AIR AND RADIATION ADMINISTRATION
DRAFT PART 70 OPERATING PERMIT

DOCKET # 24-021-0234

COMPANY: Bimbo Bakeries USA

LOCATION: 7110 English Muffin Way
Frederick, Maryland 21704

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MARYLAND DEPARTMENT OF THE ENVIRONMENT
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TITLE V – PART 70 OPERATING PERMIT PROGRAM OVERVIEW

Title V of the Clean Air Act (amended) requires each state to implement a federally enforceable operating permit program for major sources of air pollution. This program, the Part 70 Permit Program, also known as the Title V Permit Program, is designed to provide a comprehensive administrative document (a Part 70 Operating Permit) that identifies all air emissions sources at a given facility and the federal air quality regulations applicable to those sources. The permit establishes the methodology by which the owner/operator will demonstrate compliance, and includes testing, monitoring, record-keeping, and reporting requirements for each emissions source.

A Part 70 Operating Permit does not authorize new construction, and does not add any new emissions limitations, standards, or work practices on an affected facility. There may, however, be additional testing, record keeping, monitoring, and reporting requirements. A Part 70 Operating Permit is a five-year renewable permit. A responsible official for each facility subject to a Part 70 Operating Permit is required to annually certify compliance with each applicable requirement for that facility.

When an application for a Part 70 Operating Permit is received, the Department will complete a technical review of the application and will prepare a draft Part 70 Operating Permit and Fact Sheet. The Fact Sheet will explain the basis and technical analysis used by the Department to develop the federally enforceable permit conditions, including the required testing, monitoring, record keeping, and reporting provisions for each emissions unit at the permitted facility. The Fact Sheet will also include a description of the facility operations and the current compliance status with applicable requirements. If there are any discrepancies between the Part 70 Operating Permit application and the draft permit, the Fact Sheet will contain a discussion of the inconsistencies and the final resolution.

Public Participation Process

The Part 70 Operating Permit Program provides the public, adjacent states, and EPA the opportunity to review and submit comments on draft permits. The public may also request a public hearing on the draft permit.

The purpose of a public hearing is to give interested parties the opportunity to submit comments for the record which are germane to the draft federally enforceable permit conditions. Comments made at the hearing, or in writing to the Department during the comment period, should address errors and deficiencies in the permit such as unidentified emissions units, incorrect or deficient regulation citation, deficient record keeping, monitoring, reporting or testing requirements and unresolved compliance issues. After the public comment period has closed, the Department will review the formal testimony as part of the final review and prepare a Response to Comments document which will be sent to the EPA along with the draft Part 70 Operating Permit and Fact Sheet.

Testimony on state-only requirements will be kept on file at the Department as part of the formal record, however, state-only rules and regulations are not federally enforceable, and therefore are not within the scope of the EPA review. The Department will keep a record of the identity of the commenters, their statements, a summary of the issues raised during the public comment period, and the Response to Comments document for at least five years.

Citizen Petition to EPA to Object to Permit Issuance

Interested parties may petition the EPA to object to the Part 70 Permit if the EPA has not already objected, within 60 days after the 45-day EPA review period has ended. The petition period will be posted on the EPA website. The EPA will only consider objections to the federally enforceable provisions of the draft permit which were raised with reasonable specificity during the public comment period, unless: (1) the petitioner demonstrates that it was impractical to raise the objections within the public comment period, or (2) the grounds for the objection arose after the comment period. If the EPA agrees with the petition, the Department will reopen, revise, or revoke the permit as determined.

Applicant Objection to Permit Issuance and Recourse

If the applicant objects to the federally enforceable permit conditions contained in the issued Part 70 Operating permit, the applicant has 15 days from receipt of the issued permit to request a contested case hearing. More information on that can be found in 40 CFR, Part 70, and COMAR 26.11.03.11.

MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION

NOTICE OF INTENT TO ISSUE PART 70 OPERATING PERMIT, OPPORTUNITY TO SUBMIT WRITTEN COMMENTS OR TO REQUEST A PUBLIC HEARING

The Department of the Environment, Air and Radiation Administration (ARA) has completed its review of the application for a renewal Part 70 Operating Permit submitted by Bimbo Bakeries, USA, Inc. for the Frederick MD plant. The facility includes two small natural gas-fired boilers; one emergency generator equipped with a diesel-fired engine rated at 1750 kilowatts; four commercial baking ovens; ten bulk storage silos equipped with baghouses; and a small wastewater pre-treatment plant that reduces suspended solids in plant wastewater before discharging the wastewater to the Frederick County wastewater treatment plant.

The applicant is represented by: Ms. Valeria Ezikpe, Plant Manager
Bimbo Bakeries USA, Inc.
7110 English Muffin Way
Frederick, MD 21704

The Department has prepared a draft Part 70 Operating Permit for review and is now ready to receive public comment. A docket containing the application, draft permit, and supporting documentation is available for review on the Department's website, under the Air Quality Permitting Page's Title V link under "Draft Title V Permits" and may be viewed here:

https://tinyurl.com/DraftTitleV

Interested persons may submit written comments or request a public hearing on the draft permit. Written comments must be received by the Department no later than 30 days from the date of this notice. Requests for a public hearing must be submitted in writing and must also be received by the Department no later than 30 days from the date of this notice.

Comments and requests for a public hearing will be accepted by the Department if they raise issues of law or material fact regarding applicable requirements of Title V of the Clean Air Act, and/or regulations implementing the Title V Program in Maryland found in COMAR.

A Request for public hearing shall include the following:

1) The name, mailing address, and telephone number of the person making the request;

2) The names and addresses of any other persons for whom the person making the request is representing; and

3) The reason why a hearing is requested, including the air quality concern that forms the basis for the request and how this concern relates to the person making the request.

All written comments and requests for a public hearing should be directed to the attention of Ms. Shannon Heafey via email at Shannon.heafey@maryland.gov or by post at Air Quality Permits Program, Air and Radiation Administration, 1800 Washington Boulevard Suite 720, Baltimore, Maryland 21230-1720. Further information may be obtained by calling Ms. Shannon Heafey at (410) 537-4433.

BIMBO BAKERIES USA, INC.
7110 ENGLISH MUFFIN WAY
FREDERICK, MD 21704
PERMIT NO. 24-021-0234
PART 70 OPERATING PERMIT FACT SHEET

BACKGROUND

Bimbo Bakeries USA, Inc. – Frederick Plant
7110 English Muffin Way
Frederick, MD 21704
Plant Manager: Ms. Valeria Ezikpe, (301) 694-8100
Environmental Contact: Mr. Josh Beall (301) 694-8100, ext. 160

Bimbo Bakeries USA, Inc. – Frederick Plant is a commercial baking facility located in Frederick County at 7110 English Muffin Way in Frederick, Maryland 21704. The facility implements a sponge dough process to produce several varieties of English Muffins, using raw materials including white flour, wheat flour, farina, yeast, and fruit (e.g., blueberries).

The flour, water and yeast are mixed and allowed to ferment for 2 hours. Additional ingredients, such as fruit, are added to the fermented dough and the mixture is charged into a hopper. Dough pieces are cut from a divider and the pieces are dropped onto trays that are covered with farina (coarsely ground wheat). The loaded tray is then transferred to a proof box for a half an hour. The proofed dough pieces are transferred to an oven where they are baked for approximately 5 minutes. Each production has its own oven, and each oven is vented to the atmosphere. Finished muffins are transferred to a spiral cooler for 25 minutes and then packaged for shipment. The primary SIC code for the facility is 2051.

The facility operates a wastewater pre-treatment plant that uses an aerobic and anaerobic process in plant wastewater before the wastewater is discharged to the Frederick County wastewater treatment plant. The Plant discharges approximately 10,000 gallons per day to the Frederick County wastewater treatment plant.

In summation, the facility operates two (2) small natural gas-fired boilers; one (1) emergency generator equipped with a diesel-fired engine rated at 1750 kilowatts; four (4) commercial baking ovens; ten (10) bulk storage silos equipped with baghouses; two (2) vacuum systems both with a filter [one (1) for reclaiming unburned (recyclable) farina and one (1) for reclaiming burnt farina waste for disposal]; and a small wastewater pre-treatment plant that reduces suspended solids in plant wastewater before discharging the wastewater to the Frederick County wastewater treatment plant.

The following table summarizes the actual emissions from the facility based on its Annual Emission Certification Reports:

Table 1: Actual Emissions

Year	NO_x (TPY)	SO_x (TPY)	PM_{10} (TPY)	CO (TPY)	VOC (TPY)	Total HAP (TPY)
2023	2.98	0.019	0.058	2.54	48.67	0
2022	3.06	0.020	0.059	2.62	51.59	0
2021	2.97	0.017	0.054	2.54	55.57	0
2020	3.00	0.018	0.057	2.54	46.85	0
2019	2.89	0.018	0.053	2.47	40.73	0

The major source threshold for triggering Title V permitting requirements in Frederick County is 25 tons per year for VOC, 25 tons for NOx, 100 tons per year for any other criteria pollutants, and 10 tons for a single HAP or 25 tons per year for total HAPS. Since the actual VOC emissions from the facility are greater than the major source threshold, Bimbo Bakeries USA, Inc. is required to obtain a Title V – Part 70 Operating Permit under COMAR 26.11.03.01.

Bimbo Bakeries USA, Inc. – Frederick Plant has a current Title V – Part 70 Operating Permit that was issued on June 1, 2020 and expires May 31, 2025. The facility's Title V – Part 70 Operating Permit renewal application was received by the Department on May 24, 2024. An administrative completeness review was conducted, and the application was deemed administratively complete. An administrative completeness letter was sent on June 11, 2024, granting the facility an application shield.

PERMITTING ACTIVITY SINCE THE LAST TITLE V – PART 70 OPERATING PERMIT ISSUANCE

On March 30, 2021, the Department issued a Permit to Construct for the modification to an existing baghouse in their dry ingredient scaling room. The baghouse was modified to vent outside of the building, which required the dry ingredient scaling room and baghouse to need a registration with the Department; ARA Registration Number 021-0234-8-0136. The modification was considered an off-permit change to the Title V – Part 70 Operating Permit.

In 2022, the facility was granted a general Permit to Construct for the installation of an emergency generator. The emergency generator contains a diesel fired engine rated at 1750 kilowatts and is registered under ARA Registration Number 021-0234-9-0471. The installation of the generator was considered an on-permit change to the Title V – Part 70 Operating Permit.

NSPS AND MACT APPLICABILITY

NSR Applicability – None of the facility's installations is subject to NSR approval.

PSD Applicability – None of the facility's installations is subject to PSD approval.

NSPS Applicability – The facility has one (1) emergency generator equipped with a diesel fired engine rated at 1750 kilowatts, that is subject to the NSPS in 40 CFR Part 60, Subpart IIII for Stationary Compression Ignition Internal Combustion Engines. Additionally, the facility has an emergency generator subject to 40 CFR 60, Subpart JJJJ, that is listed in insignificant activities. The two gas-fired boilers, with less than 10 MMBtu/hr maximum heat input, are not subject to NSPS 40 CFR 60 Subpart Dc, which is only applicable to units with a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr.

NESHAP Part 61 Applicability – None of the facility's registered installations are subject to a 40 CFR Part 61 rule.

NESHAP Part 63 (MACT) Applicability – None of the facility's registered installations are subject to a MACT rule. The facility has an emergency generator subject to 40 CFR 63, Subpart ZZZZ, that is listed in insignificant activities.

COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

Compliance assurance monitoring (CAM) is intended to provide a reasonable assurance of compliance with applicable requirements under the Clean Air Act for large emission units that rely on air pollution control (APC) equipment to achieve compliance. The CAM approach establishes monitoring for the purpose of: (1) documenting continued operation of the control measures with ranges of specified indicators of performance (such as emissions, control device parameters, and process parameters) that are designed to provide a reasonable assurance of compliance with applicable requirements; (2) indicating any excursions from these ranges; and (3) responding to the data so that the cause or causes of the excursions are corrected. For a unit to be subject to CAM, the unit must be located at a major source, be subject to an emission limitation or standard; use a control device to achieve compliance; and must not otherwise be exempt from CAM. Applicability determinations are made on a pollutant-by-pollutant basis for each emissions unit.

The facility uses baghouses to control particulate matter (PM) but PM is not a major source of pollutant in this facility. The facility uses a flare to control emissions of VOC from the wastewater treatment plant. However, a CAM plan is not required since the wastewater treatment plant is not a major source of VOC emissions pre-control, and the control device is not relied upon to achieve compliance under the Clean Air Act.

No control devices are used to reduce emissions of VOC or HAPs from the major sources at the facility; therefore, CAM requirements do not apply for this Title V permit renewal.

GREENHOUSE GAS (GHG) EMISSIONS

Bimbo Bakeries USA, Inc. emits the following greenhouse gases (GHGs) related to Clean Air Act requirements: carbon dioxide, methane, and nitrous oxide. These GHGs originate from various processes (i.e. combustion sources such as baking ovens and boilers, a flare, and an emergency generator) contained within the facility premises applicable to Bimbo Bakeries USA, Inc. The facility has not triggered Prevention of Significant Deterioration (PSD) requirements for GHG emissions; therefore, there are no applicable GHG Clean Air Act requirements. While there may be no applicable requirements as a result of PSD, emission certifications reports for the years 2019, 2020, 2021, 2022, and 2023 showed that Bimbo Bakeries USA, Inc. is not a major source (threshold: 100,000tpy CO_2e) for GHG's (see Table 2 shown below). The Permittee shall quantify facility wide GHGs emissions and report them in accordance with Section 3 of the Part 70 permit.

The following table summarizes the actual emissions from Bimbo Bakeries USA, Inc. based on its Annual Emission Certification Reports:

Table 2: Greenhouse Gases Emissions Summary

GHG	**Conversion factor**	**2019** tpy CO_2e	**2020** tpy CO_2e	**2021** tpy CO_2e	**2022** tpy CO_2e	**2023** tpy CO_2e
Carbon dioxide CO_2	1	3,470	3,601	3,569	3,678	3,586
Methane CH_4	25	0.068	0.070	0.068	0.072	0.070
Nitrous Oxide N_2O	298	0.061	0.069	0.063	0.067	0.066

Total GHG CO_{2eq}		**3,470**	**3,601**	**3,569**	**3,678**	**3,586**

EMISSION UNIT IDENTIFICATION

Bimbo Bakeries USA, Inc. has identified the following emission units as being subject to Title V permitting requirements and having applicable requirements.

Table 3: Emission Unit Identification

Emissions Unit Number	*ARA Registration Number*	Emissions Unit Name and Description	Date of Installation
A-01	5-0293	One (1) Johnston Boiler Company model PFTA250-4G150S boiler, 9.8 MMBtu/hr maximum heat input, burns natural gas only	10/2003
A-02	5-0333	One (1) Johnston Boiler Company model PFTA250-4G150S boiler, 9.8 MMBtu/hr maximum heat input, burns natural gas only	12/2004
B-01	8-0081	Baking Oven No. 1, APV Baker Continuous Band Baking Oven, input rate of 1680 dozen muffins per hour, 2 MMBtu/hr maximum heat input	06/1977
B-02	8-0082	Baking Oven No. 2, APV Baker Continuous Band Baking Oven, input rate of 1680 dozen muffins per hour, 2 MMBtu/hr maximum heat input	06/1977
B-03	8-0083	Baking Oven No. 3, APV Baker Continuous Band Baking Oven, input rate of 2520 dozen muffins per hour, 3.7 MMBtu/hr maximum heat input	02/1996
B-04	8-0084	Baking Oven No. 4, APV Baker Continuous Band Baking Oven, input rate of 1680 dozen muffins per hour, 2 MMBtu/hr maximum heat input	03/1991
E-01	8-0085	One (1) vacuum system that reclaims unburned (recyclable) farina, and is controlled with a filter	06/1977
F-01	8-0086	One (1) vacuum system that reclaims burnt (non-recyclable) farina for disposal, and is controlled with a filter	06/1977
C-01	9-0219	Ten (10) silos for storage of white flour, wheat flour, and farina; includes eight (8) silos with nominal capacities of 100,000 pounds each, and two (2) silos	06/1977 or later

		with nominal capacities of 80,000 pounds each, and controlled by baghouses	
	8-0136	Dry ingredient scaling room controlled with a baghouse	03/2021
G-01	9-0471	One (1) Cumins DQKAA emergency generator equipped with a diesel fired engine rated at 1750 kilowatts	06/2022
1-01	9-0220	One (1) wastewater pretreatment plant processing 10,000 gallons per day. Biogas generated by the anaerobic digester is controlled via flare.	08/2018

AN OVERVIEW OF THE PART 70 PERMIT

The Fact Sheet is an informational document. If there are any discrepancies between the Fact Sheet and the Part 70 permit, the Part 70 permit is the enforceable document.

Section I of the Part 70 Permit contains a brief description of the facility and an inventory list of the emissions units for which applicable requirements are identified in Section IV of the permit.

Section II of the Part 70 Permit contains the general requirements that relate to administrative permit actions. This section includes the procedures for renewing, amending, reopening, and transferring permits, the relationship to permits to construct and approvals, and the general duty to provide information and to comply with all applicable requirements.

Section III of the Part 70 Permit contains the general requirements for testing, record keeping and reporting; and requirements that affect the facility as a whole, such as open burning, air pollution episodes, particulate matter from construction and demolition activities, asbestos provisions, ozone depleting substance provisions, general conformity, and acid rain permit. This section includes the requirement to report excess emissions and deviations, to submit an annual emissions certification report and an annual compliance certification report, and results of sampling and testing.

Section IV of the Part 70 Permit identifies the emissions standards, emissions limitations, operational limitations, and work practices applicable to each emissions unit located at the facility. For each standard, limitation, and work practice, the permit identifies the basis upon which the Permittee will demonstrate compliance. The basis will include testing, monitoring, record

keeping, and reporting requirements. The demonstration may include one or more of these methods.

Section V of the Part 70 Permit contains a list of insignificant activities. These activities emit very small quantities of regulated air pollutants and do not require a permit to construct or registration with the Department. For insignificant activities that are subject to a requirement under the Clean Air Act, the requirement is listed under the activity.

Section VI of the Part 70 Permit contains State-only enforceable requirements. Section VI identifies requirements that are not based on the Clean Air Act, but solely on Maryland air pollution regulations. These requirements generally relate to the prevention of nuisances and implementation of Maryland's Air Toxics Program.

REGULATORY REVIEW/TECHNICAL REVIEW/COMPLIANCE METHODOLOGY

Permitting History:

Dates of Initial Construction/Registration, Modifications and Reconstructions:

- The dates of initial construction/registration for each registered active installation or process are shown in Table 3 above. There have been no significant reconstructions or modifications to any of the active emissions units since their respective installation dates.

- The facility's baking ovens and associated equipment were installed before commercial bakeries were subject to Permit-to-Construct requirements.

- Two (2) Cleaver Brooks CB100-200 boilers, 8.4 MMBtu/hr each, fired with natural gas only, were installed in 1977 and were registered under ARA Registration Nos. 5-0097 and 5-0098. Both boilers were removed after boilers A-01 and A-02 were installed.

- Permit-to-Construct 021-5-0286 issued June 3, 2003, authorized installation of a temporary boiler (Superior Apache model 1750, 8.5 MMBtu/hr, natural gas-fired) to serve as a backup to the facility's one (1) operable boiler until the company could arrange for installation of a permanent new boiler. The temporary boiler has since been removed from service.

- General Permit-to-Construct number 021-0234-5-0293 issued in September 2003 authorized installation of the facility's A-01 boiler.

- General Permit-to-Construct number 021-0234-5-0333 issued in December 2004 authorized installation of the facility's A-02 boiler.

- On February 21, 2014, Bimbo Bakeries USA, Inc. submitted a Part 70 permit Application for Administrative Amendment to change the operation division of the S.B. Thomas facility located in Frederick, MD. The plant was originally operated by Orograin Bakeries Manufacturing, Inc. The effective date of the change of operation division from Orograin Bakeries Manufacturing to Bimbo Bakeries USA was January 1, 2014.

- On December 20, 2017, Bimbo Bakeries USA applied for a Permit-to-construct for the installation of one (1) flare to control exhaust gases from the anaerobic digester on the wastewater treatment system. The installation of the flare was considered an off-permit change and the facility's Title V – Part 70 Operating Permit was not updated at the time of issuance. The permit was issued on April 19, 2018 under ARA Registration No. 021-0234-9-0220.

- On October 20, 2020, Bimbo Bakeries USA, Inc. applied for a Permit-to-Construct for the modification to an existing baghouse to change venting from indoors to outdoors. The modification was considered an off-permit change and the facility's Title V – Part 70 Operating Permit was not updated at the time of issuance. The permit was issued on March 30, 2021, under ARA Registration No. 021-0234-8-0136.

- General Permit-to-Construct number 021-0234-9-0471 issued on April 7, 2022, authorized installation of the facility's G-01 emergency generator.

Applicable Standards and Limits:

1. Table IV-1 – Emissions Units A-01 and A-02:

A-01: One (1) Johnston Boiler Company model PFTA250-4G150S boiler, 9.8 MMBtu/hr maximum heat input, burns natural gas only (ARA Registration No. 021-0234-5-0293)

A-02: One (1) Johnston Boiler Company model PFTA250-4G150S boiler, 9.8 MMBtu/hr maximum heat input, burns natural gas only (ARA Registration No. 021-0234-5-0333)

The boilers were authorized via general Permit-to-Construct in 2003 and 2004, and the facility only operates one (1) at a time, leaving the other on standby. Roughly every month the facility switches the operating boiler. The boilers are not subject to 40 CFR 60, Subpart Dc since their rating is below the minimum threshold rating of 10 MMBtu/hr. Each boiler vents emissions to an individual stack.

A. Visible Emissions Limitations:

COMAR 26.11.09.05A(1), which requires installations located in Area II of the State that a person not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which are greater than 20 percent opacity.

Exceptions. **COMAR 26.11.09.05A(3)** establishes that Section A(1) does not apply "to emissions during load changing, soot blowing, start-up, or adjustments or occasional cleaning of control equipment if: (a) the visible emissions are not greater than 40 percent opacity; and (b) the visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period."

Mechanism For Demonstrating Compliance:

The Permittee is required to report occurrences of visible emissions from the boilers in accordance with conditions number 4 ("Report of Excess Emissions and Deviations"), and number 9 ("Compliance Certification Report"), of Section III – Plant Wide Conditions.

Rationale For Compliance Mechanism:

Small boilers that burn natural gas will generally have no visible emissions. Such boilers are designed to operate automatically, without oversight of an operator, and require minimal preventive maintenance to maintain a level of combustion performance that does not cause visible emissions. Although the permit imposes no specific schedule for conducting observations of stack emissions, the Permittee is required under the general reporting requirement for excess emissions and deviations to report observed occurrences of visible emissions that exceed the standard (20 percent opacity).

B. Operational Limitation: The Permittee shall burn only natural gas in the boilers unless the Permittee obtains from the Department written authorization to burn alternative fuels. [Authority: COMAR 26.11.02.09A]

Mechanism For Demonstrating Compliance:

The Permittee is required to maintain records of the types and quantity of fuel burned to support the annual emissions certification report (permit condition 8 of Section III, Plant Wide Conditions "Emissions Certification Report"). The annual emissions certification report must contain the type, quantities, and analyses of all fuels burned. No additional requirements are needed to show compliance with this operational limitation.

2. Table IV-2 – Emissions Units B-01 through B-04, Four (4) Commercial Baking Ovens That Produce Varieties of English Muffins:

B-01: Baking Oven No. 1, APV Baker Continuous Band Baking Oven, input rate of 1680 dozen muffins per hour, 2.0 MMBtu/hr maximum heat input, installed in 1977 (ARA Registration No. 021-0234-8-0081)

B-02: Baking Oven No. 2, APV Baker Continuous Band Baking Oven, input rate of 1680 dozen muffins per hour, 2.0 MMBtu/hr maximum heat input, installed in 1977 (ARA Registration No. 021-0234-8-0082)

B-03: Baking Oven No. 3, APV Baker Continuous Band Baking Oven, input of 2520 dozen muffins per hour, 3.7 MMBtu/hr maximum heat input, installed in 1996 (ARA Registration No. 021-0234-8-0083)

B-04: Baking Oven No. 4, APV Baker Continuous Band Baking Oven, input rate of 1680 dozen muffins per hour, 2.0 MMBtu/hr maximum heat input, installed in 1991 (ARA Registration No. 021-0234-8-0084)

The facility uses four (4) natural gas-fired ovens in order to produce various muffins. The ovens are not subject to any NSPS or NESHAP requirements but are subject to State regulations in order to control emissions of VOC from the facility. The largest oven at the facility is currently B-03, as determined by the maximum throughput. Each oven has two (2) associated stacks in order to vent emissions.

A. Visible Emissions Limitations

A1. **COMAR 26.11.06.02C(1)**, which requires for Area II of the State that a person not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which are greater than 20 percent opacity.

Exceptions: **COMAR 26.11.06.02A(2)**, establishes that "the visible emissions standards in COMAR 26.11.06.02C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) the visible emissions are not greater than 40 percent opacity; and (b) the visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

Mechanism For Demonstrating Compliance:

The Part 70 permit does not impose a specific schedule for conducting observations of stack emissions, however the Permittee is required under the general reporting requirement for excess emissions and deviations to report occurrences of observed visible emissions that exceed the standard (20 percent opacity).

Rationale For Compliance Mechanism:

The Part 70 permit does not require periodic visible emissions observations because the permit requires that the ovens burn only natural gas (see A2 immediately below), which leaves little potential for visible emissions. Particulate emissions from the ovens are virtually zero, and emissions of ethanol (which is the primary pollutant from the baking process) are not visible.

A2. **Operational Requirement:** The Permittee shall burn only natural gas in each of the ovens unless the Permittee obtains from the Department written authorization to burn alternate fuels. [Authority: COMAR 26.11.02.09A]

Mechanism For Demonstrating Compliance:

The Permittee is required to maintain records of the types and quantity of fuel burned to support the annual emissions certification report (permit condition 8 of Section III, Plant Wide Conditions "Emissions Certification Report"). The annual certification report must contain the type, quantities, and analyses of all fuels burned.

Rationale For Compliance Mechanism:

No additional requirements are needed to show compliance with this operational limitation; the recordkeeping and reporting requirements are sufficient for compliance demonstration.

B. Control of Particulate

COMAR 26.11.06.03B(1)(a), which limits the concentration of particulate matter in process exhaust gases to not more than 0.05 grains per standard cubic foot of dry gas.

Mechanism For Demonstrating Compliance:

The Permittee is required to burn only natural gas in the baking ovens (see Operational Requirement A2 above), and the facility operates two (2) vacuum reclaiming systems (emissions units E-01 and F-01) to capture potential emissions of unused farina. These measures are sufficient to ensure that particulate emissions will be minimal.

Rationale For Compliance Mechanism:

The use of natural gas in the bakery ovens and vacuum reclaim systems reduces any particulate matter emissions to a permissible level in order to comply with State regulations.

C. Control of VOC

C1. **COMAR 26.11.19.21**, which establishes requirements for control of VOC from commercial bakery ovens.

Note: COMAR 26.11.19.21 was developed initially such that only the largest oven would be subject to the VOC control requirements, however, as ovens were replaced (post-1994) they would then become subject to the stricter standards as a means of grandfathering in the facilities. COMAR 26.11.19.21C(2) states that only the largest oven at the facility is subject to the provisions of COMAR 26.11.19.21D (with an exemption for ovens constructed before 1942), while COMAR 26.11.19.21C(5) states that a person who owns or operates a bakery oven constructed on or after January 1, 1994, that satisfies the conditions in COMAR 26.11.19.21D(1) shall comply with COMAR 26.11.19.21D(2).

The Permittee previously identified the "largest oven" as oven no. 1, as determined by COMAR 26.11.19.21, which refers to an oven installed after 1942 and before January 1, 1994 and that has the highest actual annual production by weight. Oven No. 1 must therefore meet the requirements in D(2) if the conditions in D(1) are satisfied. Additionally, Bakery Oven No. 3 was installed after January 1, 1994, and must therefore meet the requirements in D(2) if the conditions in D(1) are satisfied.

C2. In accordance **with COMAR 26.11.19.21C(2) and D(1)**, if the facility's largest oven exceeds the average annual production tonnage of finished breads, rolls, or other yeast-raised products for the corresponding Yt value listed below, then thereafter the Permittee shall be subject to COMAR 26.11.19.21D(2).

(1) 10,000 tons with a Yt value of greater than 11.0;

(2) 15,000 tons with a Yt value between 8.1 and 11.0;

(3) 22,500 tons with a Yt value between 5 and 8.0;

(4) 28,000 tons with a Yt value less than 5.

C3. In accordance with **COMAR 26.11.19.21C(5)**, for any commercial bakery oven constructed on or after January 1, 1994 that satisfies the conditions in COMAR 26.11.19.21D(1) the Permittee shall comply with COMAR 26.11.19.21D(2).

Note: In accordance with COMAR 26.11.19.21C(5), any commercial baking oven installed on or after January 1, 1994 that exceeds the production tonnage for the oven's corresponding Yt value listed in §D(1) is subject to the control requirements provided under §D(2). To date the Permittee's production has not required any of the ovens to be subject to §D(2).

