



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: May 5, 2005
RE: General Mills / MSOP 043-19812-00050
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 1/10/05



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MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**General Mills
707 Pillsbury Lane
New Albany, Indiana 47150**

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

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

Operation Permit No.: MSOP 043-19812-00050	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 5, 2005 Expiration Date: May 5, 2010

TABLE OF CONTENTS

A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]	
A.2	Emission Units and Pollution Control Equipment Summary	
B	GENERAL CONDITIONS	7
B.1	Permit No Defense [IC 13]	
B.2	Definitions	
B.3	Effective Date of the Permit [IC 13-15-5-3]	
B.4	Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]	
B.5	Modification to Permit [326 IAC 2]	
B.6	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.7	Preventive Maintenance Plan [326 IAC 1-6-3]	
B.8	Permit Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.9	Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.10	Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]	
B.11	Annual Fee Payment [326 IAC 2-1.1-7]	
C	SOURCE OPERATION CONDITIONS	10
C.1	Particulate Emission Limitation For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]	
C.2	Permit Revocation [326 IAC 2-1.1-9]	
C.3	Opacity [326 IAC 5-1]	
C.4	Fugitive Dust Emissions [326 IAC 6-4]	
C.5	Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]	
C.6	Performance Testing [326 IAC 3-6]	
C.7	Compliance Requirements [326 IAC 2-1.1-11]	
C.8	Compliance Monitoring [326 IAC 2-1.1-11]	
C.9	Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]	
C.10	Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]	
C.11	Compliance Response Plan - Preparation and Implementation	
C.12	Actions Related to Noncompliance Demonstrated by a Stack Test	
	Record Keeping and Reporting Requirements	
C.13	Malfunctions Report [326 IAC 1-6-2]	
C.14	General Record Keeping Requirements [326 IAC 2-6.1-2]	
C.15	General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]	
D.1	EMISSIONS UNIT OPERATION CONDITIONS – Three (3) natural gas-fired heaters	16
	Emission Limitations and Standards	
D.1.1	Particulate Matter Limitation (PM) [326 IAC 6-2-3]	
D.2	EMISSIONS UNIT OPERATION CONDITIONS – One (1) pneumatic flour conveyance	17
	Emission Limitations and Standards	
D.2.1	Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]	
D.2.2	Preventive Maintenance Plan [326 IAC 1-6-3]	
	Compliance Determination Requirements	
D.2.3	Particulate Control	

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

- D.2.4 Visible Emissions Notations
- D.2.5 Parametric Monitoring
- D.2.6 Dust Collectors Inspections
- D.2.7 Broken or Failed Dust Collectors Detection

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

- D.2.8 Record Keeping Requirements

D.3 EMISSIONS UNIT OPERATION CONDITIONS – One (1) Safety Kleen cold cleaner 22

Emission Limitations and Standards

- D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

D.4 EMISSIONS UNIT OPERATION CONDITIONS – Two (2) 14, 000 gallon 24

Emission Limitations and Standards

- D.4.1 Volatile Organic Compounds (VOCs) [326 IAC 12]

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

- D.4.2 Record Keeping Requirements

Annual Notification 25

Malfunction Report 26

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary refrigerated baked goods production process.

Authorized Individual:	Plant Manager
Source Address:	707 Pillsbury Lane, New Albany, Indiana 47150
Mailing Address:	707 Pillsbury Lane, New Albany, Indiana 47150
General Source Phone:	(812) 944-8411
SIC Code:	2045
County Location:	Floyd
Source Location Status:	Nonattainment for ozone under the 8-hour standard Moderate Nonattainment for ozone under the 1-hour standard Attainment area for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD and Nonattainment NSR; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) Three (3) natural gas-fired pest control heaters, designated Nos. 1, 2, and 3, with maximum heat input rates of 4.5, 2.725, and 2.725 million (MM) British thermal units (Btu) per hour, respectively, exhausting through Stack Nos. 155, 156, and 157, respectively;
- (b) Three (3) natural gas-fired pest control heaters, designated Nos. 4, 5, and 6, each with maximum heat input rates of 2.0 MMBtu per hour, exhausting through Stack Nos. 85, 135, and 140, respectively;
- (c) One (1) natural gas-fired pest control heater, designated No. 7, with a maximum heat input rate of 0.75 MMBtu per hour, exhausting through Stack No. 142;
- (d) Two (2) natural gas-fired boilers, designated Nos. 1 and 2, both installed in 1959, each with maximum heat input rates of 10.1 MMBtu per hour, exhausting through Stack Nos. 125 and 126, respectively;
- (e) One (1) natural gas-fired boiler, designated No. 3, installed in 1966, with a maximum heat input rate of 12.5 MMBtu per hour, exhausting through Stack No. 127;
- (f) One (1) natural gas-fired boiler, designated No. 4, installed in 1959, with a maximum heat input rate of 1.6 MMBtu per hour, exhausting through Stack No. 128;
- (g) One (1) WWTP flare, with a maximum heat input capacity of 1.0 MMBtu per hour;
- (h) One (1) pneumatic flour conveyance and storage system with dust collector DC01034, exhausting through Stack No. 150;

- (i) One (1) pneumatic dusting flour conveyance and storage system with dust collector RC16002, exhausting through Stack No. 151 (which now exhausts inside the building);
- (j) One (1) pneumatic sugar conveyance with an air / material separator which exhausts through Stack No. 164, and a storage system with a sock vent which exhausts inside the building.
- (k) Two (2) pneumatically conveyed ribbon blenders with dust collectors DC10005 and DC10023 exhausting through Stack Nos. 153 and 154, respectively;
- (l) A vacuum system with three (3) dust collectors designated BL11052, BL12092, and BL01005 exhausting through Stack Nos. 160, 162, and 163, respectively;
- (m) One (1) pneumatically conveyed cookie blender with dust collector DC62, exhausting through Stack No. 8;
- (n) One (1) pneumatically conveyed vertical tower bin, designated No. 4, with dust collector DC04, exhausting through Stack No. 20;
- (o) One (1) pneumatically conveyed vertical tower bin, designated No. 9, with dust collector DC09, exhausting through Stack No. 21;
- (p) One (1) pneumatically conveyed dusting flour reclaim bin with dust collector DC37, exhausting through Stack No. 37;
- (q) One (1) pneumatically conveyed horizontal bin with dust collector DC30, exhausting through Stack No. 48;
- (r) One (1) pneumatically conveyed sugar grinding bin, designated No. 58, with dust collector DC50, exhausting through Stack No. 55;
- (s) One (1) pneumatically conveyed flour cooler with dust collector DC61, exhausting through Stack No. 61;
- (t) Two (2) pneumatically conveyed flour reclaim collectors, designated C1L and C2L, with dust collectors DC17 and DC16, respectively, exhausting through Stack Nos. 66 and 67, respectively;
- (u) One (1) pneumatically conveyed flour reclaim collector, designated PCL, with dust collector DC15, exhausting through Stack No. 68;
- (v) One (1) pneumatically conveyed flour reclaim collector, designated HJL, with dust collector DC18, exhausting through Stack No. 69;
- (w) One (1) pneumatically conveyed flour reclaim collector, designated BRL, with dust collector DC24, exhausting through Stack No. 71;
- (x) One (1) pneumatically conveyed penthouse collector, designated PC, with dust collector DC38, exhausting through Stack No. 98a;
- (y) One (1) pneumatically conveyed surge bin, designated PC, with dust collector DC48, exhausting through Stack No. 98b;

