

March 12, 2003

Mr. Mark Koenig  
Quaker Oats Mayflower Midwest Facility  
5858 Decatur Boulevard  
Indianapolis, Indiana 46214

Re: 097-00365  
First Minor Permit Revision to  
MSOP 097-11620-00365

Dear Mr. Koenig:

Quaker Oats Mayflower Midwest facility was issued a minor source operating permit on February 7, 2000 for construction and operation of a beverage manufacturing and packaging operation. A letter requesting a revision to this permit was received on November 25, 2002. Pursuant to the provisions of 326 IAC 2-6.1-6 a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The minor permit revision consists of a change in the maximum heat input capacity of one (1) steam boiler (identified as an emission unit SG-04) from 25.11 MMBtu/hr to 33.48 MMBtu/hr. The minor permit revision also consists of a correction in the maximum heat input capacity of one (1) steam boiler (identified as emission unit SG-03) in Section D.1 to reflect the correct heat input capacity of 25.11 MMBtu/hr as given in Section A.2

The following construction conditions are applicable to the proposed project:

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Pursuant to IC 13-15-5-3, this approval to construct becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, the minor source operating permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this permit revision which includes this letter, the attached operating conditions applicable to these emission units, and revised permit pages to the front of the original permit.

Office of Environmental Services (OES) has assigned the processing of this application to Eastern Research Group, Inc. (ERG). Therefore, questions should be directed to Ms. Sanobar Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Monica Dick of my staff at (317) 327-2512.

Sincerely,

Original Signed by John B. Chavez  
John B. Chavez, Administrator

Attachments

ERG/SD

cc: File - Marion County  
U.S. EPA, Region V  
Marion County Health Department  
Air Compliance Section Inspector - Dick Sekula  
Compliance Data Section - Karen Nowak  
Administrative and Development - Sara Cloe  
Technical Support and Modeling - Michele Boner

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

## MINOR SOURCE OPERATING PERMIT

### OFFICE OF AIR QUALITY AND CITY OF INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

**Quaker Oats Mayflower Midwest Facility  
5858 Decatur Boulevard  
Indianapolis, Indiana 46214**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-11620-00365	
Issued by: Robert F. Holm Ph.D. OES Administrator	Issuance Date: February 7, 2000
Minor Permit Revision No. MSOP 097-16522-00365	Pages Affected: 4, 15, 16, and 17
Issued by: Original Signed by John B. Chavez  John B. Chavez, Administrator Office of Environmental Services	Issuance Date: March 12, 2003

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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 and A.2 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates stationary source, used to manufacture beverages.

Authorized Individual: Mark Koenig  
Source Address: 5858 Decatur Boulevard, Indianapolis, Indiana 46241  
Mailing Address: 5858 Decatur Boulevard, Indianapolis, Indiana 46241  
Phone Number: (317)-788-5423  
SIC Code: 2033  
County Location: Marion  
County Status: Attainment for all criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD or Emission Offset Rules;  
Minor Source, Section 112 of the Clean Air Act

### A.2 Emissions units and Pollution Control Equipment Summary

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This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) Steam Boiler manufactured by Cleaver Brooks, identified as emission unit SG-01, with a maximum heat input capacity of 33.48 million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 01. This unit was installed in 2000.
- (b) Steam Boiler manufactured by Cleaver Brooks, identified as emission unit SG-02, with a maximum heat input capacity of 33.48 million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 02. This unit was installed in 2000.
- (c) Steam Boiler, identified as emission unit SG-03, with a maximum heat input capacity of 25.11 million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 03. This unit was installed in 2002.
- (d) Steam Boiler, identified as emission unit SG-04, with a maximum heat input capacity of 33.48 million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 04. This unit will be installed in 2003.
- (e) Cap Coding Process, identified as emission unit CC-01, involves the application of videojet ink on the bottle caps. The maximum estimated ink usage rate of 0.07 gallons per hour. Emissions generated by this process are not controlled and are vented into the building. This facility was constructed in 2000.

## **SECTION B GENERAL CONSTRUCTION CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### **B.1 Permit No Defense [IC 13]**

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This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2 Definitions**

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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, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

### **B.3 Effective Date of the Permit [IC13-15-5-3]**

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Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

### **B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.5 Modification to Permit [326 IAC 2]**

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Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.6 Minor Source Operating Permit [326 IAC 2-6.1]**

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This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section and Office of Environmental Services (OES), Permits Section.
  - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM and OES.
  - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Environmental Resources Management Division prior to beginning operation of the facilities.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from OES, the Permittee shall attach it to this document.