C4. In accordance with **COMAR 26.11.19.21D(2)**, if the facility's largest commercial bakery oven, or any bakery oven constructed after January 1, 1994, satisfies any of the conditions in COMAR 26.11.19.21D(1), the Permittee shall not cause or permit the discharge of VOC into the atmosphere unless emissions from that oven are exhausted directly into a control device which is installed, operated, and maintained to reduce VOC emissions from the bakery oven by 80 percent or more overall. In accordance with **COMAR 26.11.19.21F(3)**, if the facility's largest oven satisfies any of the conditions in COMAR 26.11.19.21D(1) the Permittee shall comply with the requirements of COMAR 26.11.19.21D(2) within 1 calendar year after the year in which the conditions were satisfied.

Mechanism For Demonstrating Compliance:

The Permittee is required to determine and maintain records of the production of yeast raised products and average weighted Yt values for the facility's largest pre-1994 oven and for each oven installed after January 1,

1994, for each month of operation and for all periods of twelve consecutive months. The Permittee is also required to maintain records of annual Yt values and total bakery production for each commercial bakery oven. [Authority: COMAR 26.11.03.06C] The average Yt value for all ovens in 2023 was 6.59. The facility uses all ovens for each product type and does not determine the Yt value per oven, instead recording the overall production and individual Yt values per bakery item. In 2023, the production for all bakery items was 30,453 tons, with oven 1 producing 7,844 tons of baked bread, oven 2 producing 7,027 tons of baked bread, oven 3 producing 9,294 tons of baked bread, and oven 4 producing 6,287 tons of baked bread. At these amounts, the facility is in compliance with the conditions of COMAR 26.11.19.21C(2) and D(1).

Rationale For Compliance Mechanism

Tracking the Yt and oven production on a monthly and annual basis provides an accurate evaluation of the facility's VOC emissions. Additional VOC control devices must be added if the Yt and finished product amount meet a certain threshold. Currently the Permittee is not required to install add-on controls. If an affected oven's production tonnage exceeds the amount associated with the pertinent Yt value provided under COMAR 26.11.19.21D(1), then the Permittee must notify the Department within 10 business days and install the required control device in accordance with the schedule provided under COMAR 26.11.19.21F(3).

3. **Table IV-3 – Emissions Unit E-01 and F-01:** Two (2) vacuum systems: one (1) that reclaims unburned (recyclable) farina (ARA Registration No. 021-0234-8-0085); and one (1) that captures burnt (non-recyclable) farina for disposal (ARA Registration No. 021-0234-8-0086), each controlled with a filter.

   The facility uses two (2) vacuum systems that were installed in 1977 in order to reduce particulate matter emissions, visible emissions, and facility waste. Each vacuum system is controlled with a baghouse filter, and each has one (1) associated air emission point.

A. Visible Emissions Limitations

COMAR 26.11.06.02C(1), which requires for Area II of the State that a person not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is greater than 20 percent opacity.

Exceptions: **COMAR 26.11.06.02A(2)** establishes that "the visible emissions standards in COMAR 26.11.06.02C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) the visible emissions are not greater than 40 percent opacity; and (b) the visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

B. Control of Particulate

COMAR 26.11.06.03B(1)(a), which limits the concentration of particulate matter in process exhaust gases to not more than 0.05 grains per standard cubic foot of dry exhaust gas.

C. Operational Requirement

The Permittee shall vent exhaust gases from each vacuum system through a properly maintained and operated baghouse before discharge to atmosphere. [Authority: COMAR 26.11.02.09A]

Mechanism For Demonstrating Compliance:

In accordance with COMAR 26.11.03.06C, the Permittee is required to perform monthly observations for visible emissions from each vacuum system baghouse when the system is operating under a normal load during daylight hours. If no visible emissions are observed from a vacuum system for six (6) consecutive months the Permittee may then relax the frequency of observation for that system to once per quarter. If visible emissions exceeding 20 percent opacity are observed during an observation, the Permittee shall determine the cause and, where practical, shall perform within 24 hours necessary adjustments or repairs to reduce the opacity to not more than 20 percent. If visible emissions have not been reduced to 20 percent or less opacity within 48 hours, the Permittee shall perform daily 12-minute observations for opacity in accordance with EPA Method 9 until visible emissions no longer exceed 20 percent opacity.

The Permittee is also required to equip the vacuum systems with baghouses and to implement a preventive maintenance plan to ensure that the baghouses are properly maintained. The Permittee must establish in writing, revise as necessary, and implement a preventive maintenance (PM) plan for the baghouses that control emissions from the vacuum systems. The PM plan is to be designed to ensure consistent compliance with all applicable particulate and visible emissions standards, and to include descriptions of maintenance activities to be performed and a schedule for performance of

each activity. The Permittee is required to perform maintenance activities in accordance with the schedules established in the PM plan and is required to maintain records of the dates on which each maintenance activity was performed. [Authority: COMAR 26.11.03.06C]

Rationale For Compliance Demonstration Mechanism:

There is no history of visible emissions problems associated with either vacuum system. The combination of required observations and performance of appropriate preventive maintenance on the required baghouses will be sufficient to demonstrate compliance status with regard to the visible emissions standard.

The baghouses that control emissions from the vacuum systems are designed to reduce particulate concentration in exhaust gases to less than 0.01 gr/scfd before discharge to atmosphere. The requirement that the Permittee develop and implement a PM plan that will ensure that the baghouses are properly maintained and will be sufficient to provide consistent compliance with the standard. The requirement that the Permittee maintain records of all maintenance performed on the baghouses will provide the inspector with a means for determining whether maintenance activities prescribed by the plan are being performed as frequently as the plan requires.

4. **Table IV-4 – Emissions Unit C-01:** Ten (10) bulk storage silos for storage of white flour, wheat flour, and farina (ARA Registration No. 021-0234-9-0219), and a dry ingredient scaling room (ARA Registration No. 021-0234-8-0136), all controlled with baghouses:

   The facility uses bulk storage silos to store raw materials and a dry ingredient scaling room for processing and must minimize particulate matter emissions from these operations in accordance with State requirements. There are six (6) emissions points associated with the ten (10) silos, and one (1) associated with the dry ingredient scaling room. As part of the required preventative maintenance of the baghouses associated with the silos, the facility uses a computer program to generate work orders for required maintenance.

A. Visible Emissions Limitations

COMAR 26.11.06.02C(1), which requires for Area II of the State that a person not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which are greater than 20 percent opacity.

Exceptions: **COMAR 26.11.06.02A(2)** establishes that "the visible emissions standards in COMAR 26.11.06.02C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if (a) the visible emissions are not greater than 40 percent opacity; and (b) the visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

B. Control of Particulate

COMAR 26.11.06.03B(1)(a), which limits the concentration of particulate matter in process exhaust gases to not more than 0.05 grains per standard cubic foot of dry gas.

C. Operational Requirement

The Permittee shall vent exhaust gases from each storage silo system and the dry ingredient scaling room through a properly maintained and operated baghouse before discharge to atmosphere. [Authority: COMAR 26.11.02.09A]

Mechanism For Demonstrating Compliance:

The Permittee is required to perform monthly observations for visible emissions from each baghouse associated with the silos. If no visible emissions are observed from a unit for 6 consecutive months the Permittee may then relax the frequency of observation for that unit to once per quarter. The Permittee is required to vent gases from the silos through the baghouses, and to implement a preventive maintenance plan that will ensure that the baghouses are properly maintained.

The Permittee must establish in writing, revise as necessary, and implement a preventive maintenance (PM) plan for the baghouses that control emissions from the silos. The PM plan is to be designed to ensure consistent compliance with all applicable particulate and visible emissions standards, and to include descriptions of maintenance activities to be performed and a schedule for performance of each activity. The Permittee is required to perform maintenance activities in accordance with the schedules established in the PM plan and is required to maintain records of the dates on which each maintenance activity was performed. [Authority: COMAR 26.11.03.06C]

Rationale For Compliance Demonstration Mechanism:

There is no history of visible emissions problems associated with any of the silos or the dry ingredient scaling room. The combination of required

observations and performance of appropriate preventive maintenance on the required baghouses will be sufficient to demonstrate compliance status with regard to the visible emissions standard.

The baghouses that control emissions from the silos and dry ingredient scaling room are designed to reduce particulate concentration in exhaust gases to less than 0.01 gr/scfd before discharge to atmosphere. The requirement that the Permittee develop and implement a PM plan that will ensure that the baghouses are properly maintained will be sufficient to provide consistent compliance with the standard. The requirement that the Permittee maintain records of all maintenance performed on the baghouses will provide the inspector with a means for determining whether maintenance activities prescribed by the plan are being performed as frequently as the plan requires.

5. **Table IV-5 – Emissions Unit G-01:** One (1) emergency generator equipped with a diesel fired engine rated at 1750 kilowatts (ARA Registration No. 9-0471)

   The facility received a General Permit to Construct in 2022 for the installation of a Tier 2 rated emergency diesel-fired generator, which is subject to 40 CFR 60 Subpart IIII for stationary compression ignition internal combustion engines. The engine is also subject to State requirements for fuel burning equipment.

A. Visible Emissions Limitations

COMAR 26.11.09.05E(2), which requires that the Permittee not cause or permit the discharge of emissions from any engine, operating at idle greater than 10 percent opacity.

COMAR 26.11.09.05E(3), which requires that the Permittee not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.

Exceptions. COMAR 26.11.09.05E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system. COMAR 26.11.09.05E(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods: (i) engines that are idled continuously when not in service: 30 minutes; (ii) all other engines: 15 minutes. COMAR 26.11.09.05E(2) and (3) do not apply while maintenance, repair, or testing is being performed by qualified mechanics. [Authority: COMAR 26.11.09.05E(4)]

Rationale For Compliance Demonstration Mechanism:

The Permittee shall operate and maintain the generator in a manner that prevents visible emissions. Properly operated and maintained engines should not cause visible emissions in excess of the applicable standards. The Permittee shall maintain records of all maintenance/repairs performed and make them available to the Department upon request.

B. Control of Sulfur Oxides and NSPS Fuel Requirement

COMAR 26.11.09.07A(1)(c), which limits the concentration of sulfur content by weight in excess of, or which otherwise exceeds, 0.3 percent for distillate fuel oils.

40 CFR §60.4207(b), which requires that the Permittee must use diesel fuel that meets the requirements of 40 CFR §1090.305 for nonroad diesel fuel, i.e. diesel fuel that has a per-gallon sulfur content that does not exceed 15 ppm, and that either has a minimum per-gallon cetane index of 40 or a maximum per-gallon aromatic content of 35 volume percent.

Rationale For Compliance Demonstration Mechanism:

The Permittee shall obtain a certification from the fuel supplier indicating that the oil complies with the limitation on the sulfur content and cetane index of fuel oil. The Permittee shall keep records of fuel supplier certification of sulfur content in fuel and submit the records to the Department upon request. Fuel supplier certifications are sufficient to demonstrate compliance with all applicable fuel sulfur limits. No additional monitoring is required.

C. NSPS Emissions Standards

40 CFR §60.4205(b), which requires that the Permittee comply with the following emissions standards for the emergency generator:

(a) Non-methane Hydrocarbons (NMHC) and NOx: 4.8 gram per horsepower-hour (g/hp-hr) or 6.4 grams per kilowatt-hour (g/kW-hr)

(b) CO: 2.6 g/hp-hr or 3.5 g/kW-hr

(c) Particulate Matter (PM): 0.15 g/hp-hr or 0.2 g/kW-hr

40 CFR §60.4205(b), which requires that the Permittee comply with the following opacity standards for the emergency generator:

(a) Exhaust opacity must not exceed 20 percent during the acceleration mode.

(b) Exhaust opacity must not exceed 15 percent during the lugging mode.

(c) Exhaust opacity must not exceed 50 percent during the peaks in either the acceleration or lugging mode.

Compliance Demonstration:

To comply with the NSPS limits, the Permittee must operate and maintain the generator according to the manufacturer's written instructions for the entire life of each engine and shall maintain documentation from the manufacturer certifying that the engine meets the applicable emissions standards.

D. Operational Requirement

40 CFR §60.4211(f), which requires that the Permittee operate the emergency generator according to the following requirements:

(a) To be considered an emergency stationary RICE under 40 CFR 60, Subpart IIII, any operation other than emergency operation, and maintenance and testing is prohibited. [Authority: 40 CFR §60.4211(f)]

(b) There is no time limit on the use of the emergency generator in emergency situations. [Authority: 40 CFR §60.4211(f)(1)]

(c) The Permittee may operate the emergency generator for any combination of the following purposes for a maximum of 100 hours per calendar year: Maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The Permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that federal, state, or local standards require maintenance and testing of the emergency generator beyond 100 hours per calendar year. [Authority: 40 CFR §60.4211(f)(2)(i)]

Compliance Demonstration and Rationale:

The Permittee is required to maintain annual records of the hours of operation for the generator including hours for maintenance and readiness checks. The Permittee must also document how many hours are spent for emergency operation, including what classified as emergency. Also, the Permittee is required to submit annual reports whenever the generators are operated for emergency demand purposes. These records are sufficient to demonstrate compliance with the operating limits.

E. Control of Hazardous Air Pollutants

40 CFR §63.6590(c)(1), which requires that the Permittee meet the requirements of 40 CFR, Part 63, Subpart ZZZZ by meeting the requirements of 40 CFR, Part 60, Subpart IIII for the generators. No further requirements apply to the generator under 40 CFR, Part 63, Subpart ZZZZ.

Compliance Demonstration:

The generator will meet the requirements of Subpart ZZZZ by meeting the requirements of Subpart IIII. No further requirements are required for these generators under Subpart ZZZZ.

COMPLIANCE SCHEDULE

Bimbo Bakeries USA, Inc. is currently in compliance with all applicable air quality regulations.

TITLE IV – ACID RAIN

Not Applicable.

TITLE VI – OZONE DEPLETING SUBSTANCES

Bimbo Bakeries USA, Inc. is subject to Title VI requirements.

SECTION 112(r) – ACCIDENTAL RELEASE

Bimbo Bakeries USA, Inc. is not subject to the requirements of Section 112(r).

PERMIT SHIELD

Bimbo Bakeries USA, Inc. did request a permit shield. The facility requested that a permit shield be expressly included in the Permittee's Part 70 permit. Permit shields are granted on an emission unit by emission unit basis. If an emission unit is covered by a permit shield, a permit shield statement will follow the emission unit table in Section IV - Plant Specific Conditions of the permit. In this case, a permit shield was granted for each emission unit covered by the permit.

INSIGNIFICANT ACTIVITIES

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

(1) No. 1 Stationary internal combustion engines with an output less than 500 brake horsepower (373 kilowatts) and which are not used to generate electricity for sale or for peak or load shaving;

The 25 hp natural gas-fired Kohler emergency engine is subject to the following requirements:

(A) COMAR 26.11.09.05E(2), Emissions During Idle Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.

(B) COMAR 26.11.09.05E(3), Emissions During Operating Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.

(C) Exceptions:

(i) COMAR 26.11.09.05E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.

(ii) COMAR 26.11.09.05E(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:

(a) Engines that are idled continuously when not in service: 30 minutes
(b) all other engines: 15 minutes.

(iii) COMAR 26.11.09.05E(2) & (3) do not apply while maintenance, repair or testing is being performed by qualified mechanics.

Note: The emergency engine is subject to the 40 CFR 60, Subpart JJJJ regulations.

(2) ✓ First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process;

(3) ✓ Comfort air conditioning subject to requirements of Title VI of the Clean Air Act;

(4) any other emissions unit at the facility which is not subject to an applicable requirement of the Clean Air Act (list and describe):

No. 1 Wastewater pretreatment plant that reduces suspended solids and biological oxygen demand (BOD) in plant wastewater before discharge to Frederick County wastewater treatment plant. Emissions of VOC range from 100 to 150 pounds per million gallons of wastewater pre-treated. The facility pre-treats less than 3 million gallons of wastewater per year. The facility has one (1) flare to control exhaust gases from the anaerobic digester on the wastewater treatment system (ARA Registration No. 021-0234-9-0220).

The wastewater treatment system and associated flare are subject to the following requirements:

Operating Conditions

(1) The exhaust gases from the anaerobic digester shall vent through the flare prior to discharging to the atmosphere to meet the visible emissions, nuisance, and odor requirements of COMAR

26.11.06.02C(1), COMAR 26.11.06.08, and COMAR 26.11.06.09.

(2) The Permittee shall check for proper function of spark ignition of the flare or the presence of flare flame at least once per operating day.

Monitoring, Record Keeping, and Reporting

(3) The Permittee shall maintain for at least five (5) years, and shall make available to the Department upon request, records of the following information:

(a) Logs indicating the proper function of spark ignition or the presence of flare flame collected at least once per operating day and records of any downtime for the flare; and

(b) Records of maintenance of the flare system.

STATE ONLY ENFORCEABLE REQUIREMENTS

The Permittee is subject to the following State-only enforceable requirements:

1. Applicable Regulations:

   (a) COMAR 26.11.06.08 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.

   (b) COMAR 26.11.15.05, which requires that the Permittee implement "Best Available Control Technology for Toxics" (T – BACT) to control emissions of toxic air pollutants.

   (c) COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions will unreasonably endanger human health

2. Operating Conditions: No additional requirements.

3. Testing and Monitoring: No additional requirements.

4. Record Keeping and Reporting:

   The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. The analysis shall include either:

   (a) a statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or

   (b) a revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.

BIMBO BAKERIES USA, INC.
7110 ENGLISH MUFFIN WAY
FREDERICK, MD 21704
DRAFT PART 70 OPERATING PERMIT NO. 24-021-0234

SECTION I SOURCE IDENTIFICATION

1. DESCRIPTION OF FACILITY

Bimbo Bakeries USA, Inc. – Frederick Plant is located at 7110 English Muffin Way in Frederick, Maryland 21704, and is a commercial baking facility utilizing a sponge dough process to produce several varieties of English Muffins.

Flour, water and yeast are mixed and allowed to ferment for 2 hours. Additional ingredients, such as fruit, are added to the fermented dough and the mixture is charged into a hopper. Dough pieces are cut from a divider and the pieces are dropped onto trays that are covered with farina (coarsely ground wheat). The loaded tray is then transferred to a proof box for a half an hour. The proofed dough pieces are transferred to an oven where they are baked for approximately 5 minutes. Each production has its own oven, and each oven is vented to the atmosphere. Finished muffins are transferred to a spiral cooler for 25 minutes and then packaged for shipment. The primary SIC code for the facility is 2051.

The facility operates a wastewater pre-treatment plant that uses an aerobic and anaerobic process in plant wastewater before the wastewater is discharged to the Frederick County wastewater treatment plant. The Plant discharges approximately 10,000 gallons per day to the Frederick County wastewater treatment plant.

2. FACILITY INVENTORY LIST

Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
A-01	5-0293	One (1) Johnston Boiler Company model PFTA250-4G150S boiler, 9.8 MMBtu/hr maximum heat input, burns natural gas only	10/2003
A-02	5-0333	One (1) Johnston Boiler Company model PFTA250-4G150S boiler, 9.8 MMBtu/hr maximum heat input, burns natural gas only	10/2004
B-01	8-0081	Baking Oven No. 1, APV Baker Continuous Band Baking Oven, input rate of 1680 dozen muffins per hour, 2.0 MMBtu/hr maximum heat input	06/1977

B-02	8-0082	Baking Oven No. 2, APV Baker Continuous Band Baking Oven, input rate of 1680 dozen muffins per hour, 2.0 MMBtu/hr maximum heat input	06/1977
B-03	8-0083	Baking Oven No. 3, APV Baker Continuous Band Baking Oven, input rate of 2520 dozen muffins per hour, 3.7 MMBtu/hr maximum heat input	02/1996
B-04	8-0084	Baking Oven No. 4, APV Baker Continuous Band Baking Oven, input rate of 1680 dozen muffins per hour, 2.0 MMBtu/hr maximum heat input	03/1991
E-01	8-0085	One (1) vacuum system that reclaims unburned (recyclable) farina, and is controlled with a filter	06/1977
F-01	8-0086	One (1) vacuum system that reclaims burnt (non-recyclable) farina for disposal, and is controlled with a filter	06/1977
C-01	9-0219	Ten (10) silos controlled with baghouses, for storage of white flour, wheat flour, and farina; includes eight (8) silos with nominal capacities of 100,000 pounds each, and two (2) silos with nominal capacities of 80,000 pounds each	06/1977 or later
	8-0136	Dry ingredient scaling room controlled with a baghouse	03/2021
G-01	9-0471	One (1) Cumins DQKAA emergency generator equipped with a diesel fired engine rated at 1750 kilowatts	06/2022
1-01	9-0220	One (1) wastewater pretreatment plant processing 10,000 gallons/day. Biogas generated by the anaerobic digester is controlled via flare.	08/2018

SECTION II GENERAL CONDITIONS

1. DEFINITIONS

[COMAR 26.11.01.01] and [COMAR 26.11.02.01]

The words or terms in this Part 70 permit shall have the meanings established under COMAR 26.11.01 and .02 unless otherwise stated in this permit.

2. ACRONYMS

ARA	Air and Radiation Administration
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEM	Continuous Emissions Monitor
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMAR	Code of Maryland Regulations
EPA	United States Environmental Protection Agency
FR	Federal Register
gr	grains
HAP	Hazardous Air Pollutant
MACT	Maximum Achievable Control Technology
MDE	Maryland Department of the Environment
MVAC	Motor Vehicle Air Conditioner
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
OTR	Ozone Transport Region
PM	Particulate Matter
PM10	Particulate Matter with Nominal Aerodynamic Diameter of 10 micrometers or less
ppm	parts per million
ppb	parts per billion
PSD	Prevention of Significant Deterioration
PTC	Permit to construct
PTO	Permit to operate (State)
SIC	Standard Industrial Classification

SO_2	Sulfur Dioxide
TAP	Toxic Air Pollutant
tpy	tons per year
VE	Visible Emissions
VOC	Volatile Organic Compounds

3. EFFECTIVE DATE

The effective date of the conditions in this Part 70 permit is the date of permit issuance, unless otherwise stated in the permit.

4. PERMIT EXPIRATION

[COMAR 26.11.03.13B(2)]

Upon expiration of this permit, the terms of the permit will automatically continue to remain in effect until a new Part 70 permit is issued for this facility provided that the Permittee has submitted a timely and complete application and has paid applicable fees under COMAR 26.11.02.16.

Otherwise, upon expiration of this permit the right of the Permittee to operate this facility is terminated.

5. PERMIT RENEWAL

[COMAR 26.11.03.02B(3)] and [COMAR 26.11.03.02E]

The Permittee shall submit to the Department a completed application for renewal of this Part 70 permit at least 12 months before the expiration of the permit. Upon submitting a completed application, the Permittee may continue to operate this facility pending final action by the Department on the renewal.

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information no later than 10 days after becoming aware that this occurred. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a completed application was submitted, but prior to the release of a draft permit. This

information shall be submitted to the Department no later than 20 days after a new requirement has been adopted.

6. CONFIDENTIAL INFORMATION

[COMAR 26.11.02.02G]

In accordance with the provisions of the State Government Article, Sec. 10-611 et seq., Annotated Code of Maryland, all information submitted in an application shall be considered part of the public record and available for inspection and copying, unless the Permittee claims that the information is confidential when it is submitted to the Department. At the time of the request for inspection or copying, the Department will make a determination with regard to the confidentiality of the information. The Permittee, when requesting confidentiality, shall identify the information in a manner specified by the Department and, when requested by the Department, promptly provide specific reasons supporting the claim of confidentiality. Information submitted to the Department without a request that the information be deemed confidential may be made available to the public. Subject to approval of the Department, the Permittee may provide a summary of confidential information that is suitable for public review. The content of this Part 70 permit is not subject to confidential treatment.

7. PERMIT ACTIONS

[COMAR 26.11.03.06E(3)] and [COMAR 26.11.03.20(A)]

This Part 70 permit may be revoked or reopened and revised for cause. The filing of an application by the Permittee for a permit revision or renewal; or a notification of termination, planned changes or anticipated noncompliance by the facility, does not stay a term or condition of this permit.

The Department shall reopen and revise, or revoke the Permittee's Part 70 permit under the following circumstances:

a. Additional requirements of the Clean Air Act become applicable to this facility and the remaining permit term is 3 years or more;

b. The Department or the EPA determines that this Part 70 permit contains a material mistake, or is based on false or inaccurate information supplied by or on behalf of the Permittee;

c. The Department or the EPA determines that this Part 70 permit must be revised or revoked to assure compliance with applicable requirements of the Clean Air Act; or

d. Additional requirements become applicable to an affected source under the Federal Acid Rain Program.

8. PERMIT AVAILABILITY

[COMAR 26.11.02.13G]

The Permittee shall maintain this Part 70 permit in the vicinity of the facility for which it was issued, unless it is not practical to do so, and make this permit immediately available to officials of the Department upon request.

9. REOPENING THE PART 70 PERMIT FOR CAUSE BY THE EPA

[COMAR 26.11.03.20B]

The EPA may terminate, modify, or revoke and reissue a permit for cause as prescribed in 40 CFR §70.7(g)

10. TRANSFER OF PERMIT

[COMAR 26.11.02.02E]

The Permittee shall not transfer this Part 70 permit except as provided in COMAR 26.11.03.15.

11. REVISION OF PART 70 PERMITS – GENERAL CONDITIONS

[COMAR 26.11.03.14] and [COMAR 26.11.03.06A(8)]

a. The Permittee shall submit an application to the Department to revise this Part 70 permit when required under COMAR 26.11.03.15 -.17.

b. When applying for a revision to a Part 70 permit, the Permittee shall comply with the requirements of COMAR 26.11.03.02 and .03 except that the application for a revision need include only information listed that is related to the proposed change to the source and revision to the permit. This information shall be sufficient to evaluate the proposed change and to determine whether it will comply with all applicable requirements of the Clean Air Act.

c. The Permittee may not change any provision of a compliance plan or schedule in a Part 70 permit as an administrative permit amendment or as a minor permit modification unless the change has been approved by the Department in writing.

d. A permit revision is not required for a change that is provided for in this permit relating to approved economic incentives, marketable permits, emissions trading, and other similar programs.

12. SIGNIFICANT PART 70 OPERATING PERMIT MODIFICATIONS

[COMAR 26.11.03.17]

The Permittee may apply to the Department to make a significant modification to its Part 70 Permit as provided in COMAR 26.11.03.17 and in accordance with the following conditions:

a. A significant modification is a revision to the federally enforceable provisions in the permit that does not qualify as an administrative permit amendment under COMAR 26.11.03.15 or a minor permit modification as defined under COMAR 26.11.03.16.

b. This permit does not preclude the Permittee from making changes, consistent with the provisions of COMAR 26.11.03, that would make the permit or particular terms and conditions of the permit irrelevant, such as by shutting down or reducing the level of operation of a source or of an emissions unit within the source. Air pollution control equipment shall not be shut down or its level of operation reduced if doing so would violate any term of this permit.

c. Significant permit modifications are subject to all requirements of COMAR 26.11.03 as they apply to permit issuance and renewal,

including the requirements for applications, public participation, and review by affected states and EPA, except:

(1) An application need include only information pertaining to the proposed change to the source and modification of this permit, including a description of the change and modification, and any new applicable requirements of the Clean Air Act that will apply if the change occurs;

(2) Public participation, and review by affected states and EPA, is limited to only the application and those federally enforceable terms and conditions of the Part 70 permit that are affected by the significant permit modification.

d. As provided in COMAR 26.11.03.15B(5), an administrative permit amendment may be used to make a change that would otherwise require a significant permit modification if procedures for enhanced preconstruction review of the change are followed that satisfy the requirements of 40 CFR 70.7(d)(1)(v).

e. Before making a change that qualifies as a significant permit modification, the Permittee shall obtain all permits-to-construct and approvals required by COMAR 26.11.02.

f. The Permittee shall not make a significant permit modification that results in a violation of any applicable requirement of the Clean Air Act.

g. The permit shield in COMAR 26.11.03.23 applies to a final significant permit modification that has been issued by the Department, to the extent applicable under COMAR 26.11.03.23.

13. MINOR PERMIT MODIFICATIONS

[COMAR 26.11.03.16]

The Permittee may apply to the Department to make a minor modification to the federally enforceable provisions of this Part 70 permit as provided in COMAR 26.11.03.16 and in accordance with the following conditions:

a. A minor permit modification is a Part 70 permit revision that:

(1) Does not result in a violation of any applicable requirement of the Clean Air Act;

(2) Does not significantly revise existing federally enforceable monitoring, including test methods, reporting, record keeping, or compliance certification requirements except by:

(a) Adding new requirements,

(b) Eliminating the requirements if they are rendered meaningless because the emissions to which the requirements apply will no longer occur, or

(c) Changing from one approved test method for a pollutant and source category to another;

(3) Does not require or modify a:

(a) Case-by-case determination of a federally enforceable emissions standard,

(b) Source specific determination for temporary sources of ambient impacts, or

(c) Visibility or increment analysis;

(4) Does not seek to establish or modify a federally enforceable permit term or condition for which there is no corresponding underlying applicable requirement of the Clean Air Act, but that the Permittee has assumed to avoid an applicable requirement to which the source would otherwise be subject, including:

(a) A federally enforceable emissions standard applied to the source pursuant to COMAR 26.11.02.03 to avoid classification as a Title I modification; and

(b) An alternative emissions standard applied to an emissions unit pursuant to regulations promulgated under Section 112(i)(5) of the Clean Air Act

(5) Is not a Title I modification; and

(6) Is not required under COMAR 26.11.03.17 to be processed as a significant modification to this Part 70 permit.

b. Application for a Minor Permit Modification

The Permittee shall submit to the Department an application for a minor permit modification that satisfies the requirements of COMAR 26.11.03.03 which includes the following:

(1) A description of the proposed change, the emissions resulting from the change, and any new applicable requirements that will apply if the change is made;

(2) The proposed minor permit modification;

(3) Certification by a responsible official, in accordance with COMAR 26.11.02.02F, that:

(a) The proposed change meets the criteria for a minor permit modification, and

(b) The Permittee has obtained or applied for all required permits-to-construct required by COMAR 26.11.03.16 with respect to the proposed change;

(4) Completed forms for the Department to use to notify the EPA and affected states, as required by COMAR 26.11.03.07-.12.

c. Permittee's Ability to Make Change

(1) For changes proposed as minor permit modifications to this permit that will require the applicant to obtain a permit to construct, the permit to construct must be issued prior to the new change.