- (z) Two (2) pneumatically conveyed starch bins, designated Nos. 12 and 13, with dust collectors DC12 and DC13, respectively, exhausting through Stack Nos. 104 and 105, respectively;
- (aa) One (1) pneumatically conveyed flour bin, designated Western, with dust collector DC36, exhausting through Stack No. 108;
- (bb) Three (3) pneumatically conveyed unloader bins, designated Nos. 1, 2, and 3, with dust collectors DC54, DC53, and DC52, respectively, exhausting through Stack Nos. 139, 137, and 138, respectively;
- (cc) One (1) upstairs dry mix central vacuum system with dust collector DC109, collecting fugitive raw materials at a maximum rate of 105 pounds per hour, and emissions exhausted through Stack 166;
- (dd) Four (4) scrubbers, designated PKL Rotoclone, BRL, C1L, and C2L, for removal of carbon dioxide refrigerant from the employee occupied area, exhausting through Stack Nos. 52, 60, 70, and 65, respectively;
- (ee) One (1) Safety Kleen cold cleaner degreaser, designated No. 87, exhausting inside, using a maximum of 0.056 gallons of solvent per day.
- (ff) One (1) 12,000 gallon No. 2 fuel oil storage tank, exhausting through Stack No. 12, constructed in 1978;
- (gg) Two (2) 14,000 gallon alcohol storage tanks, exhausting through Stack Nos. 13 and 14, respectively, constructed in 1982 and 1985, respectively;
- (hh) One (1) stick welding operation;
- (ii) One (1) bread line with dust collector DC110, exhausting through Stack No. 72; and
- (jj) One (1) central vacuum system with dust collector DC111, collecting fugitive raw materials at a maximum rate of 480 pounds per hour, and emissions exhausted through Stack 165.

SECTION B GENERAL CONDITIONS

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

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

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

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

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

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

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

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

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

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

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

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

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

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

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

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements

C.8 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.9 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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

C.10 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]

- (a) Whenever a condition in this permit requires the measurement of total static pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

C.11 Compliance Response Plan - Preparation and Implementation

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

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

Record Keeping and Reporting Requirements

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

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

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1

EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (a) Three (3) natural gas-fired pest control heaters, designated Nos. 1, 2, and 3, with maximum heat input rates of 4.5, 2.725, and 2.725 million (MM) British thermal units (Btu) per hour, respectively, exhausting through Stack Nos. 155, 156, and 157, respectively;
- (b) Three (3) natural gas-fired pest control heaters, designated Nos. 4, 5, and 6, each with maximum heat input rates of 2.0 MMBtu per hour, exhausting through Stack Nos. 85, 135, and 140, respectively;
- (c) One (1) natural gas-fired pest control heater, designated No. 7, with a maximum heat input rate of 0.75 MMBtu per hour, exhausting through Stack No. 142;
- (d) Two (2) natural gas-fired boilers, designated Nos. 1 and 2, both installed in 1959, each with maximum heat input rates of 10.1 MMBtu per hour, exhausting through Stack Nos. 125 and 126, respectively;
- (e) One (1) natural gas-fired boiler, designated No. 3, installed in 1966, with a maximum heat input rate of 12.5 MMBtu per hour, exhausting through Stack No. 127;
- (f) One (1) natural gas-fired boiler, designated No. 4, installed in 1959, with a maximum heat input rate of 1.6 MMBtu per hour, exhausting through Stack No. 128;

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

Emission Limitations and Standards

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

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 all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, in this case, the four natural gas-fired boilers (Nos. 1, 2, 3, and 4), shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.

SECTION D.2

EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (h) One (1) pneumatic flour conveyance and storage system with dust collector DC01034, exhausting through Stack No. 150;
- (i) One (1) pneumatic dusting flour conveyance and storage system with dust collector RC16002, exhausting through Stack No. 151 (which now exhausts inside the building);
- (j) One (1) pneumatic sugar conveyance with an air / material separator which exhausts through Stack No. 164, and a storage system with a sock vent which exhausts inside the building.
- (k) Two (2) pneumatically conveyed ribbon blenders with dust collectors DC10005 and DC10023 exhausting through Stack Nos. 153 and 154, respectively;
- (l) A vacuum system with three (3) dust collectors designated BL11052, BL12092, and BL01005 exhausting through Stack Nos. 160, 162, and 163, respectively;
- (m) One (1) pneumatically conveyed cookie blender with dust collector DC62, exhausting through Stack No. 8;
- (n) One (1) pneumatically conveyed vertical tower bin, designated No. 4, with dust collector DC04, exhausting through Stack No. 20;
- (o) One (1) pneumatically conveyed vertical tower bin, designated No. 9, with dust collector DC09, exhausting through Stack No. 21;
- (p) One (1) pneumatically conveyed dusting flour reclaim bin with dust collector DC37, exhausting through Stack No. 37;
- (q) One (1) pneumatically conveyed horizontal bin with dust collector DC30, exhausting through Stack No. 48;
- (r) One (1) pneumatically conveyed sugar grinding bin, designated No. 58, with dust collector DC50, exhausting through Stack No. 55;
- (s) One (1) pneumatically conveyed flour cooler with dust collector DC61, exhausting through Stack No. 61;
- (t) Two (2) pneumatically conveyed flour reclaim collectors, designated C1L and C2L, with dust collectors DC17 and DC16, respectively, exhausting through Stack Nos. 66 and 67, respectively;
- (u) One (1) pneumatically conveyed flour reclaim collector, designated PCL, with dust collector DC15, exhausting through Stack No. 68;
- (v) One (1) pneumatically conveyed flour reclaim collector, designated HJL, with dust collector DC18, exhausting through Stack No. 69;
- (w) One (1) pneumatically conveyed flour reclaim collector, designated BRL, with dust collector DC24, exhausting through Stack No. 71;
- (x) One (1) pneumatically conveyed penthouse collector, designated PC, with dust collector DC38, exhausting through Stack No. 98a;

- (y) One (1) pneumatically conveyed surge bin, designated PC, with dust collector DC48, exhausting through Stack No. 98b;
- (z) Two (2) pneumatically conveyed starch bins, designated Nos. 12 and 13, with dust collectors DC12 and DC13, respectively, exhausting through Stack Nos. 104 and 105, respectively;
- (aa) One (1) pneumatically conveyed flour bin, designated Western, with dust collector DC36, exhausting through Stack No. 108;
- (bb) Three (3) pneumatically conveyed unloader bins, designated Nos. 1, 2, and 3, with dust collectors DC54, DC53, and DC52, respectively, exhausting through Stack Nos. 139, 137, and 138, respectively;
- (cc) One (1) upstairs dry mix central vacuum system with dust collector DC109, collecting fugitive raw materials at a maximum rate of 105 pounds per hour, and emissions exhausted through Stack 166;
- (dd) Four (4) scrubbers, designated PKL Rotoclone, BRL, C1L, and C2L, for removal of carbon dioxide refrigerant from the employee occupied area, exhausting through Stack Nos. 52, 60, 70, and 65, respectively;
- (ii) One (1) bread line with dust collector DC110, exhausting through Stack No. 72; and
- (jj) One (1) central vacuum system with dust collector DC111, collecting fugitive raw materials at a maximum rate of 480 pounds per hour, and emissions exhausted through Stack 165.