- (d) The operation permit will be subject to annual operating permit fees pursuant to the Code of Indianapolis and Marion County, Chapter 511.
- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. 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. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

#### B.7 NSPS Reporting Requirement

That pursuant to the New Source Performance Standards (NSPS), Part 60.40c, Subpart Dc, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- (a) Commencement of construction date (no later than 30 days after such date);
- (b) Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- (c) Actual start-up date (within 15 days after such date); and
- (d) Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.

Reports are to be sent to:

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

and

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

The application and enforcement of these standards have been delegated to the IDEM, OAQ and OES. The requirements of 40 CFR Part 60 are also federally enforceable.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of each criteria air pollutant is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ and OES prior to making the change.
- (c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ and OES prior to making the change.

### C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
  - (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;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, and OES upon request and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

### C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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 Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

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

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM OAQ, OES and U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and OES, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, and OES shall issue a revised permit.

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.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM and OES, the fact that continuance of this permit is not consistent with purposes of this article.

**C.7 Opacity [326 IAC 5-1]**

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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.8 Fugitive Dust Emissions [326 IAC 6-4]**

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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). 326 IAC 6-4-2(4) is not federally enforceable.

**Testing Requirements**

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

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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 and OES.

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 Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

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

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ and OES within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and OES, if the source submits to IDEM, OAQ, and OES a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

### **Compliance Monitoring Requirements**

#### **C.10 Compliance Monitoring [326 IAC 2-1.1-11]**

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

#### **C.11 Monitoring Methods [326 IAC 3]**

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, or other approved methods as specified in this permit.

#### **C.12 Actions Related to Noncompliance Demonstrated by a Stack Test**

- (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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, and OES within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAQ and OES shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ and OES reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (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 may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

### **Record Keeping and Reporting Requirements**

#### **C.13 Malfunctions Report [326 IAC 1-6-2]**

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction

Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 Annual Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

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

and

City of Indianapolis  
Office of Environmental Services  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221
- (c) The annual 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.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.15 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and OES may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.16 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, and OES representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are

not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(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 Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
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, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) A malfunction as described in 326 IAC 1-6-2; or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.18 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality and OES stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

and

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

- (d) The notification 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.

## SECTION D.1

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Steam Boiler manufactured by Cleaver Brooks, identified as emission unit SG-01, with a maximum heat input capacity of 33.48 million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 01. This unit was installed in 2000.
- (b) Steam Boiler manufactured by Cleaver Brooks, identified as emission unit SG-02, with a maximum heat input capacity of 33.48 million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 02. This unit was installed in 2000.
- (c) Steam Boiler, identified as emission unit SG-03, with a maximum heat input capacity of 25.11 million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 03. This unit was installed in 2002.
- (d) Steam Boiler, identified as emission unit SG-04, with a maximum heat input capacity of 33.48 million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 04. This unit will be installed in 2003.

(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 2-7-5(1)]

#### D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart Dc.

#### D.1.2 Particulate Matter [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the Particulate Matter (PM) emissions from emission units SG-01 and 02 shall each be limited to 0.37 lbs/MMBtu of heat input.
- (b) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the Particulate Matter (PM) emissions from emission unit SG-03 shall be limited to 0.34 pound per million Btu of heat input.
- (c) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations of Sources of Indirect Heating) the Particulate Matter (PM) emissions from emission unit SG-04 shall be limited to 0.31 pound per million Btu of heat input.

These limitations are based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where Pt = Pounds of particulate matter emitted per million Btu of heat input.  
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The total source maximum operating capacity is 66.96

MMBtu/hr for boilers SG-01 and SG-02; 92.07 MMBtu/hr for boiler SG-03, and  
125.55 MMBtu/hr for boiler SG-04.

### **Compliance Determination Requirements**

#### **D.1.3 Testing Requirements [326 IAC 2-7-6(1)]**

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The Permittee is not required to test emission units SG-01, 02, 03 or 04 by this permit. However, IDEM and OES may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM and OES, compliance with the Particulate Matter limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.4 Record Keeping Requirements**

---

- (a) That pursuant to 40 CFR Part 60.48c (Reporting and Recordkeeping Requirements) records shall be maintained of the amounts of fuel combusted during each day by the four (4) natural gas fired boilers, identified as SG-01, 02, 03 and 04.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (e) Cap Coding Process, identified as emission unit CC-01, involves the application of videojet ink on the bottle caps. The maximum estimated ink usage rate of 0.07 gallons per hour. Emissions generated by this process are not controlled and are vented into the building. This unit was installed in 2000. This facility was constructed in 2000.

