



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

July 21, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Interstate Brands Corporation / MSOP 005-16926-00078

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03



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MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Interstate Brands Corporation
3060 National Road
Columbus, Indiana 47203**

(herein known as the Permittee) is hereby authorized to 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 if new source), 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 005-16926-00078	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 21, 2004 Expiration Date: July 21, 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). 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)]

The Permittee owns and operates a stationary bakery source.

Authorized Individual:	Environmental Coordinator
Source Address:	3060 National Road, Columbus, Indiana 47203
Mailing Address:	P.O. Box 857, Columbus, Indiana 47202
General Source Phone:	(814) 372-4443
SIC Code:	2051
County Location:	Bartholomew
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) One (1) natural gas-fired sweet roll oven, identified as Unit No. 1, constructed in 1965, exhausting to Stacks S1 and S2, capacity: 8,040 pounds per hour, rated at 2.9 million British thermal units per hour.
- (b) One (1) natural gas-fired band oven, identified as Unit No. 8, constructed in 1968, exhausting to Stacks S11, S11A and S11B, capacity: 2,448 pounds per hour, rated at 2.1 million British thermal units per hour.
- (c) One (1) natural gas-fired cake pan washer, identified as Unit No. 9, constructed in 1983, exhausting to Stacks S14 and S15, capacity: 17,010 pounds per hour, rated at 0.5 million British thermal units per hour.
- (d) One (1) natural gas-fired boiler, identified as Boiler No. 1, constructed in 1974, exhausting to Stack S12, rated at: 14.6 million British thermal units per hour.
- (e) One (1) natural gas-fired boiler, identified as Boiler No. 2, constructed in 1987, exhausting to Stack S13, rated at: 8.4 million British thermal units per hour.
- (f) Source-wide natural gas-fired fryers, rated at 8.34 million British thermal units per hour, total, consisting of:
 - (1) One (1) fryer, identified as Fryer No. 1, constructed in 1968, exhausting to Stacks S5, S5A and S5B, rated at 0.6 million British thermal units per hour, capacity: 1,375 pounds per hour;
 - (2) One (1) fryer, identified as Fryer No. 2, constructed in 1968, exhausting to Stacks

- S6, S6A and S6B, rated at 0.6 million British thermal units per hour, capacity: 1,375 pounds per hour;
- (3) One (1) jumbo fryer, identified as Fryer No. 5, constructed in 1984, exhausting to Stacks S8, S8A and S8B, rated at 1.26 million British thermal units per hour, capacity: 3,246 pounds per hour;
 - (4) One (1) donut fryer, identified as Fryer No. 6, constructed in 1984, exhausting to Stacks S7 and S7A, rated at 0.6 million British thermal units per hour, capacity: 1,447 pounds per hour;
 - (5) One (1) pie/stix fryer, identified as Fryer No. 7, constructed in 2000, exhausting to Stacks S3 and S4, rated at 3.6 million British thermal units per hour, capacity: 4,559 pounds per hour;
 - (6) One (1) gem donut fryer, identified as Fryer No. 10, constructed in 1970, exhausting to Stacks S16, S16A and S16B, rated at 1.08 million British thermal units per hour, capacity: 10,247 pounds per hour; and
 - (7) One (1) gem donut fryer, identified as Fryer No. 11, constructed in 1970, exhausting to Stacks S17 and S17A, rated at 0.6 million British thermal units per hour, capacity: 8,439 pounds per hour.
- (g) One (1) maintenance shop, constructed prior to 1965, consisting of welding, torch cutting, metal lathe, drilling and grinding operations, equipped with a parts washer, capacity: less than 145 gallons of solvent per year.
 - (h) One (1) wrapping operation, constructed in 1982, equipped with a parts washer, capacity: less than 145 gallons of solvent per year.
 - (i) One (1) production operation, installation date unknown, consisting of a flour and sugar transfer operation, dough and cake mixing operation, gluing operation and a pan coating operation.
 - (j) Two (2) storage silos used to store sugar, constructed in 1965.
 - (k) Two (2) storage silos used to store flour, constructed in 1965.
 - (l) Three (3) ink jet printers, installed in 2003, capacity: 9.2 gallons of ink per year and sixty-three (63) gallons of make up solution per year.
 - (m) The following miscellaneous storage tanks, each with a capacity greater than 1,000 gallons:
 - (1) Two (2) frying fat storage tanks constructed in 1960 and 1972;
 - (2) One (1) Soya oil storage tank constructed in 1985;
 - (3) Two (2) liquid fructose storage tanks constructed in 1970 and 1975; and
 - (4) Two (2) liquid chocolate storage tanks constructed in 1960.
 - (n) The following miscellaneous storage tanks, each with a capacity less than 1,000 gallons:

- (1) One (1) motor oil storage tank constructed in 1970; and
- (2) Two (2) used oil storage tanks constructed in 1973 and 1996.
- (o) Two (2) diesel fuel storage tanks, constructed in 1992, capacity: 15,000 gallons, each.
- (p) Two (2) natural gas-fired space heaters, constructed in 1986, rated at 0.12 million British thermal units per hour, each.
- (q) Seven (7) natural gas-fired space heaters, constructed in 1990, rated at 0.1 million British thermal units per hour, each.
- (r) One (1) natural gas-fired space heater, constructed in 1990, rated at 0.18 million British thermal units per hour.
- (s) One (1) natural gas-fired space heater, constructed in 1986, rated at 0.135 million British thermal units per hour.
- (t) Two (2) natural gas-fired space heaters, constructed in 1990, rated at 0.16 million British thermal units per hour, each.
- (u) Two (2) natural gas-fired space heaters, constructed in 1986, rated at 0.2 million British thermal units per hour, each.
- (v) One (1) natural gas-fired space heater, constructed in 1986, rated at 0.165 million British thermal units per hour.

SECTION B GENERAL 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]

This permit to operate 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

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 2-1.1-1 shall prevail.

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

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

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating 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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality 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 Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (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, on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (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, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, 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 an "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.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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

Any such application shall be certified by an "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)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2] [IC 13-30-3-1]

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, 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) 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 this title or the conditions of this permit or any operating permit revisions;
- (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 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) 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.10 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, 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, 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.

B.11 Annual Fee Payment [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.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to 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, the fact that continuance of this permit is not consistent with purposes of this article.

