



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

October 8, 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: Hartford Bakery, Inc / 163-17548-00040  
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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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.



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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY and Evansville Environmental Protection Agency

**Hartford Bakery, Inc.  
500 N. Fulton Avenue  
Evansville, Indiana 47710**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T163-17548-00040	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: October 8, 2004  Expiration Date: October 8, 2009



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## SECTION A

## SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary wholesale bakery.

Responsible Official:	Vice President and General Manager
Source Address:	500 N. Fulton Avenue, Evansville, Indiana 47710
Mailing Address:	500 N. Fulton Avenue, Evansville, Indiana 47710
General Source Phone Number:	(812) 425-4642
SIC Code:	2051
County Location:	Vanderburgh
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules Major Source, under Nonattainment NSR

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) One (1) natural gas fired bread oven, identified as 1, constructed in 1975, with maximum heat input capacity of 7.0 million British thermal units per hour (MMBtu/hr), and maximum baking capacity of 12,000 pounds per hour, exhausting to two (2) stacks (identified as 1 and 2);
- (b) One (1) natural gas fired bun oven, identified as 3, constructed in 1998, with maximum heat input capacity of 6.3 million British thermal units per hour (MMBtu/hr), and maximum baking capacity of 4,657 pounds per hour, exhausting to two (2) stacks (identified as 3 and 4).

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (a) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
  - (1) Two (2) 2.00625 million British thermal units per hour (MMBtu/hr) natural gas fired boilers, constructed in 1974 and 1975; [326 IAC 6-2-3]
  - (2) One (1) 1.3375 million British thermal units per hour (MMBtu/hr) natural gas fired boiler, constructed in 1951; [326 IAC 6-2-3]
- (b) Activities with emissions equal to or less than the following requirements: 25 lbs per day particulate matter, SO<sub>2</sub>, or NO<sub>x</sub>, 15 lbs per day VOC, or 3.29 lbs per day Pb, including:

- (1) A raw material storage system consisting of three (3) flour storage silos which are filled pneumatically, with a maximum capacity of 16,410 pounds per hour, using a pressure equalization bag at the top for product recovery. [326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-7-1]**

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

### **B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]**

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

### **B.3 Enforceability [326 IAC 2-7-7]**

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

### **B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### **B.5 Severability [326 IAC 2-7-5(5)]**

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

### **B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

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

### **B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]**

- (a) The Permittee shall furnish to IDEM, OAQ, and Evansville EPA within a reasonable time, any information that IDEM, OAQ, and Evansville EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and Evansville EPA, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### **B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

Evansville EPA  
C.K. Newsome Building  
100 E. Walnut Street  
Suite 100  
Evansville, Indiana 47713

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Evansville EPA, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and Evansville EPA, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (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 recordkeeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and Evansville EPA, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and Evansville EPA. IDEM, OAQ, and Evansville EPA, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.11 Emergency Provisions [326 IAC 2-7-16]

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Evansville EPA within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967  
Evansville EPA Telephone Number: (812) 435-6145  
Evansville EPA Facsimile Number: (812) 435-6155  
Southwest Regional Office Telephone Number: (812) 436-2570  
Southwest Region Office Facsimile Number: (812) 436-2572

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

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

and

Evansville EPA  
C.K. Newsome Building  
100 E. Walnut Street  
Suite 100  
Evansville, Indiana 47713

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAQ, and Evansville EPA, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ, and Evansville EPA, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
  - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency

provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, or Evansville EPA shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or Evansville EPA, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or Evansville EPA, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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

**B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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

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

and

Evansville EPA  
C.K. Newsome Building  
100 E. Walnut Street  
Suite 100  
Evansville, Indiana 47713

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or Evansville EPA determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, or Evansville EPA to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, or Evansville EPA at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or Evansville EPA may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

and

Evansville EPA  
C.K. Newsome Building  
100 E. Walnut Street  
Suite 100  
Evansville, Indiana 47713

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Evansville EPA, on or before the date it is due.

- (2) If IDEM, OAQ 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, and Evansville EPA, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and Evansville EPA, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ, and Evansville EPA, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

Evansville EPA  
C.K. Newsome Building  
100 E. Walnut Street  
Suite 100  
Evansville, Indiana 47713

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation, or removal of a nonroad engine, as defined in 40 CFR 89.2

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit

modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

Evansville EPA  
C.K. Newsome Building  
100 E. Walnut Street  
Suite 100  
Evansville, Indiana 47713

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and Evansville EPA, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326

IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, and Evansville EPA, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 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 any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC-13-14-2-2, IC-13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC-13-14-2-2, IC-13-17-3-2, and IC 13-30-3-1, sample or monitor 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

Evansville EPA  
C.K. Newsome Building  
100 E. Walnut Street  
Suite 100  
Evansville, Indiana 47713

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and Evansville EPA, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, or Evansville EPA, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### C.1 Opacity [326 IAC 5-1]

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

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

#### C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

#### C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

#### 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 Operation of Equipment [326 IAC 2-7-6(6)]

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

#### C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

and

Evansville EPA  
C.K. Newsome Building  
100 E. Walnut Street  
Suite 100  
Evansville, Indiana 47713

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" 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 14-10-4-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos Inspector is not federally enforceable.

