

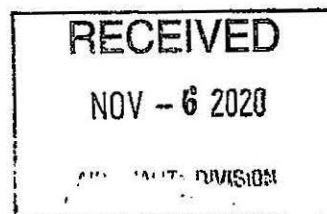
Bimbo Bakeries USA, Inc.
210 28th Street SE
Grand Rapids, MI 49548

Tel. +1.616.292.4571



November 6, 2020

Mr. Scott Evans
EGLE, AQD, Grand Rapids District
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503



RE: Response to Violation Notice
Bimbo Bakeries USA, Inc.
210 28th Street SE, Grand Rapids, MI 49548
SRN: B4394, Kent County; PTI Number: 14-97D

Dear Mr. Evans:

The Bimbo Bakeries USA, Inc. (BBU) facility listed above received a violation notice dated October 16, 2020 following an August Air Quality Division (AQD) inspection. "During the inspection, records showed the total annual production of buns on a 12-month rolling time-period to be 20,667,200 pounds as of July 2020. This exceeds the material limit of 20,000,000 pounds established in PTI 14-97D." The violation is ongoing.

BBU is in the process of developing a PTI Application to modify the current operating limit of 20,000,000 pounds per 12-month rolling time-period to approximately 25,000,000 pounds. This application is expected to be submitted no later than November 13, 2020.

Two mitigating circumstances are applicable to this exceedance. First, the bakery increased production in response to demand generated during the COVID-19 pandemic. The unexpected increased production levels pushed the bun production totals over the limit. The bakery expects production of buns to level off/decrease as the current pandemic recedes.

Second, the bakery did not exceed the permitted volatile organic compound (VOC) limit for FGOVENS of 94.9 ton/year. In fact, the rolling total VOC emissions for the inspection period remained in the 50 ton/year range. Since emissions were a little more than 50% of the permitted limit and well below the major source threshold, no environmental harm has been created with the permit limit exceedance. Additionally, the fact that the emissions are significantly low relative to the permit limit demonstrates that the calculated basis for the previous production limit may have been excessive.

Mr. Scott Evans
November 6, 2020
Page 2

The bakery will return to compliance when the permit modification is issued or when production levels return to their pre-pandemic levels. Please note that BBU may evaluate additional operational changes as consumer needs and behaviors continue to evolve. If you have any questions or need further information, please do not hesitate to contact me at (616) 292-4571 or Ms. Kia Zuber at (773) 241-9756.

Sincerely,
Walter Snidanko
Plant Manager

cc: Ms. Jenine Camilleri
Enforcement Unit Supervisor
EGLE, AQD
P.O. Box 30260
Lansing, MI 48909-7760