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

Emission Limitations and Standards

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from each of the process steps listed above except for the four (4) scrubbers shall not exceed the following pounds per hour limitations:

Stack ID	Raw Material Throughput (lb/hr)	326 IAC 6-3-2 Allowable Particulates
8	200	0.88
20	60,000	40.04
21	60,000	40.04
37	55,000	37.77
48	60,000	40.04
55	180	0.82
61	12,800	14.22
66	1200	2.91
67	1200	2.91
68	200	0.88
69	1200	2.91
71	1200	2.91
72	1282.2	3.04
98a	35,000	27.90
98b	35,000	27.90
104	35,000	27.90

Stack ID	Raw Material Throughput (lb/hr)	326 IAC 6-3-2 Allowable Particulates
105	35,000	27.90
108	1200	2.91
137	60,000	40.04
138	25,000	22.27
139	40,000	30.51
150	35,000	27.9
153	20,000	19.18
154	20,000	19.18
160	3000	5.38
162	4800	7.37
163	40,000	30.51
164	9000	11.23
165	480	1.58
166	105	0.57

The pounds per hour limitations were calculated with the following equation:

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.2.3 Particulate Control

The dust collectors for particulate control shall be in operation and control emissions from the pneumatic conveyance steps and the vacuum systems at all times that the pneumatic conveyance steps and the vacuum systems are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.4 Visible Emissions Notations

- (a) Visible emission notations of the dust collectors (DC62, DC04, DC09, DC37, DC30, DC50, DC61, DC17, DC16, DC15, DC18, DC24, DC38, DC48, DC12, DC13, DC36, DC53, DC52, DC54, DC110, DC111, DC01034, DC10005, DC10023, BL11052, BL12092, BL01005, and upstairs dry mix central vacuum system dust collector) stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across each of the dust collectors (DC62, DC04, DC09, DC37, DC30, DC50, DC61, DC17, DC16, DC15, DC18, DC24, DC38, DC48, DC12, DC13, DC36, DC53, DC52, DC54, DC110, DC111, DC01034, DC10005, DC10023, BL11052, BL12092, BL01005, and upstairs dry mix central vacuum system dust collector) used in conjunction with the pneumatic conveyance steps and the vacuum systems, at least once per shift when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across any of the dust collectors is outside the normal range as mentioned below in the table, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the below mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

Dust Collector ID	Pressure Drop Range (inches of water)
DC62	7.0 to 10.0
DC04	2.0 to 5.0
DC09	3.0 to 6.0
DC37	2.0 to 5.0
DC30	1.0 to 4.0
DC50	2.0 to 5.0
DC61	2.0 to 5.0
DC17	2.0 to 5.0
DC16	2.0 to 5.0
DC15	2.0 to 5.0
DC18	2.0 to 5.0
DC24	2.0 to 5.0
DC38	2.0 to 5.0
DC48	2.0 to 5.0
DC12	2.0 to 5.0
DC13	2.0 to 5.0
DC36	2.0 to 5.0
DC53	2.0 to 5.0
DC52	2.0 to 5.0
DC54	2.0 to 5.0
DC109	2.0 to 5.0
DC110	0.0 to 11.0
DC111	0.0 to 5.0
DC01034	2.0 to 5.0
DC10005	2.0 to 5.0
DC10023	2.0 to 5.0
BL11052	2.0 to 5.0
BL12092	2.0 to 5.0
BL01005	2.0 to 5.0

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.6 Dust Collectors Inspections

An inspection shall be performed each calendar quarter of all the dust collectors controlling the pneumatic conveyance steps and the vacuum systems when venting to the atmosphere. A dust collector inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective dust collectors shall be replaced.

D.2.7 Broken or Failed Dust Collectors Detection

In the event that a dust collector has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after dust collectors failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment dust collectors, if failure is indicated by a significant drop in the dust collectors' pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if dust collectors failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of visible emission notations of the dust collectors' stack exhausts once per shift.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere for each dust collector.
- (c) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6.
- (d) To document compliance with Condition D.2.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(ee) One (1) Safety Kleen cold cleaner degreaser designated No. 87, exhausting inside, using a maximum of 0.056 gallons of solvent per day.

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

Emission Limitations and Standards

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties, the Permittee shall ensure that the following requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9OC) (one hundred twenty degrees Fahrenheit (120OF)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION D.4

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (ff) One (1) 12,000 gallon No. 2 fuel oil storage tank, exhausting through Stack No. 12, constructed in 1978;
- (gg) Two (2) 14,000 gallon alcohol storage tanks, exhausting through Stack Nos. 13 and 14, respectively, constructed in 1982 and 1985, respectively;

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

Emission Limitations and Standards

D.4.1 Volatile Organic Compounds (VOCs) [326 IAC 12] [326 IAC 8-9]

- (a) Pursuant to 326 IAC 12, the one (1) 14,000 gallon alcohol storage tank, exhausting through Stack No. 14 shall comply with 40 CFR Part 60.116b, paragraph (b) which requires record keeping.
- (b) Pursuant to 326 IAC 8-9, the two (2) 14,000 gallon alcohol storage tanks and the one (1) 12,000 gallon No. 2 fuel oil storage tank, shall comply with 326 IAC 8-9-6(a) and (b) which require record keeping.

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

D.4.2 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain permanent records at the source in accordance with (1) through (3) below:
 - (1) The identification number of each storage vessel;
 - (2) The dimension of each storage vessel; and
 - (3) An analysis showing the capacity of each storage vessel.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	General Mills
Address:	707 Pillsbury Lane
City:	New Albany, Indiana 47150
Phone #:	(812) 944-8411
MSOP #:	043-19812-00050

I hereby certify that General Mills is still in operation.
 no longer in operation.

I hereby certify that General Mills is in compliance with the requirements of MSOP 043-19812-00050.
 not in compliance with the requirements of MSOP 043-19812-00050.

