

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL

INDIANA DEPARTMENT of ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY and CITY of INDIANAPOLIS OFFICE of ENVIRONMENTAL SERVICES

**Interstate Brands Corporation
2929 North Shadeland Avenue
Indianapolis, Indiana 46219**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-14984-00170	
Issued by: Original signed by John B. Chavez John B. Chavez, Administrator Office of Environmental Services	Issuance Date: January 26, 2004 Expiration Date: January 26, 2009

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis, Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary source manufacturing leavened and unleavened bakery bread products under a Standard Industrial Classification (SIC) Code of 2051 (establishments primarily engaged in manufacturing fresh or frozen bread and bread-type rolls and fresh cakes, pies, pastries and other similar "perishable" bakery products).

Authorized individual:	General Manager
Source Address:	2929 North Shadeland Avenue, Indianapolis, IN 46219
Mailing Address:	2929 North Shadeland Avenue, Indianapolis, IN 46219
General Source Phone:	Marty Wilson, (317) 693-2230
SIC Code:	2051
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP); Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) Baker-Perkins Bakery Bread Oven # 3 identified as Emission Unit ID Oven # 3 exhausting to two (2) stacks/vents identified as Stack/Vent ID BD-A (Front Stack) and BD-C (Rear Stack). Equipped with natural gas fired oven heating at a maximum natural gas heat input rate of 6.1 million Btu per hour. Includes the application of Oven chain lubrication for Emission Unit ID Oven # 3 and Emission Unit ID Oven # 4. Installation date of 1982.
- (b) One (1) Baker-Perkins Bakery Bun Oven # 4 identified as Emission Unit ID Oven # 4 exhausting to two (2) stacks/vents identified as Stack/Vent ID BN-A (Front Stack) and BN-B (Rear Stack). Equipped with natural gas fired oven heating at a maximum natural gas heat input rate of 3.0 million Btu per hour. Includes the application of Oven chain lubrication for Emission Unit ID Oven # 4 and Emission Unit ID Oven # 3. Installation date of 1968.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour identified as :
 - (1) Boiler # 1 and Boiler # 2 each rated at a maximum capacity of four and two tenths (4.2) million Btu per hour and 3000 pounds of steam production per hour.
 - (2) Muffin Oven # 1 rated at 3.0 million Btu per hour.
 - (3) Muffin Oven # 2 rated at 6.0 million Btu per hour.

- (4) Fryer 1 rated at 0.76 million Btu per hour.
- (5) Fryer 2 rated at 0.84 million Btu per hour.
- (6) Pan Washer 1 rated at 3.8 million Btu per hour.
- (7) Pan Washer 2 rated at 3.8 million Btu per hour.
- (8) Boil Tank rated at 1.0 million Btu per hour.
- (9) All space heaters at a combined heat input rate of 5.0 million Btu per hour.
- (b) A petroleum fuel other than gasoline dispensing facility, consisting of two (2) underground storage tanks each having a storage tank capacity of ten thousand (10,000) gallons.
- (c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (d) Filling drums, pails or other packaging containers with lubricating oils, waxes and greases.
- (e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (f) Closed loop heating and cooling systems.
- (g) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (i) Heat exchanger cleaning and repair.
- (j) Paved and unpaved roads and parking lots with public access.
- (k) Blowdown for any of the following: sight glass, boiler, compressors, pumps and cooling tower.
- (l) Muffin Oven # 1 - Maximum process rate (P) of 2.7 tons per hour.
Muffin Oven # 2 - Maximum process rate (P) of 3.0 tons per hour.
- (m) Donut Fryer A and Donut Fryer B.
- (n) Package Printers utilizing VOC/HAP solution(s) in Ink Jet Coder sprays for labeling packages. Maximum PTE of 1.4 tons per year VOC/HAP is less than significance threshold(s).
- (o) Dough mixing and flour and sugar pneumatic transferring designated as Emission Unit ID Transfer Points. A total of thirty eight (38) transfer points are controlled by twenty two (22) baghouses or cartridge filters and sixteen (16) breather bag sock filters each with an internal exhaust. Each control device has been determined as integral to the system. Each filter has a design controlled exhaust rate of less than 0.02 gr/dscf. Each baghouse or cartridge filter has a rated exhaust air flow rate of 600 acfm.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the City of Indianapolis Office of Environmental Services (OES) and the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, and OES copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

- (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and OES may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and OES, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, OAQ

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

OES

Telephone No.: 317-327-2234 (ask for Compliance Section)

Facsimile No.: 317-327-2274

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management

Compliance Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

and

Office of Environmental Services

Compliance

2700 South Belmont Avenue

Indianapolis, Indiana 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ and OES, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ and OES, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ and OES determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ and OES, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ and OES, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ and OES, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and OES and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Office of Environmental Services
Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (2) If IDEM, OAQ and OES upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and OES, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC

2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and OES, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326

IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and OES U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request

for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or

fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management

Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
and

Office of Environmental Services
Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and/or OES, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

IDEM, OAQ and/or OES may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, and OES within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
 - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days

of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ and OES that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ or OES may extend the retesting deadline.

- (c) IDEM, OAQ and OES reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

-
- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- and
- Office of Environmental Services
Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) Baker-Perkins Bakery Bread Oven # 3 identified as Emission Unit ID Oven # 3 exhausting to two (2) stacks/vents identified as Stack/Vent ID BD-A (Front Stack) and BD-C (Rear Stack). Equipped with natural gas fired oven heating at a maximum natural gas heat input rate of 6.1 million Btu per hour. Includes the application of Oven chain lubrication for Emission Unit ID Oven # 3 and Emission Unit ID Oven # 4. Installation date of 1982.
- (b) One (1) Baker-Perkins Bakery Bun Oven # 4 identified as Emission Unit ID Oven # 4 exhausting to two (2) stacks/vents identified as Stack/Vent ID BN-A (Front Stack) and BN-B (Rear Stack). Equipped with natural gas fired oven heating at a maximum natural gas heat input rate of 3.0 million Btu per hour. Includes the application of Oven chain lubrication for Emission Unit ID Oven # 4 and Emission Unit ID Oven # 3. Installation date of 1968.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-2][326 IAC 8-1-6][326 IAC 2-8-4]

- (a) Pursuant to 326 IAC 8-1-6 (Volatile Organic Compound Rules; General Reduction Provisions Relating to VOC Rules), VOC emissions from Emission Unit ID Oven # 3 shall not exceed ninety five (95.0) tons per thirteen (13) consecutive twenty eight (28) day period with compliance determined at the end of each twenty eight (28) day period. Compliance with this limitation demonstrates compliance with 326 IAC 8-1-6 (Volatile Organic Compound Rules; General Reduction Provisions Relating to VOC Rules) for Oven # 3.
- (b) Pursuant to 326 IAC 2-8-4 (Federally Enforceable Permit Program), combined total VOC emissions from Emission Unit ID Oven # 3, Emission Unit ID Oven # 4 and the use of Chain Lubrication for Oven # 3 and Oven # 4 shall not exceed ninety five (95.0) tons per thirteen (13) consecutive twenty eight (28) day period with compliance determined at the end of each twenty eight (28) day period. Compliance with this limitation makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) not applicable.

D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Emission Unit ID Oven # 3 and Emission Unit ID Oven # 4 shall not exceed 17.3 pounds per hour for Oven # 3 and 14.2 pounds per hour for Oven # 4 when operating at a process weight rate of 8.6 tons of bread production per hour for Oven # 3 and 6.4 tons of bun production per hour for Oven # 4. The pounds per hour limitation was calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID Oven # 3 and Emission Unit ID Oven # 4.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC limitations contained in Condition D.1.1(a) and (b) shall be determined by:

- (a) Pursuant to the emission factor equation for bakery oven VOC emissions found in "Alternative Control Technology (ACT) Document for Bakery Oven Emissions" 453/R-92-017 for actual bread and bun production per thirteen (13) consecutive twenty eight (28) day production period with compliance determined at the end of each twenty eight (28) day production period. The ACT emission factor utilized for Compliance Determination is:

$$\text{VOC emission factor} = 0.95(Y_i) + 0.195(t_i) - 0.51(S) - 0.86(t_s) + 1.90$$

where: Y_i = initial baker's % yeast to the nearest tenth of a percent
 t_i = total yeast action time in hours to the nearest tenth of an hour
 S = final (spike) baker's % yeast to the nearest tenth of a percent
 t_s = spiking time in hours to the nearest tenth of an hour

IDEM, OAQ and/or OES reserves the authority to determine compliance using alternate method(s) as approved by the Administrator; and

- (b) Actual chain lubrication usage in Oven # 3 and Oven # 4 per thirteen (13) consecutive twenty eight (28) day production periods with compliance determined at the end of each twenty eight (28) day production period.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.5 Record Keeping Requirements

To document compliance with Condition D.1.1, the Permittee shall maintain records of actual bread and bun production, chain lubrication usage and VOC emissions per thirteen (13) consecutive twenty eight (28) day period. Records maintained shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting form(s) located at the end of this Permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. Each quarterly report shall consist of, at a minimum, a thirteen (13) consecutive twenty eight (28) day production period VOC emissions total including all completed twenty eight (28) day production periods in the calendar quarter being reported. The quarterly report shall also include the end date of all twenty eight (28) day production periods completed during the quarter. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activity

- (o) Dough mixing and flour and sugar pneumatic transferring designated as Emission Unit ID Transfer Points. A total of thirty eight (38) transfer points are controlled by twenty two (22) baghouses or cartridge filters and sixteen (16) breather bag sock filters each with an internal exhaust. Each control device has been determined as integral to the system. Each filter has a design controlled exhaust rate of less than 0.02 gr/dscf. Each baghouse or cartridge filter has a rated exhaust air flow rate of 600 acfm.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Emission Unit ID Transfer Points shall not exceed 45.5 pounds per hour when operating at a process weight rate of 55.0 tons per hour. The pound per hour limitation was calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.2 Particulate Control

In order to comply with Condition D.2.1, the twenty two (22) baghouses or cartridge filters and sixteen (16) breather bag sock filters for particulate control shall be in operation and control emissions from the Emission Unit ID Transfer Points at all times that the Dough mixing and flour and sugar pneumatic transferring is in operation.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activity

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour identified as :
- (1) Boiler # 1 and Boiler # 2 each rated at a maximum capacity of four and two tenths (4.2) million Btu per hour and 3000 pounds of steam production per hour.
 - (2) Muffin Oven # 1 rated at 3.0 million Btu per hour.
 - (3) Muffin Oven # 2 rated at 6.0 million Btu per hour.
 - (4) Fryer 1 rated at 0.76 million Btu per hour.
 - (5) Fryer 2 rated at 0.84 million Btu per hour.
 - (6) Pan Washer 1 rated at 3.8 million Btu per hour.
 - (7) Pan Washer 2 rated at 3.8 million Btu per hour.
 - (8) Boil Tank rated at 1.0 million Btu per hour.
 - (9) All space heaters at a combined heat input rate of 5.0 million Btu per hour.
- (l) Muffin Oven # 1 - Maximum process rate (P) of 2.7 tons per hour.
Muffin Oven # 2 - Maximum process rate (P) of 3.0 tons per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Particulate Matter Emission Limitations for Sources of Indirect Heating), PM emissions from Boiler # 1 and Boiler # 2 (Q sum to 8.4 million Btu per hour) shall each be limited to 0.6 pounds per million Btu heat input.