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 forty percent (40%) 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 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.5 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

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 an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (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

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

- (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.

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

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, 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.7 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner 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.

C.8 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.

C.9 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 response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit 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 that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ

may extend the re-testing deadline.

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

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

Record Keeping and Reporting Requirements

C.10 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.11 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) 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

- (b) 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, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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. Reporting periods are based on calendar years.

SECTION D.1

EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description: Baking Operations and Boilers

- (a) One (1) natural gas-fired sweet roll oven, identified as Unit No. 1, constructed in 1965, exhausting to Stacks S1 and S2, capacity: 8,040 pounds per hour, rated at 2.9 million British thermal units per hour.
- (b) One (1) natural gas-fired band oven, identified as Unit No. 8, constructed in 1968, exhausting to Stacks S11, S11A and S11B, capacity 2,448 pounds per hour, rated at 2.1 million British thermal units per hour.
- (c) One (1) natural gas-fired cake pan washer, identified as Unit No. 9, constructed in 1983, exhausting to Stacks S14 and S15, capacity: 17,010 pounds per hour, rated at 0.5 million British thermal units per hour.
- (d) One (1) natural gas-fired boiler, identified as Boiler No. 1, constructed in 1974, exhausting to Stack S12, rated at 14.6 million British thermal units per hour.
- (e) One (1) natural gas-fired boiler, identified as Boiler No. 2, constructed in 1987, exhausting to Stack S13, rated at 8.40 million British thermal units 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

D.1.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-3-2(e), particulate emissions from any facility used for indirect heating purposes which has 250 million British thermal units per hour heat input of less and which began operation after June 8, 1972, shall in no case exceed 0.6 pound per million British thermal units heat input. Therefore, the PM emissions from Boiler No. 1 shall be limited to 0.6 pound per million British thermal units heat input.

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

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating Constructed after September 21, 1983) the PM emissions from Boiler No. 2, rated at 8.40 million British thermal units per hour, shall be limited to 0.482 pounds per million British thermal units heat input.

This limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input.

Q = The total source maximum operating capacity in million British thermal units per hour.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Fryers

- (f) Source-wide natural gas-fired fryers, rated at 8.34 million British thermal units per hour, total, consisting of:
- (1) One (1) fryer, identified as Fryer No. 1, constructed in 1968, exhausting to Stacks S5, S5A and S5B, rated at 0.6 million British thermal units per hour, capacity: 1,375 pounds per hour;
 - (2) One (1) fryer, identified as Fryer No. 2, constructed in 1968, exhausting to Stacks S6, S6A and S6B, rated at 0.6 million British thermal units per hour, capacity: 1,375 pounds per hour;
 - (3) One (1) jumbo fryer, identified as Fryer No. 5, constructed in 1984, exhausting to Stacks S8, S8A and S8B, rated at 1.26 million British thermal units per hour, capacity: 3,246 pounds per hour;
 - (4) One (1) donut fryer, identified as Fryer No. 6, constructed in 1984, exhausting to Stacks S7 and S7A, rated at 0.6 million British thermal units per hour, capacity: 1,447 pounds per hour;
 - (5) One (1) pie/stix fryer, identified as Fryer No. 7, constructed in 2000, exhausting to Stacks S3 and S4, rated at 3.6 million British thermal units per hour, capacity: 4,559 pounds per hour;
 - (6) One (1) gem donut fryer, identified as Fryer No. 10, constructed in 1970, exhausting to Stacks S16, S16A and S16B, rated at 1.08 million British thermal units per hour, capacity: 10,247 pounds per hour; and
 - (7) One (1) gem donut fryer, identified as Fryer No. 11, constructed in 1970, exhausting to Stacks S17 and S17A, rated at 0.6 million British thermal units per hour, capacity: 8,439 pounds 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

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 the source wide natural gas-fired fryers shall not exceed a total of 25.5 pounds per hour when operating at a process weight rate of 15.3 tons per hour.

The pounds per hour limitation was calculated with the following equation:

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

$$E = 4.10 P^{0.67}$$

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

SECTION D.3

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Miscellaneous Operations

- (g) One (1) maintenance shop, constructed prior to 1965, consisting of welding, torch cutting, metal lathe, drilling and grinding operations, equipped with a parts washer, capacity: less than 145 gallons of solvent per year.
- (h) One (1) wrapping operation, constructed in 1982, equipped with a parts washer, capacity: less than 145 gallons of solvent per year.
- (i) One (1) production operation, installation date unknown, consisting of a flour and sugar transfer operation, dough and cake mixing operation, gluing operation and a pan coating operation.
- (j) Two (2) storage silos used to store sugar, constructed in 1965.
- (k) Two (2) storage silos used to store flour, constructed in 1965.
- (l) Three (3) ink jet printers, installed in 2003, capacity: 9.2 gallons of ink per year and sixty-three (63) gallons of make up solution per year.

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

Emission Limitations and Standards (Cold Cleaning Degreaser Operations)

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for the cold cleaner degreaser operation that is part of the one (1) wrapping operation, constructed after January 1, 1980, the Permittee 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.

SECTION D.4

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Storage Tanks and Space Heaters

- (m) The following miscellaneous storage tanks, each with a capacity greater than 1,000 gallons:
 - (1) Two (2) frying fat storage tanks constructed in 1960 and 1972;
 - (2) One (1) Soya oil storage tank constructed in 1985;
 - (3) Two (2) liquid fructose storage tanks constructed in 1970 and 1975; and
 - (4) Two (2) liquid chocolate storage tanks constructed in 1960.
- (n) The following miscellaneous storage tanks, each with a capacity less than 1,000 gallons:
 - (1) One (1) motor oil storage tank constructed in 1970; and
 - (2) Two (2) used oil storage tanks constructed in 1973 and 1996.
- (o) Two (2) diesel fuel storage tanks, constructed in 1992, capacity: 15,000 gallons, each.
- (p) Two (2) natural gas-fired space heaters, constructed in 1986, rated at 0.12 million British thermal units per hour, each.
- (q) Seven (7) natural gas-fired space heaters, constructed in 1990, rated at 0.1 million British thermal units per hour, each.
- (r) One (1) natural gas-fired space heater, constructed in 1990, rated at 0.18 million British thermal units per hour.
- (s) One (1) natural gas-fired space heater, constructed in 1986, rated at 0.135 million British thermal units per hour.
- (t) Two (2) natural gas-fired space heaters, constructed in 1990, rated at 0.16 million British thermal units per hour, each.
- (u) Two (2) natural gas-fired space heaters, constructed in 1986, rated at 0.2 million British thermal units per hour, each.
- (v) One (1) natural gas-fired space heater, constructed in 1986, rated at 0.165 million British thermal units 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.4.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60 Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the one (1) Soya oil tank, the one (1) used oil storage tank constructed in 1996 and the two (2) diesel fuel storage tanks, except when otherwise specified in 40 CFR 60 Subpart I and 40 CFR 60 Subpart Kb.