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

##### **C.7 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any

applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

and

Evansville EPA  
C.K. Newsome Building  
100 E. Walnut Street  
Suite 100  
Evansville, Indiana 47713

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, and Evansville EPA not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and Evansville EPA, 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.8 Compliance Requirements [326 IAC 2-1.1-11]**

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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.

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

and

Evansville EPA  
C.K. Newsome Building  
100 E. Walnut Street  
Suite 100  
Evansville, Indiana 47713

in writing, prior to the end of the initial thirty (30) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

---

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

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures in January 1999.
- (b) Upon direct notification by IDEM, OAQ, and Evansville EPA, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

**C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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

**C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (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 facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

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(a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of other regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

(b) The statement must be submitted to:

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

and

Evansville EPA  
C.K. Newsome Building  
100 E. Walnut Street  
Suite 100  
Evansville, Indiana 47713

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.15 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

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(a) Records of all required monitoring data, reports and support information required by this Permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Evansville EPA makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Evansville EPA within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
  
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
and  
  
Evansville EPA  
C.K. Newsome Building  
100 E. Walnut Street  
Suite 100  
Evansville, Indiana 47713
  
- (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 Evansville EPA, on or before the date it is due.
  
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
  
- (e) Reporting periods are based on calendar years.

**Stratospheric Ozone Protection**

**C.17 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) natural gas fired bread oven, identified as 1, constructed in 1975, with maximum heat input capacity of 7.0 million British thermal units per hour (MMBtu/hr), and maximum baking capacity of 12,000 pounds per hour, exhausting to two (2) stacks (identified as 1 and 2);
- (b) One (1) natural gas fired bun oven, identified as 3, constructed in 1998, with maximum heat input capacity of 6.3 million British thermal units per hour (MMBtu/hr), and maximum baking capacity of 4,657 pounds per hour, exhausting to two (2) stacks (identified as 3 and 4).

(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 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Pursuant to CP 163-9331-00040, issued on May 4, 1998, the amount and type of bread processed in the bun oven, identified as 3, shall be limited by the following equation:

$$\sum_{m=1}^{12} \left( \sum_{i=1}^n \frac{E_i B_i}{2000 \text{ lb / ton}} \right) \leq 24 \text{ tons of VOC per year}$$

Where:

- $B_i$  = The amount of bread of type  $i$  produced during month  $m$  (tons/month);  
and
- $E_i$  = The VOC emission factor for type  $i$  bread (lb of VOC/ton of bread).
- $m$  = The compliance period as defined in Condition D.1.1(b).

The emission factor for each type of bread made shall be calculated using the following equation:

$$E = 0.95Y + 0.195t_i - 0.51S - 0.86t_s + 1.90$$

Where:

- $E$  = Pounds of VOC per ton of baked bread;
- $Y$  = Initial baker's percent of yeast;
- $t_i$  = Total yeast action time in hours;
- $S$  = Final (spike) baker's percent of yeast; and
- $t_s$  = Spiking time in hours.

Compliance with this condition limits the potential to emit VOC from the entire source to less than twenty-four (24) tons per twelve (12) consecutive month period. Therefore, the provisions of 326 IAC 8-1-6 (General Reduction Requirements) are not applicable.

- (b) The compliance period shall be defined as one (1) calendar month. Hence, twelve (12) calendar months are equal to twelve (12) compliance periods.

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

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- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the bread oven, identified as 1, shall not exceed 13.6 pounds per hour when operating at a process weight rate of 12,000 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the bun oven, identified as 3, shall not exceed 7.2 pounds per hour when operating at a process weight rate of 4,657 pounds per hour.

The pound per hour limitations were 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

#### D.1.3 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the bread throughput limits and VOC emissions limits established in Condition D.1.1.
  - (1) The dates of the compliance period;
  - (2) The amount of each type of bread produced during each compliance period;
  - (3) Information necessary to calculate the VOC emission factor for each type of bread made during the compliance period, including:
    - (A) The initial baker's percent of yeast;
    - (B) The total yeast action time in hours;
    - (C) The final (spike) baker's percent of yeast; and
    - (D) The spiking time in hours.
  - (4) The weight of VOCs emitted for each compliance period.

#### D.1.4 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] (Insignificant Activity)

- (a) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
- (1) Two (2) 2.00625 million British thermal units per hour (MMBtu/hr) natural gas fired boilers, constructed in 1974 and 1975; [326 IAC 6-2-3]
  - (2) One (1) 1.3375 million British thermal units per hour (MMBtu/hr) natural gas fired boiler, constructed in 1951; [326 IAC 6-2-3]

(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.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

- (a) Pursuant to 326 IAC 6-2-3 (d) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from the 1.3375 MMBtu per hour boiler, which was existing and in operation before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.
- (b) Pursuant to 326 IAC 6-2-3 (e) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from the two (2) 2.00625 MMBtu per hour boilers, which were constructed after June 8, 1972, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input.