(2) During the period of time after the Permittee applies for a minor modification but before the Department acts in accordance with COMAR 26.11.03.16F(2):

(a) The Permittee shall comply with applicable requirements of the Clean Air Act related to the change and the permit terms and conditions described in the application for the minor modification.

(b) The Permittee is not required to comply with the terms and conditions in the permit it seeks to modify. If the Permittee fails to comply with the terms and conditions in the application during this time, the terms and conditions of both this permit and the application for modification may be enforced against it.

d. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.16 is not within the scope of this regulation.

e. Minor permit modification procedures may be used for Part 70 permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, but only to the extent that the minor permit modification procedures are explicitly provided for in regulations approved by the EPA as part of the Maryland SIP or in other applicable requirements of the Clean Air Act.

14. ADMINISTRATIVE PART 70 OPERATING PERMIT AMENDMENTS

[COMAR 26.11.03.15]

The Permittee may apply to the department to make an administrative permit amendment as provided in COMAR 26.11.03.15 and in accordance with the following conditions:

a. An application for an administrative permit amendment shall:

(1) Be in writing;

(2) Include a statement certified by a responsible official that the proposed amendment meets the criteria in COMAR 26.11.03.15 for an administrative permit amendment, and

(3) Identify those provisions of this part 70 permit for which the amendment is requested, including the basis for the request.

b. An administrative permit amendment:

(1) Is a correction of a typographical error;

(2) Identifies a change in the name, address, or phone number of a person identified in this permit, or a similar administrative change involving the Permittee or other matters which are not directly related to the control of air pollution;

(3) requires more frequent monitoring or reporting by the Permittee;

(4) Allows for a change in ownership or operational control of a source for which the Department determines that no other revision to the permit is necessary and is documented as per COMAR 26.11.03.15B(4);

(5) Incorporates into this permit the requirements from preconstruction review permits or approvals issued by the Department in accordance with COMAR 26.11.03.15B(5), but only if it satisfies 40 CFR 70.7(d)(1)(v);

(6) Incorporates any other type of change, as approved by the EPA, which is similar to those in COMAR 26.11.03.15B(1)—(4);

(7) Notwithstanding COMAR 26.11.03.15B(1)—(6), all modifications to acid rain control provisions included in this Part 70 permit are governed by applicable requirements promulgated under Title IV of the Clean Air Act; or

(8) Incorporates any change to a term or condition specified as State-only enforceable, if the Permittee has obtained all necessary permits-to-construct and approvals that apply to the change.

c. The Permittee may make the change addressed in the application for an administrative amendment upon receipt by the Department of the application, if all permits-to-construct or approvals otherwise required by COMAR 26.11.02 prior to making the change have first been obtained from the Department.

d. The permit shield in COMAR 26.11.03.23 applies to administrative permit amendments made under Section B(5) of COMAR 26.11.03.15 , but only after the Department takes final action to revise the permit.

e. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.15 is not within the scope of this regulation.

15. OFF-PERMIT CHANGES TO THIS SOURCE

[COMAR 26.11.03.19]

The Permittee may make off-permit changes to this facility as provided in COMAR 26.11.03.19 and in accordance with the following conditions:

a. The Permittee may make a change to this permitted facility that is not addressed or prohibited by the federally enforceable conditions of this Part 70 permit without obtaining a Part 70 permit revision if:

(1) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;

(2) The change is not subject to any requirements under Title IV of the Clean Air Act;

(3) The change is not a Title I modification; and

(4) The change does not violate an applicable requirement of the Clean Air Act or a federally enforceable term or condition of the permit.

b. For a change that qualifies under COMAR 26.11.03.19, the Permittee shall provide contemporaneous written notice to the Department and the EPA, except for a change to an emissions unit or activity that is exempt from the Part 70 permit application, as provided in COMAR 26.11.03.04. This written notice shall describe the change, including the date it was made, any change in emissions, including the pollutants emitted, and any new applicable requirements of the Clean Air Act that apply as a result of the change.

c. Upon satisfying the requirements of COMAR 26.11.03.19, the Permittee may make the proposed change.

d. The Permittee shall keep a record describing:

(1) Changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement of the Clean Air Act , but not otherwise regulated under this permit; and

(2) The emissions resulting from those changes.

e. Changes that qualify under COMAR 26.11.03.19 are not subject to the requirements for Part 70 revisions.

f. The Permittee shall include each off-permit change under COMAR 26.11.03.19 in the application for renewal of the part 70 permit.

g. The permit shield in COMAR 26.11.03.23 does not apply to off-permit changes made under COMAR 26.11.03.19.

h. The Permittee is subject to enforcement action if it is determined that an off-permit change made under COMAR 26.11.03.19 is not within the scope of this regulation.

16. ON-PERMIT CHANGES TO SOURCES

[COMAR 26.11.03.18]

The Permittee may make on-permit changes that are allowed under Section 502(b)(10) of the Clean Air Act as provided in COMAR 26.11.03.18 and in accordance with the following conditions:

a. The Permittee may make a change to this facility without obtaining a revision to this Part 70 permit if:

(1) The change is not a Title I modification;

(2) The change does not result in emissions in excess of those expressly allowed under the federally enforceable provisions of the Part 70 permit for the permitted facility or for an emissions unit within the facility, whether expressed as a rate of emissions or in terms of total emissions;

(3) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;

(4) The change does not violate an applicable requirement of the Clean Air Act;

(5) The change does not violate a federally enforceable permit term or condition related to monitoring, including test methods, record keeping, reporting, or compliance certification requirements;

(6) The change does not violate a federally enforceable permit term or condition limiting hours of operation, work practices, fuel usage, raw material usage, or production levels if the term or condition has been established to limit emissions allowable under this permit;

(7) If applicable, the change does not modify a federally enforceable provision of a compliance plan or schedule in this Part 70 permit unless the Department has approved the change in writing; and

(8) This permit does not expressly prohibit the change under COMAR 26.11.03.18.

b. The Permittee shall notify the Department and the EPA in writing of a proposed on-permit change under COMAR 26.11.03.18 not later than 7 days before the change is made. The written information shall include the following information:

(1) A description of the proposed change;

(2) The date on which the change is proposed to be made;

(3) Any change in emissions resulting from the change, including the pollutants emitted;

(4) Any new applicable requirement of the Clean Air Act; and

(5) Any permit term or condition that would no longer apply.

c. The responsible official of this facility shall certify in accordance with COMAR 26.11.02.02F that the proposed change meets the criteria for the use of on-permit changes under COMAR 26.11.03.18.

d. The Permittee shall attach a copy of each notice required by condition b. above to this Part 70 permit.

e. On-permit changes that qualify under COMAR 26.11.03.18 are not subject to the requirements for part 70 permit revisions.

f. Upon satisfying the requirements under COMAR 26.11.03.18, the Permittee may make the proposed change.

g. The permit shield in COMAR 26.11.03.23 does not apply to on-permit changes under COMAR 26.11.03.18.

h. The Permittee is subject to enforcement action if it is determined that an on-permit change made under COMAR 26.11.03.18 is not within the scope of the regulation or violates any requirement of the State air pollution control law.

17. FEE PAYMENT

[COMAR 26.11.02.16A(2) & (5)(b)]

a. The fee for this Part 70 permit is as prescribed in Regulation .19 of COMAR 26.11.02.

b. The fee is due on and shall be paid on or before each 12-month anniversary date of the permit.

c. Failure to pay the annual permit fee constitutes cause for revocation of the permit by the Department.

18. REQUIREMENTS FOR PERMITS-TO-CONSTRUCT AND APPROVALS

[COMAR 26.11.02.09.]

The Permittee may not construct or modify or cause to be constructed or modified any of the following sources without first obtaining, and having in current effect, the specified permits-to-construct and approvals:

a. New Source Review source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;

b. Prevention of Significant Deterioration source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;

c. New Source Performance Standard source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;

d. National Emission Standards for Hazardous Air Pollutants source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;

e. A stationary source of lead that discharges one ton per year or more of lead or lead compounds measured as elemental lead, permit to construct required, except for generating stations constructed by electric companies;

f. All stationary sources of air pollution, including installations and air pollution control equipment, except as listed in COMAR 26.11.02.10, permit to construct required;

g. In the event of a conflict between the applicability of (a.— e.) above and an exemption listed in COMAR 26.11.02.10, the provision that requires a permit applies.

h. Approval of a PSD or NSR source by the Department does not relieve the Permittee obtaining an approval from also obtaining all permits-to-construct required by (c.— g.) above.

19. CONSOLIDATION OF PROCEDURES FOR PUBLIC PARTICIPATION

[COMAR 26.11.02.11C] and [COMAR 26.11.03.01K]

The Permittee may request the Department to authorize special procedures for the Permittee to apply simultaneously, to the extent possible, for a permit to construct and a revision to this permit.

These procedures may provide for combined public notices, informational meetings, and public hearings for both permits but shall not adversely affect the rights of a person, including EPA and affected states, to obtain information about the application for a permit, to comment on an application, or to challenge a permit that is issued.

These procedures shall not alter any existing permit procedures or time frames.

20. PROPERTY RIGHTS

[COMAR 26.11.03.06E(4)]

This Part 70 permit does not convey any property rights of any sort, or any exclusive privileges.

21. SEVERABILITY

[COMAR 26.11.03.06A(5)]

If any portion of this Part 70 permit is challenged, or any term or condition deemed unenforceable, the remainder of the requirements of the permit continues to be valid.

22. INSPECTION AND ENTRY

[COMAR 26.11.03.06G(3)]

The Permittee shall allow employees and authorized representatives of the Department, the EPA, and local environmental health agencies, upon presentation of credentials or other documents as may be required by law, to:

a. Enter at a reasonable time without delay and without prior notification the Permittee's property where a Part 70 source is located, emissions-related activity is conducted, or records required by this permit are kept;

b. Have access to and make copies of records required by the permit;

c. Inspect all emissions units within the facility subject to the permit and all related monitoring systems, air pollution control equipment, and practices or operations regulated or required by the permit; and

d. Sample or monitor any substances or parameters at or related to the emissions units at the facility for the purpose of determining compliance with the permit.

23. DUTY TO PROVIDE INFORMATION

[COMAR 26.11.03.06E(5)]

The Permittee shall furnish to the Department, within a reasonable time specified by the Department, information requested in writing by the Department in order to determine whether the Permittee is in compliance with the federally enforceable conditions of this Part 70 permit, or whether cause exists for revising or revoking the permit. Upon request, the Permittee shall also furnish to the Department records required to be kept under the permit.

For information claimed by the Permittee to be confidential and therefore potentially not discloseable to the public, the Department may require the Permittee to provide a copy of the records directly to the EPA along with a claim of confidentiality.

The Permittee shall also furnish to the Department, within a reasonable time specified by the Department, information or records requested in writing by the Department in order to determine if the Permittee is in compliance with the State-only enforceable conditions of this permit.

24. COMPLIANCE REQUIREMENTS

[COMAR 26.11.03.06E(1)] and [COMAR 26.11.03.06A(11)] and [COMAR 26.11.02.05]

The Permittee shall comply with the conditions of this Part 70 permit. Noncompliance with the permit constitutes a violation of the Clean Air Act, and/or the Environment Article Title 2 of the Annotated Code of Maryland and may subject the Permittee to:

a. Enforcement action,

b. Permit revocation or revision,

c. Denial of the renewal of a Part 70 permit, or

d. Any combination of these actions.

The conditions in this Part 70 permit are enforceable by EPA and citizens under the Clean Air Act except for the State-only enforceable conditions.

Under Environment Article Section 2-609, Annotated Code of Maryland, the Department may seek immediate injunctive relief against a person who violates this permit in such a manner as to cause a threat to human health or the environment.

25. CREDIBLE EVIDENCE

Nothing in this permit shall be interpreted to preclude the use of credible evidence to demonstrate noncompliance with any term of this permit.

26. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

[COMAR 26.11.03.06E(2)]

The need to halt or reduce activity in order to comply with the conditions of this permit may not be used as a defense in an enforcement action.

27. CIRCUMVENTION

[COMAR 26.11.01.06]

The Permittee may not install or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total weight of emissions, conceals or dilutes emissions which would otherwise constitute a violation of any applicable air pollution control regulation.

28. PERMIT SHIELD

[COMAR 26.11.03.23]

A permit shield as described in COMAR 26.11.03.23 shall apply only to terms and conditions in this Part 70 permit that have been specifically

identified as covered by the permit shield. Neither this permit nor COMAR 26.11.03.23 alters the following:

a. The emergency order provisions in Section 303 of the Clean Air Act, including the authority of EPA under that section;

b. The liability of the Permittee for a violation of an applicable requirement of the Clean Air Act before or when this permit is issued or for a violation that continues after issuance;

c. The requirements of the Acid Rain Program, consistent with Section 408(a) of the Clean Air Act;

d. The ability of the Department or EPA to obtain information from a source pursuant to Maryland law and Section 114 of the Clean Air Act; or

e. The authority of the Department to enforce an applicable requirement of the State air pollution control law that is not an applicable requirement of the Clean Air Act.

29. ALTERNATE OPERATING SCENARIOS

[COMAR 26.11.03.06A(9)]

For all alternate operating scenarios approved by the Department and contained within this permit, the Permittee, while changing from one approved scenario to another, shall contemporaneously record in a log maintained at the facility each scenario under which the emissions unit is operating and the date and time the scenario started and ended.

SECTION III PLANT WIDE CONDITIONS

1. PARTICULATE MATTER FROM CONSTRUCTION AND DEMOLITION

[COMAR 26.11.06.03D]

The Permittee shall not cause or permit any building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.

2. OPEN BURNING

[COMAR 26.11.07]

Except as provided in COMAR 26.11.07.04, the Permittee shall not cause or permit an open fire from June 1 through August 31 of any calendar year. Prior to any open burning, the Permittee shall request and receive approval from the Department.

3. AIR POLLUTION EPISODE

[COMAR 26.11.05.04]

When requested by the Department, the Permittee shall prepare in writing standby emissions reduction plans, consistent with good industrial practice and safe operating procedures, for reducing emissions creating air pollution during periods of Alert, Warning, and Emergency of an air pollution episode.

4. REPORT OF EXCESS EMISSIONS AND DEVIATIONS

[COMAR 26.11.01.07] and [COMAR 26.11.03.06C(7)]

The Permittee shall comply with the following conditions for occurrences of excess emissions and deviations from requirements of this permit, including those in Section VI – State-only Enforceable Conditions:

a. Report any deviation from permit requirements that could endanger human health or the environment, by orally notifying the Department immediately upon discovery of the deviation;

b. Promptly report all occurrences of excess emissions that are expected to last for one hour or longer by orally notifying the Department of the onset and termination of the occurrence;

c. When requested by the Department the Permittee shall report all deviations from permit conditions, including those attributed to malfunctions as defined in COMAR 26.11.01.07A, within 5 days of the request by submitting a written description of the deviation to the Department. The written report shall include the cause, dates and times of the onset and termination of the deviation, and an account of all actions planned or taken to reduce, eliminate, and prevent recurrence of the deviation;

d. The Permittee shall submit to the Department semi-annual monitoring reports that confirm that all required monitoring was performed, and that provide accounts of all deviations from permit requirements that occurred during the reporting periods. Reporting periods shall be January 1 through June 30 and July 1 through December 31, and reports shall be submitted within 30 days of the end of each reporting period. Each account of deviation shall include a description of the deviation, the dates and times of onset and termination, identification of the person who observed or discovered the deviation, causes and corrective actions taken, and actions taken to prevent recurrence. If no deviations from permit conditions occurred during a reporting period, the Permittee shall submit a written report that so states.

e. When requested by the Department, the Permittee shall submit a written report to the Department within 10 days of receiving the request concerning an occurrence of excess emissions. The report shall contain the information required in COMAR 26.11.01.07D(2).

5. ACCIDENTAL RELEASE PROVISIONS

[COMAR 26.11.03.03B(23)] and [40 CFR 68]

Should the Permittee become subject to 40 CFR 68 during the term of this permit, the Permittee shall submit risk management plans by the date

specified in 40 CFR 68.150 and shall certify compliance with the requirements of 40 CFR 68 as part of the annual compliance certification as required by 40 CFR 70.

The Permittee shall initiate a permit revision or reopening according to the procedures of 40 CFR 70.7 to incorporate appropriate permit conditions into the Permittee's Part 70 permit.

6. GENERAL TESTING REQUIREMENTS

[COMAR 26.11.01.04]

The Department may require the Permittee to conduct, or have conducted, testing to determine compliance with this Part 70 permit. The Department, at its option, may witness or conduct these tests. This testing shall be done at a reasonable time, and all information gathered during a testing operation shall be provided to the Department.

7. EMISSIONS TEST METHODS

[COMAR 26.11.01.04]

Compliance with the emissions standards and limitations in this Part 70 permit shall be determined by the test methods designated and described below or other test methods submitted to and approved by the Department.

Reference documents of the test methods approved by the Department include the following:

a. 40 CFR 60, appendix A

b. 40 CFR 51, appendix M

c. The Department's Technical Memorandum 91-01 "Test Methods and Equipment Specifications for Stationary Sources", (January 1991), as amended through Supplement 3, (October 1, 1997)

8. EMISSIONS CERTIFICATION REPORT

[COMAR 26.11.01.05-1] and [COMAR 26.11.02.19C] and [COMAR 26.11.02.19D]

The Permittee shall certify actual annual emissions of regulated pollutants from the facility on a calendar year basis.

a. The certification shall be on forms obtained from the Department and submitted to the Department not later than April 1 of the year following the year for which the certification is required;

b. The individual making the certification shall certify that the information is accurate to the individual's best knowledge. The individual shall be:

(1) Familiar with each source for which the certifications forms are submitted, and

(2) Responsible for the accuracy of the emissions information;

c. The Permittee shall maintain records necessary to support the emissions certification including the following information if applicable:

(1) The total amount of actual emissions of each regulated pollutant and the total of all regulated pollutants;

(2) An explanation of the methods used to quantify the emissions and the operating schedules and production data that were used to determine emissions, including significant assumptions made;

(3) Amounts, types and analyses of all fuels used;

(4) Emissions data from continuous emissions monitors that are required by this permit, including monitor calibration and malfunction information;

(5) Identification, description, and use records of all air pollution control equipment and compliance monitoring equipment including:

(a) Significant maintenance performed,
(b) Malfunctions and downtime, and
(c) Episodes of reduced efficiency of all equipment;

(6) Limitations on source operation or any work practice standards that significantly affect emissions; and

(7) Other relevant information as required by the Department.

9. COMPLIANCE CERTIFICATION REPORT

[COMAR 26.11.03.06G(6) and (7)]

The Permittee shall submit to the Department and EPA Region III a report certifying compliance with each term of this Part 70 permit including each applicable standard, emissions limitation, and work practice for the previous calendar year by April 1 of each year.

a. The compliance certification shall include:

(1) The identification of each term or condition of this permit which is the basis of the certification;

(2) The compliance status;

(3) Whether the compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of each source, currently and over the reporting period; and

(5) Any other information required to be reported to the Department that is necessary to determine the compliance status of the Permittee with this permit.

b. The Permittee shall submit the compliance certification reports to the Department and EPA simultaneously.

10. CERTIFICATION BY RESPONSIBLE OFFICIAL

[COMAR 26.11.02.02F]

All application forms, reports, and compliance certifications submitted pursuant to this permit shall be certified by a responsible official as to truth, accuracy, and completeness. The Permittee shall expeditiously notify the Department of an appointment of a new responsible official.

The certification shall be in the following form:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

11. SAMPLING AND EMISSIONS TESTING RECORD KEEPING

[COMAR 26.11.03.06C(5)]

The Permittee shall gather and retain the following information when sampling and testing for compliance demonstrations:

a. The location as specified in this permit, and the date and time that samples and measurements are taken;

b. All pertinent operating conditions existing at the time that samples and measurements are taken;

c. The date that each analysis of a sample or emissions test is performed and the name of the person taking the sample or performing the emissions test;

d. The identity of the Permittee, individual, or other entity that performed the analysis;

e. The analytical techniques and methods used; and

f. The results of each analysis.

12. GENERAL RECORDKEEPING

[COMAR 26.11.03.06C(6)]

The Permittee shall retain records of all monitoring data and information that support the compliance certification for a period of five (5) years from the date that the monitoring, sample measurement, application, report or emissions test was completed or submitted to the Department.

These records and support information shall include:

a. All calibration and maintenance records;

b. All original data collected from continuous monitoring instrumentation;

c. Records which support the annual emissions certification; and

d. Copies of all reports required by this permit.

13. GENERAL CONFORMITY

[COMAR 26.11.26.09]

The Permittee shall comply with the general conformity requirements of 40 CFR 93, Subpart B and COMAR 26.11.26.09.

14. ASBESTOS PROVISIONS

[40 CFR 61, Subpart M]

The Permittee shall comply with 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

15. OZONE DEPLETING REGULATIONS

[40 CFR 82, Subpart F]

The Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for MVACs in subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the prohibitions and required practices pursuant to 40 CFR 82.154 and 82.156.

b. Equipment used during the maintenance, service, repair or disposal of appliances shall comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repairs or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.

d. Persons disposing of small appliances, MVACS, and MVAC-like appliances as defined in 40 CFR 82.152, shall comply with record keeping requirements pursuant to 40 CFR 82.155.

e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.

f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

16. ACID RAIN PERMIT

Not applicable

SECTION IV PLANT SPECIFIC CONDITIONS

This section provides tables that include the emissions standards, emissions limitations, and work practices applicable to each emissions unit located at this facility. The Permittee shall comply with all applicable emissions standards, emissions limitations and work practices included herein.

The tables also include testing, monitoring, record keeping and reporting requirements specific to each emissions unit. In addition to the requirements included here in **Section IV**, the Permittee is also subject to the general testing, monitoring, record keeping and reporting requirements included in **Section III – Plant Wide Conditions** of this permit.

Unless otherwise provided in the specific requirements for an emissions unit, the Permittee shall maintain at the facility for at least five (5) years, and shall make available to the Department upon request, all records that the Permittee is required under this section to establish. [Authority: COMAR 26.11.03.06C(5)(g)]

Table IV – 1 (Boilers)	
1.0	**Emissions Unit Number(s):** **A-01:** One (1) Johnston Boiler Company Model PFTA250-4G150S Boiler, rated at 9.8 million BTU per hour maximum heat input and fired by natural gas only (ARA Registration No. 021-0234-5-0293) **A-02**: One (1) Johnston Boiler Company Model PFTA250-4G150S Boiler, rated at 9.8 million BTU per hour maximum heat input and fired by natural gas only (ARA Registration No. 021-0234-5-0333)
1.1	**Applicable Standards/Limits:** A. Visible Emissions Limitations **COMAR 26.11.09.05A(1)**, which requires installations located in Area II of the State that a person not cause or permit the discharge of emissions from any fuel burning equipment, other than water in uncombined form, which is greater than 20 percent opacity. Exceptions. **COMAR 26.11.09.05A(3)** establishes that Section A(1) does not apply "to emissions during load changing, soot blowing, start-up, or adjustments or occasional cleaning of control equipment if: (a) the visible emissions are not greater than 40 percent opacity; and (b) the visible

Table IV – 1 (Boilers)	
	emissions do not occur for more than 6 consecutive minutes in any sixty minute period." B. Operational Limitation: The Permittee shall burn only natural gas in the boilers unless the Permittee obtains from the Department written authorization to burn alternative fuels. [Authority: COMAR 26.11.02.09A]
1.2	**Testing Requirements:** A. & B. See record keeping and reporting requirements.
1.3	**Monitoring Requirements:** A. & B. See record keeping and reporting requirements.
1.4	**Record Keeping Requirements:** A. & B. The Permittee shall keep for at least five years a monthly record of fuel combusted or the amounts of each type of fuel delivered to the property each month.
1.5	**Reporting Requirements:** A. & B. The Permittee shall report occurrences of visible emissions from the boilers in accordance with conditions number 4 ("Report of Excess Emissions and Deviations"), and number 9 ("Compliance Certification Report") of Section III – Plant Wide Conditions.

*These units are covered by a Permit Shield.

Table IV – 2 (Commercial Bakery Ovens)	
2.0	**Emissions Unit Number(s):** **B-01:** Baking Oven No. 1, APV Baker Continuous Band Baking Oven, input rate of 1680 dozen muffins per hour, 2.0 million BTU per hour maximum heat input, installed in 1977 (ARA Registration No. 021-0234-8-0081) **B-02:** Baking Oven No. 2, APV Baker Continuous Band Baking Oven, input rate of 1680 dozen muffins per hour, 2.0 million BTU per hour maximum heat input, installed in 1977 (ARA Registration No. 021-0234-8-0082) **B-03:** Baking Oven No. 3, APV Baker Continuous Band Baking Oven, input rate of 2520 dozen muffins per hour, 3.7 million BTU per hour maximum heat input, installed in 1996 (ARA Registration No. 021-0234-8-0083) **B-04:** Baking Oven No. 4, AP Baker Continuous Band Baking Oven, input rate of 1680 dozen muffins per hour, 2.0 million BTU per hour maximum heat input, installed in 1991 (ARA Registration No. 021-0234-8-0084)
2.1	**Applicable Standards/Limits:** A. Visible Emissions Limitations A1. **COMAR 26.11.06.02C(1)**, which requires that a person not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is greater than 20 percent opacity. Exceptions: **COMAR 26.11.06.02A(2)** establishes that "the visible emissions standards in COMAR 26.11.06.02C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) the visible emissions are not greater than 40 percent opacity; and (b) the visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period." A2. **Operational Requirement**: The Permittee shall burn only natural gas in each oven unless the Permittee obtains from the Department written authorization to burn alternative fuels. [Authority: COMAR

Table IV – 2 (Commercial Bakery Ovens)	
	26.11.02.09A] B. Control of Particulate **COMAR 26.11.06.03B(1)(a)**, which limits the concentration of particulate matter in process exhaust gases to not more than 0.05 grains per standard cubic foot of dry gas. C. Control of VOC C1. **COMAR 26.11.19.21**, which establishes requirements for control of VOC from commercial bakery ovens. C2. In accordance with **COMAR 26.11.19.21C(2) & D(1)**, if the facility's largest commercial bakery oven exceeds the average annual production tonnage of finished bread, rolls, or other yeast-raised products for the corresponding Yt value listed below, then thereafter the Permittee shall be subject to COMAR 26.11.19.21D(2). (1) 10,000 tons with a Yt value of greater than 11.0; (2) 15,000 tons with a Yt value between 8.1 and 11.0; (3) 22,500 tons with a Yt value less than 5 and 8.0; (4) 28,000 tons with a Yt value less than 5. C3. In accordance with **COMAR 26.11.19.21C(5)**, for any commercial bakery oven constructed on or after January 1, 1994 that satisfies the conditions in COMAR 26.11.19.21D(1) the Permittee shall comply with COMAR 26.11.19.21D(2). C4. In accordance with **COMAR 26.11.19.21D(2)**, if an affected commercial bakery oven satisfies any of the conditions in COMAR 26.11.19.21D(1), the Permittee shall not cause or permit the discharge of VOC into the atmosphere unless emissions from the affected oven are exhausted directly into the control device which is installed, operated, and maintained to reduce VOC emissions from the bakery oven by 80 percent or more overall. In accordance with **COMAR 26.11.19.21F(3)**, if an affected commercial bakery oven satisfies any of the conditions in COMAR 26.11.19.21D(1) the Permittee shall comply with the requirements of COMAR 26.11.19.21D(2) within one (1)

Table IV – 2 (Commercial Bakery Ovens)	
	calendar year after the year in which the conditions were satisfied.
2.2	**<u>Testing Requirements</u>:** A. & B. See record keeping and reporting requirements. C. See monitoring, record keeping, and reporting requirements.
2.3	**<u>Monitoring Requirements:</u>** A. & B. See record keeping and reporting requirements. C. For each month of operation and for all periods of twelve consecutive months the Permittee shall determine the production of yeast raised products and weighted Yt values for the facility's largest commercial bakery oven installed before January 1, 1994, and for each commercial bakery oven installed on or after January 1, 1994. [Authority: COMAR 26.11.03.06C]
2.4	**<u>Record Keeping Requirements</u>:** A. & B. The Permittee shall maintain records of the types of fuels burned in each commercial bakery oven at the facility. [Authority: COMAR 26.11.03.06C] C. The Permittee shall maintain for at least 5 years the following records: (1) Annual natural gas consumption for each commercial bakery ovens; (2) Total weight of goods produced and weighted average Yt values for each month and for all periods of twelve consecutive months for the facility's largest commercial bakery oven installed before January 1, 1994, and for each bakery oven installed on or after January 1, 1994; and (3) Annual Yt values and total bakery production for each commercial bakery oven.