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

D.4.2 Record Keeping Requirements [326 IAC 12-1] [40 CFR 60.116b, Subpart Kb]

Pursuant to 326 IAC 12-1, the one (1) Soya oil tank, the one (1) used oil storage tank constructed in 1996 and the two (2) diesel fuel storage tanks shall comply with the New Source Performance Standards (NSPS), 326 IAC 12 (40 CFR Part 60.116b only, Subpart Kb). 40 CFR Part 60.116b requires the permittee to maintain accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel. Records shall be kept for the life of each storage tank.

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

**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).

Company Name:	Interstate Brands Corporation
Address:	3060 National Road
City:	Columbus, Indiana 47203
Phone #	(812) 372-4443
MSOP #:	005-16926-00078

I hereby certify that Interstate Brands Corporation is still in operation.
 no longer in operation.

I hereby certify that Interstate Brands Corporation is
 in compliance with the requirements of MSOP 005-16926-00078
 not in compliance with the requirements of MSOP 005-16926-00078.

Authorized Individual:
Title:
Signature:
Date:

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.

Noncompliance:

MALFUNCTION REPORT

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

**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 PERM 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: ____/____/19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ 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: _____

*SEE PAGE 2

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 Quality**

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

Source Background and Description

Source Name:	Interstate Brands Corporation
Source Location:	3060 National Road, Columbus, Indiana 47203
County:	Bartholomew
SIC Code:	2051
Operation Permit No.:	005-16926-00078
Permit Reviewer:	Stephanie A. Roy

The Office of Air Quality (OAQ) has reviewed an application from Interstate Brands Corporations relating to the operation of a bakery source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) natural gas-fired sweet roll oven, identified as Unit No. 1, constructed in 1965, exhausting to Stacks S1 and S2, capacity: 8,040 pounds per hour, rated at 2.9 million British thermal units per hour.
- (b) One (1) natural gas-fired band oven, identified as Unit No. 8, constructed in 1968, exhausting to Stacks S11, S11A and S11B, capacity: 2,448 pounds per hour, rated at 2.1 million British thermal units per hour.
- (c) One (1) natural gas-fired cake pan washer, identified as Unit No. 9, constructed in 1983, exhausting to Stacks S14 and S15, capacity: 17,010 pounds per hour, rated at 0.5 million British thermal units per hour.
- (d) One (1) natural gas-fired boiler, identified as Boiler No. 1, constructed in 1974, exhausting to Stack S12, rated at: 14.6 million British thermal units per hour.
- (e) One (1) natural gas-fired boiler, identified as Boiler No. 2, constructed in 1987, exhausting to Stack S13, rated at: 8.4 million British thermal units per hour.
- (f) Source-wide natural gas-fired fryers, rated at 8.34 million British thermal units per hour, total, consisting of:
 - (1) One (1) fryer, identified as Fryer No. 1, constructed in 1968, exhausting to Stacks S5, S5A and S5B, rated at 0.6 million British thermal units per hour, capacity: 1,375 pounds per hour;
 - (2) One (1) fryer, identified as Fryer No. 2, constructed in 1968, exhausting to Stacks S6, S6A and S6B, rated at 0.6 million British thermal units per hour, capacity: 1,375 pounds per hour;

- (3) One (1) jumbo fryer, identified as Fryer No. 5, constructed in 1984, exhausting to Stacks S8, S8A and S8B, rated at 1.26 million British thermal units per hour, capacity: 3,246 pounds per hour;
- (4) One (1) donut fryer, identified as Fryer No. 6, constructed in 1984, exhausting to Stacks S7 and S7A, rated at 0.6 million British thermal units per hour, capacity: 1,447 pounds per hour;
- (5) One (1) pie/stix fryer, identified as Fryer No. 7, constructed in 2000, exhausting to Stacks S3 and S4, rated at 3.6 million British thermal units per hour, capacity: 4,559 pounds per hour;
- (6) One (1) gem donut fryer, identified as Fryer No. 10, constructed in 1970, exhausting to Stacks S16, S16A and S16B, rated at 1.08 million British thermal units per hour, capacity: 10,247 pounds per hour; and
- (7) One (1) gem donut fryer, identified as Fryer No. 11, constructed in 1970, exhausting to Stacks S17 and S17A, rated at 0.6 million British thermal units per hour, capacity: 8,439 pounds per hour.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted emission units:

- (a) One (1) maintenance shop, constructed prior to 1965, consisting of welding, torch cutting, metal lathe, drilling and grinding operations, equipped with a parts washer, capacity: less than 145 gallons of solvent per year.
- (b) One (1) wrapping operation, constructed in 1982, equipped with a parts washer, capacity: less than 145 gallons of solvent per year.
- (c) One (1) production operation, installation date unknown, consisting of a flour and sugar transfer operation, dough and cake mixing operation, gluing operation and a pan coating operation.
- (d) Two (2) storage silos used to store sugar, constructed in 1965.
- (e) Two (2) storage silos used to store flour, constructed in 1965.
- (f) Three (3) ink jet printers, installed in 2003, capacity: 9.2 gallons of ink per year and sixty-three (63) gallons of make up solution per year.
- (g) The following miscellaneous storage tanks, each with a capacity greater than 1,000 gallons:
 - (1) Two (2) frying fat storage tanks constructed in 1960 and 1972;
 - (2) One (1) Soya oil storage tank constructed in 1985;
 - (3) Two (2) liquid fructose storage tanks constructed in 1970 and 1975; and
 - (4) Two (2) liquid chocolate storage tanks constructed in 1960.