### SECTION D.3 FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-7-5(15)] (Insignificant Activity)

- (g) A raw material storage system consisting of three (3) flour storage silos which are filled pneumatically, with a maximum capacity of 16,410 pounds per hour, using a pressure equalization bag at the top for product recovery. [326 IAC 6-3-2]

(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.3.1 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 each of the three (3) raw material storage silos shall not exceed 16.79 pounds per hour, when operating at a process weight rate of 16,410 pounds per hour, as determined by 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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
AND  
EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Hartford Bakery, Inc.  
Source Address: 500 N. Fulton Avenue, Evansville, Indiana 47710  
Mailing Address: 500 N. Fulton Avenue, Evansville, Indiana 47710  
Part 70 Permit No.: T163-17548-00040

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Affidavit (specify) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

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

**and  
Evansville Environmental Protection Agency  
C.K. Newsome Community Center - Ste. 100  
Evansville, Indiana 47713**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Hartford Bakery, Inc.  
Source Address: 500 N. Fulton Avenue, Evansville, Indiana 47710  
Mailing Address: 500 N. Fulton Avenue, Evansville, Indiana 47710  
Part 70 Permit No.: T163-17548-00040

**This form consists of 2 pages**

**Page 1 of 2**

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

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY Compliance Data Section

### Part 70 Quarterly Report

Source Name: Hartford Bakery, Inc.  
 Source Address: 500 N. Fulton Avenue, Evansville, Indiana 47710  
 Mailing Address: 500 N. Fulton Avenue, Evansville, Indiana 47710  
 Part 70 Permit No.: T163-17548-00040  
 Facility: One natural gas fired bun oven  
 Parameter: Volatile Organic Compound (VOC)  
 Limit: Twenty-four (24) tons VOC per year, according to the equation:

$$\sum_{m=1}^{12} \left( \sum_{i=1}^n \frac{E_i B_i}{2000 \text{ lb / ton}} \right)_m \leq 24 \text{ tons of VOC per year}$$

YEAR: \_\_\_\_\_

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

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance Data Section**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Hartford Bakery, Inc.  
Source Address: 500 N. Fulton Avenue, Evansville, Indiana 47710  
Mailing Address: 500 N. Fulton Avenue, Evansville, Indiana 47710  
Part 70 Permit No.: T163-17548-00040

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

Page 1 of 2

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

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality  
and Evansville EPA**

Addendum to the  
Technical Support Document (TSD) for a  
Part 70 Operating Permit Renewal

**Source Background and Description**

Source Name: Hartford Bakery, Inc.  
Source Location: 500 N. Fulton Avenue, Evansville, Indiana 47710  
County: Vanderburgh  
SIC Code: 2051  
Operation Permit No.: T163-17548-00040  
Permit Reviewer: ERG/TDP

On March 20, 2004, the Office of Air Quality (OAQ) had a notice published in the Evansville Courier, Evansville, Indiana stating that Hartford Bakery, Inc. had applied for a Title V Operating Permit Renewal to operate a stationary wholesale bakery with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On April 5, 2004, Hartford Bakery submitted comments on the proposed Title V Renewal. The summary of the comments is as follows:

**Comment 1:**

The Permittee offered comments pertaining to Condition C.14, Emission Statement, pursuant to amendments made to 326 IAC 2-6 on March 27, 2004. The Emission Statement requirements as listed under Subsection C.14(a) of the draft permit have changed. Hartford Bakery is now required to submit an emission statement triennially. Hartford Bakery proposes amending this subsection.

**Response to Comment 1:**

IDEM, OAQ, and Evansville EPA have made changes to Condition C.14, Emission Statement to reflect the new rule signed on March 27, 2004, as follows. Language with a line through it has been deleted and new language has been bolded.

C.14 Emission Statement [~~326 IAC 2-7-5(3)(C)(iii)] [~~326 IAC 2-7-5(7)] [~~326 IAC 2-7-19(c)]~~  
[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:~~ **Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall**

**submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:**

- (1) Indicate estimated actual emissions of ~~criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting)~~ **all pollutants listed in 326 IAC 2-6-4(a)**;
  - (2) Indicate estimated actual emissions of other regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") 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 Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Evansville EPA  
C.K. Newsome Building  
100 E. Walnut Street  
Suite 100  
Evansville, Indiana 47713

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Upon further review, IDEM, OAQ, and Evansville EPA have decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified, if applicable, to reflect these changes.

1. The opacity limit should be thirty percent (30%) rather than forty percent (40%), pursuant to 326 IAC 5-1-1(c)(7) and 326 IAC 5-1-2(2). Condition C.1(a) reads as follows:

**C.1 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~~ **thirty** percent (~~4~~ **30**%) in any one (1) ~~six~~ (6) minute averaging period as determined in 326 IAC 5-1-4.

2. In Condition D.1.1, the symbol for the "compliance period" in the summation equation appears as a lower case 'm' and an upper case 'M'. The same case should be used for each reference. The limit, stated as '<= 24 tons of VOC per year' is also incorrect and should be '24 tons of VOC per 12 consecutive month period'. In addition, the VOC emission factor equation should be corrected to reflect the equation from AP-42 section 9.96 and the Alternative Control Technology Document for Bakery Oven Emissions EPA 453/R-92-017 December 1992.

This condition has been corrected to read as follows:

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

- (a) Pursuant to CP 163-9331-00040, issued on May 4, 1998, the amount and type of bread processed in the bun oven, identified as 3, shall be limited by the following equation:

$$\sum_{m=1}^{12} \left( \sum_{i=1}^n \frac{E_i B_i}{2000 \text{ lb / ton}} \right)_{Mm} \leq \frac{24 \text{ tons of VOC per year}}{12 \text{ consecutive month period}}$$

Where:

- $B_i$  = The amount of bread of type i produced during month m (tons/month);  
and  
 $E_i$  = The VOC emission factor for type i bread (lb of VOC/ton of bread).  
 $m$  = The compliance period as defined in Condition D.1.1(b).

