CFR § 64.2(a), CAM is not applicable to this facility.
- d. 45CSR7 - based on the 2010 renewal Fact Sheet’s Determinations and Justifications section, ovens (Emission Units 1S, 2S and 3S) are not considered a “manufacturing process” because they don’t meet any of the Source Operation Types listed in 45CSR§7-2.39; therefore they are not subject to the requirements of this rule. Several 45CSR7 requirements related to the ovens were already removed from the permit during the 2010 renewal process, and the two that still were included with the permit (requirements 4.1.3 and 4.2.1) were removed during this renewal. As the result, former requirements 4.1.4 through 4.1.10 were re-numbered to 4.1.3 through 4.1.9, and former requirement 4.2.2 was re-numbered to 4.2.1.

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: Monday, October 5, 2015  
Ending Date: Wednesday, November 4, 2015

### **Point of Contact**

All written comments should be addressed to the following individual and office:

Natalya V. Chertkovsky-Veselova  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
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Natalya.v.chertkovsky@wv.gov

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

Not applicable.