- (h) The following miscellaneous storage tanks, each with a capacity less than 1,000 gallons:
 - (1) One (1) motor oil storage tank constructed in 1970; and
 - (2) Two (2) used oil storage tanks constructed in 1973 and 1996.
- (i) Two (2) diesel fuel storage tanks, constructed in 1992, capacity: 15,000 gallons, each.
- (j) Two (2) natural gas-fired space heaters, constructed in 1986, rated at 0.12 million British thermal units per hour, each.
- (k) Seven (7) natural gas-fired space heaters, constructed in 1990, rated at 0.1 million British thermal units per hour, each.
- (l) One (1) natural gas-fired space heater, constructed in 1990, rated at 0.18 million British thermal units per hour.
- (m) One (1) natural gas-fired space heater, constructed in 1986, rated at 0.135 million British thermal units per hour.
- (n) Two (2) natural gas-fired space heaters, constructed in 1990, rated at 0.16 million British thermal units per hour, each.
- (o) Two (2) natural gas-fired space heaters, constructed in 1986, rated at 0.2 million British thermal units per hour, each.
- (p) One (1) natural gas-fired space heater, constructed in 1986, rated at 0.165 million British thermal units per hour.

Pursuant to 326 IAC 2-1.1-3(e) (Exemptions), the one (1) maintenance shop, the one (1) wrapping operation, the one (1) production operation, the four (4) storage silos, the three (3) ink jet printers, source-wide storage tanks and source-wide space heaters are all exempt from permitting.

Existing Approvals

The source has been operating under previous approvals including, but no limited to, the following:

- (a) FESOP 005-6078-00078 issued on December 11, 1996;
- (b) OP 005-8767-00078 issued on December 5, 1997; and
- (c) OP 005-9451-00078 issued on April 28, 1998.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

IDEM is aware that the source did not apply for a MSOP renewal in a timely manner. IDEM is reviewing this matter and will take appropriate action.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
S1	sweet roll oven	30.0	1.00	2,040	350
S2	sweet roll oven	25.0	1.00	2,040	350
S3	pie/stix fryer	22.0	0.830	2,240	300
S4	pie/stix fryer	21.0	1.33	2,240	300
S5	Fryer No. 1	27.0	1.67	3,000	300
S5A	Fryer No. 1	21.0	0.830	850	300
S5B	Fryer No. 1	21.0	0.830	850	300
S6	Fryer No. 2	26.0	1.67	3,000	300
S6A	Fryer No. 2	26.0	0.83	850	300
S6B	Fryer No. 2	26.0	0.83	850	300
S7	donut fryer	24.0	1.67	2,240	300
S7A	donut fryer	24.0	0.830	850	300
S8	jumbo fryer	26.0	2.00	13,000	300
S8A	jumbo fryer	27.0	0.830	850	300
S8B	jumbo fryer	27.0	0.830	850	300
S11	band oven	21.0	0.830	680	325
S11A	band oven	18.0	0.670	680	325
S11B	band oven	21.0	0.670	680	325
S12	Boiler No. 1	26.0	1.67	2,800	300
S13	Boiler No. 2	26.0	1.33	1,600	300
S14	cake pan washer	21.0	1.50	2,200	150
S15	cake pan washer	21.0	1.25	2,100	150
S16	gem donut fryer (Fryer No. 10)	20.0	2.00	13,000	300
S16A	gem donut fryer (Fryer No. 10)	18.0	0.830	850	300
S16B	gem donut fryer (Fryer No. 10)	18.0	0.830	850	300
S17	gem donut fryer (Fryer No. 11)	21.0	1.67	2,240	300
S17A	gem donut fryer (Fryer No. 11)	21.0	0.830	850	300

Recommendation

The staff recommends to the Commissioner that the operation 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 application for the purposes of this review was received on March 17, 2003, with additional information received on October 20, 2003, November 24, 2003, March 9, 2004 and May 4, 2004.

Emission Calculations

See Appendix A, pages 1 through 9 of 9, of this document for detailed emissions calculations. There are no baking emissions associated with the band oven because the band oven does not use yeast products.

The three (3) ink jet printers have the combined estimated potential to emit HAPs (Methanol and MEK) of 0.232 tons per year and the combined estimated potential to emit VOCs of 0.234 tons per year. The estimated potential to emit VOC for the storage tanks are 0.09 tons per year. These estimates are actual emissions based on 8,760 hours per year.

Potential to Emit of the Source 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/yr)
PM	44.5
PM ₁₀	8.84
SO ₂	0.102
VOC	95.6
CO	14.3
NO _x	17.1

HAPs	Potential to Emit (tons/yr)
Benzene	0.0004
Dichlorobenzene	0.0002

HAPs	Potential to Emit (tons/yr)
Formaldehyde	0.013
Hexane	0.307
Toluene	0.001
Lead Compounds	0.0001
Cadmium Compounds	0.0002
Chromium Compounds	0.0002
Manganese Compounds	0.0001
Nickel Compounds	0.0004
Methanol Compounds	0.116
MEK Compounds	0.116
Total	0.554

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all pollutants are less than 100 tons per year and the potential to emit of PM and VOC is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) 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.

County Attainment Status

The source is located in Bartholomew County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO _x	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (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. Bartholomew 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. See the State Rule Applicability for the source section.
- (b) Bartholomew County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	44.5
PM ₁₀	8.84
SO ₂	0.102
VOC	95.6
CO	14.3
NO _x	17.1
Single HAP	0.307
Combination HAPs	0.554