The emission factor for each type of bread made shall be calculated using the following equation:

$$E = 0.95Y + 0.195E_{ti} - 0.51S - 0.86ts + 1.90$$

Where:

- $E$  = Pounds of VOC per ton of baked bread;  
 $Y$  = Initial baker's percent of yeast;  
 $E_{ti}$  = Total yeast action time in hours;  
 $S$  = Final (spike) baker's percent of yeast; and  
 $ts$  = Spiking time in hours.

Compliance with this condition limits the potential to emit VOC from the entire source to less than twenty-four (24) tons per twelve (12) consecutive month period. Therefore, the provisions of 326 IAC 8-1-6 (General Reduction Requirements) are not applicable.

3. For clarification of the units, Condition D.1.2 has been changed as follows:

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

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the ~~one~~ bread oven, **identified as 1**, shall not exceed 13.6 pounds per hour when operating at a process weight rate of 12,000 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the ~~one~~ bun oven, **identified as 3**, shall not exceed 7.2 pounds per hour when operating at a process weight rate of 4,657 pounds per hour.

4. Regarding the Part 70 Operating Permit Certification Form, the address of the EEPA should be corrected. The form has been corrected as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE BRANCH**  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967  
and  
Evansville Environmental Protection Agency  
~~Room 205, 101 Court Street~~ **C.K. Newsome Community Center - Ste. 100**  
**100 East Walnut Street**  
Evansville, Indiana ~~47708~~ **47713**

**PART 70 OPERATING PERMIT**  
**EMERGENCY OCCURRENCE REPORT**

5. Regarding the Quarterly Report, the summation equation should be corrected such that the symbol 'm'/M' is consistently lower case. The table should provide for the reporting of months within the reporting period only (quarter), and not the eight (8) months shown. The current table includes a column for "Bread Produced", which was previously necessary when a constant emission rate was used, but which is no longer applicable. The table also does not allow for a monthly compliance determination, only quarterly, without further calculations. In order to demonstrate compliance for each compliance period, as specified in section D.1.1(b) as being one (1) calendar month, each month should indicate the current month VOC emissions and the 12 consecutive month total (current month plus the previous 11 months). IDEM, OAQ, and Evansville EPA have changed the Quarterly Report as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**Compliance Data Section**

**Part 70 Quarterly Report**

Source Name: Hartford Bakery, Inc.  
Source Address: 500 N. Fulton Avenue, Evansville, Indiana 47710  
Mailing Address: 500 N. Fulton Avenue, Evansville, Indiana 47710  
Part 70 Permit No.: T163-17548-00040  
Facility: One natural gas fired bun oven  
Parameter: Volatile Organic Compound (VOC)  
Limit: Twenty-four (24) tons VOC per year, according to the equation:

$$\sum_{m=1}^{12} \left( \sum_{i=1}^n \frac{E_i B_i}{2000 \text{ lb / ton}} \right) \leq 24 \text{ tons of VOC per year}$$

YEAR: \_\_\_\_\_



7. Regarding the applicability of state rule 326 IAC 8-1-6 in the TSD, the 'm'/'M' in the equation should be consistently either lower or upper case. The last paragraph in this section should read, "Compliance with this condition limits the potential to emit VOC from ~~the entire source the #3 Bun Oven~~ to less than twenty-four (24) tons..." However, no changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice.
8. Regarding the applicability of state rule 326 IAC 8-6-1 (Organic Solvent Emissions Limitations) in the TSD, the inclusion of this determination is not necessary since the VOC emissions are not from the use of solvents. However, no changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice.
9. In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence. The following language will be incorporated into the permit to address credible evidence:

**B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]**

**Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.**

10. Upon closer examination, IDEM, OAQ has reevaluated the justifications and determined that the fabric bag filters on the three (3) flour storage silos are an integral part of the flow storage process. The filters create a vacuum that allows the pneumatic conveyance system to move material from the truck to the silos. These filters would be necessary to create product. Therefore, these control devices would operate regardless of the applicability of air pollution control requirements. Therefore, the potential to emit particulate matter from the three (3) storage silos is now calculated after the use of the fabric bag filters. The potential to emit PM/PM10 at this point is negligible. This does not change the rule applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).
11. On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Vanderburgh County has been designated as nonattainment for the 8-hour ozone standard. The following has been added to A.1 General Information:

**A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]**

The Permittee owns and operates a stationary wholesale bakery.

Responsible Official:	Vice President and General Manager
Source Address:	500 N. Fulton Avenue, Evansville, Indiana 47710
Mailing Address:	500 N. Fulton Avenue, Evansville, Indiana 47710
General Source Phone Number:	(812) 425-4642
SIC Code:	2051
County Location:	Vanderburgh
Source Location Status:	<b>Nonattainment for all criteria pollutants-ozone under the 8-hour standard</b>
	<b>Attainment for all other criteria pollutants</b>
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules <b>Major Source, under Nonattainment NSR</b>

**Indiana Department of Environmental Management  
Office of Air Quality  
and Evansville EPA**

**Technical Support Document (TSD) for a  
Part 70 Operating Permit Renewal**

**Source Background and Description**

Source Name: Hartford Bakery, Inc.  
Source Location: 500 N. Fulton Avenue, Evansville, Indiana 47710  
County: Vanderburgh  
SIC Code: 2051  
Operation Permit No.: T163-17548-00040  
Permit Reviewer: ERG/TDP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Hartford Bakery, Inc. relating to the operation of a stationary wholesale bakery.