Authorized Individual (typed):
Title:
Signature:
Date:

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____ / ____ / 19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____ / ____ / 19____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

**Indiana Department of Environmental Management
Office of Air Quality**

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

Source Background and Description

Source Name:	General Mills
Source Location:	707 Pillsbury Lane, New Albany, Indiana 47150
County:	Floyd
SIC Code:	2045
Operation Permit No.:	MSOP 043-10995-00050
Operation Permit Issuance Date:	November 9, 1999
Permit Renewal No.:	MSOP 043-19812-00050
Permit Reviewer:	Seema Roy/EVP

The Office of Air Quality (OAQ) has reviewed an application from General Mills (formerly known as The Pillsbury Company) relating to the operation of a refrigerated baked goods production process.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Three (3) natural gas-fired pest control heaters, designated Nos. 1, 2, and 3, with maximum heat input rates of 4.5, 2.725, and 2.725 million (MM) British thermal units (Btu) per hour, respectively, exhausting through Stack Nos. 155, 156, and 157, respectively;
- (b) Three (3) natural gas-fired pest control heaters, designated Nos. 4, 5, and 6, each with maximum heat input rates of 2.0 MMBtu per hour, exhausting through Stack Nos. 85, 135, and 140, respectively;
- (c) One (1) natural gas-fired pest control heater, designated No. 7, with a maximum heat input rate of 0.75 MMBtu per hour, exhausting through Stack No. 142;
- (d) Two (2) natural gas-fired boilers, designated Nos. 1 and 2, both installed in 1959, each with maximum heat input rates of 10.1 MMBtu per hour, exhausting through Stack Nos. 125 and 126, respectively;
- (e) One (1) natural gas-fired boiler, designated No. 3, installed in 1966, with a maximum heat input rate of 12.5 MMBtu per hour, exhausting through Stack No. 127;
- (f) One (1) natural gas-fired boiler, designated No. 4, installed in 1959, with a maximum heat input rate of 1.6 MMBtu per hour, exhausting through Stack No. 128;
- (g) One (1) WWTP flare, with a maximum heat input capacity of 1.0 MMBtu per hour;
- (h) One (1) pneumatic flour conveyance and storage system with dust collector DC01034, exhausting through Stack No. 150;
- (i) One (1) pneumatic dusting flour conveyance and storage system with dust collector RC16002, exhausting through Stack No. 151 (which now exhausts inside the building);

- (j) One (1) pneumatic sugar conveyance with an air / material separator which exhausts through Stack No. 164, and a storage system with a sock vent which exhausts inside the building.
- (k) Two (2) pneumatically conveyed ribbon blenders with dust collectors DC10005 and DC10023 exhausting through Stack Nos. 153 and 154, respectively;
- (l) A vacuum system with three (3) dust collectors designated BL11052, BL12092, and BL01005 exhausting through Stack Nos. 160, 162, and 163, respectively;
- (m) One (1) pneumatically conveyed cookie blender with dust collector DC62, exhausting through Stack No. 8;
- (n) One (1) pneumatically conveyed vertical tower bin, designated No. 4, with dust collector DC04, exhausting through Stack No. 20;
- (o) One (1) pneumatically conveyed vertical tower bin, designated No. 9, with dust collector DC09, exhausting through Stack No. 21;
- (p) One (1) pneumatically conveyed dusting flour reclaim bin with dust collector DC37, exhausting through Stack No. 37;
- (q) One (1) pneumatically conveyed horizontal bin with dust collector DC30, exhausting through Stack No. 48;
- (r) One (1) pneumatically conveyed sugar grinding bin, designated No. 58, with dust collector DC50, exhausting through Stack No. 55;
- (s) One (1) pneumatically conveyed flour cooler with dust collector DC61, exhausting through Stack No. 61;
- (t) Two (2) pneumatically conveyed flour reclaim collectors, designated C1L and C2L, with dust collectors DC17 and DC16, respectively, exhausting through Stack Nos. 66 and 67, respectively;
- (u) One (1) pneumatically conveyed flour reclaim collector, designated PCL, with dust collector DC15, exhausting through Stack No. 68;
- (v) One (1) pneumatically conveyed flour reclaim collector, designated HJL, with dust collector DC18, exhausting through Stack No. 69;
- (w) One (1) pneumatically conveyed flour reclaim collector, designated BRL, with dust collector DC24, exhausting through Stack No. 71;
- (x) One (1) pneumatically conveyed penthouse collector, designated PC, with dust collector DC38, exhausting through Stack No. 98a;
- (y) One (1) pneumatically conveyed surge bin, designated PC, with dust collector DC48, exhausting through Stack No. 98b;
- (z) Two (2) pneumatically conveyed starch bins, designated Nos. 12 and 13, with dust collectors DC12 and DC13, respectively, exhausting through Stack Nos. 104 and 105, respectively;
- (aa) One (1) pneumatically conveyed flour bin, designated Western, with dust collector DC36, exhausting through Stack No. 108;

- (bb) Three (3) pneumatically conveyed unloader bins, designated Nos. 1, 2, and 3, with dust collectors DC54, DC53, and DC52, respectively, exhausting through Stack Nos. 139, 137, and 138, respectively;
- (cc) One (1) upstairs dry mix central vacuum system with dust collector DC109, collecting fugitive raw materials at a maximum rate of 105 pounds per hour, and emissions exhausted through Stack 166;
- (dd) Four (4) scrubbers, designated PKL Rotoclone, BRL, C1L, and C2L, for removal of carbon dioxide refrigerant from the employee occupied area, exhausting through Stack Nos. 52, 60, 70, and 65, respectively;
- (ee) One (1) Safety Kleen cold cleaner degreaser, designated No. 87, exhausting inside, using a maximum of 0.056 gallons of solvent per day.
- (ff) One (1) 12,000 gallon No. 2 fuel oil storage tank, exhausting through Stack No. 12, constructed in 1978;
- (gg) Two (2) 14,000 gallon alcohol storage tanks, exhausting through Stack Nos. 13 and 14, respectively, constructed in 1982 and 1985, respectively;
- (hh) One (1) stick welding operation;

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted emission units:

- (a) One (1) bread line with dust collector DC110, exhausting through Stack No. 72; and
- (b) One (1) central vacuum system with dust collector DC111, collecting fugitive raw materials at a maximum rate of 480 pounds per hour, and emissions exhausted through Stack 165.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Operation Permit No. MSOP 043-10995-00050 issued on November 9, 1999;
- (b) First Notice Only change No. 043-12251-00050 issued on June 30, 2000;
- (c) Second Notice Only change No. 043-13907-00050 issued on February 28, 2001;
- (d) Third Notice Only change No. 043-15519-00050 issued on February 22, 2002;
- (e) Fourth Notice Only change No. 043-15987-00050 issued on September 6, 2002.

All conditions from previous approvals were incorporated into this permit.

Air Pollution Control Justification as an Integral Part of the Process

The following justification was incorporated into this permit from the initial MSOP 043-10995-00050, issued on November 9, 1999:

- (a) The dust collectors, which collect and return raw material and ingredients collected to the process shall be considered an integral part of the various pneumatically conveyed bins and collectors.

- (b) The production process could not be operated without the dust collectors also being in operation since the dust collectors are required to ensure that the all of the raw materials are used in the process.