Table IV – 2 (Commercial Bakery Ovens)	
	[Authority: COMAR 26.11.03.06C and COMAR 26.11.19.21F(2)]
2.5	**Reporting Requirements:** A. & B. The Permittee shall report the types of fuels burned in each commercial bakery oven in the Permittee's annual certified emissions statements as required under condition 8 of Section III – Plant Wide Conditions of this Part 70 permit. C. If the Permittee determines that the largest commercial bakery oven installed before 1994 or any commercial bakery oven installed on or after January 1, 1994 satisfies any of the conditions in COMAR 26.11.19.21D(1), the Permittee shall notify the Department of such in writing within 10 business days of determination and comply with COMAR 26.11.19.21D(2) within one (1) calendar year. [Authority: COMAR 26.11.03.06C and COMAR 26.11.19.21F(3)]

*These units are covered by a Permit Shield.

Table IV – 3 (Farina Recovery Systems)	
3.0	**Emissions Unit Numbers:** **E-01:** Vacuum system to recover and recycle unburned farina (ARA Registration No. 021-0234-8-0085) controlled with a filter **F-01:** Vacuum system to recover burnt farina for disposal (ARA Registration No. 021-0234-8-0086) controlled with a filter
3.1	**Applicable Standards/Limits:** A. Visible Emissions Limitations **COMAR 26.11.06.02C(1),** which requires that a person not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is greater than 20 percent opacity. Exceptions. **COMAR 26.11.06.02A(2)** establishes that "the visible emissions standards in COMAR 26.11.06.02C of this regulation do not apply to emissions during start-up and process modifications or

Table IV – 3 (Farina Recovery Systems)	
	adjustments, or occasional cleaning of control equipment, if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period." B. Control of Particulate **COMAR 26.11.06.03B(1)(a)**, which limits the concentration of particulate matter in process exhaust gases to not more than 0.05 grains per standard cubic foot of dry gas. C. Operational Requirement The Permittee shall vent exhaust gases from each vacuum system through a properly maintained and operated baghouse prior to discharging to the atmosphere. [Authority: COMAR 26.11.02.09A]
3.2	**Testing Requirements:** A. B. & C. See monitoring, record keeping, and reporting requirements.
3.3	**Monitoring Requirements:** A. B. & C. 1. The Permittee shall conduct observations for visible emissions from each baghouse used to control emissions from vacuum systems E-01 and F-01. Each required observation shall be conducted in accordance with paragraphs 1(1) through 1(6) of this condition. (1) Except as provided under paragraph 1(2) of this condition, the Permittee shall conduct required observations on a monthly basis (i.e., at least once per calendar month) for each baghouse; (2) If the Permittee does not observe any visible emissions from a baghouse for a period of at least six (6) consecutive months the Permittee may decrease the frequency of observation for that baghouse from a monthly basis to a quarterly basis (i.e., at least one (1) observation per three (3) consecutive calendar months). If visible emissions are observed during any quarterly observation, the Permittee shall revert to monthly observations until no visible emissions are again observed for at least six (6) consecutive

Table IV – 3 (Farina Recovery Systems)	
	months; (3) Each required observation shall be performed when the affected vacuum system is operating in normal service; (4) Required observations shall be performed during daylight hours unless the Permittee obtains from the Department written approval to conduct observations of properly lighted emissions points during non-daylight hours; (5) Each required observation shall endure for at least one (1) minute; and (6) If visible emissions exceeding 20 percent opacity are observed during an observation the Permittee shall determine the cause and, where practical, shall perform within 24 hours necessary adjustments or repairs to reduce the opacity to not more than 20 percent. If visible emissions have not been reduced to 20 percent or less opacity within 48 hours, the Permittee shall perform daily 12-minute observations for opacity in accordance with EPA Reference Method 9 until visible emissions no longer exceed 20 percent opacity. [Authority: COMAR 26.11.03.06C] 2. The Permittee shall establish in writing, revise as necessary, and implement a preventive maintenance (PM) plan for the baghouses that control emissions from the vacuum systems. The PM plan shall be designed to ensure consistent compliance with all applicable particulate and visible emissions standards, and shall include descriptions of maintenance activities to be performed and a schedule for performance of each such activity. The Permittee shall perform maintenance activities in accordance with the schedules established in the PM plan and shall maintain records of the dates on which each maintenance activity was performed. [Authority: COMAR 26.11.03.06C]
3.4	**<u>Record Keeping Requirements</u>:** A. B. & C. 1. The Permittee shall make a written or printable electronic record of each required observation for visible emissions, and each such record shall include identification of the observer, the date of the observation, the time at the start of the observation, the time at the end of the observation

Table IV – 3 (Farina Recovery Systems)	
	if the observation endures for more than 1 minute, and an account of the observer's findings during performance of the observation. [Authority: COMAR 26.11.03.06C] 2. The Permittee shall maintain on site a copy of the required preventive maintenance plan and records of descriptions and dates of all maintenance activities performed in accordance with the plan. The Permittee shall maintain records of all baghouse malfunctions and all corrective actions taken to return malfunctioning units to proper operation. [Authority: COMAR 26.11.03.06C]
3.5	**Reporting Requirements:** A. B. & C. 1. The Permittee shall report occurrences of visible emissions in accordance with conditions number 4 ("Report of Excess Emissions and Deviations") and number 9 ("Compliance Certification Report") of Section III – Plant Wide Conditions. 2. The Permittee shall make the required PM plan and required records concerning maintenance performed available to the Department upon request. [Authority: COMAR 26.11.03.06C]

*These units are covered by a permit shield.

Table IV – 4 (Flour Storage Silos & Dry Ingredient Scaling Room)	
4.0	**Emissions Unit Numbers:** **C-01:** Ten (10) silos for storage of white flour, wheat flour, and farina (ARA Registration No. 021-0234-9-0219), and a dry ingredient scaling room (ARA Registration No. 021-0234-8-0136), all controlled with baghouses
4.1	**Applicable Standards/Limits:** A. Visible Emissions Limitations **COMAR 26.11.06.02C(1),** which requires that a person not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is greater than 20 percent opacity.

Table IV – 4 (Flour Storage Silos & Dry Ingredient Scaling Room)	
	Exceptions. **COMAR 26.11.06.02A(2)** establishes that "the visible emissions standards in COMAR 26.11.06.02C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period." B. Control of Particulate **COMAR 26.11.06.03B(1)(a)**, which limits the concentration of particulate matter in process exhaust gases to not more than 0.05 grains per standard cubic foot of dry gas. C. Operational Requirement The Permittee shall vent exhaust gases from each silo and the dry ingredient scaling room through a properly maintained and operated baghouse before discharge to the atmosphere. [Authority: COMAR 26.11.02.09A]
4.2	**Testing Requirements:** A. B. & C. See monitoring, record keeping, and reporting requirements.
4.3	**Monitoring Requirements:** A. B. & C. 1. The Permittee shall conduct observations for visible emissions from each baghouse used to control emissions from the storage silos. Each required observation shall be conducted in accordance with paragraphs 1(1) through 1(6) of this condition. (1) Except as provided under paragraph 1(2) of this condition, the Permittee shall conduct required observations on a monthly basis (i.e., at least once per calendar month) for each baghouse; (2) If the Permittee does not observe any visible emissions from a baghouse for a period of at least six (6) consecutive months the Permittee may decrease the frequency of observation for that

Table IV – 4 (Flour Storage Silos & Dry Ingredient Scaling Room)	
	baghouse from a monthly basis to a quarterly basis (i.e., at least one (1) observation per three (3) consecutive calendar months). If visible emissions are observed during any quarterly observation, the Permittee shall revert to monthly observations until no visible emissions are again observed for at least six (6) consecutive months; (3) Each required observation shall be performed when at least one (1) silo or the dry ingredient scaling room controlled by the baghouse being observed is being loaded with material at a normal rate; (4) Required observations shall be performed during daylight hours unless the Permittee obtains from the Department written approval to conduct observations of properly lighted emissions points during non-daylight hours; (5) Each required observation shall endure for at least one (1) minute; and (6) If visible emissions exceeding 20 percent opacity are observed during an observation the Permittee shall determine the cause and, where practical, perform necessary adjustments or repairs to reduce the opacity to not more than 20 percent. If visible emissions have not been reduced to 20 percent or less opacity before the loading operation is completed, the Permittee shall either correct the problem before again loading into any silo controlled by the baghouse or shall perform daily, at least one 12-minute observation for opacity in accordance with EPA Reference Method 9 when material is being loaded into a silo controlled by the baghouse. [Authority: COMAR 26.11.03.06C] 2. The Permittee shall establish in writing, revise as necessary, and implement a preventive maintenance (PM) plan for the baghouses that control emissions from the silos. The PM plan shall be designed to ensure consistent compliance with all applicable particulate and visible emissions standards and shall include descriptions of maintenance activities to be performed and a schedule for performance of each such activity. The Permittee shall perform maintenance activities in accordance with the schedules established in the PM plan and shall maintain records of the dates on which each maintenance activity was performed. [Authority: COMAR 26.11.03.06C]

Table IV – 4 (Flour Storage Silos & Dry Ingredient Scaling Room)	
4.4	**Record Keeping Requirements:** A. B. & C. 1. The Permittee shall make a written or printable electronic record of each required observation for visible emissions, and each such record shall include identification of the observer, the date of the observation, the time at the start of the observation, the time at the end of the observation if the observation endures for more than 1 minute, and an account of the observer's findings during performance of the observation. [Authority: COMAR 26.11.03.06C] 2. The Permittee shall maintain on site a copy of the required preventive maintenance plan and records of descriptions and dates of all maintenance activities performed in accordance with the plan. The Permittee shall maintain records of all baghouse malfunctions and all corrective actions taken to return malfunctioning units to proper operation. [Authority: COMAR 26.11.03.06C]
4.5	**Reporting Requirements:** A. B. & C. 1. The Permittee shall report occurrences of visible emissions in accordance with conditions number 4 ("Report of Excess Emissions and Deviations") and number 9 ("Compliance Certification Report") of Section III – Plant Wide Conditions. 2. The Permittee shall make the required PM plan and required records concerning maintenance performed available to the Department upon request. [Authority: COMAR 26.11.03.06C]

*These units are covered by a Permit Shield.

Table IV – 5 (Emergency Generator)	
5.0	**Emissions Unit Numbers:** **G-01:** One (1) emergency generator equipped with a diesel fired engine rated at 1750 kilowatts (ARA Registration No. 021-0234-9-0471)
5.1	**Applicable Standards/Limits:**

Table IV – 5 (Emergency Generator)	
	A. Visible Emissions Limitations 1. The Permittee may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity. [Authority: COMAR 26.11.09.05E(2)] 2. The Permittee may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity. [Authority: COMAR 26.11.09.05E(3)] Exceptions. COMAR 26.11.09.05E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system. COMAR 26.11.09.05E(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods: (i) engines that are idled continuously when not in service: 30 minutes; (ii) all other engines: 15 minutes, and COMAR 26.11.09.05E(2) and (3) do not apply while maintenance, repair, or testing is being performed by qualified mechanics. [Authority: COMAR 26.11.09.05E(4)] B. Control of Sulfur Oxides and NSPS Fuel Requirement **COMAR 26.11.09.07A(1)(c)**, which limits the concentration of sulfur content by weight in excess of or which otherwise exceeds 0.3 percent for distillate fuel oils. The Permittee must use diesel fuel that meets the requirements of 40 CFR §1090.305 for nonroad diesel fuel, i.e., diesel fuel that has a per-gallon sulfur content that does not exceed 15 ppm, and that either has a minimum per-gallon cetane index of 40 or a maximum per-gallon aromatic content of 35 volume percent. [Authority: 40 CFR §60.4207(b)] C. NSPS Emissions Standards 1. The Permittee must comply with the following emissions standards for the emergency generator: (a) Non-methane Hydrocarbons (NMHC) and NOx: 4.8 gram per horsepower-hour (g/hp-hr) or 6.4 grams per kilowatt-hour (g/kW-hr) (b) CO: 2.6 g/hp-hr or 3.5 g/kW-hr

Table IV – 5 (Emergency Generator)	
	(c) Particulate Matter (PM): 0.15 g/hr-hr or 0.2 g/kW-hr [Authority: 40 CFR §60.4205(b)] 2. The Permittee must comply with the following opacity standards for the emergency generator: (a) Exhaust opacity must not exceed 20 percent during the acceleration mode. (b) Exhaust opacity must not exceed 15 percent during the lugging mode. (c) Exhaust opacity must not exceed 50 percent during the peaks in either the acceleration or lugging mode. Note: Compliance with COMAR 26.11.09.05E(3) demonstrates compliance with 40 CFR §60.4205(b). [Authority: 40 CFR §60.4205(b)] D. Operational Limits The Permittee must operate the emergency generator according to the following requirements: (a) To be considered an emergency stationary RICE under 40 CFR 60, Subpart IIII, any operation other than emergency operation, and maintenance and testing is prohibited. [Authority: 40 CFR §60.4211(f)] (b) There is no time limit on the use of the emergency generator in emergency situations. [Authority: 40 CFR §60.4211(f)(1)] (c) The Permittee may operate the emergency generator for any combination of the following purposes for a maximum of 100 hours per calendar year: Maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The Permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that federal, state, or local standards require maintenance and testing

Table IV – 5 (Emergency Generator)	
	of the emergency generator beyond 100 hours per calendar year. [Authority: 40 CFR §60.4211(f)(2)(i)] E. Control of Hazardous Air Pollutants The Permittee must meet the requirements of 40 CFR, Part 63, Subpart ZZZZ by meeting the requirements of 40 CFR, Part 60, Subpart IIII for the generator. No further requirements apply to the generator under 40 CFR, Part 63, Subpart ZZZZ. [Authority: 40 CFR §63.6590(c)(1)]
5.2	**Testing Requirements:** A. Visible Emissions Limitations See monitoring, record keeping, and reporting requirements. B. Control of Sulfur Oxides See monitoring, record keeping, and reporting requirements. C. NSPS Emissions Standards See monitoring, record keeping, and reporting requirements. D. Operational Limits See record keeping and reporting requirement. E. Control of Hazardous Air Pollutants The Permittee must meet the requirements of 40 CFR, Part 63, Subpart ZZZZ by meeting the requirements of 40 CFR, Part 60, Subpart IIII for the generators. No further requirements apply to the generator under 40 CFR, Part 63, Subpart ZZZZ. [Authority: 40 CFR §63.6590(c)(1)]
5.3	**Monitoring Requirements:** A. Visible Emissions Limitations The Permittee shall properly operate and maintain the emergency generator to minimize visible emissions. [Authority: COMAR 26.11.03.06C]

Table IV – 5 (Emergency Generator)	
	B. Control of Sulfur Oxides and NSPS Fuel Requirements The Permittee shall obtain a certification from the fuel supplier indicating that the oil complies with the sulfur content and cetane index requirements for the fuel oil. [Authority: COMAR 26.11.03.06C] C. NSPS Emissions Standard The Permittee must operate and maintain the generator that achieves the emissions standards as required by 40 CFR §60.4205 for emergency generators according to the manufacturer's written instructions or procedures developed by the Permittee that are approved by the engine manufacturer over the entire life of the engine. In addition, the Permittee may only change those settings that are permitted by the manufacturer. The Permittee must also meet the requirements of 40 CFR Parts 89, 94, and/or 1068 as applicable. [Authority: 40 CFR §60.4206 and 40 CFR §60.4211(a)] D. Operational Limits See record keeping and reporting requirements. E. Control of Hazardous Air Pollutants The Permittee must meet the requirements of 40 CFR, Part 63, Subpart ZZZZ by meeting the requirements of 40 CFR, Part 60, Subpart IIII for the generator. No further requirements apply to the generator under 40 CFR, Part 63, Subpart ZZZZ. [Authority: 40 CFR §63.6590(c)(1)]
5.4	**Record Keeping Requirements:** A. Visible Emissions Limitations The Permittee shall maintain records at the premises of maintenance/repairs performed that relate to combustion performance. [Authority: COMAR 26.11.03.06C] B. Control of Sulfur Oxides and NSPS Fuel Requirements The Permittee shall retain fuel supplier certifications at the premises stating that the fuel is in compliance with the sulfur content and cetane index requirements for the fuel oil. [Authority: COMAR 26.11.03.06]

Table IV – 5 (Emergency Generator)	
	C. NSPS Emissions Standard The Permittee shall maintain documentation from the manufacturer that the engine is certified to meet the applicable emissions standards. [Authority: COMAR 26.11.03.06C] D. Operational Limits The Permittee shall maintain for at least five (5) years, and shall make available to the Department upon request, annual records of the total hours of operation for the generator including the hours used for maintenance checks and readiness testing. The Permittee must also document how many hours are spent for emergency operation, including what classified the operation as emergency. [Authority: COMAR 26.11.03.06C] E. Control of Hazardous Air Pollutants The Permittee must meet the requirements of 40 CFR, Part 63, Subpart ZZZZ be meeting the requirements of 40 CFR, Part 60, Subpart IIII for the generator. No further requirements apply to the generator under 40 CFR, Part 63, Subpart ZZZZ. [Authority: 40 CFR §63.6590(c)(1)]
5.5	**Reporting Requirements:** A. Visible Emissions Limitations The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, “Report of Excess Emissions and Deviations.” [Authority: COMAR 26.11.03.06C] B. Control of Sulfur Oxides and NSPS Fuel Requirements The Permittee shall report fuel supplier certification records to the Department upon request. [Authority: COMAR 26.11.03.06C] C. NSPS Emissions Standards The Permittee shall submit all required records to the Department upon request. [Authority: COMAR 26.11.03.06C]

Table IV – 5 (Emergency Generator)	
	D. Operational Limits The Permittee shall submit operating records, including the hours spent for maintenance checks, readiness testing, emergency operation and the emergency classification, to the Department upon request. [Authority: COMAR 26.11.03.06C] E. Control of Hazardous Air Pollutants The Permittee must meet the requirements of 40 CFR, Part 63, Subpart ZZZZ by meeting the requirements of 40 CFR, Part 60, Subpart IIII for the generator. No further requirements apply to the generator under 40 CFR, Part 63, Subpart ZZZZ. [Authority: 40 CFR §63.6590(c)(1)]

SECTION V INSIGNIFICANT ACTIVITIES

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

(1) No. 1 Stationary internal combustion engines with an output less than 500 brake horsepower (373 kilowatts) and which are not used to generate electricity for sale or for peak or load shaving;

The 25 hp natural gas-fired Kohler emergency engine is subject to the following requirements:

(A) COMAR 26.11.09.05E(2), Emissions During Idle Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.

(B) COMAR 26.11.09.05E(3), Emissions During Operating Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.

(C) Exceptions:

(i) COMAR 26.11.09.05E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.

(ii) COMAR 26.11.09.05E(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:

(a) Engines that are idled continuously when not in service: 30 minutes
(b) all other engines: 15 minutes.

(iii) COMAR 26.11.09.05E(2) & (3) do not apply while maintenance, repair or testing is being performed by qualified mechanics.

Note: The emergency engine is subject to the 40 CFR 60, Subpart JJJJ regulations.

(2) ✓ First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process;

(3) ✓ Comfort air conditioning subject to requirements of Title VI of the Clean Air Act;

(4) any other emissions unit at the facility which is not subject to an applicable requirement of the Clean Air Act (list and describe):

No. 1 Wastewater pretreatment plant that reduces suspended solids and biological oxygen demand (BOD) in plant wastewater before discharge to Frederick County wastewater treatment plant. Emissions of VOC range from 100 to 150 pounds per million gallons of wastewater pre-treated. The facility pre-treats less than 3 million gallons of wastewater per year. The facility has one (1) flare to control exhaust gases from the anaerobic digester on the wastewater treatment system (ARA Registration No. 021-0234-9-0220).

The wastewater treatment system and associated flare are subject to the following requirements:

Operating Conditions

(1) The exhaust gases from the anaerobic digester shall vent through the flare prior to discharging to the atmosphere to meet the visible emissions, nuisance, and odor requirements of COMAR 26.11.06.02C(1), COMAR 26.11.06.08, and COMAR 26.11.06.09.

(2) The Permittee shall check for proper function of spark ignition of the flare or the presence of flare flame at least once per operating day.

Monitoring, Record Keeping, and Reporting

(3) The Permittee shall maintain for at least five (5) years, and shall make available to the Department upon request, records of the following information:

(a) Logs indicating the proper function of spark ignition or the presence of flare flame collected at least once per

operating day and records of any downtime for the flare; and

(b) Records of maintenance of the flare system.

SECTION VI STATE-ONLY ENFORCEABLE CONDITIONS

The Permittee is subject to the following State-only enforceable requirements:

1. Applicable Regulations:

   (a) COMAR 26.11.06.08 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.

   (b) COMAR 26.11.15.05, which requires that the Permittee implement "Best Available Control Technology for Toxics" (T – BACT) to control emissions of toxic air pollutants.

   (c) COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions will unreasonably endanger human health

2. Operating Conditions: No additional requirements.

3. Testing and Monitoring: No additional requirements.

4. Record Keeping and Reporting:

   The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. The analysis shall include either:

   (a) a statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or

   (b) a revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.

BIMBO BAKERIES USA, INC. – FREDERICK PLANT

7110 ENGLISH MUFFIN WAY, FREDERICK, MARYLAND

PART 70 OPERATING PERMIT APPLICATION

FOR RENEWAL – PERMIT NO.: 24-021-0234

Prepared by:

ENTECH ENGINEERING
www.entecheng.com

Entech Engineering, Inc.
201 Penn Street | PO Box 32 | Reading, PA 19603-0032
(p) 610.373.6667 (f) 610.373.7537

Project No.: 3379.224

Dated: May 2024

Bimbo Bakeries USA, Inc. – Frederick Plant
Part 70 Permit Application for Renewal

TABLE OF CONTENTS

1. Project Narrative

Project Narrative

Bimbo Bakeries USA, Inc. - Frederick Plant (Bimbo) is a commercial bakery located at 7110 English Muffin Way, Frederick, Frederick County, Maryland. The plant produces bread products (SIC 2051) on a commercial scale. The facility operates two boilers (A-01, A-02), four baking ovens (B-01-B-04), two farina reclamation systems (E-01, F-01), ten flour silos (C-01), one anaerobic digester biogas flare (1-01), and several units designated as insignificant. The facility is submitting this Part 70 Permit Renewal Application for the renewal of its current operating permit (24-021-0234).

On February 9, 2022, the facility submitted a General Permit to Construct application for emergency generators for a new 1,750 kW/hr Cumins DQKAA diesel-fired emergency generator. The Maryland Department of the Environment approved the application on April 7, 2022, and the emergency generator was installed in June 2022. Per the requirements of the authorization letter received on April 7, 2022, the facility must incorporate the generator into its Part 70 operating permit. Information regarding the generator, including the authorization letter, has been included in Section 3A of the permit.

2. Application Completeness Checklist

MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION
RENEWAL TITLE V APPLICATION CHECKLIST

VI .Application Completeness Checklist

The purpose of this part is to list the information required to achieve a Part 70 application shield.

Cover Page

(X) Name and address of owner or operator, including telephone number.

(X) Name and address of facility, including the plant manager's name and telephone number.

(X) A 24-hour emergency telephone number for air pollution matters.

Section 1 CERTIFICATION STATEMENTS

(X) The certification statement completed and signed by a responsible official.

Section 2 FACILITY DESCRIPTION SUMMARY

(X) A brief description of each of the source's process(es), including all applicable SIC codes and end products.

(X as applicable) Flow diagrams indicating all emissions units, emission points, and control devices.

(X) A plot plan of the entire facility.

(X) Emission Certification Report.

(X) General Emissions Information.

Section 3 EMISSIONS UNIT DESCRIPTIONS –

This section must be completed for each emissions unit.

Part A

) (X) Emissions unit number.

(X) Detailed description of unit, including all emission points.

(X) Federally enforceable limit(s) on the operating schedule.

(X) Fuel consumption information for any emissions unit that consumes fuel including the type of fuel, percent sulfur, and annual usage of fuel.

Part B

(X) A citation and description of each federally enforceable requirement, including all emission standards, for each emissions unit.

(X) A statement of compliance demonstration techniques for each requirement, including a description of monitoring, record keeping, reporting requirements, and test methods.

(X) The frequency of submittal of the compliance demonstration during the permit term.

Part C

(N/A) Emissions unit number.

(N/A) Permit to construct number.

(N/A) Emissions point number(s).

(N/A) Date(s) the permit to construct was issued.

(N/A) Condition number(s) as indicated on the permit to construct.

(N/A) Description of the permit condition(s) and the reason(s) why they are believed to be obsolete, extraneous, or insignificant.

Part D

(N/A) Description of all alternate operating scenarios that apply to an emissions unit.

(N/A) Number assigned to each scenario.

(N/A) Emissions unit number.

(X) Description of the operating parameters for the emissions unit and other information which describes the how the operation of the unit will change under the different scenario.

Part E

(N/A) A citation and description of each federally enforceable requirement triggered by an operating scenario, including all emission standards, for each emissions unit.

(N/A) As an attachment, the date and results of the most recent compliance demonstration for each emission standard and/or emissions certification report with relevant supporting documentation.

(N/A) A statement of compliance demonstration techniques for each requirement, including a description of monitoring, record keeping, reporting requirements, and test methods.

(N/A) The frequency of submittal of the compliance demonstration during the permit term.

Section 4 CONTROL EQUIPMENT

(X) The type of each piece of air pollution control equipment

(X) The capture and control efficiencies of the control equipment.

Section 5 SUMMARY SHEET OF POTENTIAL EMISSIONS

(N/A) Quantity of potential emissions for criteria pollutants and HAPs emitted in tons per year for each emissions unit.

(N/A) Fugitive emission estimations for the entire facility for criteria pollutants and HAPs emitted in tons per year.

(N/A) Basis for all emission calculations.

Section 6 AN EXPLANATION OF PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

(N/A) An explanation of the proposed exemption.

Section 7 COMPLIANCE SCHEDULE FOR NONCOMPLYING EMISSIONS UNITS

(N/A) Identification of emissions unit(s) not in compliance, including the requirement being violated and the effective compliance date.

(N/A) Detailed description of methods to be used to achieve compliance.

(N/A) A schedule of remedial measures, including an enforceable sequence of actions with milestones.

Attachment

(X) Checklist of Insignificant Activities

(N/A) CAM Plan (If Applicable)

3. Part 70 Permit Application for Renewal

MARYLAND DEPARTMENT OF THE ENVIRONMENT
1800 Washington Boulevard ● Baltimore MD 21230
(410) 537-3000 ● 1-800-633-6101 ● http://www.mde.state.md.us

PART 70 PERMIT APPLICATION FOR RENEWAL

AIR AND RADIATION ADMINISTRATION

Facilities required to obtain a Part 70 permit under COMAR 26.11.03.01 must complete and return this form. Applications are incomplete unless all applicable information required by COMAR 26.11.03.03 and 26.11.03.13 is supplied. Failure to supply additional information required by the Department to enable it to act on the application may result in loss of the application shield and denial of this application.

Owner and Operator:

Name of Owner or Operator:		
Bimbo Bakeries USA, Inc.		
Street Address:		
355 Business Center Drive		
City:	State:	Zip Code:
Horsham	PA	19044
Telephone Number		Fax Number
800-984-0989		

Facility Information:

Name of Facility:		
Bimbo Bakeries USA, Inc. - Frederick Plant		
Street Address:		
7110 English Muffin Way		
City:	State:	Zip Code:
Frederick	MD	21704
Plant Manager:	Telephone Number:	Fax Number:
Valeria Ezikpe	301-694-8100	
24-Hour Emergency Telephone Number for Air Pollution Matters:		
301-694-8100		

List, on a separate page, the names and telephone numbers of other facility owners and persons with titles.

SECTION 1. CERTIFICATION STATEMENTS

1. Compliance Status with Applicable Enhanced Monitoring and Compliance Certification Requirements

The emissions units identified in this application are in compliance with applicable enhanced monitoring and compliance certification requirements.

2. Certification of Current Compliance with All Applicable Federally Enforceable Requirements

Except for the requirements identified in Section 7 of this application, for which compliance is not achieved, I hereby certify, based on information and belief formed after reasonable inquiry, that the facility is currently in compliance with all applicable federally enforceable requirements and agree that the facility will continue to comply with those requirements during the permit term.

You must complete a Section 7 form for each non-complying emissions unit.

3. Statement of Compliance with Respect to All New Applicable Requirements Effective During the Permit Term

I hereby state, based on information and belief formed after reasonable inquiry, that the facility agrees to meet, in a timely manner, all applicable federally enforceable requirements that become effective during the permit term, unless a more detailed schedule is expressly required by the applicable requirement.