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

### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.2.1 Record Keeping Requirements

- (a) The amount, VOC content and HAP Content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type, amount used and the annual emissions.
- (a) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
FAX NUMBER - 317 233-5967**

**Indianapolis Office of Environmental Services  
FAX NUMBER 317-327-2274**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERMIT LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ?    Y    N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y    N

COMPANY: \_\_\_\_\_ PHONE NO. (    ) \_\_\_\_\_

LOCATION: (CITY AND COUNTY) \_\_\_\_\_

PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS: \_\_\_\_\_

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

\***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale : \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
and  
Indianapolis Office of Environmental Services  
FAX NUMBER 317-327-2274**

**MINOR SOURCE OPERATING PERMIT  
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Quaker Oats Mayflower Midwest Facility  
Source Address: 5858 Decatur Boulevard, Indianapolis, Indiana 46214  
Mailing Address: 5858 Decatur Boulevard, Indianapolis, Indiana 46214  
MSOP No.: 097-11620-00365

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)</b>	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
and  
Indianapolis Office of Environmental Services  
FAX NUMBER 317-327-2274**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	<b>Quaker Oats Mayflower Midwest Facility</b>
<b>Address:</b>	<b>5858 Decatur Boulevard, Indianapolis, Indiana 46241</b>
<b>City:</b>	<b>Indianapolis</b>
<b>Phone #:</b>	<b>(317)-788-5423</b>
<b>MSOP #:</b>	<b>097-11620-00365</b>

I hereby certify that [source] is  still in operation.  
 no longer in operation.

I hereby certify that [source] is  in compliance with the requirements of MSOP **097-11620-00365**.  
 not in compliance with the requirements of MSOP **097-11620-00365**.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Minor Permit Revision to a Minor Source Operating Permit

#### Source Background and Description

Source Name:	Quaker Oats Mayflower Midwest Facility
Source Location:	5858 Decatur Boulevard, Indianapolis, Indiana 46214
County:	Marion
SIC Code:	2033
Operation Permit No.:	097-11620-00365
Operation Permit Issuance Date:	February 7, 2000
Permit Revision No.:	097-16522-00365
Permit Reviewer:	ERG/SD

The City of Indianapolis Office of Environmental Services (OES) and the Office of Air Quality (OAQ) have reviewed a revision application from Quaker Oats Mayflower Midwest Facility relating to the construction and operation of a new 33.48 MMBtu/hr boiler Emission Unit SG-04, which was originally permitted as a 25.11 MMBtu/hr boiler, as follows:

One (1) Steam Boiler (identified as emission unit SG-04), with a maximum heat input capacity of 33.48 MMBtu/hr, using no controls, combusting natural gas and exhausting to Stack 04.

In Section D.1 (Emission Unit Description (c)) of permit No. 097-11620-00365, steam boiler SG-03 was incorrectly identified to have a maximum heat input capacity of 33.48 MMBtu/hour. The maximum heat input capacity has been corrected to 25.11 MMBtu/hour and is shown in bold in Section A.2 and D.1 of TSD.

#### History

On November 25, 2002, Quaker Oats Mayflower Midwest Facility submitted an application to OES and OAQ requesting to construct and operate a new 33.48 MMBtu/hr steam boiler (SG-04) at their existing plant. Quaker Oats Mayflower Midwest Facility was issued a MSOP on February 7, 2000.

#### Permitted Emission Units and Pollution Control Equipment

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

- (a) Steam Boiler manufactured by Cleaver Brooks, identified as emission unit SG-01, with a maximum heat input capacity of 33.48 million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 01. This unit was installed in 2000.

- (b) Steam Boiler manufactured by Cleaver Brooks, identified as emission unit SG-02, with a maximum heat input capacity of 33.48 million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 02. This unit was installed in 2000.
- (c) Steam Boiler, identified as emission unit SG-03, with a maximum heat input capacity of 25.11 million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 03. This unit was installed in 2002.
- (d) Steam Boiler, identified as emission unit SG-04, with a maximum heat input capacity of 33.48 million British Thermal Units per hour (MMBtu/hr), capable of firing Natural Gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 04. This unit will be installed in 2003.
- (e) Cap Coding Process, identified as emission unit CC-01, involves the application of videojet ink on the bottle caps. The maximum estimated ink usage rate of 0.07 gallons per hour. Emissions generated by this process are not controlled and are vented into the building. This facility was constructed in 2000.

