

Fact Sheet



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

Permit Number: **R30-01100062-2021**
Application Received: **May 22, 2020**
Plant Identification Number: **011-00062**
Permittee: **Bimbo Bakeries USA, Inc.**
Mailing Address: **1300 Adams Avenue, Huntington, WV 25704**

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.

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

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2019 Actual Emissions
Carbon Monoxide (CO)	9.18	1.93
Nitrogen Oxides (NO _x)	11.38	2.30
Particulate Matter (PM _{2.5})	8.64	0.92
Particulate Matter (PM ₁₀)	8.64	5.86
Total Particulate Matter (TSP)	8.64	5.86
Sulfur Dioxide (SO ₂)	0.08	0.02
Volatile Organic Compounds (VOC)	223.3	133.09
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2019 Actual Emissions
All HAPs Combined	0.21	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 223.3 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:	45CSR2	PM emissions from combustion of fuel in indirect heat exchanger
	45CSR6	Open burning prohibited.
	45CSR7	Particulate Matter emission limits
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for sources
	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 (<i>if any</i>)
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 2015. There were no modifications of the permit. The following changes to the permit were made during this renewal:

1. Emission Units Table 1.1 – added equipment with potential applicable requirements: Emergency 300-gal Generators Diesel Fuel Tanks, Soy Oil Tank No. 1 (6,100 gal), Soy Oil Tank No. 2 (2,035 gal), Boiler No. 1 (5.02 MMBtu/hr), Boiler No. 2 (4.2 MMBtu/hr), and a Water Heater (3.0 MMBtu/hr).
2. Condition 3.7.2.a – full section IDs “45CSR§10-3” and “45CSR§10-4” were added for clarification purposes. Also, a paragraph was added for non-applicability of 45CSR10 to Boilers No. 1, No. 2 and to a Water Heater.
3. Condition 3.7.2.b – non-applicability description was revised for better clarity.

4. Conditions 3.7.2.d through h – added non-applicability descriptions for different rules (see Non-Applicability Determinations section below (items d through h)).
5. Sections 4.0 and 5.0 headings – emission units / emission points ID(s) were added for clarification purposes.
6. Section 5.0 – added 40CFR63 Subpart ZZZZ requirements applicable to Emergency Generators - fuel requirement 40 CFR §63.6604(b) (5.1.4) and reporting requirement 40 CFR §63.6650(h) (5.5.4). Also, sections (b)(ii) and (b)(iii) of requirement 5.1.3 (based on 40 CFR §§63.6640(f)(2)(ii) and (iii)) were deleted, because EPA vacated these sections of the rule.
7. Section 6.0 - added to include 10% opacity limit (45CSR§2-3.1) applicable to Boilers No.1, No.2 and a Water Heater (they are considered “indirect heat exchangers” per 45CSR§2-2.14), and, also, a monitoring requirement 6.2.1 (based on 45CSR§2-3.2). Considering the size of the boilers and the heater, and that they are fueled with natural gas, visible emissions are not anticipated, so Method 9 visible emission observations will only be required upon request. Per 45CSR§2-11, Sections 4, 5, 6, 8 and 9 of 45CSR2 are not applicable because each of these fuel burning units have heat input below 10 MMBtu/hr (see Non-Applicability Determinations section below (item d)).

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 45CSR§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 45CSR§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.

Also, 45CSR10 is not applicable to Boilers No. 1 and No. 2 and the Water Heater. Although, these units meet definition of “fuel burning units” (45CSR§10-2.8), their design heat input is under ten (10) MMBtu/hr each, therefore they are exempt per 45CSR§10-10.1.

- b. 45CSR16 and 40 CFR Part 60 Subpart III - The compression ignition (CI) internal combustion engines (ICE) were constructed, modified, or reconstructed before July 11, 2005, therefore 40 CFR Part 60, Subpart III is not applicable.
- c. 40CFR64 - 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 40CFR§64.2(a), CAM is not applicable to this facility.
- d. 45CSR§§2 - 4, 5, 6, 8 and 9 – per 45CSR§2-11.1 Boilers No. 1, No. 2, and epy Water Heater are exempt from 45CSR§§2 – 4 (PM mass emission limits), 5, 6, 8 and 9, because they have heat input under ten (10) MMBtu/hr.
- e. 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.

- f. 40CFR60 Subpart Dc is not applicable to Boilers No. 1 and No. 2 because their heat input capacity is below the subpart applicability threshold of 10 MMBtu/hr.
- g. 40CFR60 Subparts K, Ka and Kb are not applicable to the 300-gal Diesel Fuel Tanks and Soy Oil Tanks, because their capacities are below the subparts' lower applicability threshold of 75 m³ (19,813 gal).
- h. 40CFR63 Subpart JJJJJ is not applicable to Boilers No. 1, No. 2, and to a Water Heater, because the boilers are natural gas-fired boilers (exempt per 40CFR§63.11195(e)), and the heater is a hot water heater (exempt per 40CFR§63.11195(f)).

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: November 20, 2020
Ending Date: December 21, 2020

Point of Contact

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

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Division of Air Quality
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Charleston, WV 25304
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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.