4. Risk Management Plan Compliance

I hereby certify that, based on information and belief formed after reasonable inquiry, that a Risk Management Plan as required under ˜112(r) of the Clean Air Act:

[ ] has been submitted;

[ ] will be submitted at a future date; or

[X] does not need to be submitted.

5. Statement of Truth, Accuracy, and Completeness

"I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision and in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

RESPONSIBLE OFFICIAL:
X _____ 5/22/24

SIGNATURE DATE

Valeria Ezikpe
PRINTED NAME

Plant Manager
TITLE

SECTION 2. FACILITY DESCRIPTION SUMMARY

1. Major Activities of Facility

Briefly describe the major activities, including the applicable SIC Code(s) and end product(s).

Please see included Project Narrative.

2. Facility-Wide Emissions

A. This facility is required to obtain a Part 70 Operating Permit because it is: Check appropriate box:

- [X] Actual Major
- [ ] Potential Major·
- [ ] Solid Waste Incineration Unit Requiring Permit Under § 129(e) of CAA

B. List the actual facility-wide emissions below:

PM10 0.057 NOx 2.98 VOC 48.67 SOx 0.02 CO 2.54 HAPs 0.00

3. Include With the Application:

Flow Diagrams showing all emissions units, emission points, and control devices;
Emissions Certification Report (copy of the most recent submitted to the Department.)

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: A-01 1a. Date of installation (month/year): 10/2003	2. MDE Registration No.:(if applicable) 5-0293

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

One Johnson Boiler Company model PFTa250-4G150S boiler, 9.8 MMBtu/hr maximum heat input, burns natural gas only. The boiler emits to a stack identified as A-01-01

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: N/A

Continuous Processes: _____ hours/day _____ days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0%	8.97 mmcf
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx 0.45 SOx 0.0027 VOC 0.0247 PM10 0.034 HAPs 0.000

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: A-02 1a. Date of installation (month/year): 12/2004	2. MDE Registration No.:(if applicable) 5-0333

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

One Johnson Boiler Company model PFTa250-4G150S boiler, 9.8 MMBtu/hr maximum heat input, burns natural gas only. The boiler emits to a stack identified as A-02-02

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: N/A

Continuous Processes: _____ hours/day _____ days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0%	8.97 mmcf
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx 0.45 SOx 0.0027 VOC 0.0247 PM10 0.034 HAPs 0.000

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: B-01 1a. Date of installation (month/year): 06/1977	2. MDE Registration No.:(if applicable) 8-0081

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

Baking Oven No. 1, APV Baker continuous band baking oven, input rate of 1680 dozen muffins per hour, 2 MMBtu/hr maximum heat input. The oven has two stacks which are identified as B-01-03 and B-01-04

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: N/A

Continuous Processes: _____ hours/day _____ days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0%	10.39 mmcf
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx 0.52 SOx 0.0031 VOC 12.50 PM10 0.039 HAPs 0.000

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: B-02 1a. Date of installation (month/year): 06/1977	2. MDE Registration No.:(if applicable) 8-0082

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

Baking Oven No. 2, APV Baker continuous band baking oven, input rate of 1680 dozen muffins per hour, 2 MMBtu/hr maximum heat input. The oven has two stacks which are identified as B-02-05 and B-02-06.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: N/A

Continuous Processes: _____ hours/day _____ days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0%	10.39 mmcf
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx 0.52 SOx 0.0031 VOC 11.20 PM10 0.039 HAPs 0.000

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: B-03 1a. Date of installation (month/year): 02/1996	2. MDE Registration No.:(if applicable) 8-0083

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

Baking Oven No. 3, APV Baker continuous band baking oven, input rate of 2520 dozen muffins per hour, 3.7 MMBtu/hr maximum heat input. The oven has two stacks which are identified as B-03-07 and B-03-08

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: N/A

Continuous Processes: _____ hours/day _____ days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0%	10.39 mmcf
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx 0.52 SOx 0.0031 VOC 14.81 PM10 0.039 HAPs 0.000

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: B-04 1a. Date of installation (month/year): 03/1991	2. MDE Registration No.:(if applicable) 8-0084

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

Baking Oven No. 4, APV Baker continuous band baking oven, input rate of 1680 dozen muffins per hour, 2 MMBtu/hr maximum heat input. The oven has two stacks which are identified as B-04-09 and B-04-10.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: N/A

Continuous Processes: _____ hours/day _____ days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0%	10.39 mmcf
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx 0.52 SOx 0.0031 VOC 10.02 PM10 0.039 HAPs 0.000

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: E-01 1a. Date of installation (month/year): 06/1977	2. MDE Registration No.:(if applicable) 8-0085

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

One vacuum system that reclaims unburned (recyclable) farina. The vacuum system has one stack identified as E-01-17.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: N/A

Continuous Processes: _____ hours/day _____ days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx_____ SOx_____ VOC_____ PM10_____ HAPs_____

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: F-01 1a. Date of installation (month/year): 06/1977	2. MDE Registration No.:(if applicable) 8-0086

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

One vacuum system that reclaims burnt farina (non-recyclable) for disposal. The system has one stack identified as F-01-18.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: N/A

Continuous Processes: _____ hours/day _____ days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx_____ SOx_____ VOC_____ PM10_____ HAPs_____

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: C-01 1a. Date of installation (month/year): 06/1977 or later	2. MDE Registration No.:(if applicable) 9-0219

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

Ten silos for storage of white flour, wheat flour, and farina; includes eight silos with nominal capacities of 100,000 pounds each, and two silos with nominal capacities of 80,000 pounds each. There are six emission points associated with the flour silos, identified as C-01-11 through C-01-16

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: N/A

Continuous Processes: _____ hours/day _____ days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.			
2.			
3.			

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx_____ SOx_____ VOC_____ PM10_____ HAPs_____

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 1-01 1a. Date of installation (month/year): 08/2018	2. MDE Registration No.:(if applicable) 9-0220

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

Wastewater pretreatment plant that processes approximately 10,000 gallons/day. Biogas generated by the plant's anaerobic digester is controlled/combusted by a flare with an associated emissions point identified as 1-01-19. With the exception of the biogas flaring operation, the wastewater treatment plant qualifies as a de minimis source and is listed as an insignificant activity.

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: N/A

Continuous Processes: _____ hours/day _____ days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.		
2.		
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx_____ SOx_____ VOC_____ PM10_____ HAPs_____

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: G-01 1a. Date of installation (month/year): 04/2022	2. MDE Registration No.:(if applicable) General Permit to Construct

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

One emergency generator equipped with a diesel fired engine rated at 1750 kilowatts

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: N/A

Continuous Processes: _____ hours/day _____ days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Diesel fuel	No more than 0.3 percent by weight	
2.			
3.			

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx_____ SOx_____ VOC_____ PM10_____ HAPs_____

April 7, 2022

Valeria Ezikpe
Bimbo Bakeries USA, Inc.
7110 English Muffin Way
Frederick, MD 21704

Dear Ms. Ezikpe:

The Department has received your completed Request for Coverage form and fee for an Air Quality General Permit to Construct for an Emergency Electric Generator at the following location:

Source Name:	Bimbo Bakeries USA, Inc
Street Address:	7110 English Muffin Way Frederick, MD 21704
Equipment:	One (1) emergency generator equipped with a diesel fired engine rated at 1750 kilowatts.
ARA Registration No.:	021-0234-9-0471
AI No.:	325

The permit is effective as stated in the General Permit. Evidence of fee payment, a copy of the Request for Coverage, the permit conditions from the application package, this letter, and other supporting documents should be retained on site. The blue bordered pages within the application package are the permit conditions applicable to you. The permit contains both general conditions, which apply to all air quality permit holders in Maryland, and specific conditions which apply to the diesel-powered emergency generator you have installed. The permit also includes citations of requirements of New Source Performance Standards (NSPS) 40 CFR Part 60 subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines which explain the operational limits and record keeping requirements in order to be defined as an emergency generator under this federal regulation.

The addition of the emergency generator qualifies as an “On-Permit” change to the facility’s Title V - Part 70 Operating Permit. The Department recognizes the permit to construct application as written notification of the proposed change. Please include the emergency generator in the application for the next renewal of the Title V - Part 70 Operating Permit.

In the event that you have misplaced the permit conditions from the application package, they can be downloaded from the Departments web page:
https://mde.maryland.gov/programs/Permits/AirManagementPermits/Pages/AirQualityGeneralPermit.aspx

If you have any questions regarding the issuance of this permit, please contact. Mr. Sam Mrida at Shazidul.mrida@maryland.gov.

Sincerely,
/S/
Suna Yi Sariscak, Manager
Air Quality Permits Program
Air & Radiation Administration

SYS/sm

cc: Sarah Wells, Air Quality Permits Program

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: A-01 & A-02 **General Reference:** COMAR 26.11.09.05A(1) & (3)

Briefly describe the Emission Standard/Limit or Operational Limitation:
COMAR 26.11.09.05A(1) which requires for installations located in Area II of the State that a person not cause or permit the discharge of emissions from any fuel burning equipment, other than water in uncombined form. Which is greater than 20 percent opacity; COMAR 26.11.09.05A(3) establishes exceptions.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report:_____
- ☒ Annual Compliance Certification:_____
- ☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference None Describe: _____

Testing: Reference None Describe: _____

Record Keeping: Reference COMAR 26.11.03.06C (5)(g) & 6 Describe: The permittee shall keep for at least five years a monthly record of fuel combusted or the amounts of each type of fuel delivered to the property each month.

Reporting: Reference COMAR 26.11.01.07 & 26.11.03.06C(7): COMAR 26.11.03.06G(6) & (7) Describe: The permittee shall report occurances of visible emissions from the boilers in accordance with conditions number 4 ("Report of Excess Emissions and Deviations") and number 9 ("Compliance Certification Report") of Section III - Plant Wide Conditions.

Frequency of submittal of the compliance demonstration: Annually

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: A-01 & A-02 **General Reference:** COMAR 26.11.02.09A

Briefly describe the Emission Standard/Limit or Operational Limitation:
The Permittee shall burn only natural gas in the boilers unless the Permittee obtains from the Department written authorization to burn alternative fuels. [Authority: COMAR 26.11.02.09A].

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report:
- ☒ Annual Compliance Certification:
- ☐ Semi-Annual Monitoring Report:

Methods used to demonstrate compliance:

Monitoring: Reference None Describe:

Testing: Reference None Describe:

Record Keeping: Reference COMAR 26.11.03.06C (5)(g) & 6 Describe: The permittee shall keep for at least five years a monthly record of fuel combusted or the amounts of each type of fuel delivered to the property each month.

Reporting: Reference COMAR 26.11.01.07 & 26.11.03.06C(7): COMAR 26.11.03.06G(6) & (7) Describe: The permittee shall report occurrences of visible emissions from the boilers in accordance with conditions number 4 ("Report of Excess Emissions and Deviations") and number 9 ("Compliance Certification Report") of Section III - Plant Wide Conditions.

Frequency of submittal of the compliance demonstration: Annually

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: B-01 through B-04 **General Reference:** COMAR 26.11.06.02C(1) & A(2)

Briefly describe the Emission Standard/Limit or Operational Limitation:
COMAR 26.11.06.02C(1) which requires for that a person not cause or permit the discharge of emissions from any installation or building, other than water in uncombined form, which is greater than 20 percent opacity; COMAR 26.11.09.02A(2) establishes exceptions.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report:_____
- ☒ Annual Compliance Certification:_____
- ☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference None Describe: _____

Testing: Reference None Describe: _____

Record Keeping: Reference COMAR 26.11.03.06C Describe: The permittee shall maintain records of the types of fuels burned in each commercial bakery oven at the facility. [Authority: COMAR 26.11.03.06C].

Reporting: Reference COMAR 26.11.01.05-1 & 26.11.02.19C & D Describe: The permittee shall report the types of fuels burned in each commercial bakery oven in the Permittee's annual certified emissions statements as required under condition 8 of Section III - Plant Wide Conditions of the Part 70 Permit.

Frequency of submittal of the compliance demonstration: Annually

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: B-01 through B-04 **General Reference:** COMAR 26.11.02.09A

Briefly describe the Emission Standard/Limit or Operational Limitation:
The Permittee shall burn only natural gas in the boilers unless the Permittee obtains from the Department written authorization to burn alternative fuels. [Authority: COMAR 26.11.02.09A].

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report:_____
- ☒ Annual Compliance Certification:_____
- ☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference None Describe: _____

Testing: Reference None Describe: _____

Record Keeping: Reference COMAR 26.11.03.06C Describe: The permittee shall maintain records of the types of fuels burned in each commercial bakery oven at the facility. [Authority: COMAR 26.11.03.06C].

Reporting: Reference COMAR 26.11.01.05-1 & 26.11.02.19C & D Describe: The permittee shall report the types of fuels burned in each commercial bakery oven in the Permittee's annual certified emissions statements as required under condition 8 of Section III - Plant Wide Conditions of the Part 70 Permit.

Frequency of submittal of the compliance demonstration: Annually

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: B-01 through B-04 **General Reference:** COMAR 26.11.06.03B(1)(a)

Briefly describe the Emission Standard/Limit or Operational Limitation:
COMAR 26.11.06.03B(1)(a) which limits the concentration of particulate matter in process exhaust gases to not more than 0.05 grains per standard cubic foot of dry gas.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report:_____
- ☒ Annual Compliance Certification:_____
- ☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference None Describe: _____

Testing: Reference None Describe: _____

Record Keeping: Reference COMAR 26.11.03.06C Describe: The permittee shall maintain records of the types of fuels burned in each commercial bakery oven at the facility. [Authority: COMAR 26.11.03.06C].

Reporting: Reference COMAR 26.11.01.05-1 & 26.11.02.19C & D Describe: The permittee shall report the types of fuels burned in each commercial bakery oven in the Permittee's annual certified emissions statements as required under condition 8 of Section III - Plant Wide Conditions of the Part 70 Permit.

Frequency of submittal of the compliance demonstration: Annually

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: B-01 through B-04 **General Reference:** COMAR 26.11.19.21

Briefly describe the Emission Standard/Limit or Operational Limitation:
Attached on next page (1)

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report:_____
- ☒ Annual Compliance Certification:_____
- ☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06C Describe: For each month of operation and for all periods of twelve consecutive months the Permittee shall determine the production of yeast raised products and weighted Yt values for the facility's largest commercial bakery oven installed before January 1, 1994, and for each commercial bakery oven installed on or after January 1, 1994, [Authority:COMAR 26.11.03.06C].

Testing: Reference None Describe: _____

Record Keeping: Reference COMAR 26.11.03.06C Describe: Attached on next page (2)

Reporting: Reference COMAR 26.11.01.05-1 & 26.11.02.19C & D Describe: If the Permittee determines that the largest commercial bakery oven installed before 1994 or any commercial bakery oven installed on or after January 1, 1994 satisfies any of the conditions in COMAR 26.11.19.21D(1), the Permittee shall notify the Department of such in writing within 10 business days of determination. [Authority: COMAR 26.11.03.06C]

Frequency of submittal of the compliance demonstration: Annually

(1) COMAR 26.11.19.21 which establishes requirements for control of VOC from commercial bakery ovens. In accordance with COMAR 26.11.19.21C(2) & D(1), if the facility's largest commercial bakery oven exceeds the average annual production tonnage of finished bread, rolls, or other yeast-raised products for the corresponding Yt value listed below, then thereafter the Permittee shall be subject to COMAR 26.11.19.21D(2): (1) 10,000 tons with a Yt value of greater than 11.0; (2) 15,000 tons with a Yt value between 8.1 and 11.0; (3) 22,500 tons with a Yt value between 5.0 and 8.0; (4) 28,000 tons with a Yt value less than 5.0. In accordance with COMAR 26.11.19.21C(5), for any commercial bakery oven constructed on or after January 1, 1994 that satisfies the conditions in COMAR 26.11.19.21D(1) the Permittee shall comply with COMAR 26.11.19.21D(2). In accordance with COMAR 26.11.19.21D(2), if an affected commercial bakery oven satisfies any of the conditions in COMAR 26.11.19.21D(1), the Permittee shall not cause or permit the discharge of VOC into the atmosphere unless emissions from the affected oven are exhausted directly into a control deviice which is installed, operated, and maintained to reduce VOC emissions from the bakery oven by 80 percent or more overall. In accordance with COMAR 26.11.19.21F(3) the Permittee shall comply with the requirements of COMAR 26.11.19.21D(2) within 1 calendar year after the year in which the conditions were satisfied.

(2) The Permittee shall maintain for at least 5 years the following records: (1) annual natural gas consumption for each commercial bakery oven; (2) total weight of goods produced and weighted average Yt values for each month and for all periods of twelve consecutive months for the facility's largest commercial bakery oven installed before January 1, 1994, and for each commercial bakery oven installed on or after January 1, 1994; and (3) annual Yt values and total annual bakery production for each commercial bakery oven. [Authority: COMAR 26.11.03.06C].

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: E-01 & F-01 **General Reference:** COMAR 26.11.06.02C(1) & A(2)

Briefly describe the Emission Standard/Limit or Operational Limitation:
COMAR 26.11.06.02C(1) which requires that a person not cause or permit the discharge of emissions from any installation or building, other than water in uncombined form, which is greater than 20 percent opacity: COMAR 26.11.06.02A(2) establishes exceptions.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report:_____
- ☒ Annual Compliance Certification:_____
- ☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06C Describe: Attached on next page (1)

Testing: Reference None Describe: _____

Record Keeping: Reference COMAR 26.11.03.06C Describe: Attached on next page (2)

Reporting: Reference COMAR 26.11.01.07 & 26.11.03.06C(7); COMAR 26.11.03.06G(6) & (7); COMAR 26.11.03.06C Describe: The Permittee shall report occurrences of visible emissions in accordance with conditions number 4 ("Report of Excess Emissions and Deviations") and number 9 ("Compliance Certification Report") of Section III - Plant Wide Conditions. The Permittee shall make the required PM plan and required records concerning maintenance performed to the Department upon request. [Authority: COMAR 26.11.03.06C].

Frequency of submittal of the compliance demonstration: Annually

(1) The Permittee shall conduct observations for visible emissions from each baghouse used to control emissions from vacuum systems E-01 and F-01. Each required observation shall be conducted in accordance with paragraphs 1.(1) through 1.(6) of Section IV. Table IV-3, section 3.3, condition no. 1. [Authority: COMAR 26.11.03.06C]. The Permittee shall establish in writing, revise as necessary, and implement a preventative maintenance (PM) plan for the baghouses that control emissions from the vacuum systems. The PM plan shall be designed to ensure consistent compliance with all applicable particulate and visible emissions standards, and shall include descriptions of maintenance activities to be performed and a schedule for performance of each such activity. The Permittee shall perform maintenance activities in accordance with the schedules established in the PM plan and shall maintain records of the dates on which each maintenance activity was performed. [Authority: COMAR 26.11.03.06C].

(2) The Permittee shall make a written or printable electronic record of each required observation for visible emissions, and each such record shall include identification of the observer, the date of the observation, the time at the start of the observation, the time at the end of the observation if the observation endures for more than 1 minute, and an account of the observer's findings during performance of the observation. [Authority: COMAR 26.11.03.06C]. The Permittee shall maintain on site a copy of the required preventative maintenance plan and records of descriptions and dates of all maintenance activities performed in accordance with the plant. Ther Permittee shall maintain records of all baghouse malfunctions and all corrective actions taken to return malfunctioning units to proper operation. [Authority: COMAR 26.11.03.06C].

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: E-01 & F-01 **General Reference:** COMAR 26.11.06.03B(1)(a)

Briefly describe the Emission Standard/Limit or Operational Limitation:
COMAR 26.11.06.03B(1)(a) which limits the concentration of particulate matter in process exhaust gases to not more than 0.05 grains per standard cubit foot of dry gas.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report:_____
- ☒ Annual Compliance Certification:_____
- ☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06C Describe: Attached on next page (1)

Testing: Reference None Describe: _____

Record Keeping: Reference COMAR 26.11.03.06C Describe: Attached on next page (2)

Reporting: Reference COMAR 26.11.01.07 & 26.11.03.06C(7); COMAR 26.11.03.06G(6) & (7); COMAR 26.11.03.06C Describe: The Permittee shall report occurrences of visible emissions in accordance with conditions number 4 ("Report of Excess Emissions and Deviations") and number 9 ("Compliance Certification Report") of Section III - Plant Wide Conditions. The Permittee shall make the required PM plan and required records concerning maintenance performed to the Department upon request. [Authority: COMAR 26.11.03.06C].

Frequency of submittal of the compliance demonstration: Annually

(1) The Permittee shall conduct observations for visible emissions from each baghouse used to control emissions from vacuum systems E-01 and F-01. Each required observation shall be conducted in accordance with paragraphs 1.(1) through 1.(6) of Section IV. Table IV-3, section 3.3, condition no. 1. [Authority: COMAR 26.11.03.06C]. The Permittee shall establish in writing, revise as necessary, and implement a preventative maintenance (PM) plan for the baghouses that control emissions from the vacuum systems. The PM plan shall be designed to ensure consistent compliance with all applicable particulate and visible emissions standards, and shall include descriptions of maintenance activities to be performed and a schedule for performance of each such activity. The Permittee shall perform maintenance activities in accordance with the schedules established in the PM plan and shall maintain records of the dates on which each maintenance activity was performed. [Authority: COMAR 26.11.03.06C].

(2) The Permittee shall make a written or printable electronic record of each required observation for visible emissions, and each such record shall include identification of the observer, the date of the observation, the time at the start of the observation, the time at the end of the observation if the observation endures for more than 1 minute, and an account of the observer's findings during performance of the observation. [Authority: COMAR 26.11.03.06C]. The Permittee shall maintain on site a copy of the required preventative maintenance plan and records of descriptions and dates of all maintenance activities performed in accordance with the plant. Ther Permittee shall maintain records of all baghouse malfunctions and all corrective actions taken to return malfunctioning units to proper operation. [Authority: COMAR 26.11.03.06C].

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: E-01 & F-01 **General Reference:** COMAR 26.11.02.09A

Briefly describe the Emission Standard/Limit or Operational Limitation:
The Permittee shall vent exhaust gases from each vacuum system through a properly maintained and operated baghouse before discharge to atmosphere. [Authority: COMAR 26.11.02.09A].

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report:_____
- ☒ Annual Compliance Certification:_____
- ☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06C Describe: Attached on next page (1)

Testing: Reference None Describe:

Record Keeping: Reference COMAR 26.11.03.06C Describe: Attached on next page (2)

Reporting: Reference COMAR 26.11.01.07 & 26.11.03.06C(7); COMAR 26.11.03.06G(6) & (7); COMAR 26.11.03.06C Describe: The Permittee shall report occurrences of visible emissions in accordance with conditions number 4 ("Report of Excess Emissions and Deviations") and number 9 ("Compliance Certification Report") of Section III - Plant Wide Conditions. The Permittee shall make the required PM plan and required records concerning maintenance performed to the Department upon request. [Authority: COMAR 26.11.03.06C].

Frequency of submittal of the compliance demonstration: Annually

(1) The Permittee shall conduct observations for visible emissions from each baghouse used to control emissions from vacuum systems E-01 and F-01. Each required observation shall be conducted in accordance with paragraphs 1.(1) through 1.(6) of Section IV. Table IV-3, section 3.3, condition no. 1. [Authority: COMAR 26.11.03.06C]. The Permittee shall establish in writing, revise as necessary, and implement a preventative maintenance (PM) plan for the baghouses that control emissions from the vacuum systems. The PM plan shall be designed to ensure consistent compliance with all applicable particulate and visible emissions standards, and shall include descriptions of maintenance activities to be performed and a schedule for performance of each such activity. The Permittee shall perform maintenance activities in accordance with the schedules established in the PM plan and shall maintain records of the dates on which each maintenance activity was performed. [Authority: COMAR 26.11.03.06C].

(2) The Permittee shall make a written or printable electronic record of each required observation for visible emissions, and each such record shall include identification of the observer, the date of the observation, the time at the start of the observation, the time at the end of the observation if the observation endures for more than 1 minute, and an account of the observer's findings during performance of the observation. [Authority: COMAR 26.11.03.06C]. The Permittee shall maintain on site a copy of the required preventative maintenance plan and records of descriptions and dates of all maintenance activities performed in accordance with the plant. Ther Permittee shall maintain records of all baghouse malfunctions and all corrective actions taken to return malfunctioning units to proper operation. [Authority: COMAR 26.11.03.06C].

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: C-01 **General Reference:** COMAR 26.11.06.02C(1) & A(2)

Briefly describe the Emission Standard/Limit or Operational Limitation:
COMAR 26.11.06.02C(1) which requires that a person not cause or permit the discharge of emissions from any installation or building, other than water in uncombined form, which is greater than 20 percent opacity; COMAR 26.11.06.02A(2) establishes exceptions.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report:_____
- ☒ Annual Compliance Certification:_____
- ☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06C Describe: Attached on next page (1)

Testing: Reference None Describe:

Record Keeping: Reference COMAR 26.11.03.06C Describe: Attached on next page (2)

Reporting: Reference COMAR 26.11.01.07 & 26.11.03.06C(7); COMAR 26.11.03.06G(6) & (7); COMAR 26.11.03.06C Describe: The Permittee shall report occurrences of visible emissions in accordance with conditions number 4 ("Report of Excess Emissions and Deviations") and number 9 ("Compliance Certification Report") of Section III - Plant Wide Conditions. The Permittee shall make the required PM plan and required records concerning maintenance performed to the Department upon request. [Authority: COMAR 26.11.03.06C].

Frequency of submittal of the compliance demonstration: Annually

(1) The Permittee shall conduct observations for visible emissions from each baghouse used to control emissions from vacuum systems E-01 and F-01. Each required observation shall be conducted in accordance with paragraphs 1.(1) through 1.(6) of Section IV. Table IV-3, section 3.3, condition no. 1. [Authority: COMAR 26.11.03.06C]. The Permittee shall establish in writing, revise as necessary, and implement a preventative maintenance (PM) plan for the baghouses that control emissions from the vacuum systems. The PM plan shall be designed to ensure consistent compliance with all applicable particulate and visible emissions standards, and shall include descriptions of maintenance activities to be performed and a schedule for performance of each such activity. The Permittee shall perform maintenance activities in accordance with the schedules established in the PM plan and shall maintain records of the dates on which each maintenance activity was performed. [Authority: COMAR 26.11.03.06C].

(2) The Permittee shall make a written or printable electronic record of each required observation for visible emissions, and each such record shall include identification of the observer, the date of the observation, the time at the start of the observation, the time at the end of the observation if the observation endures for more than 1 minute, and an account of the observer's findings during performance of the observation. [Authority: COMAR 26.11.03.06C]. The Permittee shall maintain on site a copy of the required preventative maintenance plan and records of descriptions and dates of all maintenance activities performed in accordance with the plant. Ther Permittee shall maintain records of all baghouse malfunctions and all corrective actions taken to return malfunctioning units to proper operation. [Authority: COMAR 26.11.03.06C].

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: C-01 **General Reference:** COMAR 26.11.06.03B(1)(a)

Briefly describe the Emission Standard/Limit or Operational Limitation:
COMAR 26.11.06.03B(1)(a) which limits the concentration of particulate matter in process exhaust gases to not more than 0.05 grains per standard cubit foot of dry gas.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report:_____
- ☒ Annual Compliance Certification:_____
- ☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06C Describe: Attached on next page (1)

Testing: Reference None Describe: _____

Record Keeping: Reference COMAR 26.11.03.06C Describe: Attached on next page (2)

Reporting: Reference COMAR 26.11.01.07 & 26.11.03.06C(7); COMAR 26.11.03.06G(6) & (7); COMAR 26.11.03.06C Describe: The Permittee shall report occurrences of visible emissions in accordance with conditions number 4 ("Report of Excess Emissions and Deviations") and number 9 ("Compliance Certification Report") of Section III - Plant Wide Conditions. The Permittee shall make the required PM plan and required records concerning maintenance performed to the Department upon request. [Authority: COMAR 26.11.03.06C].

Frequency of submittal of the compliance demonstration: Annually

(1) The Permittee shall conduct observations for visible emissions from each baghouse used to control emissions from vacuum systems E-01 and F-01. Each required observation shall be conducted in accordance with paragraphs 1.(1) through 1.(6) of Section IV. Table IV-3, section 3.3, condition no. 1. [Authority: COMAR 26.11.03.06C]. The Permittee shall establish in writing, revise as necessary, and implement a preventative maintenance (PM) plan for the baghouses that control emissions from the vacuum systems. The PM plan shall be designed to ensure consistent compliance with all applicable particulate and visible emissions standards, and shall include descriptions of maintenance activities to be performed and a schedule for performance of each such activity. The Permittee shall perform maintenance activities in accordance with the schedules established in the PM plan and shall maintain records of the dates on which each maintenance activity was performed. [Authority: COMAR 26.11.03.06C].

(2) The Permittee shall make a written or printable electronic record of each required observation for visible emissions, and each such record shall include identification of the observer, the date of the observation, the time at the start of the observation, the time at the end of the observation if the observation endures for more than 1 minute, and an account of the observer's findings during performance of the observation. [Authority: COMAR 26.11.03.06C]. The Permittee shall maintain on site a copy of the required preventative maintenance plan and records of descriptions and dates of all maintenance activities performed in accordance with the plant. Ther Permittee shall maintain records of all baghouse malfunctions and all corrective actions taken to return malfunctioning units to proper operation. [Authority: COMAR 26.11.03.06C].