**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 bread oven, identified as 1, constructed in 1975, with maximum heat input capacity of 7.0 million British thermal units per hour (MMBtu/hr), and maximum baking capacity of 12,000 pounds per hour, exhausting to two (2) stacks (identified as 1 and 2);
- (b) One (1) natural gas fired bun oven, identified as 3, constructed in 1998, with maximum heat input capacity of 6.3 million British thermal units per hour (MMBtu/hr), and maximum baking capacity of 4,657 pounds per hour, exhausting to two (2) stacks (identified as 3 and 4).

**Unpermitted Emission Units and Pollution Control Equipment**

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

**Insignificant Activities**

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

- (a) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
  - (1) Two (2) 2.00625 million British thermal units per hour (MMBtu/hr) natural gas fired boilers, constructed in 1974 and 1975; [326 IAC 6-2-3]
  - (2) One (1) 1.3375 million British thermal units per hour (MMBtu/hr) natural gas fired boiler, constructed in 1951; [326 IAC 6-2-3]
- (b) Combustion source flame safety purging on startup;

- (c) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (d) Heat exchanger cleaning and repair;
- (e) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (g) Activities with emissions equal to or less than the following requirements: 25 lbs per day particulate matter, SO<sub>2</sub>, or NO<sub>x</sub>, 15 lbs per day VOC, or 3.29 lbs per day Pb, including:
  - (1) A raw material storage system consisting of three (3) flour storage silos which are filled pneumatically, with a maximum capacity of 16,410 pounds per hour, using a pressure equalization bag at the top for product recovery. [326 IAC 6-3-2]

### Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) Title V Operating Permit 163-5980-00040, issued on November 11, 1998.
- (b) Registration 163-13504-00040, issued on March 13, 2002.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this Part 70 permit:

**Condition D.1.1:** Volatile Organic Compounds: Any change or modification to this facility that would lead to an increase in Volatile Organic Compound (VOC) emissions must be approved by the Office of Air Management (OAM) before such change can occur.

**Reason not incorporated:** Condition D.1.1 is redundant. This requirement is stated in Condition B.21 (Source Modification Requirement). Pursuant to this change, Section D.1 and Section D.2 were combined and revised.

**Conditions D.2.3, D.3.2, and D.4.3:** Testing Requirements: The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance testing.

**Reason not incorporated:** Condition D.2.3 is redundant. This requirement is stated in Condition C.7 (Performance Testing) and Condition C.8 (Compliance Requirements).

**Condition D.2.6, D.3.3, and D.4.4:** Monitoring: Monitoring of this facility is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

**Reason not incorporated:** Condition D.2.6 is redundant. This requirement is stated in Condition C.8 (Compliance Requirements).

**Condition D.4.5:** Record Keeping Requirements: To document compliance with D.4.1, the Permittee shall maintain a log of daily overspray observations, and daily and weekly inspections. All records shall be maintain in accordance with Section C - General Record Keeping Requirements, of this permit.

**Reason not incorporated:** Overspray observations and daily and weekly inspections are not required by this permit because there are no emission units (e.g., spray booths) that this requirement would apply to.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 permit:

### **Air Pollution Control Justification as an Integral Part of the Process**

The company has submitted the following justification such that the pressure equalization bags be considered as an integral part of the raw material storage system:

- (a) The company states that the three (3) flour storage silos are not equipped with baghouses. The silos are entirely encased and are not exposed to the ambient air. They are pnueamatically filled from tanker deliver trucks with a maximum pressure of seven (7) pounds. The company states that each silo is equipped with fabric bag filters that act solely to relieve pressure when the silos are being filled or emptied. The company states that these filters are not air pollution control devices. The company provided a schematic diagram of the silo system. The source has not provided any financial analysis to determine if the cost of the control is less than the cost of the amount of product recovered.

IDEM, OAQ has evaluated the justifications and determined that the fabric bag filters will not be considered as an integral part of the raw material storage system. Based on the schematic diagram provided, IDEM, OAQ has determined that the fabric bag filters provide pollution control, and that the raw material storage system can operate without the fabric bag filters in place. Therefore, the permitting level will be determined using the potential to emit before the fabric bag filters.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit application for the purposes of this review was received on February 11, 2003.

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

### **Emission Calculations**

See Appendix A of this document for detailed emissions calculations (pages 1 through 3).

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous Part 70 operating permit.