D.3.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Muffin Oven # 1 and # 2 shall not exceed 7.9 pounds per hour for Muffin Oven # 1 and 8.6 pounds per hour for Muffin Oven # 2 when operating at a process weight rate of 2.7 tons per hour for Muffin # 1 and 3.0 tons per hour for Muffin Oven # 2. The pounds per hour limitation was calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.3.3 Volatile Organic Compounds (VOC)[326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (Federally Enforceable Permit Program), combined total natural gas consumption in Boiler # 1, Boiler # 2, Muffin Oven # 1, Muffin Oven # 2, Fryer # 1, Fryer # 2, Pan Washer 1, Pan Washer 2, Boil Tank, All space heaters, Oven # 3 and Oven # 4 shall not exceed 254.5 million cubic feet per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC from fuel combustion in Boiler # 1, Boiler # 2, Muffin Oven # 1, Muffin Oven # 2, Fryer # 1, Fryer # 2, Pan Washer 1, Pan Washer 2, Boil Tank, All space heaters, Oven # 3 and Oven # 4 to less than 0.7 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-7 (Part 70 Permit Program)

not applicable.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.4 Record Keeping Requirements

To document compliance with Condition D.3.3, the Permittee shall maintain records of actual combined total natural gas consumption in Boiler # 1, Boiler # 2, Muffin Oven # 1, Muffin Oven # 2, Fryer # 1, Fryer # 2, Pan Washer 1, Pan Washer 2, Boil Tank, All space heaters, Oven # 3 and Oven # 4. Records maintained shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.3.3. All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this Permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Interstate Brands Corporation
Source Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
Mailing Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
FESOP No.: F097-14984-00170

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- ? Annual Compliance Certification Letter
- ? Test Result (specify) _____
- ? Report (specify) _____
- ? Notification (specify) _____
- ? Affidavit (specify) _____
- ? Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

and

OFFICE OF ENVIRONMENTAL SERVICES

**COMPLIANCE
2700 South Belmont Avenue
Indianapolis, Indiana 46221
Phone: 317-327-2234
FAX:317-327-2274**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Interstate Brands Corporation
Source Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
Mailing Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
FESOP No.: F097-14984-00170

This form consists of 2 pages

Page 1 of 2

? This is an emergency as defined in 326 IAC 2-7-1(12)
?The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
?The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

Interstate Brands Corporation
Indianapolis, Indiana
Permit Reviewer: MBC

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OP No. F097-14984-00170

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE OF ENVIRONMENTAL SERVICES**

FESOP Quarterly Report

Source Name: Interstate Brands Corporation
 Source Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
 Mailing Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
 FESOP No.: F097-14984-00170
 Facility: Oven # 3, Oven #4 and Chain Lubrication Usage
 Parameter: VOC Emissions
 Limit(s): (a) Oven # 3 shall not exceed 95.0 tons of VOC per thirteen (13) consecutive twenty eight (28) day periods with compliance determined at the end of each twenty eight (28) day period.
 (b) Oven # 3, Oven # 4 and the use of Chain Lubrication for Oven # 3 and Oven # 4 shall not exceed 95.0 tons of VOC per thirteen (13) consecutive twenty eight (28) day periods with compliance determined at the end of each twenty eight (28) day period.

QUARTER: _____ YEAR: _____

28 day Period Ending Date	Oven # 3 VOC 28 day Period Total (tons VOC)	Oven # 4 VOC 28 day Period Total (tons VOC)	Chain Lubrication Usage (gallons)	Thirteen consecutive 28 day Period Total (tons VOC)

- ? No deviation occurred in this quarter.
- ? Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE OF ENVIRONMENTAL SERVICES**

FESOP Quarterly Report

Source Name: Interstate Brands Corporation
 Source Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
 Mailing Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
 FESOP No.: F097-14984-00170
 Facility: Natural gas consumption in Boiler # 1, Boiler # 2, Muffin Oven # 1, Muffin Oven # 2, Fryer # 1, Fryer # 2, Pan Washer 1, Pan Washer 2, Boil Tank, All space heaters, Oven # 3 and Oven # 4
 Parameter: Source wide combined total natural gas consumption per twelve (12) consecutive month period.
 Limit: Source wide combined total natural gas consumption shall not exceed 254.5 million cubic feet per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Interstate Brands Corporation
Source Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
Mailing Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
FESOP No.: F097-14984-00170

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

**Addendum to the
Technical Support Document for a Federally Enforceable State
Operating Permit (FESOP) Renewal**

Source Name: Interstate Brands Corporation
Source Location: 2929 North Shadeland Avenue, Indianapolis, IN 46219
County: Marion
SIC Code: 2051
Operation Permit No.: F097-14984-00170
Permit Reviewer: M. Caraher

On October 21, 2003, the Indiana Department of Environmental Management, Office of Air Quality (OAQ) and the City of Indianapolis, Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Interstate Brands Corporation had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a stationary source manufacturing leavened and unleavened bakery bread products under a Standard Industrial Classification (SIC) Code of 2051 (establishments primarily engaged in manufacturing fresh or frozen bread and bread-type rolls and fresh cakes, pies, pastries and other similar "perishable" bakery products). The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The following changes to the draft FESOP Renewal will be made. The Technical Support Document (TSD) will remain as it originally appeared when published. OAQ and OES prefer that the TSD reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. The Permit Table of Contents has been updated to reflect changes where necessary without being included in the response to comments and formatting changes have been made that do not change the meaning, intent or language of the permit. The summary of the changes made by IDEM and OES, public comments, and responses to comments follows with ~~strikeout~~ showing deleted text and **bold** showing new text.

Interstate Brands Corporation submitted written comments during the public notice period on November 19, 2003. Interstate Brands submitted additional written information on December 18, 2003 to provide clarification on the November 19, 2003 comments. As a result of the public notice comments, IDEM, OAQ and OES have made the following changes:

Comment # 1

In the Technical Support Document on page 1 of 13 and in the draft FESOP on page 4 of 31, Section A.3(b), there are actually two storage tanks, each less than 10,500 gallons in capacity, not one as the following Insignificant Activity category may infer: A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons

per month.

Each of the two storage tanks are located underground and each tank has a storage capacity of 10,000 gallons. Each tank is used to store diesel fuel. Fuel is dispensed to delivery truck fuel tanks through one hand operated pump. Annual throughput for the past three years has averaged 309,000 gallons. Breathing losses for underground storage tanks are assumed to be zero since the underground storage tanks are not subject to diurnal temperature changes. Using the FIRE emission factor (SCC # 40301021) for working losses of 0.02 pounds of VOC per 1000 gallons of throughput, total annual emissions are estimated to be 7.0 pounds of VOC per year or 0.0 tons per year. Therefore, pursuant to 326 IAC 2-7-1(21), this operation is an Insignificant Activity as VOC emissions are less than 3.0 pounds per hour and 15.0 pounds per day.

Response to Comment # 1

The exact wording of this Insignificant Activity category as listed in 326 IAC 2-7-1(21)(G)(ii)(BB) has been amended by 326 IAC 2 rule changes since the initial FESOP issuance in 1997. The change in wording of this particular category was not updated in the public notice version FESOP Renewal. The actual wording is: A petroleum fuel other than gasoline dispensing facility, having a storage **tank** capacity of less than or equal to ten thousand five hundred (10,500) gallons, and dispensing ~~less than or equal to 230,000 gallons per month~~ **three thousand five hundred (3,500) gallons per day or less.**

Pursuant to 326 IAC 1-2-27, "facility" is defined as any one (1) structure, piece of equipment, installation or operation which emits or has the potential to emit any air contaminant. Single pieces of equipment or installations with multiple emission points shall be considered a facility for the purpose of this rule (326 IAC 1-2). Each of the two storage tanks at Interstate Brands Corporation has a storage tank capacity of 10,000 gallons which is less than 10,500 gallons. However, the combined storage tank capacity exceeds 10,500 gallons. Therefore, these two (2) storage tanks are not adequately identified by the existing wording of this Insignificant Activity category as listed in 326 IAC 2-7-1(21).

However, AP-42 Chapter 7.1 (Organic Liquid Storage Tanks) states that VOC emissions from fixed roof storage tanks is the sum of standing losses (L_s) and working losses (L_w). In utilizing the TANKS 4.07 emissions estimation software that contains AP-42 Chapter 7.1 emission factors for standing and working losses from fixed roof tanks, two 10,000 gallon diesel fuel storage tanks, with an annual throughput of 309,000 gallons equates to, approximately, 9.0 pounds of VOC emissions per year (0.0 tons of VOC emissions per year) from this diesel fuel dispensing activity at Interstate Brands Corporation.

Using the FIRE emission factor (SCC # 40301021) for working losses of 0.02 pounds of VOC per 1000 gallons of throughput, total annual emissions are estimated to be 7.0 pounds of VOC per year or 0.0 tons of VOC per year (0.02 pounds VOC per 1000 gallons x 309,000 gallons per year = 7.0 pounds of VOC per year). FIRE does not list a standing loss VOC emissions rate. The VOC emissions estimate of 0.0 tons per year from fuel dispensing activities at Interstate Brands Corporation does not cause any revision to the VOC emission total from fuel dispensing activities as identified in the calculation pages 1 through 6 of 6 in Appendix A of the public notice Technical Support Document.

Therefore, pursuant to 326 IAC 2-7-1(21)(A)(iv), this operation is an Insignificant Activity as VOC emissions are less than 3.0 pounds per hour and 15.0 pounds per day.

Each storage tank is less than 75 cubic meters of storage capacity (19,815 gallons) and fuel dispensing operations commenced prior to July 23, 1984. Therefore, each storage tank is not subject to the provisions of 40 CFR 60.110b Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984). Each storage tank is less than 40 cubic meters of storage capacity (10,568 gallons) and fuel dispensing operations commenced prior to July 23, 1984. Therefore, each storage tank is not subject to the provisions of 326 IAC 12 (New Source Performance Standards). Therefore, there are no specific

applicable requirements for this Insignificant Activity.