### Unpermitted Emission Units and Pollution Control Equipment

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

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
SG-04	SG-04	41.5	2	7,850	390

### Recommendation

The staff recommends to the Commissioner that the Minor Permit Revision 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.

A complete application for the purposes of this review was received on November 25, 2002.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 2).

### Potential To Emit of Revision Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation

is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	1.11
PM-10	1.11
SO <sub>2</sub>	0.09
VOC	0.81
CO	12.32
NO <sub>x</sub>	14.66

HAP's	Potential To Emit (tons/year)
TOTAL	<10 tpy combined

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all pollutants are less than 100 tons per year.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Justification for Revision**

This MSOP is being modified through a MSOP minor permit revision. This revision is being performed pursuant to 326 IAC 2-6.1-6(g)(4), as the potential to emit of NOx from the modification is greater than ten (10) tons per year and less than twenty-five (25) tons per year.

**County Attainment Status**

The source is located in Marion County.

Pollutant	Status)
PM-10	unclassifiable
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	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. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Marion County has been classified as attainment or unclassifiable for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 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.

**Source Status**

Existing Source MSOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	4.18
PM10	4.18
SO <sub>2</sub>	0.33
VOC	5.63
CO	46.19
NO <sub>x</sub>	54.99

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

**Proposed Modification**

PTE from the proposed revision (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)
Existing Units	3.06	3.06	0.24	4.82	33.87	40.33
Proposed Modification	1.11	1.11	0.09	0.81	12.32	14.66
Total	4.18	4.18	0.33	5.63	46.19	54.99
PSD Threshold Level	<250	<250	<250	<250	<250	<250

This revision to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

**Federal Rule Applicability**

- (a) The four (4) boilers (identified as emission units SG-01, SG-02, SG-03, and SG-04) are subject to the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generator Units, 40 CFR Part 60. 40c, Subpart Dc (312 IAC 12), because they were constructed after June 9, 1989 and have a heat input capacity greater than 10 MMBtu/hr. Since these units are fired with natural gas and no other fuel,

the recordkeeping requirements under 40 CFR Part 60.48c are the only applicable requirements for Subpart Dc.

Under this rule, the source is required to maintain daily records of the amount and type of fuel burned. If the source would like to change the frequency of record keeping from daily recording to monthly recording, then the source must send a letter requesting this change to the following address:

George Czemiak  
c/o U.S. Environmental Protection Agency, Region V  
Air and Radiation Division  
Air Enforcement Branch - Indiana (AE-17)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

The request should reference the NSPS requirement.

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

#### **State Rule Applicability - Entire Source**

##### **326 IAC 2-2 (Prevention of Significant Deterioration)**

This source was constructed in 2000 and had a potential to emit air pollutants that were less than 250 tons per year and it is not in 1 of 28 listed source categories. It was an existing minor source under PSD. The construction of the new 33.48 MMBtu per hour boiler (identified as SG-04) will result in only a small increase in emissions and the potential to emit for the entire source will remain below the 250 tons per year PSD threshold. Therefore, the source is not subject to the provisions of 326 IAC 2-2 and 40 CFR 52.21.

##### **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<sub>x</sub> and is located in Marion County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year 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)(Emission Statement Operating Year).

##### **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

The operation of the beverage manufacturing and packaging plant will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

##### **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%) 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.

### State Rule Applicability - Individual Facilities

#### 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

Since this source has the potential to emit particulate matter less than 100 tons per year and has actual emissions less than 10 tons per year, it is not subject to the non-attainment provisions of 326 IAC 6-1.

- (a) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect-Heating), the particulate matter (PM) emissions from emission units SG-01 and SG-02 shall each be limited to 0.37 lbs/MMBtu. Boilers SG-01 and SG-02 were constructed in 2000.
- (b) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the Particulate Matter (PM) emissions from emission unit SG-03 shall be limited to 0.34 lbs/MMBtu. Boiler SG-03 was constructed in 2002.
- (c) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the Particulate Matter (PM) emissions from emission unit SG-04 shall be limited to 0.31 lbs/MMBtu. Boiler SG-04 will be constructed in 2003.