IDEM, OAQ evaluated the justifications at the time of issuance of the initial MSOP 043-10995-00050 and agreed the dust collectors/baghouses will be considered as an integral part of the process. Therefore, the permitting level will be determined using the potential to emit after the dust collectors/baghouses. Operating conditions in the proposed permit will specify that the dust collectors/baghouses shall operate at all times when the pneumatic conveyance system is in operation.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
8	DC62	38	0.67	800	ambient
12	Fuel Oil Tank	13	0.33	N/A	ambient
13	Alcohol Tank	15	0.5	N/A	ambient
14	Alcohol Tank	15	0.5	N/A	ambient
20	DC04	10	1.67x1.0	2600	ambient
21	DC09	10	1.67x1.0	4000	ambient
37	DC37	Bldg. Vent	0.5x0.58	800	ambient
48	DC30	24	1.33	5157	ambient
52	PKL Rotoclone	40	0.83	2000	ambient
55	DC50	43	0.67	850	ambient
60	Scrubber BRL	24	0.83	1200	ambient
61	DC61	45	0.83x0.83	756	ambient
65	Scrubber C2L	30	1.5	3000	ambient
66	DC17	24	0.83	2500	ambient
67	DC16	24	0.83	2700	ambient
68	DC15	45	0.83	2250	ambient
69	DC18	26	0.83	2800	ambient
70	Scrubber C1L	28	1.0	1200	ambient
71	DC24	27	0.83	2100	ambient
72	DC110	41	8	600	114
85	Pest Control # 4	25	1.17	500	752
98a	DC38	23	0.83	2800	ambient
98b	DC48	23	0.67x0.67	750	ambient
104	DC12	10	0.83	1800	ambient
105	DC13	10	0.83	1800	ambient
108	DC36	23	1.67x2.17	12000	ambient
125	Boiler # 1	43	2.17	2020	355
126	Boiler # 2	43	2.17	2020	355
127	Boiler # 3	43	1.67	2020	355
128	Boiler # 4	20	1.0	320	355

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
135	Pest Control # 5	28	1.17	500	752
137	DC53	22	0.67	1500	ambient
138	DC52	22	1.17	1500	ambient
139	DC54	22	1.17	1500	ambient
140	Pest Control # 6	40	1.17	500	752
142	Pest Control # 7	40	1.17	150	752
150	DC01034	50	1.33	1600	ambient
153	DC10005	81	1.33	2000	ambient
154	DC10023	81	1.33	2000	ambient
155	Pest Control # 1	81	1.33	1700	300
156	Pest Control # 2	81	1.17	850	300
157	Pest Control # 3	81	1.17	1000	300
159	WWTP Flare	12.67	1.5	25	1200
160	BL11052	40	0.5	200	ambient
162	BL12092	40	0.67	300	ambient
163	BL01005	22	0.67	1285	ambient
164	Air Material Separator	26	0.58	850	70
165	DC111	46	8	2800	64
166	DC109	33	6	465.7	110

Recommendation

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

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

A complete application for the purposes of this review was received on August 11, 2004.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 6).

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	56.55
PM-10	57.83
SO ₂	0.13
VOC	1.95
CO	20.38
NO _x	22.64

HAPs	Potential to Emit (tons/yr)
Hexane	0.40
All other HAPs	0.02
Total	0.42

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 is greater than 25 tons per year and less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Floyd County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Basic Non-Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Floyd County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Floyd County has been classified as attainment or unclassifiable in Indiana for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	53.02
PM-10	54.29
SO ₂	0.13
VOC	1.95
CO	20.38
NO _x	22.63
Single HAP	0.40
Combination HAPs	0.42

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) This existing source is **not** a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.
- (c) These emissions were based on MSOP No. 043-10995-00050 issued on November 9, 1999.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from MSOP No. 043-10995-00050 issued on November 9, 1999, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

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

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standard, (40 CFR 60.40c, Subpart Dc) Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units are not included in the permit for the four (4) boilers, designated as Boilers #1, #2, #3 and #4. The New Source Performance Standard (NSPS) (326 IAC 12 and 40 CFR Part 60, Subpart Dc) applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (MM Btu/hr) or less, but greater than or equal to 2.9 MW (10 MM Btu/hr). Boilers #1 and #2 were constructed in 1959 and Boiler #3 was constructed in 1966, before the June 9, 1989, rule applicability date. Moreover, these units have not undergone any major modifications (involving costs exceeding 50 percent of the replacement value for a new unit) since June 9, 1989. Boiler #4 has a maximum design heat input capacity of 1.6 MM Btu/hr which is less than the 10 MM Btu/hr threshold and it was also constructed in 1959, before the June 9, 1989, rule applicability date.

- (b) The requirements of the New Source Performance Standards, (40 CFR 60.110, Subpart K and 40 CFR 60.110a, Subparts Ka) Standards of Performance for Storage Vessels for Petroleum Liquids are not included in the permit because the one (1) 12,000 gallon No. 2 fuel oil storage tank and the one (1) 14,000 gallon alcohol storage tank exhausting through Stack Nos. 12 and 13, respectively, each have a capacity less than 40,000 gallons.
- (c) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels" are not included in the permit for the one (1) 12,000 gallon No. 2 fuel oil storage tank and the one (1) 14,000 gallon alcohol storage tank exhausting through Stack Nos. 12 and 13, respectively, because they were both constructed before the July 23, 1984 rule applicability date.
- (d) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels" are not included in the permit for the one (1) 14,000 gallon alcohol storage tank exhausting through Stack No. 14. Although it was constructed in 1985, after the July 23, 1984 rule applicability date, the tank has a storage capacity of less than 75 cubic meters.

However, the one (1) 14,000 gallon alcohol storage tank exhausting through Stack No. 14 is still subject to the requirements of 40 CFR 60.116b(a) and (b) pursuant to 326 IAC 12 due to the state rules not yet reflecting the October 15, 2003 changes made to this NSPS.

- (e) The requirements of National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters are not included in the permit for the four (4) boilers, designated as Boilers #1, #2, #3 and #4 because they are not located at a major source of hazardous air pollutants pursuant to 40 CFR Part 63.2.
- (f) The requirements of National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63, Subpart T) are not included in the permit for the Safety Kleen cold cleaner degreaser because Subpart T applies to degreasing operations using one of six listed halogenated solvents, or any combination of the solvents in a concentration greater than 5 percent by weight, as a cleaning or drying agent and this source does not use the regulated halogenated solvents in the degreasing operation.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset)

This source was originally constructed in 1959, which is before the August 7, 1977 rule applicability date. Pursuant to 326 IAC 2-2 (PSD), this source was a minor stationary source in 1959 since it is not one of the 28 listed source categories and it had the potential to emit less than 250 tons per year of all regulated pollutants. Modifications thereafter are not subject to the requirements of 326 IAC 2-2 (PSD) because the potential emissions of all regulated pollutants were less than major source thresholds and it is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2. The source has still maintained its minor PSD status.

Nonattainment New Source Review

On April 15, 2004, the United States Environment Protection Agency (USEPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004, with Floyd County being designated as nonattainment for the 8-hour ozone standard. This existing source is located in Floyd County, which was redesignated on June 15, 2004 as a basic nonattainment area for the 8-hour ozone standard. Based upon this redesignation, the source shall be a minor source because it has a potential to emit of VOC and NO_x at less than the nonattainment NSR applicability threshold of 100 tons per year.