The following changes will be made to the proposed FESOP Renewal to delete reference to the exact wording of the category, as stated in 326 IAC 2-7-1(21)(G)(ii)(BB), and to properly identify this diesel fuel dispensing activity at Interstate Brands Corporation as an Insignificant Activity pursuant to 326 IAC 2-7-1(21):

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour identified as Boiler # 1 and Boiler # 2.
- (b) A petroleum fuel other than gasoline dispensing facility, **consisting of two (2) underground storage tanks each** having a storage **tank** capacity of ~~less than or equal to~~ ten thousand five hundred (10,000) gallons ~~, and dispensing less than or equal to 230,000 gallons per month~~ **three thousand five hundred (3,500) gallons per day or less.**

Comment # 2

In the Technical Support Document, item (n) of the Insignificant Activities on page 2 of 13 should list the potential to emit VOC from printing as less than 1.4 tons per year and not 1.2 tons per year. This change should also be made to Section A.3(n) of the draft FESOP on page 5 of 31. No new printing equipment has been added to reflect this slight overall increase in potential to emit from printing which arises from the use and consumption of different printing inks.

In the TSD Appendix A calculation page 6 of 6 under footnote (6), the maximum throughput of ink and makeup for printing is 709 gallons and not 542 gallons as stated. Also, on page 6 of 6 in the TSD Appendix A calculation pages, the potential to emit emission totals from printing should reflect new emission totals that arise from the use and consumption of different printing inks. The potential to emit from printing should be 1.4 tons of VOC per year, 0.7 tons of MEK per year, 0.5 tons of methanol per year, 0.1 tons of glycol ethers per year and 1.3 tons of combined HAPs from printing. No new printing equipment has been added. The slight overall increase in potential to emit from printing arises from the use and consumption of different printing inks.

The label printing equipment is not classified as flexographic, lithographic or rotogravure printing and it is also not a web printing or coating operation. Water based inks and/or inks thinned with a solvent carrier are sprayed directly onto the item printed. It is similar to an airless spray painting application except on a much smaller scale. The potential to emit VOC from all label printing is less than three (3.0) pounds per hour and fifteen pounds (15.0) per day. Therefore, pursuant to 326 IAC 2-7-1(21), this operation is an Insignificant Activity as VOC emissions are less than 3.0 pounds per hour and 15.0 pounds per day.

The summary tables throughout the TSD and Appendix A calculation pages should be revised accordingly to reflect the changes to potential to emit from printing.

Response to Comment # 2

The change in printing ink(s) and potential consumption rate from printing causes the potential to emit VOC from printing to be changed from 1.2 tons per year to 1.4 tons per year. The change in printing ink(s) also causes an individual HAP, methyl ethyl ketone (MEK), to be emitted that was not previously emitted.

Minor changes in the total potential to emit VOC and HAPs from existing Insignificant Activity label printing at Interstate Brands Corporation did not cause an exceedance of the limited potential to emit VOC or HAPs from the source. The combined potential to emit VOC from all Insignificant Activities at Interstate Brands

had previously summed to one and eight tenths (1.8) tons per year (see page 7 of 13 public notice version TSD). Therefore, source wide potential to emit VOC, pursuant to 326 IAC 2-8-4, was limited to 96.8 tons per year.

The changes to Insignificant Activity label printing listed in Appendix A page 6 of 6, by way of this TSD Addendum, are revised as follows:

Emission Unit	PM	PM10	SO2	NOx	VOC	CO	HAP (METHA NOL)	HAP (Ethylene Glycol)	HAP (HEXANE)	HAP (MEK)	Combined HAPs
Printing (6)	0.0	0.0	0.0	0.0	1.2 1.4	0.0	1.1 0.5	0.1	0.0	0.7	1.2 1.3

The footnote number 6 of Appendix A page 6 of 6 is revised by way of this TSD Addendum to now state:

- (6) Based on max usage @ 8760 hours of ~~542~~ **709** gal ink/makeup solution per year.

Interstate Brands submitted additional comments on emission totals listed in summary tables in the public notice TSD and TSD Appendix A calculation pages. The summary tables that are being revised by way of this TSD Addendum to reflect the changes to the potential to emit from printing will be discussed and summarized at the end of this TSD Addendum. However, the following change to Section A.3 of the public notice version FESOP is made:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (n) Package Printers utilizing VOC/HAP solution(s) in Ink Jet Coder sprays for labeling packages. Maximum PTE of ~~1.4~~ ~~1.2~~ tons per year VOC/HAP is less than significance threshold(s).

Comment # 3

In consulting with the boiler manufacturer, Interstate Brands Corporation states that the two (2) boilers design rate are each rated at 200 horsepower. Based on a value of 1000 Btu per cubic foot of natural gas, potential gas usage for both boilers operating simultaneously at 8760 annual operating hours is calculated to be 147.17 million cubic feet of natural gas consumption per year. The installed nameplate rating on each boiler indicates a maximum steam production rate of 3000 pounds of steam production per hour. For a 200 horsepower boiler, the steam output should be 34.5 pounds of steam per horsepower or 6980 pounds of steam per hour, which exceeds the nameplate rating by over two times. The boilers were derated when installed because the maximum heat input cannot physically produce greater than 3000 pounds of steam per hour. In using the conversion factor of one thousand (1000) Btu per pound of steam, each boiler should be rated at three (3) million Btu per hour, not one (1.0) million Btu per hour as listed. Therefore, Q, as listed in Section D.3.1 of the public notice version FESOP, should state the sum of these two boilers as six (6.0) million Btu per hour, not two (2.0) million Btu per hour. This change in combined heat input rate for these boilers should also be made on page 11 of 13 of the TSD and on page 1 and 6 of 6 of the TSD Appendix A calculation pages.

Response to Comment # 3

The heat input capacity for each boiler of one (1.0) million Btu per hour listed in the public notice FESOP was the heat input capacity value for these Insignificant Activity boilers as listed in FESOP 097-7413-

00170 issued on December 15, 1997.

Based on Interstate Brands Corporation review of the maximum heat input capacity (in terms of the steam production rate) versus the design heat input capacity for each of these two boilers, it is determined that the potential to emit regulated pollutants from each of these boilers should be based on the maximum steam production rate and not the manufacturer's design heat input rate. Based on the 'Compilation of Air Pollutant Emission Factors AP-42 Appendix A (1/95)', the conversion value for heat input to steam production rate has a range of twelve hundred (1200) to seventeen hundred (1700) Btu per pound of steam with a median conversion value of fourteen hundred (1400) Btu per pound of steam, not one thousand (1000) Btu per pound of steam. If each boiler is capable of producing 3000 pounds of steam per hour, then the maximum heat input rate for each boiler is four and two tenths (4.2) million Btu per hour (3000 lbs steam/hr x 1400 Btu/lb steam = 4.2 million Btu per hour). The resultant value for Q, the total source maximum operating capacity rating in million Btu per hour heat input for the sum of all indirect heating units at Interstate Brands Corporation, is eight and four tenths (8.4) million Btu per hour.

Pursuant to 326 IAC 6-2-2(a), for Q less than ten (10.0) million Btu per hour, the particulate matter emitted per million Btu (lb/million Btu) heat input, Pt, shall not exceed six tenths (0.6) pounds. Therefore, pursuant to 326 IAC 6-2-2(a) (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from Boiler # 1 and Boiler # 2 each shall not exceed six tenths (0.6) pounds per million Btu heat input. The change in Q does not cause a change in the previously established allowable emission rate, pursuant to 326 IAC 6-2-2(a), of six tenths (0.6) pounds of particulate matter emitted per million Btu of heat input.

The value of Q is being revised from 2.0 million Btu to 8.4 million Btu by way of this TSD Addendum. This re-evaluation now causes a revision to the total heat input of natural gas to all Insignificant Activities as listed in the Appendix A calculation page 1 of 6 as follows:

Insignificant Activities Sum of Nat Gas fuel max	
Muffin Oven # 1	3.00
Muffin Oven # 2	6.00
Fryer 1	0.76
Fryer 2	0.84
2 Boilers sum	2.00 8.4
Pan Washer 1	3.80
Pan Washer 2	3.80
Boil Tank	1.00
All space heaters	<u>5.00</u>
sum	26.20 32.6

This revision to the total heat input of natural gas to all Insignificant Activities causes a subsequent revision, by way of this TSD Addendum, to the potential to emit criteria pollutants from natural gas combustion from Insignificant Activity fuel combustion that had been quantified in Appendix A page 1 of 6. Utilizing AP-42 Table 1.4.2 emission factors, the revision to a maximum combined heat input value of 32.6 million Btu per hour of natural gas is as follows:

	Pollutant						
	PM	PM10	SO ₂	NO _x	VOC	CO	Highest HAP Hexane
Potential Emissions in tons/yr	0.9 1.1	0.9 1.1	0.1	44.5 14.3	0.6 0.8	9.6 12.0	0.2 0.3

In addition, the Insignificant Activity list in the draft FESOP in Section A.3(a) is now revised to more accurately describe the maximum capacity of each boiler. This change is also made to the description box in Section D.3 on page 25 of 31. The value for Q is also revised in Section D.3.1 to reflect the new value for Q of 8.4 million Btu. These revisions are as follows:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour identified as Boiler # 1 and Boiler # 2 **each rated at a maximum capacity of four and two tenths (4.2) million Btu per hour and 3000 pounds of steam production per hour.**

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activity

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour identified as Boiler # 1 and Boiler # 2 **each rated at a maximum capacity of four and two tenths (4.2) million Btu per hour and 3000 pounds of steam production per hour.**
- (n) Muffin Oven # 1 - Maximum process rate (P) of 2.7 tons per hour.
Muffin Oven # 2 - Maximum process rate (P) of 3.0 tons per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Particulate Matter Emission Limitations for Sources of Indirect Heating), PM emissions from Boiler # 1 and Boiler # 2 (Q sum to **8.4 million Btu** ~~2.0 MMBtu~~ per hour) shall each be limited to 0.6 pounds per **million Btu** ~~MMBtu~~ heat input.

Interstate Brands submitted additional comments on emission totals in summary tables in the public notice TSD and TSD Appendix A calculation pages. The summary tables that are being revised by way of this TSD Addendum to reflect the changes to the potential to emit from Boiler # 1 and Boiler # 2 will be discussed and summarized at the end of this TSD Addendum.

Comment # 4

On pages 1, 2 and 4 of 6 of the TSD Appendix A calculation pages, the uncontrolled value for carbon monoxide (CO) emissions is eighty four (84.0) pounds per million cubic feet of natural gas fired instead of twenty one (21.0) pounds per million cubic feet of natural gas fired.