- (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 greater and it is not in one of the 28 listed source categories.
- (b) The emissions were based on the Minor Source Operating Permit (MSOP) application submitted by the company.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 005-16926-00078, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) The two (2) boilers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR Part 60.40, Subpart D, since they each have a heat input rate less than 250 million British thermal units per hour.
- (b) The two (2) boilers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR Part 60.40a, Subpart Da, because neither boiler is capable of combusting more than 250 million British thermal units per hour heat input of fossil fuel.
- (c) The two (2) boilers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR Part 60.40b, Subpart Db, because each boiler has a heat input rating less than 100 million British thermal units per hour.
- (d) The two (2) boilers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR Part 60.40c, Subpart Dc, since their 1974 and 1987 construction dates are prior to the June 9, 1989 applicability date of NSPS Subpart Dc.
- (e) The four (4) grain and flour storage silos are not subject to 40 CFR 60, Subpart DD (Standards of Performance for Grain Elevators) because the storage silos are not equipped with grain elevators.
- (f) The two (2) parts washers that are part of the one (1) maintenance operation and the one (1) wrapping operation are not subject to the requirements of 40 CFR 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning) because the two (2) parts washers use only non-halogenated solvents.
- (g) The three (3) ink jet printers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.430, Subpart QQ, because the three (3) ink jet printers are not rotogravure printing presses.
- (h) The three (3) ink jet printers are not subject to the requirements of 40 CFR 63, Subpart KK (National Emission Standards for Hazardous Air Pollutants; Final Standards for Hazardous Air Pollutant Emissions from Printing and Publishing Industry) because the three (3) ink jet printers are not rotogravure or wide-web flexographic facilities and the source is not a major source of HAPs.
- (i) On October 15, 2003, revisions to 40 CFR 60, Subpart Kb, became effective. As of the date this permit is being issued these revisions have not been incorporated into the Indiana state rules. Therefore, the requirements from the previous version of 40 CFR 60, Subpart Kb, published in the federal register on August 8, 1987, which is referenced by 326 IAC 12, will remain applicable until the revisions are incorporated into the Indiana State Implementation Plan (SIP) and the condition is modified in a subsequent permit action.
 - (1) Pursuant to 326 IAC 12, the two (2) frying fat storage tanks, the two (2) liquid fructose storage tanks, the two (2) liquid chocolate storage tanks, the one (1) motor oil storage tank and one (1) of the used oil storage tanks are all not subject

to the requirements of NSPS, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb) because each was constructed prior to July 23, 1984.

- (2) The one (1) Soya oil storage tank, the one (1) other used oil storage tank and the two (2) diesel fuel storage tanks have a capacity less than seventy-five (75) cubic meters, vapor pressure less than 15.0 kiloPascals and each were constructed after July 23, 1984. Therefore, these storage tanks are subject to only 40 CFR Part 60.116b, paragraphs (a) and (b), which require record keeping. Pursuant to 40 CFR 60.110b, the requirements of 40 CFR 60, Subpart Kb, will not be applicable after the state rule revision because each tank has a capacity less than seventy-five (75) cubic meters.
- (j) 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 is not a major source of hazardous air pollutant (HAP) emissions (i.e., 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 a combination of HAPs).

State Rule Applicability – Entire Source

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

Construction of the source commenced prior to August 7, 1977, however the source has since been modified. The unrestricted potential to emit from this source is less than 250 tons per year of any pollutant and it is not one of the 28 sources listed under 326 IAC 2-2. Therefore, the requirements of 326 IAC 2-2 do not apply.

326 IAC 2-4.1-1 (New Source Toxics Control)

- (a) The one (1) pie/stix fryer and the three (3) ink jet printers were constructed after July 27, 1997. The potential to emit of these facilities for any single HAP is less than ten (10) tons per year and the potential to emit from any combination of HAPs is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply to the one (1) pie/stix fryer and the three (3) ink jet printers.
- (b) All remaining equipment were constructed prior to July 27, 1997 and are therefore not subject to the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control).

326 IAC 2-6 (Emission Reporting)

Revisions to 326 IAC 2-6 (Emission Reporting) became effective March 27, 2004. The Permittee will not be required to submit an emission statement because it is not a Title V source.

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 forty percent (40%) 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 6-4 (Fugitive Dust Emissions Limitations)

This rule requires the source 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 8-6-1 (Organic Solvent Emission Limitations)

- (a) The one (1) parts washer that is part of the one (1) maintenance operation is not subject to the requirements of 326 IAC 8-6-1 (Organic Solvent Emission Limitations) because the parts washer was constructed prior to October 7, 1974 and has potential emissions less than one hundred (100) tons per year of VOC.
- (b) The one (1) parts washers that is part of the one (1) wrapping operation is not subject to the requirements of 326 IAC 8-6-1 (Organic Solvent Emission Limitations) because the parts washer was constructed after 1980 and has potential emissions less than one hundred (100) tons per year of VOC.
- (c) The one (1) natural gas-fired boiler, identified as Boiler #1, constructed in 1974, and the one (1) liquid fructose storage tank constructed in 1975 are not subject to the requirements of 326 IAC 8-6-1 (Organic Solvent Emission Limitations) because no organic solvent is used at these facilities and they both have the potential to emit VOC less than one hundred (100) tons per year.

State Rule Applicability – Individual Facilities

326 IAC 6-2-3 (Particulate Emissions Limitations for Sources of Indirect Heating Constructed prior to September 21, 1983)

The one (1) natural gas-fired boiler, identified as Boiler No. 1, constructed in 1974, with a heat input capacity of 14.6 million British thermal units per hour, must comply with the PM emission limitation of 326 IAC 6-2-3. This limitation is based on the following equation given in 326 IAC 6-2-3:

$$Pt = C \times a \times h / 76.5 \times Q^{0.75} \times N^{0.25}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBTU/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet.

$$Pt = 50 \times 0.67 \times 22 / 76.5 \times (14.6)^{0.75} \times 1^{0.25} = 1.29 \text{ lb/MMBtu}$$

Pursuant to 326 IAC 6-2-3(e), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation after June 8, 1972, shall in no case exceed 0.6 lb/MMBtu heat input. Therefore, Boiler No. 1 is limited to emissions of 0.6 pound per million British thermal units.

Based on Appendix A, the potential to emit PM emissions from Boiler No.1 is:

$$0.122 \text{ tons/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.028 \text{ lb/hr}$$
$$(0.028 \text{ lb/hr} / 14.6 \text{ MMBtu/hr}) = 0.002 \text{ lb PM per MMBtu}$$

Therefore, Boiler No. 1 will comply with this rule.

326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating Constructed after September 21, 1983)

The one (1) natural gas-fired boiler, identified as Boiler No. 2, constructed in 1987, with a heat input capacity of 8.4 million British thermal units per hour, must comply with the PM emission limitation of 326 IAC 6-2-4. This limitation is based on the following equation given in 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input.

Q = The total source maximum operating capacity in million British thermal units per hour.

$$Pt = 1.09/((8.40+14.6\text{mmBtu/hr})^{0.26}) = 0.482 \text{ pounds per million British thermal units}$$

Allowable PM emissions = (0.482 lbs/MMBtu)*(8.40 MMBtu/hr)*(8760 hr/yr)*(1 ton/2000 lbs) = 17.7 tons per year. The potential PM emissions from this boiler are 0.07 tons per year.