Pollutant	Potential To Emit (tons/year)
PM	less than 25
PM-10	less than 25
SO <sub>2</sub>	less than 25
VOC	greater than 100
CO	less than 25
NO <sub>x</sub>	less than 25

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

HAPs	Potential To Emit (tons/year)
Benzene	1.72E-04
Dichlorobenzene	9.80E-05
Formaldehyde	6.13E-03
Hexane	1.47E-01
Toluene	2.78E-04
Lead	4.08E-05
Cadmium	8.99E-05
Chromium	1.14E-04
Manganese	3.10E-05
Nickel	1.72E-04
TOTAL	1.54E-01

- (a) The unrestricted potential emissions of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (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 emissions are not counted toward determination of PSD applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	--
PM-10	0.0
SO <sub>2</sub>	0.0
VOC	69.0
CO	1.0
NO <sub>x</sub>	4.0

### Potential To Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Bread Oven	0.23	0.23	0.02	107.49	2.58	3.07	--
Bun Oven	0.21	0.21	0.02	24.15	2.32	2.76	--
Insignificant Activities	3.95	3.95	0.01	0.13	1.97	2.34	--
<b>Total Emissions</b>	<b>4.39</b>	<b>4.39</b>	<b>0.05</b>	<b>131.77</b>	<b>7.09</b>	<b>8.17</b>	<b>--</b>

**County Attainment Status**

The source is located in Vanderburgh County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Maintenance 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. Vanderburgh County has been designated as maintenance attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Vanderburgh County has been classified as attainment or unclassifiable for PM10, SO<sub>2</sub>, NO<sub>2</sub>, CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

**Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### **Federal Rule Applicability**

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

The two (2) 2.00625 MMBtu/hr natural gas fired boilers and the one (1) 1.3375 MMBtu/hr natural gas fired boiler are not subject to the New Source Performance Standard, 326 IAC 12 (40 CFR 60.40c, Subpart Dc), because the heat input capacities are less than ten (10) MMBtu/hr.

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

- (c) 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 (1) the source is not a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs), and (2) the source does not include one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.

- (d) This source is not subject to the provisions of 40 CFR Part 64, Compliance Assurance Monitoring. In order for this rule to apply, a pollutant specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and 3) the unit has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source.

This source does not contain any units that require the use of a control device to achieve compliance with the representative emission limitations. Therefore, 40 CFR 64 is not applicable to any facilities contained therein.

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

#### **326 IAC 1-6-3 (Preventive Maintenance Plan)**

The source submitted a Preventive Maintenance Plan (PMP) in January 1999. The plan was revised in December 2002.

#### **326 IAC 1-5-2 (Emergency Reduction Plans)**

This source submitted an Emergency Reduction Plan (ERP) in January 1999.

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

This source was an existing minor source when PSD rules came into effect. The source is not 1 of 28 source categories defined in 326 IAC 2-2-1(p)(1) and has the potential to emit of any regulated pollutant before controls less than two hundred and fifty (250) tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) are not applicable.

#### **326 IAC 2-4.1 (New Source Toxics Control)**

This source is not subject to 326 IAC 2-4.1 (New Source Toxics Control) because the source is not a major source of hazardous air pollutants (HAPs) (i.e., the source does not have the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs).

#### **326 IAC 6-1-1 (Nonattainment Area Limitations)**

This source is not subject to 326 IAC 6-1-1 (Nonattainment Area Limitations), even though it is located in Vanderburgh County, because the potential to emit particulate matter is less than one

hundred (100) tons per year, and actual emissions of particulate matter are less than ten (10) tons per year.

326 IAC 6-1-16 (Nonattainment Area Limitations for Vanderburgh County)

This source is not subject to 326 IAC 6-1-16 (Nonattainment Area Limitations for Vanderburgh County), because it is not one of the listed facilities.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) because the potential to emit fugitive particulate matter is less than twenty-five (25) tons per year.

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 one hundred (100) tons per year of VOC. 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 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%) 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.

**State Rule Applicability - One (1) Bread Oven and One (1) Bun Oven**

326 IAC 8-1-6 (General Reduction Requirements)

The bread oven is not subject to 326 IAC 8-1-6 (General Reduction Requirements) because it was constructed in 1975, which is prior to the January 1, 1980 applicability date.

The bun oven is subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements), because it was constructed in 1998 and the potential volatile organic compound (VOC) emissions are greater than twenty-five (25) tons per year.

Pursuant to Construction Permit (CP 163-9331-00040), issued May 4, 1998 and 326 IAC 8-1-6 (General Reduction Requirements), the potential to emit volatile organic compound (VOC) from the one (1) bun oven shall be limited to twenty-four (24) tons per year to avoid the requirements of this rule.

Since VOC emissions from bread baking operations vary depending on the amount and type of bread produced, a single numerical throughput limit cannot be determined. Hence, the proposed permit limits bread throughput using the following equation:

Where:

- $B_i$  = The amount of bread of type  $i$  produced during month  $m$  (tons/month);
- $E_i$  = The VOC emission factor for type  $i$  bread (lb of VOC/ton of bread); and
- $m$  = The compliance period.

The VOC emissions, calculated using the amount of bread produced and the emission factor, are summed over the previous twelve (12) months. The emission factor for each type of bread made will be calculated using the following equation:

$$\sum_{m=1}^{12} \left( \sum_{i=1}^n \frac{E_i B_i}{2000 \text{ lb / ton}} \right) \leq 24 \text{ tons of VOC per year}$$
$$E = 0.95Y + 0.19E - 0.51S - 0.86ts + 1.90$$

Where:

- E = Pounds of VOC per ton of baked bread;
- Y = Initial baker's percent of yeast;
- E = Total yeast action time in hours;
- S = Final (spike) baker's percent of yeast; and
- ts = Spiking time in hours.