These limitations are based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where:

Pt = emission rate limit (lbs/MMBtu/hr)

Q = total source heat input capacity (MMBtu/hr). The total source maximum heat input capacity is 66.96 MMBtu/hr for boilers SG-01 and SG-02; 92.07 MMBtu/hr for boiler SG-03; and 125.55 MMBtu/hr for boiler SG-04.

### Compliance Requirements

Permits issued under 326 IAC 2-6 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 2-6. 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.

There are no additional compliance monitoring provisions required by this permit other than record keeping requirements.

## Proposed Changes

Reference to Office of Air Management (OAM) and Environmental Resources Management Division (ERMD) in permit no. 97-11620-00365 has been changed to Office of Air Quality (OAQ) and Office of Environmental Services (OES), respectively, in minor permit revision no. 097-16522-00365.

## 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 and A.3 2 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.2 Emissions units and Pollution Control Equipment Summary

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This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) Steam Boiler manufactured by Cleaver Brooks, identified as emission unit SG-01, with a maximum heat input capacity of 33.48 million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 01. **This unit was installed in 2000.**
- (b) Steam Boiler manufactured by Cleaver Brooks, identified as emission unit SG-02, with a maximum heat input capacity of 33.48 million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 02. **This unit was installed in 2000.**
- (c) Steam Boiler, identified as emission unit SG-03, with a maximum heat input capacity of ~~25.1133-48~~ 25.1133-48 million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 03. **This unit was installed in 2002.**
- (d) Steam Boiler, identified as emission unit SG-04, with a maximum heat input capacity of ~~25.1133-48~~ 25.1133-48 million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 04. **This unit will be installed in 2003.**
- (e) Cap Coding Process, identified as emission unit CC-01, involves the application of videojet ink on the bottle caps. The maximum estimated ink usage rate of 0.07 gallons per hour. Emissions generated by this process are not controlled and are vented into the building. **This facility was constructed in 2000.**

## SECTION D.1

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Steam Boiler manufactured by Cleaver Brooks, identified as emission unit SG-01, with a maximum heat input capacity of 33.48 million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 01. **This unit was installed in 2000.**
- (b) Steam Boiler manufactured by Cleaver Brooks, identified as emission unit SG-02, with a maximum heat input capacity of 33.48 million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 02. **This unit was installed in 2000.**
- (c) Steam Boiler, identified as emission unit SG-03, with a maximum heat input capacity of ~~33.48~~ **25.11** million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 03. **This unit was installed in 2002.**
- (d) Steam Boiler, identified as emission unit SG-04, with a maximum heat input capacity of ~~25.14~~ **33.48** million British Thermal Units per hour (MMBtu/hr), capable of firing natural gas only. The emissions from this boiler are not controlled and are exhausted out one stack identified as stack I.D. 04. **This unit was installed in 2003.**

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

### D.1.2 Particulate Matter [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect-Heating), the particulate matter (PM) emissions from emission units SG-01; ~~and 02; and 03; and 04~~ shall each be limited to 0.327 lbs/MMBtu.
- (b) **Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the Particulate Matter (PM) emissions from emission unit SG-03 shall be limited to 0.34 pound per million Btu of heat input.**
- (c) **Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations of Sources of Indirect Heating) the Particulate Matter (PM) emissions for emission unit SG-04 shall be limited to 0.31 pound per million Btu of heat input.**

~~This~~ **These** limitations ~~is~~ **are** based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where Pt = Pounds of particulate matter emitted per million Btu of heat input.  
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The total source maximum operating capacity is **66.96 MMBtu/hr for boilers SG-01 and SG-02; 92.07 MMBtu/hr for boiler SG-03, and 125.55**~~117.48~~ **MMBtu/hr for boiler SG-04.**

### D.1.3 Testing Requirements [326 IAC 2-7-6(1)]

#### D.1.4 Record Keeping Requirements

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- (a) That pursuant to 40 CFR Part 60.48c (Reporting and Recordkeeping Requirements) records shall be maintained of the amounts of fuel combusted during each ~~month~~**day** by the four (4) natural gas fired boilers, identified as SG-01, 02, 03 and 04.

### SECTION D.2

### EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description:

- (e) Cap Coding Process, identified as emission unit CC-01, involves the application of videojet ink on the bottle caps. The maximum estimated ink usage rate of 0.07 gallons per hour. Emissions generated by this process are not controlled and are vented into the building. This unit was installed in 2000. **This facility was constructed in 2000.**

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

#### Conclusion

The operation of this beverage manufacturing and packaging plant shall be subject to the conditions of the attached Minor Permit Revision 097-16522-00365.