Response to Comment # 4

The calculation pages for the initial FESOP (097-7413-00170) issued on December 15, 1997 contained the emission factor of twenty one (21.0) pounds of carbon monoxide per million cubic feet of natural gas fired. This emission factor was listed in Table 1.4-2 of 'Compilation of Air Pollutant Emission Factors AP-42' (1/95). The AP-42 emission factor for carbon monoxide was revised in 1998 and is now listed in Table 1.4-1 of AP-42. The revised emission factor of eighty four (84.0) pounds of carbon monoxide per million cubic feet of natural gas fired was utilized in the public notice version TSD Appendix A calculation pages 1, 2 and 4 of 6. OAQ and OES believe that the comment results from the review of the FESOP 097-7413-00170 review files rather than this draft FESOP 097-14984-00170. There are no revisions based on this comment.

Comment # 5

In re-examining oven chain lubrication usage at Interstate Brands Corporation, it appears that the potential to emit VOC determination from the use and evaporation of chain lubrication for the proposed FESOP has been attributed solely to Oven # 3 and Oven # 4. The Insignificant Activity ovens, Muffin Oven # 1 and # 2 each use chain lubrication for the conveyor chain(s) used to pull the bread products through the respective oven. On page 9 of 13 of the TSD, the use of chain lubrication in these four ovens appears to be entirely attributed to Oven # 3 and Oven # 4. Interstate Brands would like to separate the potential to emit determination for chain lubrication VOC emissions in Ovens # 1 and # 2 from Ovens # 3 and # 4.

There are two types of chain lubricants used in the ovens at Interstate Brands. A high temperature lubricant is used only occasionally and has a specific gravity of 1.07 (1.07 x 8.337 pounds water per gallon water = high temperature lubricant density of 8.92 pounds lubricant per gallon lubricant). The high temperature lubricant has no VOC containing material. The second type of lubricant used is a cold lubricant that has a specific gravity of 0.88 (0.88 x 8.337 pounds water/gallon water = cold lubricant density of 7.34 pounds lubricant per gallon lubricant) and a VOC weight percent of eighty percent (80%). The VOC content of cold lubricant is entirely mineral spirits. The VOC content of the cold temperature lubricant equates to 5.9 pounds VOC emitted per gallon applied (7.34 pounds lubricant per gallon lubricant x 0.8 pounds VOC per pound of lubricant = 5.9 pounds VOC emitted per gallon applied). Either lubricant can be used in any of the four ovens. Therefore, the use of cold lubricant indicates the worst case VOC content material that can be applied in any of the ovens and should be utilized in the potential to emit determination.

Normal application of chain lubrication in Oven # 3 and Oven # 4 is up to five (5) gallons per application per oven with an application typically being twice per week. Normal application of chain lubrication in Oven # 1 and Oven # 2 is up to seven and five tenths (7.5) gallons per application per oven with one application per week. These usage values should approximate the potential consumption rates as Interstate Brands has operated 24 hours per day and seven days per week under the stated normal application rates and schedules.

Interstate Brands requests that the potential to emit VOC from the use of chain lubrication, as stated on page 9 of 13 of the TSD for Ovens # 3 and # 4, be revised from 4.3 tons per year to 2.8 tons per year based on a combined estimated maximum chain lubrication consumption rate of 966 gallons per year at a VOC content of 5.9 pounds of VOC per gallon of chain lubrication (966 gallons per year x 5.9 pounds VOC per gallon lubricant / 2000 pounds VOC per ton of VOC = 2.8 tons VOC per year).

Interstate Brands requests that the combined potential to emit VOC from the use of chain lubrication for Ovens # 1 and # 2 be stated as 2.8 tons per year based on a combined estimated maximum chain lubrication consumption rate of 966 gallons per year at a VOC content of 5.9 pounds of VOC per gallon of chain lubrication (966 gallons per year x 5.9 pounds VOC per gallon lubricant / 2000 pounds VOC per ton of VOC = 2.8 tons VOC per year).

In the TSD Appendix A calculation page 6 of 6, add a line for the potential to emit VOC from chain lubrication used in the other two ovens, Oven # 1 and Oven # 2. There are no ethanol emissions from these two ovens as these ovens are not utilized to bake leavened bread products. Therefore, the potential to emit

VOC from these ovens arises solely from the consumption and evaporation of chain lubrication and is 2.8 tons per year at an estimated combined maximum capacity of 966 gallons per year at a VOC content of 5.9 pounds of VOC per gallon of chain lubrication. Pursuant to 326 IAC 2-7-1(21), the use of chain lubrication in Oven # 1 and Oven # 2 are each classified as an Insignificant Activity as VOC emissions are less than 3.0 pounds per hour and 15.0 pounds per day per Oven.

Pursuant to 326 IAC 2-8-4 (Federally Enforceable Permit Program), combined total VOC emissions from Emission Unit ID Oven # 3, Emission Unit ID Oven # 4 and the use of chain lubrication for Oven # 3 and Oven # 4 shall not exceed ninety five (95.0) tons per thirteen (13) consecutive twenty eight (28) day period with compliance determined at the end of each twenty eight (28) day period. Interstate Brands has been and is still now required to quarterly report chain lubrication usage in Oven # 3 and Oven # 4 such that compliance with 326 IAC 2-8-4 can be demonstrated.

Response to Comment # 5

The potential to emit VOC from the use and evaporation of chain lubrication as stated on page 9 of 13 of the public notice TSD, is from the FESOP application of 1996 for the initial FESOP (097-7413-00170) issuance on December 15, 1997. No previous information prior to the public notice period for this draft FESOP, 097-14984-00170, was submitted by Interstate Brands to revise the potential to emit VOC and attribute chain lubrication VOC emissions directly to individual ovens. TSD Appendix A calculation page 6 of 6 attributed source wide chain lubrication emissions, four and three tenths (4.3) tons per year, to Oven # 3 and Oven # 4. The public notice comment states that Oven # 1 and Oven # 2 have historically used and continue to use chain lubrication in these ovens as well.

Interstate Brands states that the combined potential to emit VOC from the use and evaporation of chain lubrication in Oven # 1 and Oven # 2 is two and eight tenths (2.8) tons per year at a maximum capacity of nine hundred sixty six (966) gallons per year at a VOC content of five and nine tenths (5.9) pounds of VOC per gallon of chain lubrication.

Pursuant to 326 IAC 2-8-4 (Federally Enforceable Permit Program), combined total VOC emissions from Emission Unit ID Oven # 3, Emission Unit ID Oven # 4 and the use of chain lubrication for Oven # 3 and Oven # 4 shall not exceed ninety five (95.0) tons per thirteen (13) consecutive twenty eight (28) day period with compliance determined at the end of each twenty eight (28) day period. Interstate Brands has been and is still now required to quarterly report chain lubrication usage in Oven # 3 and Oven # 4 such that compliance with 326 IAC 2-8-4 can be demonstrated.

The combined potential to emit VOC from all Insignificant Activities at Interstate Brands had previously summed to one and eight tenths (1.8) tons per year (see page 7 of 13 public notice version TSD). Therefore, source wide potential to emit VOC, pursuant to 326 IAC 2-8-4, was limited to 96.8 tons per year.

The change in the recognized potential to emit VOC from the use and evaporation of chain lubrication in Oven # 1 and Oven # 2, each Insignificant Activities, causes the potential to emit VOC from these Insignificant Activities to increase from 0.0 tons per year to 2.8 tons per year. The change in potential to emit VOC from Insignificant Activity label printing, by way of this TSD Addendum, causes the potential to emit VOC to increase from 1.2 tons per year to 1.4 tons per year. The change in maximum heat input capacity for Boiler # 1 and Boiler # 2 causes an increase in the potential to emit VOC from 0.6 tons per year to 0.8 tons per year. The revisions to the potential to emit VOC from Insignificant Activities is now 5.0 tons per year ($2.8 + 1.4 + 0.8 = 5.0$). The combination of limited potential to emit VOC from the significant units, Oven # 3, Oven # 4 and chain lubrication usage in Oven # 3 and Oven # 4 (95.0 tons per year), and the potential to emit VOC from Insignificant Activities must sum to less than one hundred tons per year ($95.0 + 5.0 = 100.0$).

If there are to be no revisions to the limited potential to emit VOC of 95.0 tons per year from Oven # 3 and Oven # 4 and the use of chain lubrication in Oven # 3 and Oven # 4, Interstate Brands Corporation has acknowledged through post public notice discussion that one or more Insignificant Activities will have to have

the potential to emit VOC enforceably limited such that the sum of the limited potential to emit VOC from the significant emission units and the limited potential to emit from Insignificant Activities will sum to less than one hundred tons per year such that Interstate Brands Corporation can continue to be permitted under 326 IAC 2-8 (Federally Enforceable State Operating Permit Program).

As a result, Interstate Brands Corporation has identified that natural gas fuel consumed (and the resultant VOC emissions) at the source on an annual basis are far less than the maximum capacity to combust natural gas. Interstate Brands Corporation has informed OES that restrictions on natural gas fuel combustion and record keeping and reporting the fuel combustion through the FESOP such that the combined limited potential to emit VOC from Insignificant Activities will be less than 5.0 tons per year is the most acceptable option for any additional limitations on the potential to emit VOC at the source.

All natural gas consumed at the source for fuel combustion in significant emission units (Oven # 3 and Oven # 4) and Insignificant Activities (at 32.6 million Btu per hour) is monitored by one meter. Therefore, separating record keeping of Insignificant Activity fuel combustion from significant emission unit (Oven # 3 and Oven # 4) fuel combustion is not currently feasible. Utilizing the AP-42 Table 1.4.2 VOC emission factor of 5.5 pounds of VOC emissions per million cubic foot of natural gas burned, a maximum combined limited throughput rate of natural gas consumed by all combustion activities at Interstate Brands can be derived such that limited potential to emit VOC is less than 0.8 tons per year and the resultant limited source wide potential to emit VOC will sum to less than 100 tons per year. The derivation of the limited natural gas throughput is:

$$5.5 \text{ lbs VOC/MMCF} \times X \text{ MMCF/year} \times \text{ton}/2000 \text{ lbs VOC} = 0.7 \text{ tons VOC/year from natural gas combustion}$$

$$X = 254.5 \text{ MMCF/year}$$

At a combined total limited natural gas combustion throughput limit of 254.5 million cubic feet, the limited potential to emit from natural gas combustion is:

	PM	PM10	SO ₂	NO _x	VOC	CO	Highest HAP Hexane
Emission Factor (lbs/MMCF)	7.6	7.6	0.6	100	5.5	84	1.8
Limited PTE (tons/yr)	1.0	1.0	0.1	12.7	0.7	10.7	0.2

Therefore, source wide natural gas fuel consumption shall not exceed 254.5 million cubic feet per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limitation makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

As a result, all Insignificant Activity fuel combustion activities need to be specifically identified in the FESOP under item (a) of the Condition A.3 Insignificant Activity listing and in Section D.3 such that the inclusion of all natural gas fuel combustion activities for record keeping and reporting requirements will be specifically identified. Condition A.3(a) has now been changed to:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour identified as :