This equation is taken from AP-42, Chapter 9.9.6 (Bread Baking) and "Alternative Control Technology Document for Bakery Oven Emissions", EPA 453/R-92-017, published December 1992.

In order to demonstrate compliance with this limit, the source must maintain records of the amount and type of bread produced, and for each type of bread, the initial baker's percent of yeast, the total yeast action time, the final baker's percent of yeast and the spiking time. Using this data and the equations above, the source will calculate the VOC emissions for each compliance period.

Compliance with this condition limits the potential to emit VOC from the entire source to less than twenty-four (24) tons per twelve (12) consecutive month period. Therefore, the provisions of 326 IAC 8-1-6 (General Reduction Requirements) are not applicable.

#### 326 IAC 8-6-1 (Organic Solvent Emission Limitations)

The one (1) bread oven is not subject to 326 IAC 8-6 (Organic Solvent Emission Limitations) because this source commenced operation in 1973, which is prior to the October 7, 1974 applicability date, even though the potential to emit volatile organic compound (VOC) is greater than one hundred (100) tons per year.

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

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one bread oven shall not exceed 13.6 pounds per hour when operating at a process weight rate of 12,000 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one bun oven shall not exceed 7.2 pounds per hour when operating at a process weight rate of 4,657 pounds per hour.

The pound per hour limitations were 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:

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

### State Rule Applicability - Insignificant Activities

#### 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-3(a), the particulate emissions from the 2.00625 MMBtu/hr natural gas fired boiler, constructed in 1974, and the 2.00625 MMBtu/hr natural gas fired boiler, constructed in 1975, shall not exceed 0.6 pounds per million Btu, and the particulate emissions from the 1.3375 MMBtu/hr natural gas fired boiler, constructed in 1951, shall not exceed 0.8 pounds per million Btu.

This limitation is based on the following equation:

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

where

C = 50 u/m<sup>3</sup>

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr)

N = number of stacks

a = plume rise factor (0.67)

h = stack height (ft)

- (1) For the 1.3375 MMBtu/hr natural gas fired boiler, constructed in 1951,

C = 50

Q = 1.3375

N = 1

a = 0.67

h = 28

Pt = 9.85 > 0.8, therefore the boiler is limited to 0.8 lb/MMBtu.

Based on AP-42 emission factors, the boiler is in compliance with this limitation.

- (2) For the 2.00625 MMBtu/hr natural gas fired boiler, constructed in 1974,

C = 50

Q = 1.3375 + 2.00625 = 3.34375

N = 1 + 1 = 2

a = 0.67

h = 28

Pt = 4.16 > 0.6, therefore the boiler is limited to 0.6 lb/MMBtu.

Based on AP-42 emission factors, the boiler is in compliance with this limitation.

- (3) For the 2.00625 MMBtu/hr natural gas fired boiler, constructed in 1975,

C = 50

Q = 1.3375 + 2.00625 + 2.00625 = 5.35

N = 1 + 1 + 1 = 3

a = 0.67

h = 28

Pt = 2.64 > 0.6, therefore the boiler is limited to 0.6 lb/MMBtu.

Based on AP-42 emission factors, the boiler is in compliance with this limitation.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) from each of the three (3) raw material storage silos shall not exceed to 16.79 pounds per hour when operating at a process weight rate of 16,410 pounds per hour, as determined by the following:

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

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

For each raw material storage silos:

$$P = 16,410 \text{ lbs per hour} = 8.205 \text{ tons per hour}$$

$$E = 4.10 \times 8.205^{0.67} = 16.79 \text{ lbs PM per hour}$$

Since the potential emissions are less than the allowable emissions, the three (3) raw material storage silos will be in compliance with this requirement.

### Testing Requirements

Testing is not required by this permit. The initial Part 70 Operating Permit did not require testing. The bun oven, identified as 3, is limited to 24 tons of VOC per year. The uncontrolled potential to emit of VOC from the bun oven is less than forty percent (40%) of the total source potential to emit of VOC. Therefore, testing is not required for the bun oven, because the proposed permit includes record keeping requirements that will be sufficient to demonstrate continued compliance with the VOC emission limits.

The natural-gas fired boilers (insignificant activities) can meet the particulate matter limitations established in 326 IAC 6-2-3, based on AP-42 emission factors. In addition, the three flour storage silos can meet the particulate emission limitations of 326 IAC 6-3-2, because the allowable emissions are greater than the potential emissions calculated using AP-42.

### Compliance Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. 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.

## **Conclusion**

The operation of this stationary wholesale bakery shall be subject to the conditions of the attached proposed Part 70 Permit No. T163-17458-00040.