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: C-01 **General Reference:** COMAR 26.11.02.09A

Briefly describe the Emission Standard/Limit or Operational Limitation:
The Permittee shall vent exhaust gases from each silo through a properly maintained baghouse before discharge to atmosphere. [Authority: COMAR 26.11.02.09A].

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report:
- ☒ Annual Compliance Certification:
- ☐ Semi-Annual Monitoring Report:

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06C Describe: Attached on next page (1)

Testing: Reference None Describe:

Record Keeping: Reference COMAR 26.11.03.06C Describe: Attached on next page (2)

Reporting: Reference COMAR 26.11.01.07 & 26.11.03.06C(7); COMAR 26.11.03.06G(6) & (7); COMAR 26.11.03.06C Describe: The Permittee shall report occurrences of visible emissions in accordance with conditions number 4 ("Report of Excess Emissions and Deviations") and number 9 ("Compliance Certification Report") of Section III - Plant Wide Conditions. The Permittee shall make the required PM plan and required records concerning maintenance performed to the Department upon request. [Authority: COMAR 26.11.03.06C].

Frequency of submittal of the compliance demonstration: Annually

(1) The Permittee shall conduct observations for visible emissions from each baghouse used to control emissions from vacuum systems E-01 and F-01. Each required observation shall be conducted in accordance with paragraphs 1.(1) through 1.(6) of Section IV. Table IV-3, section 3.3, condition no. 1. [Authority: COMAR 26.11.03.06C]. The Permittee shall establish in writing, revise as necessary, and implement a preventative maintenance (PM) plan for the baghouses that control emissions from the vacuum systems. The PM plan shall be designed to ensure consistent compliance with all applicable particulate and visible emissions standards, and shall include descriptions of maintenance activities to be performed and a schedule for performance of each such activity. The Permittee shall perform maintenance activities in accordance with the schedules established in the PM plan and shall maintain records of the dates on which each maintenance activity was performed. [Authority: COMAR 26.11.03.06C].

(2) The Permittee shall make a written or printable electronic record of each required observation for visible emissions, and each such record shall include identification of the observer, the date of the observation, the time at the start of the observation, the time at the end of the observation if the observation endures for more than 1 minute, and an account of the observer's findings during performance of the observation. [Authority: COMAR 26.11.03.06C]. The Permittee shall maintain on site a copy of the required preventative maintenance plan and records of descriptions and dates of all maintenance activities performed in accordance with the plant. Ther Permittee shall maintain records of all baghouse malfunctions and all corrective actions taken to return malfunctioning units to proper operation. [Authority: COMAR 26.11.03.06C].

SECTION 3C. OBSOLETE, EXTRANEOUS, OR INSIGNIFICANT PERMIT CONDITIONS

List permit to construct conditions which should be considered to be obsolete, extraneous, or environmentally insignificant.

Emissions Unit No.: N/A **Permit to Construct No.** N/A

Emissions Point No.	Date Permit Issued	Condition No.	Brief Description of Condition and Reason for Exclusion

SECTION 3D. ALTERNATE OPERATING SCENARIOS

Emissions Unit No.: N/A

Briefly describe any alternate operating scenarios. Assign a number to each scenario for identification purposes.

There are no Alternate Operating Scenarios associated with the facility.

SECTION 3E. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS FOR AN ALTERNATE OPERATING SCENARIO

Scenario No.: N/A

Emissions Unit No.: _____ **General Reference:** _____

Briefly describe any applicable Emissions Standard/Limits/Operational Limitations:

_____

_____

_____

_____

_____

_____

Compliance Demonstration

Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

_____

_____

_____

Testing: Reference _____ Describe: _____

_____

_____

_____

Record Keeping: Reference _____ Describe: _____

_____

_____

_____

Reporting: Reference _____ Describe: _____

_____

_____

_____

Frequency of submittal of the compliance demonstration: _____

SECTION 4. CONTROL EQUIPMENT

1. Associated Emissions Units No. :	2. Emissions Point No.:
C-01, E-01, F-01	C-01-11 though C-01-16, E-01-17, F-01-18

3. Type and Description of Control Equipment:

Exhaust gases from the flour and farina handling equipment passes through bag filters within the baghouses associated with each process.

4. Pollutants Controlled:	Control Efficiency:
Particulate Matter	99.9%

5. Capture Efficiency:

100%

SECTION 4. CONTROL EQUIPMENT

1. Associated Emissions Units No. :	2. Emissions Point No.:
1-01	1-01-19

3. Type and Description of Control Equipment:
Exhaust gases (biogas) from the WWTP anaerobic digester are vented to a flare

4. Pollutants Controlled:	Control Efficiency:
Hydrocarbons	98%

5. Capture Efficiency:

100%

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

Pollutant					
CAS Number					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Fugitive Emissions					
Total	Please see included Potential to Emit calculations for all emission units identified in Section 3.				

SECTION 6. EXPLANATION OF PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Describe and cite the applicable requirements to be exempted. Complete this Section only if the facility is claiming exemptions from or the non-applicability of any federally enforceable requirements.

1. Applicable Requirement:

N/A

2. Brief Description:

_____

_____

_____

3. Reasons for Proposed Exemption or Justification of Non-applicability:

_____

_____

_____

_____

_____

SECTION 7. COMPLIANCE SCHEDULE FOR NONCOMPLYING EMISSIONS UNITS

1. Emissions Unit #	Anticipated Compliance Date

Applicable Federally Enforceable Requirement being Violated:

The facility is in compliance with all permitted requirements.

2. Description of Plan to Achieve Compliance:

_____

_____

_____

_____

_____

_____

Certified Progress Reports for sources in noncompliance shall be submitted at least quarterly to the Department.

4. State-Only Permit Requirements

STATE-ONLY ENFORCEABLE REQUIREMENTS

Facility Information:

Name of Facility: Bimbo Bakeries USA, Inc.	County Frederick
Premises Number: 021-0234	
Street Address: 7110 English Muffin Way, Frederick, MD 21704	
24-hour Emergency Telephone Number for Air Pollution Matters:	
Type of Equipment (List Significant Units): Boilers, bakery ovens, flour siles, farina systems, WWTP biogas flare, emergency generator	

CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY ENFORCEABLE REQUIREMENTS

Registration No.: 24-021-0234

Emissions Unit No.: Facility-wide **General Reference:** COMAR 26.11.06.08 and 09 ~~COMAR 26.~~11.15.05 and 06

Briefly describe the requirement and the emissions limit (if applicable):

COMAR 26.11.06.08 and 09 - prohibits the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created

COMAR 26.11.15.05 - requires the Permittee implement Best Available Control Technology for Toxins to control emissions of toxic air pollutants

COMAR 26.11.15.06 - prohibits the discharge of toxic air pollutants to the extent that such emissions will endanger human health

Methods used to demonstrate compliance:

Monitoring, record keeping, and reporting requirements specified in the facility's current operating permit.

5. Exempt Emissions Units and Activities

MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION
RENEWAL TITLE V APPLICATION INSIGNIFICANT ACTIVITIES LIST

III. Check-off List of Emissions Units and Activities Exempt from the Part 70 Permit Application

Insignificant Activities

Place a check mark beside each type of emissions unit or activity that is located at the facility. Where noted, please indicate the number of that type of emissions unit or activity located at the facility.

(1) No. ___ Fuel burning equipment using gaseous fuels or no. 1 or no. 2 fuel oil, and having a heat input less than 1,000,000 Btu (1.06 gigajoules) per hour;

(2) No. ___ Fuel-burning equipment using solid fuel and having a heat input of less than 350,000 Btu (0.37 gigajoule) per hour;

(3) No. 1 Stationary internal combustion engines with less than 500 brake horsepower (373 kilowatts)of power output

(4) ___ Space heaters utilizing direct heat transfer and used solely for comfort heat;

(5) ___ Water cooling towers and water cooling ponds unless used for evaporative cooling of water from barometric jets or barometric condensers, or used in conjunction with an installation requiring a permit to operate;

(6) No. ___ Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

(7) ___ Commercial bakery ovens with a rated heat input capacity of less than 2,000,000 Btu per hour;

(8) ___ Kilns used for firing ceramic ware, heated exclusively by natural gas, liquefied petroleum gas, electricity, or any combination of these;

(9) ___ Confection cookers where the products are edible and intended for human consumption;

(10) ___ Die casting machines;

(11) ___ Photographic process equipment used to reproduce an image upon sensitized material through the use of radiant energy;

(12) ___ Equipment for drilling, carving, cutting, routing, turning, sawing, planing, spindle sanding, or disc sanding of wood or wood products;

(13)___ Brazing, soldering, or welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals and not directly related to plant maintenance, upkeep and repair or maintenance shop activities;

(14)___ Equipment for washing or drying products fabricated from metal or glass, provided that no VOC is used in the process and that no oil or solid fuel is burned;

(15)___ Containers, reservoirs, or tanks used exclusively for electrolytic plating work, or electrolytic polishing, or electrolytic stripping of brass, bronze, cadmium, copper, iron, lead, nickel, tin, zinc, and precious metals;

(16) Containers, reservoirs, or tanks used exclusively for:

(a) ___ Dipping operations for applying coatings of natural or synthetic resins that contain no VOC;

(b) ___ Dipping operations for coating objects with oils, waxes, or greases, and where no VOC is used;

(c) ___ Storage of butane, propane, or liquefied petroleum, or natural gas;

(d) No. ___ Storage of lubricating oils:

(e) No. ___ Unheated storage of VOC with an initial boiling point of 300 °F (

(f) No. ___ Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel,

(g) No. ___ Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less;

(h) No. ___ The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;

(17) ___ Gaseous fuel-fired or electrically heated furnaces for heat treating glass or metals, the use of which does not involve molten materials;

(18) Crucible furnaces, pot furnaces, or induction furnaces, with individual capacities of 1,000 pounds (454 kilograms) or less each, in which no sweating or distilling is conducted, or any fluxing is conducted using chloride, fluoride,

or ammonium compounds, and from which only the following metals are poured or in which only the following metals are held in a molten state:

(a) ___ Aluminum or any alloy containing over 50 percent aluminum, if no gaseous chloride compounds, chlorine, aluminum chloride, or aluminum fluoride is used;

(b) ___ Magnesium or any alloy containing over 50 percent magnesium;

(c) ___ Lead or any alloy containing over 50 percent lead;

(d) ___ Tin or any alloy containing over 50 percent tin;

(e) ___ Zinc or any alloy containing over 50 percent zinc;

(f) ___ Copper;

(g) ____ Precious metals;

(19) ____ Charbroilers and pit barbecues as defined in COMAR 26.11.18.01 with a total cooking area of 5 square feet (0.46 square meter) or less;

(20) X First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process;

(21) ____ Certain recreational equipment and activities, such as fireplaces, barbecue pits and cookers, fireworks displays, and kerosene fuel use;

(22) ___ Potable water treatment equipment, not including air stripping equipment;

(23) ___ Firing and testing of military weapons and explosives;

(24) ___ Emissions resulting from the use of explosives for blasting at quarrying operations and from the required disposal of boxes used to ship the explosive;

(25) X Comfort air conditioning subject to requirements of Title VI of the Clean Air Act;

(26) ____ Grain, metal, or mineral extrusion presses;

(27) ____ Breweries with an annual beer production less than 60,000 barrels;

MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION
RENEWAL TITLE V APPLICATION INSIGNIFICANT ACTIVITIES LIST

(28)___ Natural draft hoods or natural draft ventilators that exhaust air pollutants into the ambient air from manufacturing/industrial or commercial processes;

(29)____ Laboratory fume hoods and vents;

(30) No. ___ Sheet-fed letter or lithographic printing press(es) with a cylinder width of less than 18 inches;

For the following, attach additional pages as necessary:

(31) any other emissions unit, not listed in this section, with a potential to emit less than the "de minimus" levels listed in COMAR 26.11.02.10X (list and describe units):

No. 1 One 10,000 gallons per day wastewater pretreatment plant

No. ___ _____

No. ___ _____

No. ___ _____

No. ___ _____

(32) any other emissions unit at the facility which is not subject to an applicable requirement of the Clean Air Act (list and describe):

No. ___ _____

No. ___ _____

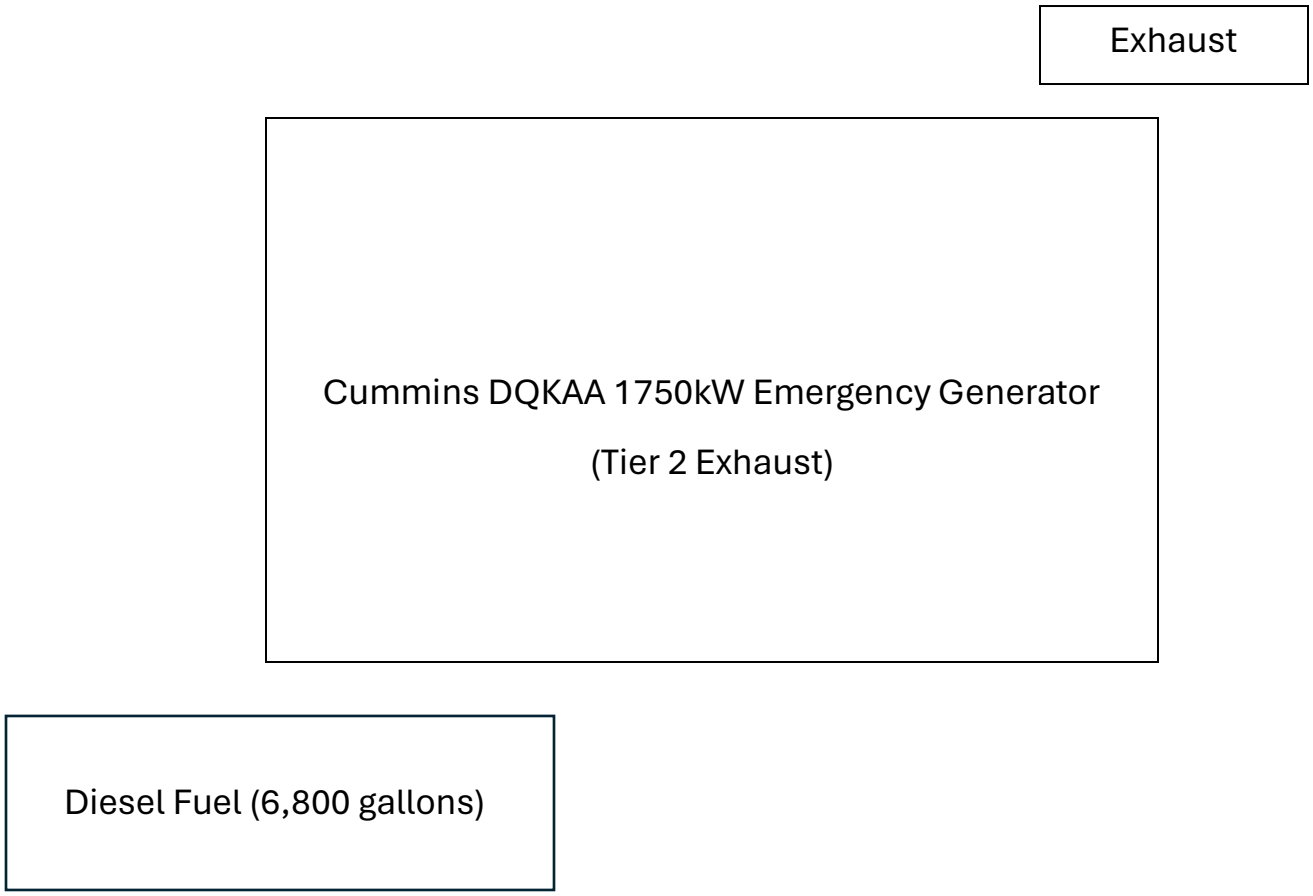
No. ___ _____

6. Process Flow Diagram

Bimbo Bakeries USA, Inc.

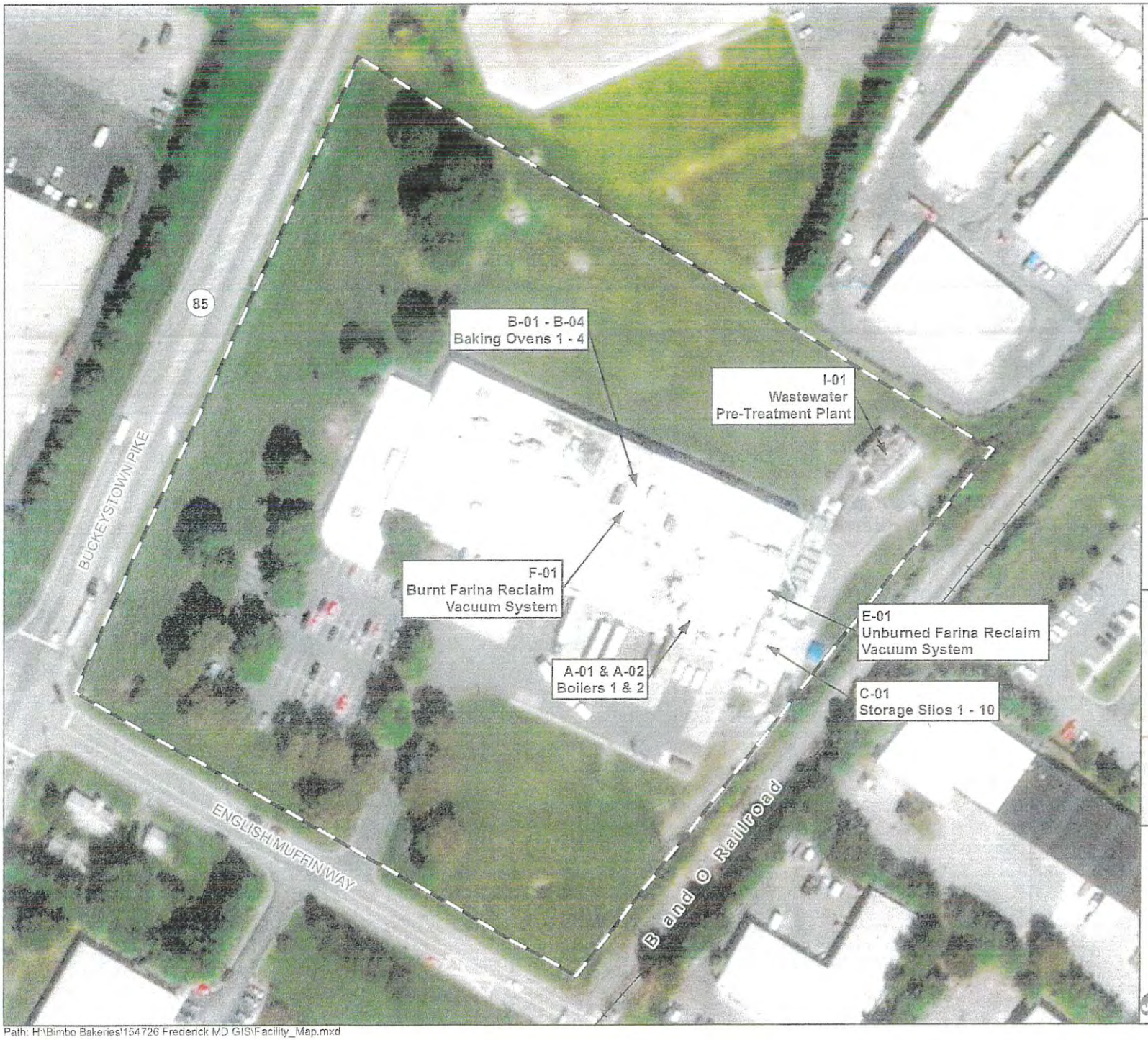
Process Flow Diagram

Part 70 Operating Permit Renewal



Only the process diagram for the diesel emergency generator has been included. There have been no changes to the other emission units/control devices previously submitted to the Department.

7. Facility Plot Plan



Bimbo Bakeries USA, Inc.

FACILITY PLOT PLAN
Part 70 Operating Permit
No. 24-021-0234

7110 English Muffin Way
Frederick, MD 21704

Legend

- Property Boundary
- Railroad

0 50 100 200
Feet

POWER ENGINEERS

Date: 4/5/2019

Path: H:\Bimbo Bakeries\154726 Frederick MD GIS\Facility_Map.mxd

8. 2023 Emissions Certification Report

7110 English Muffin Way · Frederick, Maryland 21704
☎ 301-694-8100 🖷 301-694-8100

Maryland Department of the Environment
Air and Radiation Administration
1800 Washington Boulevard
Baltimore, Maryland 21230

Re: Annual Emission Certification Report
Toxics Certification Statement
Bimbo Bakeries USA, Inc. – Frederick Plant
Facility ID: 24-021-0234

To Whom It May Concern:

The Bimbo Bakeries USA, Inc. Frederick Plant is pleased to submit the 2023 Annual Emission Certificate Report as an attachment to this letter.

This letter also serves as the Toxics Certification Statement renewal for 2023. All toxic chemicals were below the reporting threshold, and the previous Toxics Certification Statement is still valid. There were no equipment changes or process changes affecting toxic chemicals in the 2023 calendar year.

Sincerely,

Greg Peterson
Senior Director of Operations

Enclosures

Sent via email:
mdeair.ecr@maryland.gov
scott.thompson@maryland.gov

MARYLAND DEPARTMENT OF THE ENVIRONMENT
1800 Washington Boulevard, Suite 715 • Baltimore Maryland 21230-1720
410-537-3000 • 1-800-633-6101 • http://www.mde.state.md.us
Air and Radiation Management Administration
Air Quality Compliance Program
410-537-3220

FORM 1:

GENERAL FACILITY INFORMATION
EMISSIONS CERTIFICATION REPORT

Calendar Year: 2023

A. FACILITY IDENTIFICATION			**Do Not Write in This Space**
Facility Name Bimbo Bakeries USA Inc.			Date Received Regional
Address 7110 English Muffin Way			Date Received State
City Frederick	County Frederick	Zip Code 21704	AIRS Code
B. Briefly describe the major function of the facility Commercial bakery operation producing English Muffins.			FINDS Code
			SIC Code
			Facility Number:
			TEMPO ID:
C. SEASONAL PRODUCTION (%, if applicable) Winter *(Dec – Feb)* Spring *(Mar – May)* Summer *(Jun – Aug)* Fall *(Sept – Nov)* _____ _____ _____ _____			Reviewed by: Name Date

D. Explain any increases or decreases in emissions from the previous calendar year for each registration at this facility.

N/A

E. CONTROL DEVICE INFORMATION (for NOx and VOC sources only)

Control Device	Capture Efficiency	Removal Efficiency

I am familiar with the facility and the installations and sources for which this report is submitted. I have personally examined the information in this report, which consists of 58 pages (including attachments), and certify that the information is correct to the best of my knowledge.

Greg Peterson	Senior Director of Operations	3/27/24
Name (Print/Type)	Title	Date
Signature		301-694-8100 Telephone

1/09/08

FORM 2: **CRITERIA AIR POLLUTANTS** **Calendar Year:** 2023

EMISSIONS CERTIFICATION REPORT

Facility Name: Bimbo Bakeries USA, Inc. Facility ID: 24-021-0234 Pollutant: **VOC**

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Estimation Method
				Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
5-0293	10300603	Natural	S	0.025	0.14	24	7	52	365	0.14	24	NA	NA	C3
Boiler A01		Gas	F											
5-0333	10300603	Natural	S	0.025	0.14	24	7	52	365	0.14	24	NA	NA	C3
Boiler A02		Gas	F											
8-0081	30203201	Natural	S	12.50	126.25	24	5.5	52	198	126.25	24	NA	NA	C3 & A9 (AIB EF)
Oven B01		Gas	F											
8-0082	30203201	Natural	S	11.20	113.13	24	5.5	52	198	113.13	24	NA	NA	C3 & A9 (AIB EF)
Oven B02		Gas	F											
8-0083	30203201	Natural	S	14.81	149.54	24	5.5	52	198	149.54	24	NA	NA	C3 & A9 (AIB EF)
Oven B03		Gas	F											
8-0084	30203201	Natural	S	10.02	101.25	24	5.5	52	198	101.25	24	NA	NA	C3 & A9 (AIB EF)
Oven B04		Gas	F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			5	5	52	260		5	NA	NA	
Silo C01			F											
8-0085	30288801	None	S			24	5.5	52	286		24	NA	NA	
Farina Reclaim E01			F											
8-0086	30288801	None	S			24	5.5	52	286		24	NA	NA	
Burnt Farina F01			F											
9-0220	39999996	None	S	0.091	0.50	24	7	52	365	0.50	24	NA	NA	C3
WWTP I01			F											
Total				48.67	490.95					490.95				

Bimbo Bakeries USA Inc.
Frederick, MD

VOC Emission Calculation

2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{5.5 \text{ lb VOC}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{5.5 \text{ lb VOC}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day
A01	1-03-006-03	8.973338	0.0247	0.14
A02	1-03-006-03	8.973338	0.0247	0.14

VOC Emission Calculation

2. Ovens

VOC emissions from the ovens originate from the burning of natural gas and from the ethanol released during fermentation.
Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).
Emissions of the VOC ethanol from fermentation are derived from the American Institute of Baking (AIB) technical bulletin entitled, *Bakery Oven Ethanol Emissions; Experimental and Plant Survey Results.*

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{5.5 \text{ lb VOC}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = A \text{ tons/year}$$

$$\frac{b \text{ tons bread}}{\text{year}} * \frac{3.18 \text{ lb VOC}}{\text{ton bread}} * \frac{\text{ton}}{2000 \text{ lb}} = B \text{ tons/year}$$

A tons/year + *B tons/year* = ***tons/year***

Oven	NGas Usage (*a*)	A tons/year	Bread Baked (*b*)	B tons/year	A+B tons/year
B01	10.390569	0.029	7,844	12.47	12.50
B02	10.390569	0.029	7,027	11.17	11.20
B03	10.390569	0.029	9,294	14.78	14.81
B04	10.390569	0.029	6,287	10.00	10.02

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{5.5 \text{ lb VOC}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = A \text{ lbs/day}$$

$$\frac{b \text{ tons bread}}{\text{year}} * \frac{3.18 \text{ lb VOC}}{\text{ton bread}} * \frac{\text{year}}{198 \text{ days}} = B \text{ lbs/day}$$

A lbs/day + *B lbs/day* = ***lbs/day***

Oven	NGas Usage (*a*)	A lbs/day	Bread Baked (*b*)	B lbs/day	A+B lbs/day
B01	10.39	0.2886	7,844	125.97	126.25
B02	10.39	0.2886	7,027	112.85	113.13
B03	10.39	0.2886	9,294	149.25	149.54
B04	10.39	0.2886	6,287	100.96	101.25

VOC Emission Calculation

3. WWTP Biogas Flare

Emissions based on million cubic feet (mmcf) of biogas (BG) combusted by the flare for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 13.5-2 (02/2018 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{600 \text{ mmBTU}}{\text{mmcf}} * \frac{0.66 \text{ lb VOC}}{\text{mmBTU}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{600 \text{ mmBTU}}{\text{mmcf}} * \frac{0.66 \text{ lb VOC}}{\text{mmBTU}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

WWTP	BG Combusted (*a*)	tons/year	lbs/day
Flare	0.458050	0.0907	0.50

FORM 2: **CRITERIA AIR POLLUTANTS** **Calendar Year:** 2023

EMISSIONS CERTIFICATION REPORT

Facility Name: Bimbo Bakeries USA, Inc. Facility ID: 24-021-0234 Pollutant: **SOx**

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Estimation Method
				Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
5-0293	10300603	Natural	S	0.0027	0.015	24	7	52	365		24	NA	NA	C3
Boiler A01		Gas	F											
5-0333	10300603	Natural	S	0.0027	0.015	24	7	52	365		24	NA	NA	C3
Boiler A02		Gas	F											
8-0081	30203201	Natural	S	0.0031	0.031	24	5.5	52	198		24	NA	NA	C3
Oven B01		Gas	F											
8-0082	30203201	Natural	S	0.0031	0.031	24	5.5	52	198		24	NA	NA	C3
Oven B02		Gas	F											
8-0083	30203201	Natural	S	0.0031	0.031	24	5.5	52	198		24	NA	NA	C3
Oven B03		Gas	F											
8-0084	30203201	Natural	S	0.0031	0.031	24	5.5	52	198		24	NA	NA	C3
Oven B04		Gas	F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			5	5	52	260		5	NA	NA	
Silo C01			F											
8-0085	30288801	None	S			24	5.5	52	286		24	NA	NA	
Farina Reclaim E01			F											
8-0086	30288801	None	S			24	5.5	52	286		24	NA	NA	
Burnt Farina F01			F											
9-0220	39999996	None	S			24	7	52	365		24	NA	NA	
WWTP I01			F											
Total				0.018	0.16									

SOx Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{0.6 \text{ lb } SO_x}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{0.6 \text{ lb } SO_x}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day
A01	1-03-006-03	8.97	0.0027	0.0148
A02	1-03-006-03	8.97	0.0027	0.0148

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year
and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{0.6 \text{ lb } SO_x}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{0.6 \text{ lb } SO_x}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day
B01	10.39	0.0031	0.0315
B02	10.39	0.0031	0.0315
B03	10.39	0.0031	0.0315
B04	10.39	0.0031	0.0315