- (1) Boiler # 1 and Boiler # 2 each rated at a maximum capacity of four and two tenths (4.2) million Btu per hour and 3000 pounds of steam production per hour.
- (2) **Muffin Oven # 1 rated at 3.0 million Btu per hour.**
- (3) **Muffin Oven # 2 rated at 6.0 million Btu per hour.**
- (4) **Fryer 1 rated at 0.76 million Btu per hour.**
- (5) **Fryer 2 rated at 0.84 million Btu per hour.**
- (6) **Pan Washer 1 rated at 3.8 million Btu per hour.**
- (7) **Pan Washer 2 rated at 3.8 million Btu per hour.**
- (8) **Boil Tank rated at 1.0 million Btu per hour.**
- (9) **All space heaters at a combined heat input rate of 5.0 million Btu per hour.**

The Section D.3 description box is now revised as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activity

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour identified as :
 - (1) Boiler # 1 and Boiler # 2 each rated at a maximum capacity of four and two tenths (4.2) million Btu per hour and 3000 pounds of steam production per hour.
 - (2) **Muffin Oven # 1 rated at 3.0 million Btu per hour.**
 - (3) **Muffin Oven # 2 rated at 6.0 million Btu per hour.**
 - (4) **Fryer 1 rated at 0.76 million Btu per hour.**
 - (5) **Fryer 2 rated at 0.84 million Btu per hour.**
 - (6) **Pan Washer 1 rated at 3.8 million Btu per hour.**
 - (7) **Pan Washer 2 rated at 3.8 million Btu per hour.**
 - (8) **Boil Tank rated at 1.0 million Btu per hour.**
 - (9) **All space heaters at a combined heat input rate of 5.0 million Btu per hour.**
- (o) Muffin Oven # 1 - Maximum process rate (P) of 2.7 tons per hour.
Muffin Oven # 2 - Maximum process rate (P) of 3.0 tons per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

A new Condition D.3.3 under the Emission Limitation and Standards section of the public notice FESOP has been added to limit source wide natural gas fuel combustion such that 326 IAC 2-7 (Part 70 Permit Program) is not applicable.

D.3.3 Volatile Organic Compounds (VOC)[326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (Federally Enforceable Permit Program), combined total natural gas consumption in Boiler # 1, Boiler # 2, Muffin Oven # 1, Muffin Oven # 2, Fryer # 1, Fryer # 2, Pan Washer 1, Pan Washer 2, Boil Tank, All space heaters, Oven # 3 and Oven # 4 shall not exceed 254.5 million cubic feet per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC from fuel combustion in Boiler # 1, Boiler # 2, Muffin Oven # 1, Muffin Oven # 2, Fryer # 1, Fryer # 2, Pan Washer 1, Pan Washer 2, Boil Tank, All space heaters, Oven # 3 and Oven # 4 to less than 0.7 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.4 Record Keeping Requirements

To document compliance with Condition D.3.3, the Permittee shall maintain records of actual combined total natural gas consumption in Boiler # 1, Boiler # 2, Muffin Oven # 1, Muffin Oven # 2, Fryer # 1, Fryer # 2, Pan Washer 1, Pan Washer 2, Boil Tank, All space heaters, Oven # 3 and Oven # 4 Records maintained shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.3.3. All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this Permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

A Reporting Form for combined total source wide natural gas fuel consumption has been added as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE OF ENVIRONMENTAL SERVICES**

FESOP Quarterly Report

Source Name: Interstate Brands Corporation
Source Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
Mailing Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
FESOP No.: F097-14984-00170
Facility: Natural gas consumption in Boiler # 1, Boiler # 2, Muffin Oven # 1, Muffin Oven # 2, Fryer # 1, Fryer # 2, Pan Washer 1, Pan Washer 2, Boil Tank, All space heaters, Oven # 3 and Oven # 4
Parameter: Source wide combined total natural gas consumption per twelve (12) consecutive month period.
Limit: Source wide combined total natural gas consumption shall not exceed 254.5 million cubic feet per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			

Month 2			
Month 3			

? **No deviation occurred in this quarter.**

? **Deviation/s occurred in this quarter.**
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Because public notice comments received from Interstate Brands Corporation during the public notice period have served to modify the potential to emit from Insignificant Activities, this TSD Addendum amends the Unrestricted Potential Emissions Table and the Potential to Emit After Issuance Table that had appeared on Pages 6 and 7 of 13 of the public notice version TSD. As discussed previously in the Response to Comments, the potential to emit from Insignificant Activity label printing increased from 1.2 tons of VOC per year to 1.4 tons per year, potential to emit VOC from chain lubrication increased from 4.3 tons per year to 5.6 tons per year (2.8 combined total tons from Oven # 1 and # 2 and 2.8 combined total tons per year from Oven # 3 and Oven # 4) and the potential to emit VOC from natural gas combustion increased from 0.6 tons per year to 0.8 tons per year. The potential to emit criteria pollutants increased slightly from natural gas combustion as discussed in Response to Comment # 3. Therefore, the unrestricted potential emissions of the source Table is revised as follows:

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	44.7 11.9
PM-10	44.7 11.9
SO ₂	0.1
VOC	325.8 327.5
CO	42.9 15.3
NO _x	45.5 18.3

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Ethylene Glycol	0.1
Hexane	0.2
MEK	0.7

HAP's	Unrestricted Potential Emissions (tons/yr)
Methanol	1.4 0.5
TOTAL	4.4 1.5

The limited potential to emit from the significant emission units (Oven # 3 and Oven # 4 and chain lubrication in Oven # 3 and Oven # 4) does not change from 95.0 tons of VOC per thirteen (13) consecutive twenty eight (28) day periods with compliance determined at the end of each twenty eight (28) day period. However, the limited potential to emit VOC from Insignificant Activities is revised as follows (1.4 tons per year from label printing, 2.8 combined total tons per year from chain lubrication usage in Oven # 1 and Oven # 2: and 0.7 tons per year from natural gas combustion = 4.9 tons per year):

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Emission Unit ID Oven # 3 and Emission Unit ID Oven # 4 and Chain Lubrication usage for Oven # 3 and Oven # 4	5.1	5.1	negligible	95.0 (a)	3.3	4.0	0.0 / 0.0
Insignificant Activities	6.6 6.7	6.6 6.7	0.1	1.8 4.9	9.6 10.7	11.5 12.7	1.1 / 1.4 0.7 / 1.5
Total PTE After Issuance	11.7 11.8	11.7 11.8	0.1	96.8 99.9	12.9 14.0	15.5 16.7	1.1 / 1.4 0.7 / 1.5

(a) Pursuant to 326 IAC 8-1-6 1997 BACT analysis for Oven # 3 (see TSD discussion under *State Rule Applicability - Individual Facilities*). Oven # 3 and Oven # 4 combined emissions are limited pursuant to 326 IAC 2-8-4.

Additional OAQ/OES changes

Per change to condition language in Condition C.9(c) Performance Testing, C.13 Risk Management Plan and C.17 General Reporting Requirements, the term source has been changed to Permittee as follows with Condition C.9(c) as the example:

C.9 Performance Testing [326 IAC 3-6]

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and/or OES, if the ~~source~~ **Permittee** submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

In the Table of Contents, add "326 IAC 2-7-19" to B.22 Annual Fee Payment. It was included with the condition but inadvertently left out of the Table of Contents listing.

B.22 Annual Fee Payment **[326 IAC 2-7-19]** [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

In Section C.19 Monitoring Methods, remove "performed" before "required by Section D..." as follows:

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing ~~performed~~ required by Section D of this permit shall be performed according

to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

**Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP) Renewal**

Source Background and Description

Source Name: Interstate Brands Corporation
Source Location: 2929 North Shadeland Avenue, Indianapolis, IN 46219
County: Marion
SIC Code: 2051
Operation Permit No.: F097-14984-00170
Permit Reviewer: M. Caraher

The City of Indianapolis Office of Environmental Services (OES) and the Indiana Department of Environmental Management Office of Air Quality (OAQ) have reviewed a FESOP renewal application from Interstate Brands Corporation relating to the operation of a stationary source manufacturing leavened and unleavened bakery bread products under a Standard Industrial Classification (SIC) Code of 2051 (establishments primarily engaged in manufacturing fresh or frozen bread and bread-type rolls and fresh cakes, pies, pastries and other similar "perishable" bakery products). Interstate Brands Corporation was issued FESOP 097-7413-00170 on December 15, 1997.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) Baker-Perkins Bakery Bread Oven # 3 identified as Emission Unit ID Oven # 3 exhausting to two (2) stacks/vents identified as Stack/Vent ID BD-A (Front Stack) and BD-C (Rear Stack). Equipped with natural gas fired oven heating at a maximum natural gas heat input rate of 6.1 million Btu per hour. Includes the application of Oven chain lubrication for Emission Unit ID Oven # 3 and Emission Unit ID Oven # 4. Installation date of 1982.
- (b) One (1) Baker-Perkins Bakery Bun Oven # 4 identified as Emission Unit ID Oven # 4 exhausting to two (2) stacks/vents identified as Stack/Vent ID BN-A (Front Stack) and BN-B (Rear Stack). Equipped with natural gas fired oven heating at a maximum natural gas heat input rate of 3.0 million Btu per hour. Includes the application of Oven chain lubrication for Emission Unit ID Oven # 4 and Emission Unit ID Oven # 3. Installation date of 1968.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour identified as Boiler # 1 and Boiler # 2.
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less

- than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
 - (d) Filling drums, pails or other packaging containers with lubricating oils, waxes and greases.
 - (e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
 - (f) Closed loop heating and cooling systems.
 - (g) Forced and induced draft cooling tower system not regulated under a NESHAP.
 - (h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
 - (i) Heat exchanger cleaning and repair.
 - (j) Paved and unpaved roads and parking lots with public access.
 - (k) Blowdown for any of the following: sight glass, boiler, compressors, pumps and cooling tower.
 - (l) Muffin Oven # 1 - Maximum process rate (P) of 2.7 tons per hour.
Muffin Oven # 2 - Maximum process rate (P) of 3.0 tons per hour.
 - (m) Donut Fryer A and Donut Fryer B.
 - (n) Package Printers utilizing VOC/HAP solution(s) in Ink Jet Coder sprays for labeling packages. Maximum PTE of 1.2 tons per year VOC/HAP is less than significance threshold(s).
 - (o) Dough mixing and flour and sugar pneumatic transferring designated as Emission Unit ID Transfer Points. A total of thirty eight (38) transfer points are controlled by twenty two (22) baghouses or cartridge filters and sixteen (16) breather bag sock filters each with an internal exhaust. Each control device has been determined as integral to the system. Each filter has a design controlled exhaust rate of less than 0.02 gr/dscf. Each baghouse or cartridge filter has a rated exhaust air flow rate of 600 acfm.