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

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE of 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). There are no facilities with an uncontrolled PTE of 10 tons per year of any single HAP and 25 tons per year of the combination of HAPs that have been constructed or reconstructed since July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply to this source.

326 IAC 2-6 (Emission Reporting)

Since this source is complying with 326 IAC 2-6.1 and is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is not subject to 326 IAC 2-6 (Emission Reporting).

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 the permit:

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

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions because this rule applies to all sources of fugitive dust. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

State Rule Applicability – Individual Facilities

326 IAC 6-2-3 (Particulate Emission Limitations for Facilities Specified in 326 IAC 6-2-1(c))

This rule establishes limitations for sources of indirect heating, not specified in 326 IAC 6-2-1(b), which were existing and in operation or which received permits to construct prior to September 21, 1983. The four (4) boilers (Nos. 1, 2, 3, and 4), each constructed before September 21, 1983, are subject to 326 IAC 6-2-3 because they are not located in any of the specifically listed counties in 326 IAC 6-2-1(b). Pursuant to this rule, the PM emissions from each of the four boilers based on a total heat input rate of 34.3 MMBtu per hour shall be limited to 0.94 pounds per MMBtu heat input.

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:

Pt = Pounds of particulate matter emitted per MMBtu heat input.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain = 50 μm^3

a = Plume rise factor = 0.67

h = Stack height = 43 ft

Q = Total source maximum operating capacity rating in MMBtu per hour = 34.3 MMBtu/hr

N = Number of stacks in fuel burning operation = 4

$$Pt = \frac{50 \times 0.67 \times 43}{76.5 \times 34.3^{0.75} \times 4^{0.25}} = 0.94 \text{ lb/MMBtu}$$

However, pursuant to 326 IAC 6-2-3(d), the allowable particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.80 pound per MMBtu heat input. Therefore, the allowable PM emissions from each of the four (4) boilers is 0.80 pound per MMBtu heat input. This is equivalent to a PM emission limit for each of boilers No. 1, 2, 3, and 4 of 8.1, 8.1, 10.0, and 1.28 pounds per hour, respectively. The PM emissions from the four (4) boilers (Nos. 1, 2, 3, and 4), are 0.019, 0.019, 0.024 and 0.003 pounds per hour, respectively (see Appendix A, page 2 of 6 for detailed emission calculations). Therefore, all the four (4) boilers are in compliance with this limit

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

(a) The particulate from each of the process steps shall be limited by the following:

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

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

The allowable limits for each of the process steps at the source are provided in the calculations in Appendix A, page 5 of 6. The potential emissions from each process step is less than the allowable emissions, therefore, the facilities are in compliance with the rule.

(b) The stick welding equipment, as an insignificant activity, is not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). This activity is exempt from this rule pursuant to 326 IAC 6-3-1(b)(9) because it uses 4.32 pounds of welding wire per day on a potential basis, which is less than the 625 lbs of wire/day threshold.

326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control)

The Safety Kleen cold cleaner degreaser is subject to the requirements of this rule because the source is located in Floyd County.

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser emissions unit shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

(B) The solvent is agitated; or

(C) The solvent is heated.

- (2) Equip the degreaser with a emissions unit for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage emissions unit must be internal such that articles are enclosed under the cover while draining. The drainage emissions unit may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning emissions unit shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1, on or after October 1, 1995, this rule applies to stationary vessels used to store volatile organic liquid that are located in Clark, Floyd, Lake or Porter County. The one (1) fuel oil storage tank and the two (2) alcohol storage tanks are subject to 326 IAC 8-9-6 (a) and (b) (Record Keeping Requirements) of this section because each tank has a storage capacity of less than thirty-nine thousand (39,000) gallons.

326 IAC 12 (New Source Performance Standards)

The one (1) 14,000 gallon alcohol storage tank exhausting through Stack No. 14 is subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels" because it was constructed after the July 23, 1984 rule applicability date, and it has a storage capacity greater than 40 cubic meters. However, since the tank has a storage capacity less than 75 cubic meters, it is subject to only 40 CFR 60.116b, paragraph (b) which requires record keeping.

Conclusion

The renewed operation of this refrigerated baked goods production process shall be subject to the conditions of the Minor Source Operating Permit 043-19812-00050.

Appendix A: Emission Calculations Summary

Company Name: General Mills
Address City IN Zip: 707 Pillsbury Lane, New Albany, Indiana 47150
MSOP Renewal No.: 043-19812-00050
Reviewer: Seema Roy/EVP

Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Natural Gas Combustion	Flare*	Conveying and Handling	Degreasing*	Welding Operation	TOTAL
PM	0.42	0.73	55.38	0.00	0.018	56.55
PM10	1.70	0.73	55.38	0.00	0.018	57.83
SO2	0.13	0.00	0.00	0.00	0.00	0.13
NOx	22.34	0.30	0.00	0.00	0.00	22.64
VOC	1.23	0.39	0.00	0.33	0.00	1.95
CO	18.76	1.62	0.00	0.00	0.00	20.38
total HAPs	0.42	0.00	0.00	0.00	0.00	0.42
worst case single HAP	0.40	0.00	0.00	0.00	0.00	0.40
Total emissions based on rated capacity at 8,760 hours/year.						
PM emissions are assumed to be equal to PM10 emissions for the conveying and handling operations.						
* Flare and degeaser emissions are based on initial MSOP No. 043-10995-00050, issued on November 9, 1999.						
Controlled Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Natural Gas Combustion	Flare	Conveying and Handling	Degreasing	Welding Operation	TOTAL
PM	0.42	0.73	54.18	0.00	0.018	55.35
PM10	1.70	0.73	54.18	0.00	0.018	56.63
SO2	0.13	0.00	0.00	0.00	0.00	0.13
NOx	22.34	0.30	0.00	0.00	0.00	22.64
VOC	1.23	0.39	0.00	0.33	0.00	1.95
CO	18.76	1.62	0.00	0.00	0.00	20.38
total HAPs	0.42	0.00	0.00	0.00	0.00	0.42
worst case single HAP	0.40	0.00	0.00	0.00	0.00	0.40
Total emissions based on rated capacity at 8,760 hours/year.						
PM emissions are assumed to be equal to PM10 emissions for the conveying and handling operations.						
* Flare and degeaser emissions are based on initial MSOP No. 043-10995-00050, issued on November 9, 1999.						