NOx Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-1 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{100 \text{ lb } NO_x}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{100 \text{ lb } NO_x}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day
A01	1-03-006-03	8.97	0.45	2.46
A02	1-03-006-03	8.97	0.45	2.46

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-1 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{100 \text{ lb } NO_x}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{100 \text{ lb } NO_x}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day
B01	10.39	0.52	5.25
B02	10.39	0.52	5.25
B03	10.39	0.52	5.25
B04	10.39	0.52	5.25

NOx Emission Calculations

3. WWTP Biogas Flare

Emissions based on million cubic feet (mmcf) of biogas (BG) combusted by the flare for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 13.5-1 (02/2018 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{600 \text{ mmBTU}}{\text{mmcf}} * \frac{0.068 \text{ lb NOx}}{\text{mmBTU}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{600 \text{ mmBTU}}{\text{mmcf}} * \frac{0.068 \text{ lb NOx}}{\text{mmBTU}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

WWTP	BG Combusted (*a*)	tons/year	lbs/day
Flare	0.458050	0.009	0.051

FORM 2: **CRITERIA AIR POLLUTANTS** **Calendar Year:** 2023

EMISSIONS CERTIFICATION REPORT

Facility Name: Bimbo Bakeries USA, Inc. Facility ID: 24-021-0234 Pollutant: **NOx**

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Estimation Method
				Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
5-0293	10300603	Natural	S	0.45	2.46	24	7	52	365	2.46	24	NA	NA	C3
Boiler A01		Gas	F											
5-0333	10300603	Natural	S	0.45	2.46	24	7	52	365	2.46	24	NA	NA	C3
Boiler A02		Gas	F											
8-0081	30203201	Natural	S	0.52	5.25	24	5.5	52	198	5.25	24	NA	NA	C3
Oven B01		Gas	F											
8-0082	30203201	Natural	S	0.52	5.25	24	5.5	52	198	5.25	24	NA	NA	C3
Oven B02		Gas	F											
8-0083	30203201	Natural	S	0.52	5.25	24	5.5	52	198	5.25	24	NA	NA	C3
Oven B03		Gas	F											
8-0084	30203201	Natural	S	0.52	5.25	24	5.5	52	198	5.25	24	NA	NA	C3
Oven B04		Gas	F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			5	5	52	260		5	NA	NA	
Silo C01			F											
8-0085	30288801	None	S			24	5.5	52	286		24	NA	NA	
Farina Reclaim E01			F											
8-0086	30288801	None	S			24	5.5	52	286		24	NA	NA	
Burnt Farina F01			F											
9-0220	39999996	None	S	0.0093	0.051	24	7	52	365	0.051	24	NA	NA	C3
WWTP I01			F											
Total				2.98	25.96					25.96				

FORM 2: **CRITERIA AIR POLLUTANTS** **Calendar Year:** 2023

EMISSIONS CERTIFICATION REPORT

Facility Name: Bimbo Bakeries USA, Inc. Facility ID: 24-021-0234 Pollutant: **CO**

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Estimation Method
				Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
5-0293	10300603	Natural	S	0.38	2.07	24	7	52	365		24	NA	NA	C3
Boiler A01		Gas	F											
5-0333	10300603	Natural	S	0.38	2.07	24	7	52	365		24	NA	NA	C3
Boiler A02		Gas	F											
8-0081	30203201	Natural	S	0.44	4.41	24	5.5	52	198		24	NA	NA	C3
Oven B01		Gas	F											
8-0082	30203201	Natural	S	0.44	4.41	24	5.5	52	198		24	NA	NA	C3
Oven B02		Gas	F											
8-0083	30203201	Natural	S	0.44	4.41	24	5.5	52	198		24	NA	NA	C3
Oven B03		Gas	F											
8-0084	30203201	Natural	S	0.44	4.41	24	5.5	52	198		24	NA	NA	C3
Oven B04		Gas	F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			5	5	52	260		5	NA	NA	
Silo C01			F											
8-0085	30288801	None	S			24	5.5	52	286		24	NA	NA	
Farina Reclaim E01			F											
8-0086	30288801	None	S			24	5.5	52	286		24	NA	NA	
Burnt Farina F01			F											
9-0220	39999996	None	S	0.043	0.23	24	7	52	365		24	NA	NA	C3
WWTP I01			F											
Total				2.54	21.99									

CO Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-1 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{84 \text{ lb CO}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{84 \text{ lb CO}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day
A01	1-03-006-03	8.97	0.38	2.07
A02	1-03-006-03	8.97	0.38	2.07

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-1 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{84 \text{ lb CO}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{84 \text{ lb CO}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day
B01	10.39	0.44	4.41
B02	10.39	0.44	4.41
B03	10.39	0.44	4.41
B04	10.39	0.44	4.41

CO Emission Calculations

3. WWTP Biogas Flare

Emissions based on million cubic feet (mmcf) of biogas (BG) combusted by the flare for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 13.5-2 (02/2018 update).

Tons/year

$$\frac{a\ \text{mmcf}}{\text{year}} * \frac{600\ \text{mmBTU}}{\text{mmcf}} * \frac{0.31\ \text{lb CO}}{\text{mmBTU}} * \frac{\text{ton}}{2000\ \text{lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a\ \text{mmcf}}{\text{year}} * \frac{600\ \text{mmBTU}}{\text{mmcf}} * \frac{0.31\ \text{lb CO}}{\text{mmBTU}} * \frac{\text{year}}{365\ \text{days}} = \textbf{\textit{lbs/day}}$$

WWTP	BG Combusted (*a*)	tons/year	lbs/day
Flare	0.458050	0.043	0.23

FORM 2: **CRITERIA AIR POLLUTANTS** **Calendar Year:** 2023

EMISSIONS CERTIFICATION REPORT

Facility Name: Bimbo Bakeries USA, Inc. Facility ID: 24-021-0234 Pollutant: **Lead**

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Estimation Method
				Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
5-0293	10300603	Natural	S	2.24E-06	1.23E-05	24	7	52	365		24	NA	NA	C3
Boiler A01		Gas	F											
5-0333	10300603	Natural	S	2.24E-06	1.23E-05	24	7	52	365		24	NA	NA	C3
Boiler A02		Gas	F											
8-0081	30203201	Natural	S	2.60E-06	2.62E-05	24	5.5	52	198		24	NA	NA	C3
Oven B01		Gas	F											
8-0082	30203201	Natural	S	2.60E-06	2.62E-05	24	5.5	52	198		24	NA	NA	C3
Oven B02		Gas	F											
8-0083	30203201	Natural	S	2.60E-06	2.62E-05	24	5.5	52	198		24	NA	NA	C3
Oven B03		Gas	F											
8-0084	30203201	Natural	S	2.60E-06	2.62E-05	24	5.5	52	198		24	NA	NA	C3
Oven B04		Gas	F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	1	26	26		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			2	2	52	104		2	NA	NA	
Silo C01			F											
8-0219	30288801	None	S			5	5	52	260		5	NA	NA	
Silo C01			F											
8-0085	30288801	None	S			24	5.5	52	286		24	NA	NA	
Farina Reclaim E01			F											
8-0086	30288801	None	S			24	5.5	52	286		24	NA	NA	
Burnt Farina F01			F											
9-0220	39999996	None	S			24	7	52	365		24	NA	NA	
WWTP I01			F											
Total				1.49E-05	1.30E-04									

FORM 3: PM

EMISSIONS CERTIFICATION REPORT
Particulate Matter

Calendar Year: 2023

Facility Name: Bimbo Bakeries USA, Inc. **Facility ID:** 24-021-0234 **Pollutant:** PM

Equipment Description/ Registration No.	SCC Number	Fuel		PM - Filterable		PM 10 - Filterable		PM 2.5 - Filterable		PM Condensable		Operation	Emissions Methods
				Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day	Days/yr	
5-0293	10300603	Natural	S	0.0085	0.047	0.0085	0.047	0.0085	0.047	0.026	0.14	365	C3
Boiler A01		Gas	F										
5-0333	10300603	Natural	S	0.0085	0.047	0.0085	0.047	0.0085	0.047	0.026	0.14	365	C3
Boiler A02		Gas	F										
8-0081	30203201	Natural	S	0.0099	0.100	0.0099	0.100	0.0099	0.100	0.030	0.30	198	C3
Oven B01		Gas	F										
8-0082	30203201	Natural	S	0.0099	0.100	0.0099	0.100	0.0099	0.100	0.030	0.30	198	C3
Oven B02		Gas	F										
8-0083	30203201	Natural	S	0.0099	0.100	0.0099	0.100	0.0099	0.100	0.030	0.30	198	C3
Oven B03		Gas	F										
8-0084	30203201	Natural	S	0.0099	0.100	0.0099	0.100	0.0099	0.100	0.030	0.30	198	C3
Oven B04		Gas	F										
8-0219	30288801	None	S	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	26	
Silo C01			F										
8-0219	30288801	None	S	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	26	
Silo C01			F										
8-0219	30288801	None	S	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	104	
Silo C01			F										
8-0219	30288801	None	S	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	104	
Silo C01			F										
8-0219	30288801	None	S	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	104	
Silo C01			F										
8-0219	30288801	None	S	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	104	
Silo C01			F										
8-0219	30288801	None	S	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	26	
Silo C01			F										
8-0219	30288801	None	S	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	26	
Silo C01			F										
8-0219	30288801	None	S	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	104	
Silo C01			F										
8-0219	30288801	None	S	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	260	
Silo C01			F										
8-0085	30288801	None	S	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	286	
Farina Reclaim E01			F										
8-0086	30288801	None	S	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	286	
Burnt Farina F01			F										
9-0220	39999996	None	S	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	365	
WWTP I01			F										
Total				0.057	0.49	0.057	0.49	0.057	0.49	0.17	1.48		

PM Total, Filterable, and Condensible Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).

Tons/year (Total)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{7.6 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day (Total)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{7.6 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day
A01	1-03-006-03	8.97	0.0341	0.1868
A02	1-03-006-03	8.97	0.0341	0.1868

Tons/year (Filterable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.9 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day (Filterable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.9 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day
A01	1-03-006-03	8.97	0.0085	0.0467
A02	1-03-006-03	8.97	0.0085	0.0467

Tons/year (Condensable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{5.7 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day (Condensable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{5.7 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day
A01	1-03-006-03	8.97	0.0256	0.1401
A02	1-03-006-03	8.97	0.0256	0.1401

* According to AP-42 Table 1.4-2, all particulate matter is assumed to be < 1.0 micrometer in diameter; therefore, the above numbers can be applied to PM_{Total}, PM_{10}, or $PM_{2.5}$.

PM Total, Filterable, and Condensible Emission Calculations

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the actual number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).

Tons/year (Total)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{7.6 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day
B01	10.39	0.0395	0.3988
B02	10.39	0.0395	0.3988
B03	10.39	0.0395	0.3988
B04	10.39	0.0395	0.3988

lb/day (Total)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{7.6 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Tons/year (Filterable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.9 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day
B01	10.39	0.0099	0.0997
B02	10.39	0.0099	0.0997
B03	10.39	0.0099	0.0997
B04	10.39	0.0099	0.0997

lb/day (Filterable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.9 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Tons/year (Condensable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{5.7 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day
B01	10.39	0.0296	0.2991
B02	10.39	0.0296	0.2991
B03	10.39	0.0296	0.2991
B04	10.39	0.0296	0.2991

lb/day (Condensable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{5.7 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

* According to AP-42 Table 1.4-2, all particulate matter is assumed to be < 1.0 micrometer in diameter; therefore, the above numbers can be applied to PM_{Total}, PM_{10}, or $PM_{2.5}$.

3. Silos

The emission factor reference for the silos is taken from AP-42, Fifth Edition Table 9.9.1-2 (2003 update) for *wheat flour mills,* bulk loading. No data is available for this emission source, consequently, no emissions were assumed to be emitted from the silos.

PM_{10} Total, Filterable, and Condensible Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).

Tons/year (Total)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{7.6 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day (Total)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{7.6 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day
A01	1-03-006-03	8.97	0.034	0.19
A02	1-03-006-03	8.97	0.034	0.19

Tons/year (Filterable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.9 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day (Filterable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.9 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day
A01	1-03-006-03	8.97	0.0085	0.047
A02	1-03-006-03	8.97	0.0085	0.047

Tons/year (Condensable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{5.7 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day (Condensable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{5.7 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day
A01	1-03-006-03	8.97	0.026	0.14
A02	1-03-006-03	8.97	0.026	0.14

* According to AP-42 Table 1.4-2, all particulate matter is assumed to be < 1.0 micrometer in diameter; therefore, the above numbers can be applied to PM_{Total}, PM_{10}, or $PM_{2.5}$.

PM_{10} Total, Filterable, and Condensible Emission Calculations

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the actual number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).

Tons/year (Total)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{7.6 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day
B01	10.39	0.039	0.40
B02	10.39	0.039	0.40
B03	10.39	0.039	0.40
B04	10.39	0.039	0.40

lb/day (Total)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{7.6 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Tons/year (Filterable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.9 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day
B01	10.39	0.0099	0.100
B02	10.39	0.0099	0.100
B03	10.39	0.0099	0.100
B04	10.39	0.0099	0.100

lb/day (Filterable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.9 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Tons/year (Condensable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{5.7 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day
B01	10.39	0.030	0.30
B02	10.39	0.030	0.30
B03	10.39	0.030	0.30
B04	10.39	0.030	0.30

lb/day (Condensable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{5.7 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

* According to AP-42 Table 1.4-2, all particulate matter is assumed to be < 1.0 micrometer in diameter; therefore, the above numbers can be applied to PM_{Total}, PM_{10}, or $PM_{2.5}$.

3. Silos

The emission factor reference for the silos is taken from AP-42, Fifth Edition Table 9.9.1-2 (2003 update) for *wheat flour mills,* bulk loading. No data is available for this emission source; consequently, no emissions were assumed to be emitted from the silos.

$PM_{2.5}$ Total, Filterable, and Condensible Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).

Tons/year (Total)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{7.6 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day (Total)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{7.6 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textit{lbs/day}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day
A01	1-03-006-03	8.97	0.034	0.19
A02	1-03-006-03	8.97	0.034	0.19

Tons/year (Filterable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.9 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day (Filterable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.9 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textit{lbs/day}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day
A01	1-03-006-03	8.97	0.0085	0.047
A02	1-03-006-03	8.97	0.0085	0.047

Tons/year (Condensable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{5.7 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day (Condensable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{5.7 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textit{lbs/day}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day
A01	1-03-006-03	8.97	0.026	0.14
A02	1-03-006-03	8.97	0.026	0.14

* According to AP-42 Table 1.4-2, all particulate matter is assumed to be < 1.0 micrometer in diameter; therefore, the above numbers can be applied to PM_{Total}, PM_{10}, or $PM_{2.5}$.

$PM_{2.5}$ Total, Filterable, and Condensible Emission Calculations

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the actual number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).

Tons/year (Total)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{7.6 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day
B01	10.39	0.039	0.40
B02	10.39	0.039	0.40
B03	10.39	0.039	0.40
B04	10.39	0.039	0.40

lb/day (Total)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{7.6 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Tons/year (Filterable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.9 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day
B01	10.39	0.0099	0.100
B02	10.39	0.0099	0.100
B03	10.39	0.0099	0.100
B04	10.39	0.0099	0.100

lb/day (Filterable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.9 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Tons/year (Condensable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{5.7 \text{ lb PM}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day
B01	10.39	0.030	0.30
B02	10.39	0.030	0.30
B03	10.39	0.030	0.30
B04	10.39	0.030	0.30

lb/day (Condensable)

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{5.7 \text{ lb PM}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

* According to AP-42 Table 1.4-2, all particulate matter is assumed to be < 1.0 micrometer in diameter; therefore, the above numbers can be applied to PM_{Total}, PM_{10}, or $PM_{2.5}$.

3. Silos

The emission factor reference for the silos is taken from AP-42, Fifth Edition Table 9.9.1-2 (2003 update) for *wheat flour mills,* bulk loading. No data is available for this emission source; consequently, no emissions were assumed to be emitted from the silos.

FORM 4:

TOXIC AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Calendar Year: 2023

Facility Name: Bimbo Bakeries USA, Inc. **Facility ID:** 24-021-0234 **Pollutant:** None *

Equipment Description/ Registration Number[1]	Actual Emissions			Control Device**	% Efficiency
	Tons/yr	Lbs/day	Lbs/hr		
5-0293					
Boiler A01					
5-0333					
Boiler A02					
8-0081					
Oven B01					
8-0082					
Oven B02					
8-0083					
Oven B03					
8-0084					
Oven B04					
8-0219					
Silo C01					
8-0219					
Silo C01					
8-0219					
Silo C01					
8-0219					
Silo C01					
8-0219					
Silo C01					
8-0219					
Silo C01					
8-0219					
Silo C01					
8-0219					
Silo C01					
8-0219					
Silo C01					
8-0085					
Farina Reclaim E01					
8-0086					
Burnt Farina F01					
9-0220					
WWTP I01					
TOTALS	0	0	0		

[1] Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

* Please attach all calculations.

* See Attachment 1 for the minimum reporting values.

** Control Device
S = Scrubber
B = Baghouse
ESP = Electrostatic Precipitator
A = Afterburner
C = Condenser
AD = Adsorption
O = Other

Bimbo Bakeries USA Inc.
Frederick, MD

Arsenic Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.0\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.0\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.00000090	0.0000049	0.00000020
A02	1-03-006-03	8.97	0.00000090	0.0000049	0.00000020

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.0\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.0\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.0000010	0.0000105	0.00000044
B02	10.39	0.0000010	0.0000105	0.00000044
B03	10.39	0.0000010	0.0000105	0.00000044
B04	10.39	0.0000010	0.0000105	0.00000044
Plant Total		0.0000060	0.000052	0.0000022

Bimbo Bakeries USA Inc.
Frederick, MD

Barium Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{4.4\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{4.4\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textit{lbs/day}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.000020	0.000108	0.0000045
A02	1-03-006-03	8.97	0.000020	0.000108	0.0000045

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{4.4\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{4.4\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textit{lbs/day}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.000023	0.00023	0.0000096
B02	10.39	0.000023	0.00023	0.0000096
B03	10.39	0.000023	0.00023	0.0000096
B04	10.39	0.000023	0.00023	0.0000096
Plant Total		0.00013	0.00114	0.000047

Bimbo Bakeries USA Inc.
Frederick, MD

Beryllium Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.2\text{E-}05 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.2\text{E-}05 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.000000054	0.00000030	0.000000012
A02	1-03-006-03	8.97	0.000000054	0.00000030	0.000000012

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.2\text{E-}05 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.2\text{E-}05 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.000000062	0.00000063	0.000000026
B02	10.39	0.000000062	0.00000063	0.000000026
B03	10.39	0.000000062	0.00000063	0.000000026
B04	10.39	0.000000062	0.00000063	0.000000026
Plant Total		0.00000036	0.0000031	0.000000130

Cadmium Emission Calculations

2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.1\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.1\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.0000049	0.000027	0.0000011
A02	1-03-006-03	8.97	0.0000049	0.000027	0.0000011

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.1\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.1\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.0000057	0.000058	0.0000024
B02	10.39	0.0000057	0.000058	0.0000024
B03	10.39	0.0000057	0.000058	0.0000024
B04	10.39	0.0000057	0.000058	0.0000024
Plant Total		0.000033	0.00028	0.0000119

Chromium Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.4\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.4\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textit{lbs/day}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.0000063	0.000034	0.0000014
A02	1-03-006-03	8.97	0.0000063	0.000034	0.0000014

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.4\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.4\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textit{lbs/day}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.0000073	0.000073	0.0000031
B02	10.39	0.0000073	0.000073	0.0000031
B03	10.39	0.0000073	0.000073	0.0000031
B04	10.39	0.0000073	0.000073	0.0000031
Plant Total		0.000042	0.00036	0.000015

Cobalt Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{8.4\text{E-}05 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{8.4\text{E-}05 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.00000038	0.0000021	0.000000086
A02	1-03-006-03	8.97	0.00000038	0.0000021	0.000000086

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{8.4\text{E-}05 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{8.4\text{E-}05 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.00000044	0.0000044	0.00000018
B02	10.39	0.00000044	0.0000044	0.00000018
B03	10.39	0.00000044	0.0000044	0.00000018
B04	10.39	0.00000044	0.0000044	0.00000018
Plant Total		0.0000025	0.000022	0.00000091

Copper Emission Calculations

2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{8.5\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{8.5\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textit{lbs/day}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.0000038	0.000021	0.00000087
A02	1-03-006-03	8.97	0.0000038	0.000021	0.00000087

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{8.5\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{8.5\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textit{lbs/day}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.0000044	0.000045	0.0000019
B02	10.39	0.0000044	0.000045	0.0000019
B03	10.39	0.0000044	0.000045	0.0000019
B04	10.39	0.0000044	0.000045	0.0000019
Plant Total		0.000025	0.00022	0.0000092

Bimbo Bakeries USA Inc.
Frederick, MD

Manganese Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{3.8\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{3.8\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.0000017	0.0000093	0.00000039
A02	1-03-006-03	8.97	0.0000017	0.0000093	0.00000039

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{3.8\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{3.8\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.0000020	0.000020	0.00000083
B02	10.39	0.0000020	0.000020	0.00000083
B03	10.39	0.0000020	0.000020	0.00000083
B04	10.39	0.0000020	0.000020	0.00000083
Plant Total		0.000011	0.000098	0.0000041

Bimbo Bakeries USA Inc.
Frederick, MD

Mercury Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.6\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.6\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.0000012	0.0000064	0.00000027
A02	1-03-006-03	8.97	0.0000012	0.0000064	0.00000027

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.6\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.6\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.0000014	0.0000136	0.00000057
B02	10.39	0.0000014	0.0000136	0.00000057
B03	10.39	0.0000014	0.0000136	0.00000057
B04	10.39	0.0000014	0.0000136	0.00000057
Plant Total		0.0000077	0.000067	0.0000028

Bimbo Bakeries USA Inc.
Frederick, MD

Molybdenum Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.1\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.1\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.0000049	0.000027	0.0000011
A02	1-03-006-03	8.97	0.0000049	0.000027	0.0000011

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.1\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.1\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.0000057	0.000058	0.0000024
B02	10.39	0.0000057	0.000058	0.0000024
B03	10.39	0.0000057	0.000058	0.0000024
B04	10.39	0.0000057	0.000058	0.0000024
Plant Total		0.000033	0.00028	0.0000119

Bimbo Bakeries USA Inc.
Frederick, MD

Nickel Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.1\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.1\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textit{lbs/day}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.0000094	0.000052	0.0000022
A02	1-03-006-03	8.97	0.0000094	0.000052	0.0000022

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.1\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.1\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textit{lbs/day}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.000011	0.000110	0.0000046
B02	10.39	0.000011	0.000110	0.0000046
B03	10.39	0.000011	0.000110	0.0000046
B04	10.39	0.000011	0.000110	0.0000046
Plant Total		0.000062	0.00054	0.000023

Bimbo Bakeries USA Inc.
Frederick, MD

Selenium Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.4\text{E-}05 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.4\text{E-}05 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.000000108	0.00000059	0.000000025
A02	1-03-006-03	8.97	0.000000108	0.00000059	0.000000025

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.4\text{E-}05 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.4\text{E-}05 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.00000012	0.00000126	0.000000052
B02	10.39	0.00000012	0.00000126	0.000000052
B03	10.39	0.00000012	0.00000126	0.000000052
B04	10.39	0.00000012	0.00000126	0.000000052
Plant Total		0.00000071	0.0000062	0.00000026

Bimbo Bakeries USA Inc.
Frederick, MD

Vanadium Emission Calculations

2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{\text{2.3E-03 lb}}{\text{mmcf}} * \frac{\text{ton}}{\text{2000 lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{\text{2.3E-03 lb}}{\text{mmcf}} * \frac{\text{year}}{\text{365 days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.0000103	0.000057	0.0000024
A02	1-03-006-03	8.97	0.0000103	0.000057	0.0000024

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{\text{2.3E-03 lb}}{\text{mmcf}} * \frac{\text{ton}}{\text{2000 lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{\text{2.3E-03 lb}}{\text{mmcf}} * \frac{\text{year}}{\text{198 days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.000012	0.000121	0.0000050
B02	10.39	0.000012	0.000121	0.0000050
B03	10.39	0.000012	0.000121	0.0000050
B04	10.39	0.000012	0.000121	0.0000050
Plant Total		0.000068	0.00060	0.000025

Bimbo Bakeries USA Inc.
Frederick, MD

Zinc Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.9\text{E-}02 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.9\text{E-}02 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.00013	0.00071	0.000030
A02	1-03-006-03	8.97	0.00013	0.00071	0.000030

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-4 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.9\text{E-}02 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.9\text{E-}02 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.00015	0.0015	0.000063
B02	10.39	0.00015	0.0015	0.000063
B03	10.39	0.00015	0.0015	0.000063
B04	10.39	0.00015	0.0015	0.000063
Plant Total		0.00086	0.0075	0.00031

Bimbo Bakeries USA Inc.
Frederick, MD

Benzene Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-3 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.1\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.1\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.0000094	0.000052	0.0000022
A02	1-03-006-03	8.97	0.0000094	0.000052	0.0000022

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-3 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.1\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.1\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.000011	0.000110	0.0000046
B02	10.39	0.000011	0.000110	0.0000046
B03	10.39	0.000011	0.000110	0.0000046
B04	10.39	0.000011	0.000110	0.0000046
Plant Total		0.000062	0.00054	0.000023

Bimbo Bakeries USA Inc.
Frederick, MD

Dichlorobenzene Emission Calculations

2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-3 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.2\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.2\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.0000054	0.000030	0.0000012
A02	1-03-006-03	8.97	0.0000054	0.000030	0.0000012

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-3 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.2\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.2\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.0000062	0.000063	0.0000026
B02	10.39	0.0000062	0.000063	0.0000026
B03	10.39	0.0000062	0.000063	0.0000026
B04	10.39	0.0000062	0.000063	0.0000026
Plant Total		0.000036	0.00031	0.0000130

Bimbo Bakeries USA Inc.
Frederick, MD

Formaldehyde Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-3 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{7.5\text{E-}02 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{7.5\text{E-}02 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.00034	0.0018	0.000077
A02	1-03-006-03	8.97	0.00034	0.0018	0.000077

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-3 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{7.5\text{E-}02 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{7.5\text{E-}02 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.00039	0.0039	0.00016
B02	10.39	0.00039	0.0039	0.00016
B03	10.39	0.00039	0.0039	0.00016
B04	10.39	0.00039	0.0039	0.00016
Plant Total		0.0022	0.019	0.00081

Bimbo Bakeries USA Inc.
Frederick, MD

Hexane Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-3 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.8E+00 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.8E+00 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textit{lbs/day}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.0081	0.044	0.0018
A02	1-03-006-03	8.97	0.0081	0.044	0.0018

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-3 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.8E+00 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{1.8E+00 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textit{lbs/day}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.0094	0.094	0.0039
B02	10.39	0.0094	0.094	0.0039
B03	10.39	0.0094	0.094	0.0039
B04	10.39	0.0094	0.094	0.0039
Plant Total		0.054	0.47	0.019

Bimbo Bakeries USA Inc.
Frederick, MD

Naphthalene Emission Calculations

2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-3 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{6.1\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{6.1\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textit{lbs/day}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.0000027	0.000015	0.00000062
A02	1-03-006-03	8.97	0.0000027	0.000015	0.00000062

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-3 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{6.1\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{6.1\text{E-}04 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textit{lbs/day}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.0000032	0.000032	0.00000133
B02	10.39	0.0000032	0.000032	0.00000133
B03	10.39	0.0000032	0.000032	0.00000133
B04	10.39	0.0000032	0.000032	0.00000133
Plant Total		0.000018	0.00016	0.0000066

Bimbo Bakeries USA Inc.
Frederick, MD

Toluene Emission Calculations

2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-3 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{3.4\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{3.4\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textit{lbs/day}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.000015	0.000084	0.0000035
A02	1-03-006-03	8.97	0.000015	0.000084	0.0000035

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-3 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{3.4\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{3.4\text{E-}03 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textit{lbs/day}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.000018	0.00018	0.0000074
B02	10.39	0.000018	0.00018	0.0000074
B03	10.39	0.000018	0.00018	0.0000074
B04	10.39	0.000018	0.00018	0.0000074
Plant Total		0.000101	0.00088	0.000037

Bimbo Bakeries USA Inc.
Frederick, MD

Lead Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{0.0005 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{0.0005 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
A01	1-03-006-03	8.97	0.0000022	0.000012	0.00000051
A02	1-03-006-03	8.97	0.0000022	0.000012	0.00000051

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{0.0005 \text{ lb}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{0.0005 \text{ lb}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day	lbs/hour
B01	10.39	0.0000026	0.000026	0.00000109
B02	10.39	0.0000026	0.000026	0.00000109
B03	10.39	0.0000026	0.000026	0.00000109
B04	10.39	0.0000026	0.000026	0.00000109
Plant Total		0.000015	0.000130	0.0000054