Existing Approvals

- (a) FESOP 097-7413-00170, issued on December 15, 1997.

All conditions from previous approvals were incorporated into this FESOP except the following:

- (a) FESOP 097-7413-00170 issued on December 15, 1997.

Condition A.3(6) Insignificant Activities and Condition D.3.3 Volatile Organic Compounds (VOC):

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(l)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (6) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

D.3.3 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Reason not incorporated: Additional information in regards to the replacement of organic solvent degreasing with aqueous parts cleaning was received by OES on April 15, 2002. Interstate Brands Corporation notified OES that all solvent based parts cleaning had been replaced by aqueous based chemical cleaner(s) and that 326 IAC 8-3-2 (Cold Cleaner Operations) no longer applies to parts cleaning at this source. The solvent based degreasing operation was identified as an Insignificant Activity. 326 IAC 8-3-2 (Cold Cleaner Operations) does not apply to water based cleaning solutions containing no solvent or Volatile Organic Compounds. Therefore, 326 IAC 8-3-2 (Cold Cleaner Operations) does not apply to this source and is removed from the Insignificant Activity list in Section A.3 and from Emission Limitations and Standards in Section D.3 Insignificant Activities.

- (b) FESOP 097-7413-00170 issued on December 15, 1997;

The rule cite stated in Condition D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)], Condition D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)] and Condition D.3.4 Particulate Matter (PM) [326 IAC 6-3-2(c)].

Reason not incorporated: As a result of Indiana rule making revisions the following rule applicability has changed:

On June 12, 2002, revisions to 326 IAC 6-3 (Process Operations) became effective. This rule is now entitled 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes). As of the date this permit is being issued, these revisions have not been approved by EPA in to the Indiana State Implementation Plan (SIP); therefore, the following requirement(s) from the previous version of 326 IAC 6-3 (Process Operations) which has been approved in to the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved in to the SIP and the condition is modified in a subsequent permit action.

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions shall be limited by the following;

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by the use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Interpolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by the use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (c) FESOP 097-7413-00170 issued on December 15, 1997;

Condition D.1.1(a) Volatile Organic Compounds (VOC) [326 IAC 8-1-6] limitation of 89.3 tons per rolling thirteen (13) consecutive twenty eight (28) day period and Condition D.1.1(b) limitation of 95.0 tons per rolling fifty two (52) consecutive week period.

Reason not incorporated: Oven # 3, Oven # 4 and chain lubrication usage emissions were previously limited to 89.3 tons per year of VOC emissions per rolling thirteen (13) consecutive twenty eight (28) day period or 95.0 tons per of VOC per rolling fifty two (52) consecutive week period.

During the initial FESOP (F097-7413-00170) review and issuance in 1997, Interstate Brands stated that the production cycle for this source is a twenty eight (28) consecutive day period. Interstate Brands had stated that due to the fermentation process, daily, weekly and calendar month production and emission estimates could not adequately be attributed to each day, only in terms of the twenty eight (28) day production cycle. The source keeps records, as most bakeries do, based on a 28 consecutive calendar day production period only. June 1st of every year signifies the start of their production year and/or cycle. As a result, Interstate Brands production year, on a June 1 to May 31 calendar basis, would always consist of thirteen 28 day production periods.

Source wide VOC emissions were restricted by the initial FESOP, F097-7413-00170, to less than 12/13ths of the major source threshold which equated to 91.4 tons (12/13 x 99 tons/year = 91.4 tons/year). The 12/13ths value of 91.4 tons per year was further limited by subtracting the sum of potential to emit VOC, 2.1 tons per year, from Insignificant Activities to yield 89.3 tons of VOC emissions per rolling thirteen (13) consecutive twenty (28) day period.

Should Interstate Brands have wished to change record keeping at a later date from the frequency of thirteen (13) twenty eight (28) day periods to weekly record keeping, source wide VOC emissions would then be limited to 51/52nds of the major source threshold which equated to 97.1 tons per year (51/52 x 99 tons/yr = 97.1 tons/year). The 51/52nds value was further limited by subtracting the sum of potential to emit VOC, 2.1 tons per year, from Insignificant Activities to yield 95.0 tons per rolling fifty two consecutive week period.

However, Interstate Brands initially wished to submit weekly emissions quarterly as a 52 consecutive week total. The 28 day production period would be divided by four at the end of the production period to obtain a weekly record. Interstate Brands wished to have language inserted that would allow the source to change to weekly record keeping as stated in Section D.1.1(b). Section D.1.1 and Section D.1.6 state that the switch to weekly record keeping may be made by the source but the change can be made only once unless an Administrative Amendment is first procured to revert to 28 day period record keeping. A switch back to record keeping based on thirteen 28 day production periods might be deemed a relaxation of record keeping or reporting provisions.

Due to recent EPA guidance, IDEM, OAQ and OES no longer use the 12/13ths or 51/52nds of a major source threshold in setting emission limitations for sources seeking to be permitted under 326 IAC 2-8 (Federally Enforceable State Operating Permit). Therefore, combined total VOC emissions from Emission Unit ID Oven # 3, Emission Unit ID Oven # 4 and the use of Chain Lubrication for Oven # 3 and Oven # 4 shall not exceed 95.0 tons per thirteen (13) consecutive twenty eight (28) day period with compliance determined at the end of each twenty eight (28) day period such that 326 IAC 2-7 (Part 70 Permit Program) does not apply and compliance with 326 IAC 8-1-6 (Volatile Organic Compound Rules; General Reduction Provisions Relating to VOC Rules) for Oven # 3 is demonstrated.

(d) FESOP 097-7413-00170 issued on December 15, 1997;

Condition D.1.5(a) and (b), Condition D.1.6(b) and D.1.7 reference to rolling fifty two (52) consecutive week period emission calculations, record keeping and reporting.

Reason not incorporated: Due to recent EPA guidance, IDEM, OAQ and OES no longer use the 12/13ths or 51/52nds of a major source threshold in setting emission limitations for

sources seeking to be permitted under 326 IAC 2-8 (Federally Enforceable State Operating Permit). Therefore, combined total VOC emissions from Emission Unit ID Oven # 3, Emission Unit ID Oven # 4 and the use of Chain Lubrication for Oven # 3 and Oven # 4 shall not exceed 95.0 tons per thirteen (13) consecutive twenty eight (28) day period with compliance determined at the end of each twenty eight (28) day period such that 326 IAC 2-7 (Part 70 Permit Program) does not apply and compliance with 326 IAC 8-1-6 (Volatile Organic Compound Rules; General Reduction Provisions Relating to VOC Rules) for Oven # 3 is demonstrated.

- (e) FESOP 097-7413-00170 issued on December 15, 1997;

All reference to Boiler # 3 in Condition D.3.1 Particulate Matter (PM):

D.3.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-2 (Particulate Matter Emission Limitations for Sources of Indirect Heating, PM emissions from Boiler # 1, Boiler # 2 and Boiler # 3, each less than 10 mmBtu per hour heat input (Q sum to 3.0 mmBtu per hour), shall each be limited to 0.6 pounds per mmBtu heat input.

Reason not incorporated: Interstate Brands submitted information on October 8, 2003 that Boiler # 3 has been removed from the premises and should not be included in the FESOP Renewal. Therefore, Boiler # 3 is not included in the FESOP Renewal F097-14984-00170.

Air Pollution Control Justification as an Integral Part of the Process

The following justification was incorporated into this permit from the previous FESOP:

- (a) The company has submitted the following justification such that the pneumatic transfer baghouses, cartridge filters and breather bag sock filters are to be considered as an integral part of bakery products manufacturing:
- (1) Control equipment is necessary to pneumatically transfer flour and sugar throughout the source in a manner consistent with Federal food products manufacturing industry standards. Recovered baghouse catch material is recycled on-site in the process.
 - (2) All control equipment exhaust is vented inside the building with no direct exhaust to the outside air.
 - (3) Controlled PM/PM10 emissions for each filtration unit is less than 0.02 gr/dscf at a design exhaust flow rate of 600 acfm.

OES and IDEM, OAQ have evaluated the justifications and agreed that pneumatic transfer and storage of flour and sugar will be considered as an integral part of bakery operations. Therefore, the permitting level will be determined using the potential emissions after air pollution control equipment. Operating conditions will be specified in the proposed permit that air pollution control equipment for pneumatic transfer and storage of flour and sugar shall be in operation at all times when the bakery is in operation.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the FESOP Renewal be approved. This

recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on October 17, 2001. Additional information in regards to the replacement of organic solvent degreasing being replaced by aqueous parts cleaning was received on April 15, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A: Emissions Calculations for detailed calculations (Page 1 through 6).

In July 1998, AP-42 Table 1.4-1 and Table 1.4-2 emission factors for PM/PM10, VOC and CO from natural gas combustion were revised (see TSD Appendix A page 1, 2 and 4 of 6). Source wide potential to emit with revised emission factors along with the deletion of parts washing VOC emissions are stated in the table in Appendix A page 6 of 6. The initial FESOP F097-7413-00170 issued December 15, 1997 utilized January 1995 AP-42 Table 1.4-1 and Table 1.4-2 emission factors and included parts washing VOC potential to emit.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	11.7
PM-10	11.7
SO ₂	0.1
VOC	325.8
CO	12.9
NO _x	15.5

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Ethylene Glycol	0.1
Hexane	0.2
Methanol	1.1
TOTAL	1.4

- (a) The unrestricted potential emissions of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP).
- (c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 15, 1997, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP (F097-7413-00170; issued on December 15, 1997).

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Emission Unit ID Oven # 3 and Emission Unit ID Oven # 4 and Chain Lubrication usage for Oven # 3 and Oven # 4	5.1	5.1	negligible	95.0 (a)	3.3	4.0	0.0 / 0.0
Insignificant Activities	6.6	6.6	0.1	1.8	9.6	11.5	1.1 / 1.4
Total PTE After Issuance	11.7	11.7	0.1	96.8	12.9	15.5	1.1 / 1.4

(a) Pursuant to 326 IAC 8-1-6 1997 BACT analysis for Oven # 3 (see TSD discussion under **State Rule Applicability - Individual Facilities**). Oven # 3 and Oven # 4 combined emissions are limited pursuant to 326 IAC 2-8-4.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

(b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed sources under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC)

emissions are not counted toward determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

40 CFR 60. 40c Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) does not apply to Boiler # 1 or Boiler # 2 because each boiler is less than 10 million Btu per hour maximum heat input and each boiler was constructed prior to June 9, 1989. Therefore, 40 CFR 60. 40c Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) does not apply to Boiler # 1 or Boiler # 2.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source does not have the potential to emit ten (10) tons per year or greater of a single HAP or twenty five (25) tons per year or greater of any combination of HAP.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

This source has the unrestricted potential to emit greater than two hundred and fifty (250) tons per year of volatile organic compounds, VOC (see TSD Appendix A pages 5 and 6 of 6), and is, therefore, a major source pursuant to 326 IAC 2-2-1(y)(2) (Prevention of Significant Deterioration (PSD) Requirements). This source is not in one of the twenty eight (28) listed source categories under 326 IAC 2-2-1(y)(1) (Prevention of Significant Deterioration (PSD) Requirements). This existing major PSD source commenced operation prior to August 8, 1977 and did not have a modification or have new construction that was reviewed and deemed a major modification under the PSD rule at the time of modification or construction.