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Boilers and Pest Control Heaters**

**Company Name: General Mills
Address City IN Zip: 707 Pillsbury Lane, New Albany, Indiana 47150
MSOP Renewal No.: 043-19812-00050
Reviewer: Seema Roy/EVP**

Emission Unit ID	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Pollutant					
Boiler 1	10.10	88.5						
Boiler 2	10.10	88.5						
Boiler 3	12.50	109.5						
Boiler 4	1.60	14.0						
Pest Control Heater 1	4.50	39.4						
Pest Control Heater 2	2.73	23.9						
Pest Control Heater 3	2.73	23.9						
Pest Control Heater 4	2.00	17.5						
Pest Control Heater 5	2.00	17.5						
Pest Control Heater 6	2.00	17.5						
Pest Control Heater 7	0.75	6.6						
	16.8	147.168						
Emission Factor in lb/MMCF			PM*	PM10*	SO2	NOx 100.0 **see below	VOC 5.5	CO 84.0
Boiler 1 Potential Emission in tons/yr			0.08	0.34	0.03	4.42	0.24	3.72
Boiler 2 Potential Emission in tons/yr			0.08	0.34	0.03	4.42	0.24	3.72
Boiler 3 Potential Emission in tons/yr			0.10	0.42	0.03	5.48	0.30	4.60
Boiler 4 Potential Emission in tons/yr			0.01	0.05	0.00	0.70	0.04	0.59
Pest Control Heater 1 Potential Emission in tons/yr			0.04	0.15	0.01	1.97	0.11	1.66
Pest Control Heater 2 Potential Emission in tons/yr			0.02	0.09	0.01	1.19	0.07	1.00
Pest Control Heater 3 Potential Emission in tons/yr			0.02	0.09	0.01	1.19	0.07	1.00
Pest Control Heater 4 Potential Emission in tons/yr			0.02	0.07	0.01	0.88	0.05	0.74
Pest Control Heater 5 Potential Emission in tons/yr			0.02	0.07	0.01	0.88	0.05	0.74
Pest Control Heater 6 Potential Emission in tons/yr			0.02	0.07	0.01	0.88	0.05	0.74
Pest Control Heater 7 Potential Emission in tons/yr			0.01	0.02	0.00	0.33	0.02	0.28
Total Emissions in tons/yr			0.42	1.70	0.13	22.34	1.23	18.76

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

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of 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

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

See page 3 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Boilers and Pest Control Heaters
HAPs Emissions

Company Name: General Mills
Address City IN Zip: 707 Pillsbury Lane, New Albany, Indiana 47150
MSOP Renewal No.: 043-19812-00050
Reviewer: Seema Roy/EVP

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.691E-04	2.681E-04	1.675E-02	4.021E-01	7.595E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total (ton/yr)
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.338E-04	2.944E-04	3.747E-04	1.017E-04	5.620E-04	4.218E-01

Methodology is the same as page 2.

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

Appendix A: Process Particulate Emissions

Company Name: General Mills
Address City IN Zip: 707 Pillsbury Lane, New Albany, Indiana 47150
MSOP Renewal No.: 043-19812-00050
Reviewer: Seema Roy/EVP

Uncontrolled Potential Emissions (tons/year)							
A. Dust Collectors							
Stack ID	Baghouse ID No.	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency	Total (lbs/hr)	Total (tons/yr)
8	DC62	0.02000	4.60	173	99.90%	0.14	0.60
20	DC04	0.02000	7.50	347	99.90%	0.45	1.95
21	DC09	0.02000	11.50	347	99.90%	0.68	3.00
37	DC37	0.02000	8.89	90	99.90%	0.14	0.60
48	DC30	0.02000	15.00	347	99.90%	0.89	3.91
55	DC50	0.02000	6.00	198	99.90%	0.20	0.89
61	DC61	0.02000	11.00	70	99.90%	0.13	0.58
66	DC17	0.02000	7.20	347	99.90%	0.43	1.88
67	DC16	0.02000	6.15	488	99.90%	0.51	2.25
68	DC15	0.02000	12.50	90	99.90%	0.19	0.84
69	DC18	0.02000	6.18	453	99.90%	0.48	2.10
71	DC24	0.02000	8.27	254	99.90%	0.36	1.58
72	DC110	0.02000	11.54	52	99.90%	0.10	0.45
98a	DC38	0.02000	8.10	347	99.90%	0.48	2.11
98b	DC48	0.02000	16.67	45	99.90%	0.13	0.56
104	DC12	0.02000	5.20	347	99.90%	0.31	1.35
105	DC13	0.02000	5.20	347	99.90%	0.31	1.35
108	DC36	0.02000	6.88	1,742	99.90%	2.05	9.00
137	DC53	0.02000	4.51	397	99.90%	0.31	1.34
138	DC52	0.02000	4.00	460	99.90%	0.32	1.38
139	DC54	0.02000	4.00	452	99.90%	0.31	1.36
N/A	Dry Mix Vent*	0.00500	Flow rate = 8500 acfm	N/A	N/A	0.36	1.60
N/A	Dry Mix Vent*	0.00500	Flow rate = 8500 acfm	N/A	N/A	0.36	1.60
N/A	Dry Mix Vent*	0.00500	Flow rate = 8500 acfm	N/A	N/A	0.36	1.60
N/A	Dry Mix Vent*	0.00500	Flow rate = 8500 acfm	N/A	N/A	0.36	1.60
150	DC01034	0.02000	Flow rate = 1600 acfm	N/A	99.90%	0.00	1.20
153	DC10005	0.02000	Flow rate = 2000 acfm	N/A	99.90%	0.00	1.50
154	DC10023	0.02000	Flow rate = 2000 acfm	N/A	99.90%	0.00	1.50
160	BL11052	0.02000	Flow rate = 200 acfm	N/A	99.90%	0.00	0.15
162	BL12092	0.02000	Flow rate = 300 acfm	N/A	99.90%	0.00	0.23
163	BL01005	0.02000	Flow rate = 1285 acfm	N/A	99.90%	0.00	0.96
164	Air Material Sep.	0.02000	Flow rate = 850 acfm	N/A	N/A	0.15	0.64
165	DC111	0.02000	40.00	70	99.90%	0.48	2.10
166	DC109	0.02000	Flow rate = 465.7 acfm	N/A	N/A	0.08	0.35
B. Scrubbers							
Stack ID	Scrubber ID No.	Grain Loading per Actual Standard Cubic Foot of Outlet Air	Flow Rate (gpm)	Liquid to Air Ratio (gpm/1,000 acfm)	Control Efficiency	Total (lbs/hr)	Total (tons/yr)
52	PKL Rotoclone	0.00023	1.88	0.94	95.00%	0.08	0.34
60	BRL	0.00023	1.50	1.25	95.00%	0.05	0.20
65	C2L	0.00023	1.00	0.33	95.00%	0.12	0.51
70	C1L	0.00023	1.88	1.50	95.00%	0.05	0.21

Total Emissions Based on Rated Capacity at 8,760 Hours/Year

Total: 55.38

Appendix A: Process Particulate Emissions

Company Name: General Mills
 Address City IN Zip: 707 Pillsbury Lane, New Albany, Indiana 47150
 MSOP Renewal No.: 043-19812-00050
 Reviewer: Seema Roy/EVP

