



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: July 26, 2005
RE: Holsum of Fort Wayne, Inc / 091-21007-00106
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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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.

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

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

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

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



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Mr. Robert M. Renock
Holsum of Fort Wayne, Inc.
500 North Fulton Avenue
Evansville, Indiana 47710

July 26, 2005

Re: 091-21007-00106
First Significant Permit Modification to
Part 70 Permit No.: T091-17680-00106

Dear Mr. Renock:

Holsum of Fort Wayne, Inc. was issued Part 70 Operating Permit T091-17680-00106 on October 15, 2004 for a bakery, located at 800 Boyd Boulevard, LaPorte, Indiana 46350. A letter requesting changes to this permit was received March 15, 2005. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document. The Permittee requested the following modifications:

- (a) Addition of one (1) natural gas fired baking oven, identified as Bread Oven (BD2), with a maximum production of 12,075 pounds of per hour of bread and buns, with a maximum heat capacity of 7.82 MMBtu per hour, and exhausting at stacks 3 and 4. This unit will be constructed in 2005.
- (b) Revision to the maximum production of buns in the existing baking oven, identified as Bun Oven, from 20,525 to 5,400 pounds per hour of buns.
- (c) Removal of the existing natural gas fired baking oven, identified as Bread Oven (BD1), constructed in 1969 with a combined maximum production of 20,525 pounds of per hour of bread and buns, with a maximum heat capacity of 4.875 MMBtu per hour.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanobar Durrani, ERG, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality



Attachments

ERG/SD

cc: File - LaPorte County
LaPorte County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Letty Zepada
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Holsum of Fort Wayne, Inc.
800 Boyd Boulevard
LaPorte, Indiana 46350**

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

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

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

Operation Permit No.: T091-17680-00106	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: October 15, 2004 Expiration Date: October 15, 2009
Significant Permit Modification No.: 091-21007-00106	Pages Affected: 4, 15, 24, 25, 31
Issued by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: July 26, 2006



TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
SECTION B	GENERAL CONDITIONS	6
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]	
B.3	Enforceability [326 IAC 2-7-7]	
B.4	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)] [326 IAC 1-6-3]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.15	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]	
B.16	Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4]	
B.17	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.18	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.19	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.20	Source Modification Requirement [326 IAC 2-7-10.5]	
B.21	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.24	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS	16
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates [40 CFR 52 Subpart P] [326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Operation of Equipment [326 IAC 2-7-6(6)]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-7-6(1)]	
C.9	Performance Testing [326 IAC 3-6]	

Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS 24

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

D.1.1 Volatile Organic Compounds [326 IAC 2-3] [326 IAC 8-1-6]

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Record Keeping and Reporting Requirement

D.1.3 Record Keeping Requirements

D.1.4 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS 26

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

D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3]

D.2.2 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

SECTION D.3 FACILITY OPERATION CONDITIONS 27

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

D.3.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Certification 28

Emergency Occurrence Report..... 29

Part 70 Quarterly Report 31

Quarterly Deviation and Compliance Monitoring Report 32

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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partials county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. LaPorte County has been designated as nonattainment for the 8-hour ozone standard. The following has been added to A.1 General Information:

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]
The Permittee owns and operates a stationary bakery plant.

Responsible Official:	Vice President/General Manager
Source Address:	800 Boyd Boulevard, LaPorte, Indiana 46350
Mailing Address:	500 N. Fulton Ave., Evansville, Indiana 47710
General Source Phone Number:	(219) 362-4561
SIC Code:	2051
County Location:	LaPorte
Source Location Status:	NonAttainment for ozone under the 8-hour standard Attainment for ozone under the 1-hour standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under Emission Offset Minor Source, under PSD Rules

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

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

- (a) One (1) natural gas fired baking oven, identified as Bun Oven, constructed in 1969, with a maximum production of 5,400 pounds per hour of bread and buns, with a maximum heat capacity of 3.055 MMBtu per hour, exhausting at stacks 1 and 2.
- (b) One (1) natural gas fired baking oven, identified as Bread Oven (BD2), with a maximum production of 12,075 pounds per hour of bread and buns, with a maximum heat capacity of 7.82 MMBtu per hour, and exhausting at stacks 3 and 4.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) One (1) natural gas fired boiler, identified as B1, with a maximum heat capacity of 2.9 MMBtu per hour [326 IAC 6-2-3].