Based on this calculation, the potential PM emissions are less than the allowable emissions. Therefore, the Boiler No. 2 will comply with this rule.

326 IAC 6-3-2 (Process Operations)

- (a) The particulate matter (PM) emissions from the source wide natural gas fired fryers, with a combined process weight rate of 15.3 tons per hour will be limited by the following:

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:

$$E = 4.10 P^{0.67}$$

where:

E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour.

$$E = 4.10 * 15.3^{0.67} = 25.5 \text{ pounds per hour, total}$$

The potential PM emissions from the source wide natural gas fired fryers are equal to 8.58 pounds per hour. Therefore, the source wide natural gas fired fryers will comply with this rule.

- (b) Pursuant to 326 IAC 6-3-1(b)(1), the two (2) natural gas-fired boilers are not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because the two (2) natural gas-fired boilers are considered sources of indirect heat.
- (c) Pursuant to 326 IAC 6-3-1(b)(14), the one (1) natural gas-fired sweet roll oven is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because the one (1) natural gas-fired sweet roll oven has potential particulate emissions less than 0.551 pounds per hour.
- (d) Pursuant to 326 IAC 6-3-1(b)(14), the one (1) natural gas-fired band oven is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because the one (1) natural gas-fired band oven has potential particulate emissions less than 0.551 pounds per hour.
- (e) Pursuant to 326 IAC 6-3-1(b)(14), the one (1) natural gas-fired cake pan washer is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because the one (1) natural gas-fired cake pan washer has potential particulate emissions less than 0.551 pounds per hour.
- (f) Pursuant to 326 IAC 6-3-1(b)(14), the one (1) production operation, which consists of a flour and sugar transfer operation, dough and cake mixing operation, gluing operation and a pan coating operation, is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because the one (1) production operation has potential particulate emissions less than 0.551 pounds per hour.
- (g) Pursuant to 326 IAC 6-3-1(b)(14), the three (3) ink jet printers are not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because the three (3) ink jet printers have potential particulate emissions less than 0.551 pounds per hour.
- (h) Pursuant to 326 IAC 6-3-1(b)(14), the source-wide space heaters are not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing

Processes) because the source-wide space heaters have potential particulate emissions less than 0.551 pounds per hour.

- (i) Pursuant to 326 IAC 6-3-1(b)(9), the one (1) maintenance shop, which consists of a parts washer and a welding operation, is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because the one (1) maintenance shop has potential particulate emissions less than 0.551 pounds per hour. Pursuant to 326 IAC 6-3-1(b)(9), welding operations are exempt from 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).
- (j) The one (1) wrapping operation, which consists of a parts washer, is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because the one (1) wrapping operation has no potential to emit particulate matter.
- (k) The source-wide storage tanks are not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because they do not have the potential to emit particulate matter.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

- (a) The one (1) sweet roll oven is not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because the one (1) sweet roll oven was constructed in 1965, which is before the January 1, 1980 rule applicability date.
- (b) All remaining facilities are not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because each facility has the potential to emit VOC less than twenty-five (25) tons per year.

326 IAC 8-3-2 (Cold Cleaner Operations)

- (a) The one (1) parts washer that is part of the one (1) maintenance operation is not subject to the provisions of 326 IAC 8-3-2 (Organic solvent degreasing operations: cold cleaner operations) because the one (1) parts washer was constructed prior to January 1, 1980 and is located in Bartholomew County.
- (b) The one (1) parts washer that is part of the one (1) wrapping operation is subject to the provisions of 326 IAC 8-3-2 (Organic solvent degreasing operations: cold cleaner operations) because the one (1) parts washer was constructed after January 1, 1980 and does not have a remote solvent reservoir. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee shall ensure that the following control equipment requirements are met:
 - (1) equip the cleaner with a cover;
 - (2) equip the cleaner with a facility for draining cleaned parts;
 - (3) close the degreaser cover whenever parts are not being handled in the cleaner;
 - (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) provide a permanent, conspicuous label summarizing the operating requirements;

- (6) 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.

326 IAC 8-3-5 (Organic Solvent Degreasing Operations)

The two (2) parts washers that are part of the one (1) maintenance operation and the one (1) wrapping operation are not subject to the requirements of 326 IAC 8-3-5 (Organic solvent degreasing operations: cold cleaner degreaser operation and control) because they were constructed prior to July 1, 1990.

326 IAC 8-5-5 (Graphics Arts Operations)

The three (3) ink jet printers are not subject to the requirements of 326 IAC 8-5-5 (Graphics Arts Operations) because the printers are not packaging rotogravure, publishing rotogravure or flexographic printing facilities and the three (3) ink jet printer have the potential to emit VOC less than twenty-five (25) tons per year.

326 IAC 8-9 (Volatile Organic Liquid Vessels)

The source-wide storage tanks are not subject to the requirements of 326 IAC 8-9 (Volatile Organic Liquid Vessels) because the source is located in Bartholomew County.

326 IAC 12-1 (New Source Performance Standards)

- (a) Pursuant to 326 IAC 12, the two (2) frying fat storage tanks, the two (2) liquid fructose storage tanks, the two (2) liquid chocolate storage tanks, the one (1) motor oil storage tank and one (1) of the used oil storage tanks are all not subject to the requirements of NSPS, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb) because each was constructed prior to July 23, 1984.
- (b) The one (1) Soya oil storage tank, the one (1) other used oil storage tank and the two (2) diesel fuel storage tanks have a capacity less than seventy-five (75) cubic meters, vapor pressure less than 15.0 kiloPascals and each were constructed after July 23, 1984. Therefore, these storage tanks are subject to only 40 CFR Part 60.116b, paragraphs (a) and (b), which require record keeping. Pursuant to 40 CFR 60.110b, the requirements of 40 CFR 60, Subpart Kb, will not be applicable after the state rule revision because each tank has a capacity less than seventy-five (75) cubic meters.

326 IAC 20-6 (Halogenated Solvent Cleaning)

The two (2) parts washers that are part of the one (1) maintenance operation and the one (1) wrapping operation are not subject to the requirements of 326 IAC 20-6 because the two (2) parts washers use only non-halogenated solvents.