**Appendix A: Emission Calculations**  
**Emissions from one 7 MMBtu/hr Bread Oven and one 6.3 MMBtu/hr Bun Oven**

**Company Name: Hartford Bakery, Inc.**  
**Address: 500 N. Fulton Avenue, Evansville, Indiana 47710**  
**TV: 163-17548-00040**  
**Reviewer: ERG/TDP**  
**Date: December 15, 2003**

**1. VOC Emissions from Bread Baking:**

**Maximum Baking Rate of Bread Oven: 12,000 pounds per hour**  
**Maximum Baking Rate of Bun Oven: 4,657 pounds per hour**

According to AP-42, Chapter 9.9.6 - Bread Baking, the VOC emission factor from the bread baking process can be estimated with the following equation:

$$E.F. = 0.95 Y_i + 0.195 t_i - 0.51 S - 0.86 t_s + 1.90$$

Where

E.F. = pounds VOC per ton of baked bread  
 $Y_i$  = initial baker's percent of yeast  
 $t_i$  = total yeast action time in hours  
 $S$  = final (spike) baker's percent of yeast  
 $t_s$  = spiking time in hours

Facility	Maximum Throughput (lb/hr)	Initial Baker's % Yeast ( $Y_i$ )	Total Yeast Action Time ( $t_i$ )	Final (Spike) Baker's % Yeast ( $S$ )	Spiking Time ( $t_s$ )	Emission Factor (EF)	Potential VOC (tons/year)
Bread Oven	12000	3.59	2.8	1.79	1	4.08	107.32
Bun Oven	4657	2.99	2.8	0.44	1.2	4.03	41.10
<b>Total</b>							<b>148.42</b>

Potential VOC Emission (tons/year) = Maximum Throughput (lb/hr) x (8760 hr/yr) x (1ton/2000 lbs) x VOC EF (lbs VOC/ton) / 2000 lbs/ton

**2. Emissions from Natural Gas Combustion:**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

13.3 (2 units total)

116.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	7.6	7.6	0.6	100	5.5	84.0
<b>Potential Emission in tons/yr</b>	<b>0.44</b>	<b>0.44</b>	<b>3.5E-02</b>	<b>5.83</b>	<b>0.32</b>	<b>4.89</b>

\*PM and PM10 emission factors are condensable and filterable PM10 combined.

**Methodology**

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 7/98)

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

**3. Total Uncontrolled Emissions from the Bread and Bun Ovens:**

Total Potential Emission in tons/yr	Pollutant					
	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	0.44	0.44	3.5E-02	5.83	148.74	4.89

Total Potential Emissions = PTE from bread baking + PTE of natural gas combustion.

**Appendix A: Emission Calculations**  
**Natural Gas Combustion**  
**(MMBtu/hr < 100)**  
**From two 2.00625 MMBtu/hr boilers and one 1.3375 MMBtu/hr boiler**

**Company Name: Hartford Bakery, Inc.**  
**Address: 500 N. Fulton Avenue, Evansville, Indiana 47710**  
**TV: 163-17548-00040**  
**Reviewer: ERG/TDP**  
**Date: December 15, 2003**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

5.4 (3 units total)

46.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	7.6	7.6	0.6	100	5.5	84.0
<b>Potential Emission in tons/yr</b>	<b>0.18</b>	<b>0.18</b>	<b>0.01</b>	<b>2.34</b>	<b>0.13</b>	<b>1.97</b>

\*PM and PM10 emission factors are condensable and filterable PM10 combined.

### Methodology

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

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

Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

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

**Appendix A: Emission Calculations  
Natural Gas Combustion  
HAP Emissions From  
Two 2.00625 MMBtu/hr boilers, One 1.3375 MMBtu/hr boiler,  
One 7 MMBtu/hr Bread Oven, and One 6.3 MMBtu/hr Bun Oven**

**Company Name: Hartford Bakery, Inc.  
Address: 500 N. Fulton Avenue, Evansville, Indiana 47710  
TV: 163-17548-00040  
Reviewer: ERG/TDP  
Date: December 15, 2003**

Heat Input Capacity                      Potential Throughput  
MMBtu/hr                                      MMCF/yr

18.7

163.4

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.72E-04	9.80E-05	6.13E-03	1.47E-01	2.78E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.08E-05	8.99E-05	1.14E-04	3.10E-05	1.72E-04

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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)

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

**Appendix A: Emission Calculations  
PM/PM10 Emissions  
From Three (3) Storage Silos**

**Company Name: Hartford Bakery, Inc.  
Address : 500 N. Fulton Avenue, Evansville, Indiana 47710  
Title V: 163-17548-00040  
Reviewer: ERG/TDP  
Date: December 15, 2003**

**1. Process Descriptions:**

**Max Throughput: 8.205 tons/hr**  
**\*PM/PM10 Emission Factor: 0.035 lbs/ton**

The flour is delivered via tank trucks and the silos are filled pneumatically. Pressure equalization bags are installed at the top of each silo to equalize the pressure and to prevent the flour from being emitted to the atmosphere.

\*Emission Factors are from AP-42, Tables 9.9.1-1, SCC #3-02-005-52 (Grain receiving by hopper truck, AP-42, 05/98), which is the emission factor for wheat loading. There is no emission factor for flour loading in AP-42.

**2. Potential Uncontrolled PM/PM10 Emissions from Each Silo:**

Hourly Potential PM/PM10 Emissions =	$8.205 \text{ tons/hr} \times 0.035 \text{ lbs/ton} =$	<b>0.287 lbs/hr/silo</b>
Annual Potential PM/PM10 Emissions =	$0.287 \text{ tons/yr} \times 8760 \text{ hr/yr} \times 1 \text{ ton}/2000 \text{ lbs} =$	<b>1.26 tons/yr/silo</b>

**3. Potential Uncontrolled PM/PM10 Emissions from All Three Silos:**

Total Potential PM/PM10 Emissions =	$1.26 \text{ ton/yr/silo} \times 3 \text{ silos} =$	<b>3.77 tons/yr</b>
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