This source consists of two significant emission units, Oven # 3 and Oven # 4, and various insignificant activities including the use of conveyor chain lubrication in these Ovens. The Baker-Perkins Bakery Bread Oven # 3 was installed in 1982 and Oven # 4 was installed in 1968. Oven # 3 is a replacement oven which increased maximum production capacity for this Oven from 3.2 tons of bread per hour to 6.6 tons of bread per hour.

Pursuant to "Alternative Control Technology (ACT) Document for Bakery Oven Emissions" 453/R-92-017, ethanol (VOC) emissions from bakery bread production arise from the fermentation process for leavened bread production. There is no fermentation process or ethanol generation for unleavened bread production (Muffin Oven # 1 and Muffin Oven # 2). Each oven produces a variety of leavened bakery bread products during a twenty eight (28) consecutive calendar day production cycle. Each type of bakery bread product produced has varying initial and final (spike) baker's percent yeast, yeast action time, spiking time and maximum hourly bread production rate all serving to derive a different VOC emission factor for each type of leavened bread product produced.

Pursuant to the emission factor equation for bakery oven VOC emissions found in "Alternative Control Technology (ACT) Document for Bakery Oven Emissions" 453/R-92-017, unrestricted potential to emit VOC from Butter Top Wheat production is 220.0 tons of VOC per year (see TSD Appendix A page 3 of 6). When combined with VOC emissions from Baker-Perkins Bakery Bun Oven # 4, this source has the unrestricted potential to emit greater than two hundred and fifty (250) tons per year of volatile organic compounds, VOC (see TSD Appendix A pages 5 and 6 of 6), and is, therefore, a major source

pursuant to 326 IAC 2-2-1(y)(2) (Prevention of Significant Deterioration (PSD) Requirements).

This source has actual emissions of less than one hundred (100) tons of VOC per year and has opted to seek a FESOP under 326 IAC 2-8 (Federally Enforceable State Operating Permit Program) such that combined total VOC emissions from Emission Unit ID Oven # 3, Emission Unit ID Oven # 4 and the use of Chain Lubrication for Oven # 3 and Oven # 4 shall not exceed 95.0 tons per thirteen (13) consecutive twenty eight (28) day period with compliance determined at the end of each twenty eight (28) day period. Compliance with this limitation makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) not applicable. Compliance with this limitation demonstrates compliance with 326 IAC 326 IAC 8-1-6 (Volatile Organic Compound Rules; General Reduction Provisions Relating to VOC Rules) for Oven # 3.

326 IAC 2-4.1 (New Source Toxics Control)

This existing source commenced operation prior to July 27, 1997 and does not have the potential to emit hazardous air pollutant (HAP) emissions of greater than ten (10) tons per year for any individual HAP nor does this source have the potential to emit HAP of greater than twenty five (25) tons per year for any combination of HAP. This source did not undergo a construction or a reconstruction of a major HAP source after July 27, 1997. Therefore, this source is not subject to 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of NO_x and/or VOC in Marion County. Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6 and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8).

326 IAC 2-8 (Federally Enforceable State Operating Permit Program)

The unrestricted potential emissions of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 (Part 70 Permit Program). Pursuant to 326 IAC 2-8 (Federally Enforceable State Operating Permit Program), this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP).

Source wide VOC emissions need to be limited such that the source is eligible to accept a permit with federally enforceable limits that restrict PTE to below Title V major source emission levels. Interstate Brands agreed to limit combined VOC emissions from Oven # 3, Oven # 4, chain lubrication usage and Insignificant Activities to less than the major source threshold pursuant to 326 IAC 2-7 (Part 70 Permit Program). Each Oven produces a variety of leavened bakery bread products during a twenty eight (28) consecutive calendar day production cycle. There are thirteen (13) consecutive twenty eight (28) day production periods in a June 1st to May 31st production and record keeping cycle. Interstate Brands has stated that due to the fermentation process, daily, weekly and calendar month production and emission estimates could not adequately be attributed to each day, only in terms of the twenty eight (28) day production cycle. Therefore, Oven # 3 and Oven # 4, when combined with the chain lubrication usage, are limited to less than 95.0 tons per thirteen (13) consecutive twenty eight (28) day production periods with compliance determined at the end of each twenty eight (28) day period such that 326 IAC 2-7 (Part 70 Permit Program) does not apply and compliance with 326 IAC 8-1-6 (Volatile Organic Compound Rules; General Reduction Provisions Relating to VOC Rules) for Oven # 3 is demonstrated. The potential to emit VOC from chain lubrication usage is estimated to be 4.3 tons per year (see Appendix A page 6 of 6).

Compliance with the VOC limitation shall be determined by:

- (a) Actual chain lubrication usage in Oven # 3 and Oven # 4 per thirteen (13) consecutive twenty eight (28) day production periods with compliance determined at the end of each twenty eight (28) day production period; and
- (b) Pursuant to the emission factor equation for bakery oven VOC emissions found in "Alternative Control Technology (ACT) Document for Bakery Oven Emissions" 453/R-92-017 for actual bread and bun production per thirteen (13) consecutive twenty eight (28) day production period with compliance determined at the end of each twenty eight day (28) production period. The ACT emission factor utilized for Compliance Determination is:

$$\text{VOC emission factor} = 0.95(Y_i) + 0.195(t_i) - 0.51(S) - 0.86(t_s) + 1.90$$

where: Y_i = initial baker's % yeast to the nearest tenth of a percent
 t_i = total yeast action time in hours to the nearest tenth of an hour
 S = final (spike) baker's % yeast to the nearest tenth of a percent
 t_s = spiking time in hours to the nearest tenth of an hour

IDEM, OAQ and/or OES reserves the authority to determine compliance using alternate method(s) as approved by the Administrator.

The source wide VOC emissions limit includes 1.9 tons of VOC per 365 day calendar period from insignificant activities.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) for any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-2(a) (Nonattainment Area Limitations)

Sources or facilities located in Marion County which have the potential to emit greater than one hundred (100) tons per year of particulate matter or that have actual emissions greater than ten (10) tons per year and are not otherwise limited by 326 IAC 6-1-2(b) through (g) or 326 IAC 6-1-12 shall not exceed three hundredth (0.03) grains per dry standard cubic foot of exhaust air. This source does not have the potential to emit greater than one hundred (100) tons per year of particulate matter nor does the source have actual emissions greater than ten (10) tons per year. This source is not otherwise limited by 326 IAC 6-1-2(b) through (g) and is not specifically identified in 326 IAC 6-1-12. Therefore, 326 IAC 6-1-2(a) (Nonattainment Area Limitations) does not apply to this source.

State Rule Applicability - Individual Facilities

Emission Unit ID Oven # 3

326 IAC 8-1-6 (Volatile Organic Compound Rules; General Reduction Provisions Relating to VOC Rules)

Pursuant to 326 IAC 8-1-6 (Volatile Organic Compound Rules; General Reduction Provisions Relating to VOC Rules), new facilities, as of January 1, 1980, which have potential VOC emissions of 25 tons or more per year which are not otherwise regulated by other provisions of 326 IAC 8 shall reduce

emissions using Best Available Control Technology (BACT). Oven # 3 is a replacement oven which was installed in 1982 and has unrestricted potential emissions of 220.0 tons VOC per year (see Appendix A Page 3 of 6). The Oven # 3 replacement increased maximum production capacity from 3.2 tons of bread per hour to 6.6 tons of bread per hour and, using ACT emission factors for bakery oven emissions, resulted in an increase of greater than 25 tons of VOC per year.

A BACT analysis for VOC emission control for a maximum actual annual VOC emission rate of 95.0 tons per year for Oven # 3 was submitted by Interstate Brands Corporation on August 20, 1997 and a revised BACT analysis was submitted on September 29, 1997. During the initial FESOP issuance review process in 1997 for F097-7413-00170, BACT for Oven # 3 was determined to be no add on control and a VOC emission limitation of 95.0 tons per year for Oven # 3. VOC emissions from Oven # 3 will be determined by use of the equation found in "Alternative Control Technology (ACT) Document for Bakery Oven Emissions" 453/R-92-017 for the fermentation of bakery bread products.

Emission Unit ID Oven # 4

326 IAC 8-1-6 (Volatile Organic Compound Rules; General Reduction Provisions Relating to VOC Rules)

Pursuant to 326 IAC 8-1-6 (Volatile Organic Compound Rules; General Reduction Provisions Relating to VOC Rules), new facilities, as of January 1, 1980, which have potential VOC emissions of 25 tons or more per year which are not otherwise regulated by other provisions of 326 IAC 8 shall reduce emissions using Best Available Control Technology (BACT). Oven # 4 was installed in 1968 and has not had any modifications. Therefore, Oven # 4 is not subject to 326 IAC 8-1-6 (Volatile Organic Compound Rules; General Reduction Provisions Relating to VOC Rules).

Emission Unit ID Oven # 3 and Emission Unit ID Oven # 4

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from Emission Unit ID Oven # 3 and Emission Unit ID Oven # 4 shall not exceed 17.3 pounds per hour for Oven # 3 and 14.2 pounds per hour for Oven # 4 when operating at a process weight rate of 8.6 tons of bread production per hour for Oven # 3 and 6.4 tons of bun production per hour for Oven # 4. The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by the use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

PM emissions from Emission Unit ID Oven # 3 and Oven # 4 are each estimated to be 0.55 lbs PM per hour. Based on the maximum capacity (P) of each Emission Unit ID, each Emission Unit ID is in compliance with the limit established by 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Interstate Brands stated that identifying maximum capacity in tons of bread manufactured per hour would be misleading and confusing and would not lead to an adequate description of bakery bread manufacturing capacity in Emission Unit ID Oven # 3 or Emission Unit ID Oven # 4. There are many different bakery bread products manufactured. Each product would have a separate maximum capacity determination because of variations in initial and spike percent yeast, yeast action time and spiking time. The bread and bun oven hourly production capacities represent the one variety with the highest VOC emission factor. Other varieties may have a higher throughput rate for determining compliance with a process weight rate which is different than the basis for determining oven VOC Potential to Emit (PTE). As a result, maximum production capacity is not specifically identified in the emission unit description.