Conclusion

The operation of this bakery source shall be subject to the conditions of Minor Source Operating Permit 005-16926-00078.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Interstate Brands Corporation
Address City IN Zip: 3060 National Road, Columbus, Indiana 47203
Permit Number: 005-16926
Plt ID: 005-00078
Reviewer: Stephanie A. Roy
Date: March 17, 2003

One (1) sweet roll oven rated at 2.90 MMBtu/hr.

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr					
2.90	25.4					
	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.024	0.097	0.008	1.27	0.070	1.07

One (1) band oven rated at 2.10 MMBtu/hr.

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr					
2.10	18.4					
	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.017	0.070	0.006	0.920	0.051	0.773

One (1) natural gas-fired boiler rated at 8.40 MMBtu/hr.

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr					
8.40	73.6					
	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.070	0.280	0.022	3.68	0.202	3.09

One (1) natural gas-fired boiler rated at 14.6 MMBtu/hr.

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr					
14.6	128					
	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.122	0.486	0.038	6.39	0.352	5.37

Continued on Page 2.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Interstate Brands Corporation
Address City IN Zip: 3060 National Road, Columbus, Indiana 47203
Permit Number: 005-16926
Plt ID: 005-00078
Reviewer: Stephanie A. Roy
Date: March 17, 2003

One (1) natural gas-fired cake pan washer rated at 0.5 MMBtu/hr.

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr					
0.500	4.38					
	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.004	0.017	0.001	0.219	0.012	0.184

Source-wide fryers rated at 8.34 MMBtu/hr.

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr					
8.34	73.1					
	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.069	0.278	0.022	3.65	0.201	3.07

Source-wide space heaters rated at 2.14 MMBtu/hr, total.

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr					
2.14	18.7					
	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.018	0.071	0.006	0.937	0.052	0.787

Total

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr					
38.98	341					
	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.324	1.30	0.102	17.1	0.939	14.3

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of ()
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 See page 3 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 HAPs Emissions**

Company Name: Interstate Brands Corporation
Address City IN Zip: 3060 National Road, Columbus, Indiana 47203
Permit Number: 005-16926
Pit ID: 005-00078
Reviewer: Stephanie A. Roy
Date: March 17, 2003

Heat Input Capacity
 MMBtu/hr
 38.98

Potential Throughput
 MMcF/yr
 341

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.002	Dichlorobenzene 0.001	Formaldehyde 0.075	Hexane 1.80	Toluene 0.003
Potential Emission in tons/yr	0.0004	0.0002	0.013	0.307	0.001

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.001	Cadmium 0.001	Chromium 0.001	Manganese 0.0004	Nickel 0.002	Total
Potential Emission in tons/yr	0.0001	0.0002	0.0002	0.0001	0.0004	0.322

Methodology is the same as pages 1 and 2.

The ten highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Fryers - Process**

Company Name: Interstate Brands Corporation
Address City IN Zip: 3060 National Road, Columbus, Indiana 47203
Permit Number: 005-16926
Plt ID: 005-00078
Reviewer: Stephanie A. Roy
Date: March 17, 2003

Potential Throughput
tons/yr

134413

Potential Throughput
tons/hr

15.3

Potential Throughput
lbs/hr

Fryer No. 1	1375
Fryer No. 2	1375
Jumbo Fryer	3246
Donut Fryer	1447
Pie/Stix Fryer	4559
Fryer No. 10	10247
Fryer No. 11	8439

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/ton	0.560	0.080	0.00	0.00	0.085	0.00
Potential Emission in tons/yr	37.6	5.38	0.00	0.00	5.71	0.00

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

Methodology

Emission Factors from AP 42, Chapter 9.13, SCC #3-02-036-02

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

**Appendix A: Emission Calculations
Sweet Roll Oven - Baking**

Company Name: Interstate Brands Corporation
Address City IN Zip: 3060 National Road, Columbus, Indiana 47203
Permit Number: 005-16926
Plt ID: 005-00078
Reviewer: Stephanie A. Roy
Date: March 17, 2003

Potential Throughput
tons/yr

35215

Potential Throughput
tons/hr

4.02

Potential Throughput
lbs/hr

Sweet Roll Oven 8040

	Pollutant
Emission Factor in lb/ton	VOC 4.981
Potential Emission in tons/yr	87.7

Methodology

Emission Factors from EPA Alternative Control Technology (ACT) Document for Bakery Oven Emissions (EPA-453/R-92-017)

VOC Emission Factor: The pounds of VOC per ton of baked bread = $0.95(Y_i) + 0.195(t_i) - 0.51(S) - 0.86(ts) + 1.90$

Y_i: The initial baker's percent of yeast to the nearest tenth of a percent.

t_i: The total yeast action time in hours to the nearest tenth of an hour.

S: The final (spike) baker's percent of yeast to the nearest tenth of a percent.

ts: The spiking time in hours to the nearest tenth of an hour.

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

VOC EF 4.981

Y _i =	5.4
t _i =	4.2
S =	3.6
ts =	1.2

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating**

**Company Name: Interstate Brands Corporation
Address City IN Zip: 3060 National Road, Columbus, Indiana 47203
Permit Number: 005-16926
Plt ID: 005-00078
Reviewer: Stephanie A. Roy
Application Date: March 17, 2003**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Maintenance Shop																
Crystal Clean	6.59	100%	0.00%	100%	0.00%	0.00%	0.0166	1.00	6.59	6.59	0.109	2.63	0.479	0.00	N/A	100%
Wrapping Operation																
Crystal Clean	6.59	100%	0.00%	100%	0.00%	0.00%	0.0166	1.00	6.59	6.59	0.109	2.63	0.479	0.00	N/A	100%
Glues																
Cool-Lok Hot Melt Adhesive	8.00	0.00%	0.00%	0.00%	0.00%	100%	0.0004	570	0.00	0.00	0.000	0.00	0.000	0.00	N/A	100%
Swift Hot Melt Adhesive	7.84	0.00%	0.00%	0.00%	0.00%	100%	0.0001	2160	0.00	0.00	0.000	0.00	0.000	0.00	N/A	100%
H1237A Hot Melt Adhesive	8.18	0.00%	0.00%	0.00%	0.00%	100%	0.0001	760	0.00	0.00	0.000	0.00	0.000	0.00	N/A	100%
H1237A Hot Melt Adhesive	8.18	0.00%	0.00%	0.00%	0.00%	100%	0.00004	1800	0.00	0.00	0.000	0.00	0.000	0.00	N/A	100%
H1237A Hot Melt Adhesive	8.18	0.00%	0.00%	0.00%	0.00%	100%	0.00003	1740	0.00	0.00	0.000	0.00	0.000	0.00	N/A	100%
H1237A Hot Melt Adhesive	8.18	0.00%	0.00%	0.00%	0.00%	100%	0.0001	1740	0.00	0.00	0.000	0.00	0.000	0.00	N/A	100%
H1237A Hot Melt Adhesive	8.18	0.00%	0.00%	0.00%	0.00%	100%	0.00001	2565	0.00	0.00	0.000	0.00	0.000	0.00	N/A	100%
H1237A Hot Melt Adhesive	8.18	0.00%	0.00%	0.00%	0.00%	100%	0.00006	2565	0.00	0.00	0.000	0.00	0.000	0.00	N/A	100%
Pan Greaser	9.34	0.00%	0.00%	0.00%	0.00%	100%	0.0017	6720	0.00	0.00	0.000	0.00	0.000	0.00	N/A	100%