Controlled Potential Emissions (tons/year)									
A. Dust Collectors									
Stack ID	Baghouse ID No.	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency	Total (lbs/hr)	Total (tons/yr)	Raw Material Throughput (lb/hr)	326 IAC 6-3-2 Allowable PM Emissions (lb/hr)
8	DC62	0.02000	4.60	173	99.90%	0.14	0.60	200.00	0.88
20	DC04	0.02000	7.50	347	99.90%	0.45	1.95	60000.00	40.04
21	DC09	0.02000	11.50	347	99.90%	0.68	3.00	60000.00	40.04
37	DC37	0.02000	8.89	90	99.90%	0.14	0.60	55000.00	37.77
48	DC30	0.02000	15.00	347	99.90%	0.89	3.91	60000.00	40.04
55	DC50	0.02000	6.00	198	99.90%	0.20	0.89	180.00	0.82
61	DC61	0.02000	11.00	70	99.90%	0.13	0.58	12800.00	14.22
66	DC17	0.02000	7.20	347	99.90%	0.43	1.88	1200.00	2.91
67	DC16	0.02000	6.15	488	99.90%	0.51	2.25	1200.00	2.91
68	DC15	0.02000	12.50	90	99.90%	0.19	0.84	200.00	0.88
69	DC18	0.02000	6.18	453	99.90%	0.48	2.10	1200.00	2.91
71	DC24	0.02000	8.27	254	99.90%	0.36	1.58	1200.00	2.91
72	DC110	0.02000	11.50	52	99.90%	0.10	0.45	1282.20	3.04
98a	DC38	0.02000	8.10	347	99.90%	0.48	2.11	35000.00	27.90
98b	DC48	0.02000	16.67	45	99.90%	0.13	0.56	35000.00	27.90
104	DC12	0.02000	5.20	347	99.90%	0.31	1.35	35000.00	27.90
105	DC13	0.02000	5.20	347	99.90%	0.31	1.35	35000.00	27.90
108	DC36	0.02000	6.88	1,742	99.90%	2.05	9.00	1200.00	2.91
137	DC53	0.02000	4.51	397	99.90%	0.31	1.34	60000.00	40.04
138	DC52	0.02000	4.00	460	99.90%	0.32	1.38	25000.00	22.27
139	DC54	0.02000	4.00	452	99.90%	0.31	1.36	40000.00	30.51
N/A	Dry Mix Vent*	0.00500	Flow rate = 8500 acfm	N/A	N/A	0.36	1.60	30000.00	25.16
N/A	Dry Mix Vent*	0.00500	Flow rate = 8500 acfm	N/A	N/A	0.36	1.60		
N/A	Dry Mix Vent*	0.00500	Flow rate = 8500 acfm	N/A	N/A	0.36	1.60		
N/A	Dry Mix Vent*	0.00500	Flow rate = 8500 acfm	N/A	N/A	0.36	1.60		
150	DC01034	0.02000	Flow rate = 1600 acfm	N/A	99.90%	0.00	1.20	35000.00	27.90
153	DC10005	0.02000	Flow rate = 2000 acfm	N/A	99.90%	0.00	1.50	20000.00	19.18
154	DC10023	0.02000	Flow rate = 2000 acfm	N/A	99.90%	0.00	1.50	20000.00	19.18
160	BL11052	0.02000	Flow rate = 200 acfm	N/A	99.90%	0.00	0.15	3000.00	5.38
162	BL12092	0.02000	Flow rate = 300 acfm	N/A	99.90%	0.00	0.23	4800.00	7.37
163	BL01005	0.02000	Flow rate = 1285 acfm	N/A	99.90%	0.00	0.96	40000.00	30.51
164	Air Material Sep.	0.02000	Flow rate = 850 acfm	N/A	N/A	0.15	0.64	9000.00	11.23
165	DC111	0.02000	40.00	70	99.90%	0.48	2.10	480.00	1.58
166	DC109	0.02000	Flow rate = 465.7 acfm	N/A	N/A	0.08	0.35	105.00	0.57
B. Scrubbers									
Stack ID	Scrubber ID No.	Grain Loading per Actual Standard Cubic Foot of Outlet Air	Flow Rate (gpm)	Liquid to Air Ratio (gpm/1,000 acfm)	Control Efficiency	Total (lbs/hr)	Total (tons/yr)		326 IAC 6-3-2 Allowable PM Emissions (lb/hr)
52	PKL Rotoclone	0.00023	1.88	0.94	95.00%	0.00	0.02		N/A
60	BRL	0.00023	1.50	1.25	95.00%	0.00	0.01		N/A
65	C2L	0.00023	1.00	0.33	95.00%	0.01	0.03		N/A
70	C1L	0.00023	1.88	1.50	95.00%	0.00	0.01		N/A

Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls

54.18

Note:

The baghouses/dust collectors, which are part of the pneumatic conveyance system, are used to collect and return raw material and ingredients to the process. Therefore, they are considered integral to the process and are included in uncontrolled emissions.

*The 326 IAC 6-3-2 allowable emissions represent the total allowables for all four vents.

The 326 IAC 6-3-2 allowable PM emissions are greater than the controlled emissions for each operation, therefore, all operations are in compliance with this rule.

Uncontrolled Potential Emissions:

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

ESP (tons/yr) = No. Units * Loading (grains/acf) * Face Velocity (ft/sec) * Surface Area (ft²) * 1 lb/7,000 grains * 60 sec/min * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Scrubber (tons/yr) = No. Units * Loading (grains/acf) * Flow Rate (gpm) * 1/Liquid to Air Ratio (gpm/1,000 acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Controlled Potential Emissions:

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

ESP (tons/yr) = No. Units * Loading (grains/acf) * Face Velocity (ft/sec) * Surface Area (ft²) * 1 lb/7,000 grains * 60 sec/min * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Scrubber (tons/yr) = No. Units * Loading (grains/acf) * Flow Rate (gpm) * 1/Liquid to Air Ratio (gpm/1,000 acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Appendix A: Welding and Thermal Cutting

Company Name: General Mills
Address City IN Zip: 707 Pillsbury Lane, New Albany, Indiana 47150
MSOP Renewal No.: 043-19812-00050
Reviewer: Seema Roy/EVP

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Submerged Arc	0	0	0.036								0.000
Metal Inert Gas (MIG)(ER5154)	0	0	0.0241	0.000034		0.00001					0.000
Stick (E7018 electrode)	6	0.03	0.0211				0.004				0.000
Tungsten Inert Gas (TIG)(carbon steel)	0	0	0.0055								0.000
Oxyacetylene(carbon steel)	0	0	0.0055								0.000
EMISSION TOTALS							PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr							0.0042	0.00	0.00	0.00	0.00
Potential Emissions lbs/day							0.100	0.00	0.00	0.00	0.00
Potential Emissions tons/year							0.018	0.00	0.00	0.00	0.00

METHODOLGY

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

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

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

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

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

Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.

326 IAC 6-3-2 Allowable Emission Calculation

The following calculations determine compliance with 326 IAC 6-3-2 for process weight rates up to 30 tons per hour:

$$\text{limit} = 4.1 * (0.0001 ^{0.67}) = 0.00857 \text{ lb/hr for entire welding operation}$$

$$= 0.03752 \text{ ton/yr}$$

Potential PM emissions from the welding operation are 0.004 pounds per hour, therefore, this operation is in compliance with 326 IAC 6-3-2.