State Rule Applicability - Insignificant Activities

Boiler #1 and Boiler # 2 (Insignificant Activities)

326 IAC 6-2-2 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-1(b), particulate emissions from indirect heating facilities located in Marion County which were existing and in operation prior to September 21, 1983 shall be limited by 326 IAC 6-2-2 (Particulate Emission Limitations for Sources of Indirect Heating). Pursuant to 326 IAC 6-2-2(a), this limitation is based on the following equation:

$$Pt = 0.87 Q^{0.16}$$

Where: Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input.

Q for Boiler # 1 and Boiler # 2 when combined, equal 2.0 million Btu per hour. Pursuant to the above equation listed in 326 IAC 6-2-2(a), Pt equals 0.78 pounds of particulate matter emitted per million Btu heat input.

Pursuant to 326 IAC 6-2-2 (a), for Q less than 10.0 million Btu per hour, Pt shall not exceed 0.6. Therefore, pursuant to 326 IAC 6-2-2(a) (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from Boiler # 1 and Boiler # 2 each shall not exceed 0.6 pounds per million Btu heat input.

Based on an AP-42 emission factor of 7.6 pounds of PM per million cubic feet of natural gas, these insignificant activities appear to be in compliance at an emission rate of 0.01 pounds of PM per million Btu (7.6# PM/MMCF x MMCF/1000 MMBtu = 0.01 # PM/MMBtu).

Emission Unit ID Transfer Points and Muffin Ovens # 1 and # 2 (Insignificant Activities)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from Muffin # 1 and Muffin # 2 shall not exceed 7.9 pounds per hour for Muffin Oven # 1 and 8.6 pounds per hour for Muffin Oven # 2 when operating at a process weight rate of 2.7 tons per hour for Muffin # 1 and 3.0 tons per hour for Muffin Oven # 2. The pounds per hour limitation was calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where:} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

Muffin Oven # 1 and # 2 are each estimated to be 0.55 lbs PM per hour. Based on the maximum capacity (P) of each Emission Unit ID, each Emission Unit ID is in compliance with the limit established by 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from Emission Unit ID Transfer Points shall not exceed 45.5 pounds per hour when operating at a process weight rate of 55.0 tons per hour. The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by the use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

PM emissions after transfer point emissions control, which was determined to be integral to the system, are estimated to be 0.9 tons per year (0.2 lbs PM per hour). The twenty two (22) baghouses or cartridge filters and sixteen (16) breather bag sock filters for particulate control shall be in operation and control emissions from the Emission Unit ID Transfer Points at all times that the Dough mixing and flour and sugar pneumatic transferring is in operation.

Testing Requirements

The Permittee is not required to performance stack test any of the Emission Units at this time. However, IDEM, OAQ and/or OES may require stack testing at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the Administrator or the U. S. EPA.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP.

Conclusion

The operation of this stationary bakery bread products manufacturing operation shall be subject to the conditions of the attached proposed FESOP No.: F097-14984-00170.

APPENDIX A

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr < 100**

Insignificant Activities Sum of Nat Gas fuel max	
Muffin Line 1	3.00
Muffin Line 2	6.00
Fryer 1	0.76
Fryer 2	0.84
2 Boilers sum	2.00
Pan Washer 1	3.80
Pan Washer 2	3.80
Boil Tank	1.00
All space heaters	<u>5.00</u>
sum	26.20

Company Name: Interstate Brands Corporation
Address City IN Zip: 2929 North Shadeland, Indianapolis, IN 46219
CP:
Plt ID: F097-14984-00170
Reviewer: M. Caraher
Date: 09/02/03

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

26.2

229.5

Emission Factor in lb/MMCF	Pollutant						Highest HAP
	PM	PM10	SO2	NOx	VOC	CO	Hexane
	7.6	7.6	0.6	100.0	5.5	84.0	1.8
Potential Emission in tons/yr	0.9	0.9	0.1	11.5	0.6	9.6	0.2

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42 (7/98), Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr < 100

Oven # 3 (Bread Line)
Fuel Combustion

Company Name: Interstate Brands Corporation
Address City IN Zip: 2929 North Shadeland, Indianapolis, IN 46219
CP:
Plt ID: F097-14984-00170
Reviewer: M. Caraher
Date: 09/02/03

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

6.1

53.1

	Pollutant						Highest HAP
	PM	PM10	SO2	NOx	VOC	CO	Hexane
Emission Factor in lb/MMCF	7.6	7.6	0.6	100	5.5	84	1.8
Potential Emission in tons/yr	0.2	0.2	0.0	2.7	0.1	2.2	0.0

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42 (7/98), Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

OVEN # 3
Ethanol emissions

Company Name: Interstate Brands Corporation
Address City IN Zip: 2929 North Shadeland, Indianapolis 46219
CP:
Plant ID: F097-14984-00170
Reviewer: M. Caraher
Date: 09/02/03

Per EPA ACT Document 453/R-92-017 "Alternative Control Technology Document for Bakery Oven Emissions" the emission factor estimation is:

VOC emfac = 0.95(Yi) + 0.195(ti) - 0.51(S) - 0.86(ts) + 1.90

Guidance dictates the use of the highest VOC emitting bread produced x max production rate x 8760/2000 to establish PTE

where: Yi = initial baker's % yeast to the nearest tenth of a percent where no final (spike) yeast is added, the formula condenses to:
 ti = total yeast action time in hours to the nearest tenth of an hour VOC emfac = 0.95(Yi) + 0.195(ti) + 1.9
 S = final (spike) baker's % yeast to the nearest tenth of a percent
 ts = spiking time in hours to the nearest tenth of an hour

Bread Product Name	Yi	S	Ti and Ts		
	Sponge % Yeast	Dough % Yeast	Ferment Time hours	Proof Time hours	Floor Time hours
Butter Top Wheat	5.1	0.0	3.0	1.0	0.5

bread product	bread product highest VOC emfac lbs VOC per ton	highest VOC emfac product max bread production tons per hour	highest PTE lbs VOC per hour	PTE tons per year
Butter Top Wheat	7.6	6.6	50.2	220.0

2002 STEPS reported actual = 57.7 tons VOC per year

Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr < 100

Oven # 4 (Bun Line)
Fuel Combustion

Company Name: Interstate Brands Corporation
Address City IN Zip: 2929 North Shadeland, Indianapolis, IN 46219
CP:
Plt ID: F097-14984-00170
Reviewer: M. Caraher
Date: 09/02/03

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.0

26.3

	Pollutant						Highest HAP
	PM	PM10	SO2	NOx	VOC	CO	Hexane
Emission Factor in lb/MMCF	7.6	7.6	0.6	100	5.5	84	1.8
Potential Emission in tons/yr	0.1	0.1	0.0	1.3	0.1	1.1	0.0

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42 (7/98), Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

OVEN # 4
Ethanol emissions

Company Name:
Address City IN Zip:
CP:
Plant ID:
Reviewer:
Date:

Interstate Brands Corporation
2929 North Shadeland, Indianapolis 46219
F097-14984-00170
M. Caraher
09/02/03

Per EPA ACT Document 453/R-92-017 "Alternative Control Technology Document for Bakery Oven Emissions" the emission factor estimation is:

VOC emfac = 0.95(Yi) + 0.195(ti) - 0.51(S) - 0.86(ts) + 1.90

Guidance dictates the use of the highest VOC emitting bread produced x max production rate x 8760/2000 to establish PTE

where: Yi = initial baker's % yeast to the nearest tenth of a percent where no final (spike) yeast is added, the formula condenses to:
 ti = total yeast action time in hours to the nearest tenth of an hour VOC emfac = 0.95(Yi) + 0.195(ti) + 1.9
 S = final (spike) baker's % yeast to the nearest tenth of a percent
 ts = spiking time in hours to the nearest tenth of an hour

Bread Product Name	Yi	S	Ti and Ts		
	Sponge % Yeast	Dough % Yeast	Ferment Time hours	Proof Time hours	Floor Time hours
h.p. wheat buns	4.0	0.9	1.8	1.0	0.3

bread product	bread product highest VOC emfac lbs VOC per ton	highest VOC emfac product max bread production tons per hour	highest PTE lbs VOC per hour	PTE tons per year
h.p. Wheat buns	4.7	4.8	22.7	99.5

2002 STEPS reported actual = 11.8 tons VOC per year

Interstate Brands Corporation
SUM of Emission Unit PTE
09/02/03

Emission Unit	PM	PM10	SO2	NOx	VOC	CO	HAP (METHANOL)	HAP (Ethylene Glycol)	HAP (HEXANE)	Combined HAP's
Oven # 3										
fuel (1)	0.2	0.2	0.0	2.7	0.1	2.2	0.0	0.0	0.0	0.0
process (2)	2.4	2.4	0.0	0.0	220.0	0.0	0.0	0.0	0.0	0.0
Oven # 4										
fuel (1)	0.1	0.1	0.0	1.3	0.1	1.1	0.0	0.0	0.0	0.0
process (2)	2.4	2.4	0.0	0.0	99.5	0.0	0.0	0.0	0.0	0.0
Oven # 3 & Oven # 4										
Chain Lubrication (3)	0.0	0.0	0.0	0.0	4.3	0.0	0.0	0.0	0.0	0.0
Insignificant Activities										
Fuel Combustion (sum) (4)	0.9	0.9	0.1	11.5	0.6	9.6	0.0	0.0	0.2	0.2
Muffin Oven # 1 (2)	2.4	2.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Muffin Oven # 2 (2)	2.4	2.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Transfer Points (sum) (5)	0.9	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Printing (6)	0.0	0.0	0.0	0.0	1.2	0.0	1.1	0.1	0.0	1.2
Sum	11.8	11.8	0.1	15.5	325.8	12.9	1.1	0.1	0.2	1.4

NOTES

- (1) AP-42 emfacs for natural gas combustion only.
- (2) EPA ACT for Bakeries Document to generate highest bread product VOC emfac.
PM/PM10 emissions assume 0.55 lbs/hr from mixing dough/flour/sugar at ovens & @ 8760 = 2.41 tons per year.
- (3) Based on max usage @ 8760 of 1417.5 gals per year @ 6 # VOC per gal.
- (4) Includes 9 natural gas fuel combustion units plus space heating. See TSD App A Page 1 of 6.
- (5) Includes 38 transfer point emission control devices determined to be integral to the system. PM/PM10 emissions represent value after control. All pneumatically transferred ingredients baghouse catch reused.
- (6) Based on max usage @ 8760 of 542 gal ink/makeup solution per year.

12/13ths of 99 tons = 91.4 tons per year 51/52nds of 99 tons = 97.1 tons per year

1.8 = sum VOC tons of insignificant activities

95.0 = available tons to split between Oven # 3 & Oven # 4 & chain lubrication

95.0 - 4.3 90.8 = available tons to split between Oven # 3 & Oven # 4