PM Control Efficiency: 0.00%

State Potential Emissions	Add worst case coating to all solvents	Total Uncontrolled	0.219	5.25	0.958	0.00
		Total Controlled	0.219	5.25	0.958	0.00

METHODOLOGY

- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
- Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
- Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
- Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations

Welding and Thermal Cutting

Company Name: Interstate Brands Corporation
 Address City IN Zip: 3060 National Road, Columbus, Indiana 47203
 Permit Number: 005-16926
 Pit ID: 005-00078
 Reviewer: Stephanie A. Roy
 Application Date: March 17, 2003

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(carbon steel)	1.00	0.010		0.006	0.0005			0.0001	0.00001	0.00	0.00	0.00001
Stick (E7018 electrode)	2.00	0.018		0.021	0.0009			0.001	0.00003	0.00	0.00	0.00003
Tungsten Inert Gas (TIG)(carbon steel)	2.00	0.008		0.006	0.0005			0.0001	0.00001	0.00	0.00	0.00001
Oxyacetylene(carbon steel)	2.00	0.004		0.006	0.0005			0.00004	0.000004	0.00	0.00	0.000004
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Plasma**	1.00	0.500	2.00	0.0039				0.0005	0.00	0.00	0.00	0.00
EMISSION TOTALS												
Potential Emissions lbs/hr								0.001	0.00005	0.00	0.00	0.00005
Potential Emissions lbs/day								0.034	0.001	0.00	0.00	0.001
Potential Emissions tons/year								0.006	0.0002	0.000	0.000	0.0002

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" t

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lb

**Appendix A: Emissions Calculations
PM from Production Operation Storage Silo**

Company Name: Interstate Brands Corporation
Address City IN Zip: 3060 National Road, Columbus, Indiana 47203
Permit Number: 005-16926
Plt ID: 005-00078
Reviewer: Stephanie A. Roy
Date: March 17, 2003

AP-42 Emission Factor for Grain Receiving (lb/ton)

PM	PM10
0.18	0.059

Delivery Rate by Truck tons/hour	PM emissions lbs/hour	PM emissions tons/year	PM10 emissions lbs/hour	PM10 emissions tons/year
8.33	1.50	6.57	0.491	2.15

Methodology

Emission Factor for Starch Loading found in AP-42 Chapter 9.9.1 for Grain Elevators and Processes.

PM emissions (lbs/hour) = PM emission factor (lb/ton) x Delivery Rate (tons/hour)

PM emissions (tons/year) = PM emissions (lb/hour) x (8760hours/year) x (1 ton / 2000 lbs)

PM10 emissions (lbs/hour) = PM10 emission factor (lb/ton) x Delivery Rate (tons/hour)

PM10 emissions (tons/year) = PM10 emissions (lb/hour) x (8760hours/year) x (1 ton / 2000 lbs)

**Appendix A: Emissions Calculations
Summary from Entire Source**

Company Name: Interstate Brands Corporation
Address City IN Zip: 3060 National Road, Columbus, Indiana 47203
Permit Number: 005-16926
Plt ID: 005-00078
Reviewer: Stephanie A. Roy
Date: March 17, 2003

Uncontrolled Emissions (tons per year)

Facility	PM	PM10	SO2	NOx	VOC	CO
Combustion	0.324	1.30	0.102	17.1	0.939	14.3
Frying	37.6	5.38	0.00	0.00	5.71	0.00
Baking	0.00	0.00	0.00	0.00	87.7	0.00
Parts Washer / Glues	0.00	0.00	0.00	0.00	0.958	0.00
Welding	0.006	0.006	0.00	0.00	0.00	0.00
Storage Tanks	0.00	0.00	0.00	0.00	0.090	0.00
Storage Silo	6.57	2.15	0.00	0.00	0.00	0.00
Printing	0.00	0.00	0.00	0.00	0.234	0.00
Total	44.5	8.84	0.102	17.1	95.6	14.3

Controlled Emissions (tons per year)

Facility	PM	PM10	SO2	NOx	VOC	CO
Combustion	0.324	1.30	0.102	17.1	0.939	14.3
Frying	37.6	5.38	0.00	0.00	5.71	0.00
Baking	0.00	0.00	0.00	0.00	87.7	0.00
Parts Washer / Glues	0.00	0.00	0.00	0.00	0.958	0.00
Welding	0.006	0.006	0.00	0.00	0.00	0.00
Storage Tanks	0.00	0.00	0.00	0.00	0.090	0.00
Storage Silo	6.57	2.15	0.00	0.00	0.00	0.00
Printing	0.00	0.00	0.00	0.00	0.234	0.00
Total	44.5	8.84	0.102	17.1	95.6	14.3

HAPs Emissions (tons per year)

Facility	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium
Combustion	0.0004	0.0002	0.013	0.307	0.001	0.0001	0.0002
Welding	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Printing	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.0004	0.0002	0.013	0.307	0.001	0.0001	0.0002

Facility	Chromium	Manganese	Nickel	Methanol	MEK	Overall Total
Combustion	0.0002	0.0001	0.0004	0.00	0.00	0.322
Welding	0.00	0.0002	0.00	0.00	0.00	0.0002
Printing	0.00	0.00	0.00	0.116	0.116	0.232
Total	0.0002	0.0001	0.0004	0.116	0.116	0.554