

PERMIT NO. 2051-185-0117-S-01-0

ISSUANCE DATE:



**GEORGIA**  
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

## Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

**Facility Name:** Bimbo Bakeries QSR, LLC – Valdosta Plant

**Facility Address:** 1802 Bimbo QSR Blvd  
Valdosta, Georgia 31601 Lowndes County

**Mailing Address:** 3005 Eastpointe Drive  
Zanesville, OH 43701

**Facility AIRS Number:** 04-13-185-00117

is issued a Permit for the following:

**The construction and operation of a commercial bakery.**

**This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.**

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 28319 dated March 2, 2022; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 5 pages.



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Richard E. Dunn, Director  
Environmental Protection Division

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**1. General Requirements**

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

**2. Allowable Emissions**

- 2.1 The Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility volatile organic compound (VOC) emissions equal to or exceeding 95 tons during any consecutive 12-month period.  
[Title V Avoidance]
- 2.2 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from all process equipment, any gases which exhibit visible emissions, the opacity of which is equal to or greater than 40 percent, unless otherwise specified.  
[391-3-1-.02(2)(b)1.]

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- 2.3 The Permittee shall not fire any fuel other than natural gas in all fuel burning sources.  
[391-3-1-.03(2)(c) and 391-3-1-.02(2)(g)2. (subsumed)]
- 2.4 The Permittee shall not cause, let, suffer, permit, or allow the emission from any source, particulate matter (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below, unless otherwise specified in this Permit.  
[391-3-1-.02(2)(e)1.]

$E = 4.1P^{0.67}$ , for process input weight rate up to and including 30 tons per hour;

$E = 55P^{0.11} - 40$ , for process input weight rate in excess of 30 tons per hour.

Where:

E = allowable emission rate in pounds per hour;

P = process input weight rate in tons per hour.

- 2.5 The Permittee shall take all reasonable precautions to prevent fugitive dust from becoming airborne from any operation, process, handling, and transportation or storage facility. The opacity from any fugitive dust source shall not equal or exceed twenty percent. Reasonable precautions that should be taken to prevent dust from becoming airborne include, but are not limited to, the following:  
[391-3-1-.02(2)(n)]
- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
  - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
  - c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
  - d. Covering, at all times when in motion, open-bodied trucks, transporting materials likely to give rise to airborne dust; and
  - e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

### **3. Fugitive Emissions**

- 3.1 The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive emissions of air contaminants.

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**4. Process & Control Equipment**

Not applicable.

**5. Monitoring**

Not applicable.

**6. Performance Testing**

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
- a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
  - b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.
  - c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.
  - d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

**7. Notification, Reporting and Record Keeping Requirements**

- 7.1 The Permittee shall submit written notification of startup to the Division within 15 days after such date. The notification shall be submitted to:
- Mr. Sean Taylor  
Stationary Source Compliance Program  
4244 International Parkway, Suite 120  
Atlanta GA 30354

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7.2 The Permittee shall maintain the following records for each product formulation produced during any calendar month: The initial baker's percent of yeast to the nearest tenth of a percent; the total yeast action time, in hours; the final (spike) baker's percent of yeast to the nearest tenth of a percent; the spiking time in hours to the nearest tenth of an hour; and the mass (in tons) of each product formulation produced. These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal.  
[391-3-1-.02(6)(b)1]

7.3 The Permittee shall use the records required by Condition 7.2 to calculate and record the VOC emission factor (pounds of VOC per ton of baked product) for each product formulation baked in the oven during any calendar month. The Permittee shall derive the VOC emission factor using the following equation. These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal.  
[391-3-1-.02(6)(b)1]

$$\text{VOC E.F. \#X} = (0.95Y_i) + (0.195T_i) - (0.51S) - (0.86t_s) + 1.90$$

$$\text{Total VOC}_{\text{Baking}} = \sum [ (\text{VOC E.F. \#X}) * Q_x ] / 2,000$$

Where,

VOC E.F. #X = VOC Emission Factor, in pounds of VOC per ton of baked product, for each product formulation number X. Each formulation, which results in a change in variables below, must have a different VOC Emission Factor.

$Y_i$  = Initial baker's percent of yeast to the nearest tenth of a percent (baker's percent of an ingredient refers to the weight of that ingredient per 100 pound of flour in the formula).

$T_i$  = Total yeast action time, in hours, to the nearest tenth of an hour (includes all time between the moment the yeast comes in contact with water and the moment the product enters the oven)

$S$  = Final (spike) baker's percent of yeast to the nearest tenth of a percent.

$t_s$  = Spiking time in hours to the nearest tenth of an hour.

$\text{Total VOC}_{\text{Baking}}$  = Total monthly VOC emissions from baking operations, in tons per month.

$Q_x$  = Mass of each product (bread) formulation produced, in tons.

2,000 = Conversion factor from pounds to tons

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- 7.4 The Permittee shall use the records required by Conditions 7.2 and 7.3 to calculate and record the total monthly emission rate, in tons, of VOC emissions from the bakery process. The Permittee shall notify the Division in writing if any monthly VOC emissions are equal to or exceed 7.9 tons. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition 2.1. These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal.  
[391-3-1-.02(6)(b)1]
- 7.5 The Permittee shall use the records required by Condition 7.4 to calculate and record the consecutive 12-month total emission rate, in tons, of VOC emissions from the bakery process. A consecutive 12-month total shall be the total for the month plus the monthly totals for the previous eleven months. The Permittee shall notify the Division in writing if any consecutive 12-month VOC emissions are equal to or exceed 95 tons ending in any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition 2.1. These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal.  
[391-3-1-.02(6)(b)1]

**8. Special Conditions**

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
- 8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Application & Annual Permit Fees."