2023 Reporting Year

Pollutant	Emission Factor	Emission Factor Reference	Emission Source	Ngas Usage (mmcf)	tons/year	lbs/day	lbs/hour
2-Methylnaphthalene	2.4E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.000000108	0.00000059	0.000000025
2-Methylnaphthalene	2.4E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.000000108	0.00000059	0.000000025
2-Methylnaphthalene	2.4E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.00000012	0.00000126	0.000000052
2-Methylnaphthalene	2.4E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.00000012	0.00000126	0.000000052
2-Methylnaphthalene	2.4E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.00000012	0.00000126	0.000000052
2-Methylnaphthalene	2.4E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.00000012	0.00000126	0.000000052
Plant Level Total					0.00000071	0.0000062	0.00000026
3-Methylcholanthrene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000081	0.000000044	0.0000000018
3-Methylcholanthrene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000081	0.000000044	0.0000000018
3-Methylcholanthrene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
3-Methylcholanthrene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
3-Methylcholanthrene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
3-Methylcholanthrene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Plant Level Total					0.000000054	0.00000047	0.000000019
7,12-Dimethylbenz(a)anthracene	1.6E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.000000072	0.00000039	0.000000016
7,12-Dimethylbenz(a)anthracene	1.6E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.000000072	0.00000039	0.000000016
7,12-Dimethylbenz(a)anthracene	1.6E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000083	0.00000084	0.000000035
7,12-Dimethylbenz(a)anthracene	1.6E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000083	0.00000084	0.000000035
7,12-Dimethylbenz(a)anthracene	1.6E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000083	0.00000084	0.000000035
7,12-Dimethylbenz(a)anthracene	1.6E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000083	0.00000084	0.000000035
Plant Level Total					0.00000048	0.0000041	0.00000017
Acenaphthalene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000081	0.000000044	0.0000000018
Acenaphthalene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000081	0.000000044	0.0000000018
Acenaphthalene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Acenaphthalene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Acenaphthalene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Acenaphthalene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Plant Level Total					0.000000054	0.00000047	0.000000019
Acenaphthylene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000081	0.000000044	0.0000000018
Acenaphthylene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000081	0.000000044	0.0000000018
Acenaphthylene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Acenaphthylene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Acenaphthylene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Acenaphthylene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Plant Level Total					0.000000054	0.00000047	0.000000019

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Pollutant	Emission Factor	Emission Factor Reference	Emission Source	Ngas Usage (mmcf)	tons/year	lbs/day	lbs/hour
Anthracene	2.4E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000108	0.000000059	0.0000000025
Anthracene	2.4E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000108	0.000000059	0.0000000025
Anthracene	2.4E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000012	0.000000126	0.0000000052
Anthracene	2.4E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000012	0.000000126	0.0000000052
Anthracene	2.4E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000012	0.000000126	0.0000000052
Anthracene	2.4E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000012	0.000000126	0.0000000052
Plant Level Total					0.000000071	0.00000062	0.000000026
Benz(a)anthracene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000081	0.000000044	0.0000000018
Benz(a)anthracene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000081	0.000000044	0.0000000018
Benz(a)anthracene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Benz(a)anthracene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Benz(a)anthracene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Benz(a)anthracene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Plant Level Total					0.000000054	0.00000047	0.000000019
Benzo(a)pyrene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000054	0.000000030	0.0000000012
Benzo(a)pyrene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000054	0.000000030	0.0000000012
Benzo(a)pyrene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000062	0.000000063	0.0000000026
Benzo(a)pyrene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000062	0.000000063	0.0000000026
Benzo(a)pyrene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000062	0.000000063	0.0000000026
Benzo(a)pyrene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000062	0.000000063	0.0000000026
Plant Level Total					0.000000036	0.00000031	0.0000000130
Benzo(b)fluoranthene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000081	0.000000044	0.0000000018
Benzo(b)fluoranthene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000081	0.000000044	0.0000000018
Benzo(b)fluoranthene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Benzo(b)fluoranthene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Benzo(b)fluoranthene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Benzo(b)fluoranthene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Plant Level Total					0.000000054	0.00000047	0.000000019
Benzo(g,h,i)perylene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000054	0.000000030	0.0000000012
Benzo(g,h,i)perylene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000054	0.000000030	0.0000000012
Benzo(g,h,i)perylene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000062	0.000000063	0.0000000026
Benzo(g,h,i)perylene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000062	0.000000063	0.0000000026
Benzo(g,h,i)perylene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000062	0.000000063	0.0000000026
Benzo(g,h,i)perylene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000062	0.000000063	0.0000000026
Plant Level Total					0.000000036	0.00000031	0.0000000130

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Pollutant	Emission Factor	Emission Factor Reference	Emission Source	Ngas Usage (mmcf)	tons/year	lbs/day	lbs/hour
Benzo(k)fluoranthene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000081	0.000000044	0.0000000018
Benzo(k)fluoranthene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000081	0.000000044	0.0000000018
Benzo(k)fluoranthene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Benzo(k)fluoranthene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Benzo(k)fluoranthene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Benzo(k)fluoranthene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Plant Level Total					0.000000054	0.00000047	0.000000019
Chrysene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000081	0.000000044	0.0000000018
Chrysene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000081	0.000000044	0.0000000018
Chrysene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Chrysene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Chrysene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Chrysene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000094	0.000000094	0.0000000039
Plant Level Total					0.000000054	0.00000047	0.000000019
Dibenzo(a,h)anthracene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000054	0.000000030	0.0000000012
Dibenzo(a,h)anthracene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.0000000054	0.000000030	0.0000000012
Dibenzo(a,h)anthracene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000062	0.000000063	0.0000000026
Dibenzo(a,h)anthracene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000062	0.000000063	0.0000000026
Dibenzo(a,h)anthracene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000062	0.000000063	0.0000000026
Dibenzo(a,h)anthracene	1.2E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.0000000062	0.000000063	0.0000000026
Plant Level Total					0.000000036	0.00000031	0.0000000130
Fluoranthene	3.0E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.000000013	0.000000074	0.0000000031
Fluoranthene	3.0E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.000000013	0.000000074	0.0000000031
Fluoranthene	3.0E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000016	0.00000016	0.0000000066
Fluoranthene	3.0E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000016	0.00000016	0.0000000066
Fluoranthene	3.0E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000016	0.00000016	0.0000000066
Fluoranthene	3.0E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000016	0.00000016	0.0000000066
Plant Level Total					0.000000089	0.00000078	0.000000032
Fluorene	2.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.000000013	0.000000069	0.0000000029
Fluorene	2.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.000000013	0.000000069	0.0000000029
Fluorene	2.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000015	0.00000015	0.0000000061
Fluorene	2.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000015	0.00000015	0.0000000061
Fluorene	2.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000015	0.00000015	0.0000000061
Fluorene	2.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000015	0.00000015	0.0000000061
Plant Level Total					0.000000083	0.00000073	0.000000030

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Pollutant	Emission Factor	Emission Factor Reference	Emission Source	Ngas Usage (mmcf)	tons/year	lbs/day	lbs/hour
Indeno(1,2,3-cd)pyrene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.000000008	0.000000044	0.0000000018
Indeno(1,2,3-cd)pyrene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.000000008	0.000000044	0.0000000018
Indeno(1,2,3-cd)pyrene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000009	0.000000094	0.0000000039
Indeno(1,2,3-cd)pyrene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000009	0.000000094	0.0000000039
Indeno(1,2,3-cd)pyrene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000009	0.000000094	0.0000000039
Indeno(1,2,3-cd)pyrene	1.8E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000009	0.000000094	0.0000000039
Plant Level Total					0.000000054	0.00000047	0.000000019
Phenanathrene	1.7E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.000000076	0.00000042	0.000000017
Phenanathrene	1.7E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.000000076	0.00000042	0.000000017
Phenanathrene	1.7E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000088	0.00000089	0.000000037
Phenanathrene	1.7E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000088	0.00000089	0.000000037
Phenanathrene	1.7E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000088	0.00000089	0.000000037
Phenanathrene	1.7E-05 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000088	0.00000089	0.000000037
Plant Level Total					0.00000051	0.0000044	0.00000018
Pyrene	5.0E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.000000022	0.00000012	0.0000000051
Pyrene	5.0E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Boilers	8.97	0.000000022	0.00000012	0.0000000051
Pyrene	5.0E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000026	0.00000026	0.0000000109
Pyrene	5.0E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000026	0.00000026	0.0000000109
Pyrene	5.0E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000026	0.00000026	0.0000000109
Pyrene	5.0E-06 lb/mmcf	AP-42, Fifth Edition Table 1.4-3 (1998 update)	Ovens	10.39	0.000000026	0.00000026	0.0000000109
Plant Level Total					0.00000015	0.00000130	0.000000054

FORM 5:

BILLABLE TOXIC AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Calendar Year: 2023

Facility Name: Bimbo Bakeries USA, Inc.

Facility ID: 24-021-0234

Chemical Name	CAS Number		Actual Emissions				Estimation Method
			Tons/year	Lbs/day	Lbs/hr		
carbon disulfide	75-15-0	S	0	0	0		C4
		F					
carbonyl sulfide	463-58-1	S	0	0	0		C4
		F					
chlorine	7782-50-5	S	0	0	0		C4
		F					
cyanide compounds	57-12-5	S	0	0	0		C4
		F					
hydrochloric acid	7647-01-0	S	0	0	0		C4
		F					
hydrogen fluoride	7664-39-3	S	0	0	0		C4
		F					
methyl chloroform	71-55-6	S	0	0	0		C4
		F					
methylene chloride	75-09-02	S	0	0	0		C4
		F					
perchloroethylene	127-18-4	S	0	0	0		C4
		F					
phosphine	7803-51-2	S	0	0	0		C4
		F					
titanium tetrachloride	7550-45-0	S	0	0	0		C4
		F					
TOTALS			0	0	0		

S-Stack Emissions F-Fugitive Emissions Daily emissions (lbs/day) are lbs/operating day of the source

Emissions Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption Technique
A4-Solid Absorption Technique
A5-Freezing Out Technique
A9-Other, Specify

C1-User calculated based on source test or other measurement
C2-User calculated based on material balance using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by engineering judgment
C5-User calculated based on a State or local agency factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standards

This form is to include only the chemicals identified.

PLEASE NOTE: Be sure to attach all data and calculations necessary to support the emission figures shown above.

03/09/09

FORM 6: Greenhouse Gases

Calendar Year: 2023

GREENHOUSE GAS AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: Bimbo Bakeries USA, Inc. **Facility ID:** 24-021-0234 **Pollutant:** **CO2** *

Equipment Description/ Registration Number[1]	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hr
5-0293	538.40	2,950.14	122.92
Boiler A01			
5-0333	538.40	2,950.14	122.92
Boiler A02			
8-0081	623.43	6,296.65	262.36
Oven B01			
8-0082	623.43	6,296.65	262.36
Oven B02			
8-0083	623.43	6,296.65	262.36
Oven B03			
8-0084	623.43	6,296.65	262.36
Oven B04			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0085			
Farina Reclaim E01			
8-0086			
Burnt Farina F01			
9-0220	15.77	86.44	3.60
WWTP I01			
TOTALS	3,586.31	31,173.32	1,298.89

[1] Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

This form must be used to report Greenhouse gas emissions:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)

* Use a separate form for each pollutant.

* Please attach all calculations.

Bimbo Bakeries USA Inc.
Frederick, MD

CO_2 Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{120{,}000 \text{ lb CO2}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{120{,}000 \text{ lb CO2}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textit{lbs/day}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day
A01	1-03-006-03	8.97	538.40	2,950.14
A02	1-03-006-03	8.97	538.40	2,950.14

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{120{,}000 \text{ lb CO2}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{120{,}000 \text{ lb CO2}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textit{lbs/day}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day
B01	10.39	623.43	6,296.65
B02	10.39	623.43	6,296.65
B03	10.39	623.43	6,296.65
B04	10.39	623.43	6,296.65

CO_2 Emission Calculations

3. WWTP Biogas Flare

Emissions based on million cubic feet (mmcf) of biogas (BG) combusted by the flare for the calendar year.
The emission factor (52.07 kg CO2 per mmBTU) is taken from USEPA, GHG Emissions Factors Hub Table 1 (03/09/2018 update).

Tons/year

$$\frac{a\ \text{mmcf}}{\text{year}} * \frac{600\ \text{mmBTU}}{\text{mmcf}} * \frac{114.7947\ \text{lb CO2}}{\text{mmBTU}} * \frac{\text{ton}}{2000\ \text{lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a\ \text{mmcf}}{\text{year}} * \frac{600\ \text{mmBTU}}{\text{mmcf}} * \frac{114.7947\ \text{lb CO2}}{\text{mmBTU}} * \frac{\text{year}}{365\ \text{days}} = \textbf{\textit{lbs/day}}$$

WWTP	BG Combusted (*a*)	tons/year	lbs/day
Flare	0.458050	15.77	86.44

FORM 6: Greenhouse Gases

Calendar Year: 2023

GREENHOUSE GAS AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: Bimbo Bakeries USA, Inc. **Facility ID:** 24-021-0234 **Pollutant:** **CH4** *

Equipment Description/ Registration Number[1]	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hr
5-0293	0.010	0.057	0.0024
Boiler A01			
5-0333	0.010	0.057	0.0024
Boiler A02			
8-0081	0.012	0.121	0.0050
Oven B01			
8-0082	0.012	0.121	0.0050
Oven B02			
8-0083	0.012	0.121	0.0050
Oven B03			
8-0084	0.012	0.121	0.0050
Oven B04			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0085			
Farina Reclaim E01			
8-0086			
Burnt Farina F01			
9-0220	0.00097	0.0053	0.00022
WWTP I01			
TOTALS	0.069	0.60	0.025

[1] Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

This form must be used to report Greenhouse gas emissions:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)

* Use a separate form for each pollutant.

* Please attach all calculations.

Bimbo Bakeries USA Inc.
Frederick, MD

CH_4 Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.3 \text{ lb CH4}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.3 \text{ lb CH4}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day
A01	1-03-006-03	8.97	0.0103	0.0565
A02	1-03-006-03	8.97	0.0103	0.0565

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.3 \text{ lb CH4}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.3 \text{ lb CH4}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textbf{\textit{lbs/day}}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day
B01	10.39	0.0119	0.1207
B02	10.39	0.0119	0.1207
B03	10.39	0.0119	0.1207
B04	10.39	0.0119	0.1207

CH_4 Emission Calculations

3. WWTP Biogas Flare

Emissions based on million cubic feet (mmcf) of biogas (BG) combusted by the flare for the calendar year.
The emission factor (3.2 g CH4 per mmBTU) is taken from USEPA, GHG Emissions Factors Hub Table 1 (03/09/2018 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{600 \text{ mmBTU}}{\text{mmcf}} * \frac{0.00705479 \text{ lb CH4}}{\text{mmBTU}} * \frac{\text{ton}}{2000 \text{ lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{600 \text{ mmBTU}}{\text{mmcf}} * \frac{0.00705479 \text{ lb CH4}}{\text{mmBTU}} * \frac{\text{year}}{365 \text{ days}} = \textbf{\textit{lbs/day}}$$

WWTP	BG Combusted (*a*)	tons/year	lbs/day
Flare	0.458050	0.0010	0.0053

FORM 6: Greenhouse Gases

Calendar Year: 2023

GREENHOUSE GAS AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: Bimbo Bakeries USA, Inc. **Facility ID:** 24-021-0234 **Pollutant:** **N2O** *

Equipment Description/ Registration Number[1]	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hr
5-0293	0.010	0.054	0.0023
Boiler A01			
5-0333	0.010	0.054	0.0023
Boiler A02			
8-0081	0.011	0.115	0.0048
Oven B01			
8-0082	0.011	0.115	0.0048
Oven B02			
8-0083	0.011	0.115	0.0048
Oven B03			
8-0084	0.011	0.115	0.0048
Oven B04			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0219			
Silo C01			
8-0085			
Farina Reclaim E01			
8-0086			
Burnt Farina F01			
9-0220	0.00019	0.00105	0.000044
WWTP I01			
TOTALS	0.066	0.57	0.024

[1] Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

This form must be used to report Greenhouse gas emissions:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)

* Use a separate form for each pollutant.

* Please attach all calculations.

Bimbo Bakeries USA Inc.
Frederick, MD

N_2O Emission Calculations
2023 Reporting Year

1. Boilers

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.2 \text{ lb N2O}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.2 \text{ lb N2O}}{\text{mmcf}} * \frac{\text{year}}{365 \text{ days}} = \textit{lbs/day}$$

Boiler	SCC Number	Ngas Usage (*a*)	tons/year	lbs/day
A01	1-03-006-03	8.97	0.0099	0.0541
A02	1-03-006-03	8.97	0.0099	0.0541

2. Ovens

Emissions based on million cubic feet (mmcf) of natural gas (NG) consumed for the calendar year and the number of oven operating hours.
The emission factor is taken from AP-42, Fifth Edition Table 1.4-2 (1998 update).

Tons/year

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.2 \text{ lb N2O}}{\text{mmcf}} * \frac{\text{ton}}{2000 \text{ lb}} = \textit{tons/year}$$

lb/day

$$\frac{a \text{ mmcf}}{\text{year}} * \frac{2.2 \text{ lb N2O}}{\text{mmcf}} * \frac{\text{year}}{198 \text{ days}} = \textit{lbs/day}$$

Oven	Ngas Usage (*a*)	tons/year	lbs/day
B01	10.39	0.0114	0.1154
B02	10.39	0.0114	0.1154
B03	10.39	0.0114	0.1154
B04	10.39	0.0114	0.1154

N_2O Emission Calculations

3. WWTP Biogas Flare

Emissions based on million cubic feet (mmcf) of biogas (BG) combusted by the flare for the calendar year.
The emission factor (0.63 g N2O per mmBTU) is taken from USEPA, GHG Emissions Factors Hub Table 1 (03/09/2018 update).

Tons/year

$$\frac{a\ \text{mmcf}}{\text{year}} * \frac{600\ \text{mmBTU}}{\text{mmcf}} * \frac{0.001388912\ \text{lb N2O}}{\text{mmBTU}} * \frac{\text{ton}}{2000\ \text{lb}} = \textbf{\textit{tons/year}}$$

lb/day

$$\frac{a\ \text{mmcf}}{\text{year}} * \frac{600\ \text{mmBTU}}{\text{mmcf}} * \frac{0.001388912\ \text{lb N2O}}{\text{mmBTU}} * \frac{\text{year}}{365\ \text{days}} = \textbf{\textit{lbs/day}}$$

WWTP	BG Combusted (*a*)	tons/year	lbs/day
Flare	0.458050	0.00019	0.00105

Bimbo Bakeries USA Inc.
Frederick, MD

Yt Calculations for Various Products
2023 Reporting Year

Product	Baker's Yeast %	Fermentation time (hr)	Yt*	lb EtOH/ ton prod.**	Production (lbs)	% of Production	Weighted Emissions
Regular	2.33%	2.50	5.83	2.99	38,570,647.00	63.33%	1.90
100% Whole Wheat	2.91%	2.50	7.28	3.64	3,329,878	5.47%	0.20
Light Multi Grain	3.13%	2.50	7.83	3.88	6,127,421	10.06%	0.39
Cinnamon Protein	2.20%	2.50	5.50	2.85	259,557	0.43%	0.01
Cinnamon Raisin	2.67%	2.50	6.68	3.37	5,892,039	9.67%	0.33
Blueberry	2.60%	2.50	6.50	3.29	2,695,427	4.43%	0.15
Cranberry	3.43%	2.50	8.58	4.22	703,407	1.15%	0.05
Pumpkin	2.22%	2.50	5.55	2.87	694,132	1.14%	0.03
Buttermilk	2.23%	2.50	5.58	2.88	2,634,060	4.32%	0.12
				Totals	60,906,568	100.0%	
					Weighted Emission Factor		**3.18**

* The Yt is calculated by multiplying the baker's yeast percentage by the fermentation time in hours
** Derived from the equation 0.4446 * Yt + 0.404

9. 2023 Annual Compliance Certification Report

United States Environmental Protection Agency

OMB No. 2060-0336, Expires 11/30/2022

Federal Operating Permit Program (40 CFR Part 71)
CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Peterson (First) Greg (MI) ____

Title Senior Director of Operations

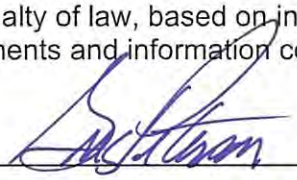
Street or P.O. Box 7110 English Muffin Way

City Frederick State MD ZIP 21704 - _____

Telephone (610) 478-9369 x307 Facsimile (____) ____ - _____

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) 

Name (typed) Greg Peterson Date: 3/27/24

United States Environmental Protection Agency

OMB No. 2060-0336, Expires 11/30/2022

Federal Operating Permit Program (40 CFR Part 71)

ANNUAL COMPLIANCE CERTIFICATION (A-COMP)

A. GENERAL INFORMATION

Permit No. 24-021-0234

Reporting Period: Beg. 1 / 1 / 2023 End. 12 / 31 / 2023

Source / Company Name Bimbo Bakeries USA Inc.

Mailing Address: Street or P.O. Box 7110 English Muffin Way

City Frederick State MD ZIP 21704 -

Contact person Josh Beall Title Production Manager

Telephone (301) 694 - 8100 Ext. 160

Continued on next page

A-COMP

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): A 01 & A 02

Permit Term (Describe requirements and cross-reference)

Two 8.4 million BTU/hr natural gas boilers.

Operating Requirements:

The Permittee shall only use natural gas in the boilers.

Recording Keeping Requirements:

The Permittee shall maintain the annual fuel usage on site for at least five (5) years and shall make them available to the Department upon request.

Reporting Requirements: - The Permittee shall include annual fuel usage in its emission certification report submitted by April 1 each year.

Compliance Methods for the Above (Description and Citation):

Operating Requirements

Only natural gas was utilized as fuel source – boilers are not designed to operate on an alternate fuel source

Record Keeping Requirements

Gas usage records are maintained for the operation and are available for review by the department

Reporting Requirements

Annual fuel usage was included on the emission certification report

Status (Check one): ___ Intermittent Compliance _√__ Continuous Compliance

Emission Unit ID(s): B-03

Permit Term (Describe requirements and cross-reference)

Largest bakery oven at this premises.

Operating Requirements:

The Permittee shall use only natural gas in this bakery oven.

Operating Requirements:

If the facility's largest commercial bakery oven exceeds the average annual production tonnage of finished bread, rolls, or other yeast-raised products for the corresponding Yt values as listed in the permit the Permittee shall be subject to COMAR 26.11.19.21D(2)

Monitoring Requirements:

The Permittee shall calculate the 12-month rolling average, Yt value, and total production of finished bread, rolls or other yeast raised products from the previous 12 months.

Record Keeping Requirements:

The Permittee shall maintain the records for annual fuel usage, and monthly Yt value for at least five years from this oven.

Reporting requirements:

The permittee shall include the annual fuel usage and Yt value of the bakery production from this oven on its annual emission certification report submitted by April 1 each year.

Compliance Methods for the Above (Description and Citation):

Operating Requirements

Only natural gas was utilized as a fuel source – this oven is not designed to operate on an alternative fuel source

Operating Requirements

This oven did not exceed the corresponding Yt value listed in the permit based on production

Monitoring Requirements

A 12-month rolling average of VOC from this line was maintained

Record Keeping Requirements

Fuel usage and production records are maintained

Reporting Requirements

Annual fuel usage and Yt of the bakery production from this oven are included on annual emission certification report

Status (Check one): ___ Intermittent Compliance _√__ Continuous Compliance

A-COMP

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): B01, B02 & B04

Permit Term (Describe requirements and cross-reference)

Three bakery ovens none of which is the largest bakery oven at this premise.

Operating Requirements:

The Permittee shall use only natural gas in these bakery ovens.

Record Keeping Requirements:

The Permittee shall maintain the records for annual fuel usage, and yearly Yt value for at least five years for each bakery oven.

Reporting requirements:

The permittee shall include the annual fuel usage and Yt value for each bakery oven on its annual emission certification report submitted by April 1 each year.

Compliance Methods for the Above (Description and Citation):

Operating Requirements

Only natural gas was utilized as a fuel source – these ovens are not designed to operate on an alternative fuel source

Recordkeeping Requirements

Fuel usage and production records are maintained

Reporting Requirements

Fuel usage and production information were included on the annual emission certification report

Status (Check one): ___ Intermittent Compliance _√_ Continuous Compliance

Emission Unit ID(s): C-01

Permit Term (Describe requirements and cross-reference)

Ten silos for storage of white flour, farina, and wheat flour

Operating Requirements: The exhaust gas from each silo shall vent through a bag filter before discharging to the atmosphere unless the Permittee applies for and obtains an approval or permit from the Department to operate an alternative method.

Monitoring Requirements: When the silo loading operation takes place, the Permittee shall visually inspect the exhaust gases from the silo at least once per quarter. If exhaust gases are visible control equipment should be inspected, and repaired before the next unloading takes place. The results of the inspection and any required repairs or adjustments should be documented in writing.

Record Keeping Requirements: The Permittee shall maintain records of visible observations for at least five (5) years and shall make them available upon request.

Compliance Methods for the Above (Description and Citation):

Operating Requirements

The exhaust gas from each silo was vented through a bag filter before discharging into the atmosphere

Monitoring Requirements

Visual inspections of the exhaust gases from the silos were performed as outlined in the permit

Record Keeping Requirements

Observation records are maintained

Status (Check one): ___ Intermittent Compliance _√__ Continuous Compliance

A-COMP

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): E01 & F01

Permit Term (Describe requirements and cross-reference)

Two Farina reclaim bins service two vacuum systems on the production lines.

Operating Requirements:

The exhaust gas from each vacuum system shall vent through a bag filter before discharging to the atmosphere unless the Permittee applies for and obtains an approval or permit from the Department to operate in an alternate method.

Monitoring Requirements:

When the vacuum operation takes place, the Permittee shall visually inspect the exhaust gases from the silo at least once per quarter. If exhaust gases are visible control equipment should be inspected and repaired before the next unloading takes place. The results of the inspection and any required repairs or adjustments should be documented in writing.

Record Keeping Requirements:

The Permittee shall maintain records of visible observations for at least five (5) years and shall make them available upon request.

Compliance Methods for the Above (Description and Citation):

Operating Requirements

The exhaust gas from each vacuum system was vented through a bag filter before discharging to the atmosphere

Monitoring Requirements

Visual inspections of the exhaust gases from the vacuum system were performed as outlined in the permit

Recording Keeping Requirement

Observation records are maintained

Status (Check one): ___ Intermittent Compliance _√_ Continuous Compliance

Emission Unit ID(s):

Permit Term (Describe requirements and cross-reference)

Compliance Methods for the Above (Description and Citation):

Status (Check one): ___ Intermittent Compliance ___ Continuous Compliance

A-COMP

C. DEVIATIONS FROM PERMIT TERMS AND CONDITIONS

Report all deviations from permit terms (whether reported previously or not) that occurred during the permit term. Cross-reference deviations already reported in the six-month report. Indicate whether each deviation is a "possible exception" to compliance. Start and end period of each deviation should be in mo/day/yr, hr:min format (24-hour clock). Also specify the date when the written deviation report was submitted (If written report required, but not submitted, leave the date field blank).

Permit Term for Which There was a Deviation: None Emission Units (unit IDs): Deviation Start _____/_____/_____ ____:____ End:_____/_____/_____ ____:____ Date Written Report Submitted ____/____/_____
Permit Term for Which There was a Deviation: Emission Units (unit IDs): Deviation Start _____/_____/_____ ____:____ End:_____/_____/_____ ____:____ Date Written Report Submitted ____/____/_____
Permit Term for Which There was a Deviation: Emission Units (unit IDs): Deviation Start _____/_____/_____ ____:____ End:_____/_____/_____ ____:____ Date Written Report Submitted ____/____/_____
Permit Term for Which There was a Deviation: Emission Units (unit IDs): Deviation Start _____/_____/_____ ____:____ End:_____/_____/_____ ____:____ Date Written Report Submitted ____/____/_____

CERTIFICATION OF PLANT-WIDE-CONDITIONS
(SECTION III OF PART 70 OPERATING PERMIT)

Indicate compliance with the following requirements of section III of your part 70 Operating Permit in the space provided below:

1. Particulate Matter from Construction or Demolition
   There was no particulate from construction or demolition the previous year.

2. Open Burning
   There was no open burning the previous year.

3. Air Pollution Episode
   N/A

4. Report of Excessive Emission and Deviations
   (All deviations from the permit requirements should be clearly identified in the quarterly monitoring reports)
   There were no excessive emissions or deviations from the permitted requirements.

5. Accidental Release Provision (if applicable)
   N/A

6. General Testing Requirements
   Visual observations of the exhaust from the silos during loading, as well as observations of the burnt farina reclaim and farina reclaim vacuum systems, were conducted as outlined in the permit.

7. Emission Test Methods
   Method 9 procedure was used to conduct the visual observations.

8. Emission Certification
   An Emission Certification Report was completed and submitted.

9. Compliance Certification Report
   A Compliance Certification Report was completed.

10. Certification by Responsible Party
    The report was signed by the Senior Director of Operations, who is the corporate designated acting Responsible Official for this location

11. Sampling and Emission Testing Record Keeping
    Records are maintained on site as required by the permit

12. General Record Keeping Requirements
    All record keeping required by the permit is available on site for inspection

13. General Conformity (N/A except for federal facility)
    N/A

14. Asbestos Provision (if applicable)
    N/A

15. Ozone Depleting Regulation (if applicable)
    This facility has a refrigerant compliance program for CFC materials

16. Acid Rain Permit (if applicable)
    N/A