- (2) One (1) natural gas fired boiler, identified as B2, with a maximum heat capacity of 5.4 MMBtu per hour [326 IAC 6-2-4].
- (b) Six (6) flour silos, each having a capacity of 150,000 pounds, with a baghouse for equalizing pressure on top of the silo (and not for control), exhausting inside the building [326 IAC 6-3-2].
- (c) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Heat exchanger cleaning and repair.
- (f) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (g) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

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

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

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

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

- (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 as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation 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 contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for the unit within a reasonable time.

B.11 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

And

Telephone Number: 1-888-209-8892 or 219-881-6712 (ask for Northwest Regional Office)
Facsimile Number: (219) 757-0267

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

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

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

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

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

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

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

under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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

(b) All previous registrations and permits are superseded by this permit.

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue
Indianapolis, Indiana 46204

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

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

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

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

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

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

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

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1][IC 13-17-3-2]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]
- (a) Pursuant to [40 CFR 52 Subpart P], particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
 - (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.
- C.2 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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 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.6 Operation of Equipment [326 IAC 2-7-6(6)]
- Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]
- The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC

1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

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

The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by 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.10 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 [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

- C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

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

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

within ninety (90) days after the date of issuance of this permit.

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. 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 or Operation, Maintenance and Monitoring (OMM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (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 Operation, Maintenance and Monitoring (OMM) Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) 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) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
 - (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
 - (f) 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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
 - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
 - (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

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

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (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 within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, 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.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Baking Ovens

- (a) One (1) natural gas fired baking oven, identified as Bun Oven, constructed in 1969, with a maximum production of 5,400 pounds per hour of bread and buns, with a maximum heat capacity of 3.055 MMBtu per hour, exhausting at stacks 1 and 2.
- (b) One (1) natural gas fired baking oven, identified as Bread Oven (BD2), with a maximum production of 12,075 pounds per hour of bread and buns, with a maximum heat capacity of 7.82 MMBtu per hour, and exhausting at stacks 3 and 4.

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

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

D.1.1 Volatile Organic Compounds [326 IAC 2-3] [326 IAC 8-1-6]

- (a) Pursuant to 326 IAC 8-1-6, and to render the requirements of 326 IAC 2-3 not applicable, the potential to emit of VOC from the new bread oven (BD2) shall be limited to 60 tons per twelve (12) consecutive month period, with compliance determined at the end of each month by using the following equations:

$$\text{VOC Emissions (tons/month)} = \sum_{n=1}^{12} (P_i \times \text{Emission Rate}_i)$$

where:

- i = Type of bread;
- P_i = Bread production for type i bread; and
- n = Number of months.

$$\text{Emission Rate (lb VOC/ton of baked bread)} = 0.95 Y_i + 0.195 t_i - 0.51S - 0.86t_s + 1.90$$

where:

- Y_i = Initial baker's percent of yeast;
- t_i = Total yeast action time in hours;
- S = Final (spike) baker's percent of yeast; and
- t_s = Spiking time in hours.

- (b) The existing Bread Oven (BD1) shall not operate while the new Bread Oven (BD2) is in operation. The existing Bread Oven (BD1) shall be removed and replaced by the new Bread Oven (BD2).

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the new bread oven.

Record Keeping and Reporting Requirement

D.1.3 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the type of bread production and emission rate (in pounds of VOC per ton of baked bread) calculated using the equation in AP-42, Chapter 9.9.6 - Bread Baking (February 1997).

- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Combustion Sources

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
- (1) One (1) natural gas fired boiler, identified as B1, with a maximum heat capacity of 2.9 MMBtu per hour [326 IAC 6-2-3].
 - (2) One (1) natural gas fired boiler, identified as B2, with a maximum heat capacity of 5.4 MMBtu per hour [326 IAC 6-2-4].

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

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

D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (e) (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the 2.9 MMBtu per hour natural gas fired boiler (B1) shall be limited to six tenths (0.6) pounds per million Btu heat input.

D.2.2 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (a) (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the 5.4 MMBtu per hour natural gas fired boiler (B2) shall be limited to six tenths (0.6) pounds per million Btu heat input.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Flour Silos

- (b) Six (6) flour silos, each having a capacity of 150,000 pounds, with a baghouse for equalizing pressure on top of the silo (and not for control), exhausting inside the building [326 IAC 6-3-2].

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

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

- D.3.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the six flour silos shall not exceed 20.2 pounds per hour when operating at a process weight rate of 21,605 pounds per hour.

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

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

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Holsum of Fort Wayne, Inc.
Source Address: 800 Boyd Boulevard, LaPorte, Indiana 46350
Mailing Address: 500 N. Fulton Ave., Evansville, Indiana 47710
Part 70 Permit No.: T091-17680-00106

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Holsum of Fort Wayne, Inc.
Source Address: 800 Boyd Boulevard, LaPorte, Indiana 46350
Mailing Address: 500 N. Fulton Ave., Evansville, Indiana 47710
Part 70 Permit No.: T091-17680-00106

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">· The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and· The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.
--

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

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

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

Page 2 of 2

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

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Holsum of Fort Wayne, Inc.
Source Address: 800 Boyd Boulevard, LaPorte, Indiana 46350
Mailing Address: 500 N. Fulton Ave., Evansville, Indiana 47710
Part 70 Permit No.: T091-17680-00106
Facility: New Bread Oven (BD2)
Parameter: VOC
Limit: Less than 60 tons per 12 consecutive month period with compliance determined at the end of each month

YEAR:

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

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Holsum of Fort Wayne, Inc.
Source Address: 800 Boyd Boulevard, LaPorte, Indiana 46350
Mailing Address: 500 N. Fulton Ave., Evansville, Indiana 47710
Part 70 Permit No.: T091-17680-00106

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Significant Source Modification and Part 70 Significant Permit Modification

Source Background and Description

Source Name:	Holsum of Fort Wayne, Inc.
Source Location:	500 North Fulton Avenue, Evansville Indiana 47710
County:	LaPorte
SIC Code:	2051
Operation Permit No.:	T091-17680-00106
Operation Permit Issuance Date:	October 15, 2004
Significant Source Modification No.:	091-20967-00106
Significant Permit Modification No.:	091-21007-00106
Permit Reviewer:	ERG/SD

On June 1, 2005, the Office of Air Quality (OAQ) had a notice published in LaPorte Herald – Argus, Evansville, Indiana, stating that Holsum of Fort Wayne, Inc. had applied for a Significant Source Modification and Significant Permit Modification to their existing Part 70 Permit to construct and operate a new natural gas-fired Bread Oven (BD2), to remove the existing natural gas-fired Bread Oven (BD1), and to revise the production rate of the existing Bun Oven. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On June 22, 2005, Holsum of Fort Wayne, Inc. submitted comments on the proposed Significant Source Modification and Significant Permit Modification to the Part 70 Permit. The summary of the comments is as follows. (Deleted language appears as strikeouts, new language is bolded). The Table of Contents has been modified to reflect these changes.

Comment 1:

The Permittee requested that the word “combined” be removed from the facility description identified in Section A.2, item (a) and Section D.1, item (a). The maximum production rate for the Bun Oven changed with this permit modification. Before the modification, the combined maximum production for both the ovens (BD1 and Bun Oven) was 20,525 pounds per hour. With the construction of the new Bread Oven (BD2), the maximum production rate of the Bun Oven will be equal to 5,400 pounds per hour and the maximum production rate of the new Bread Oven (BD2) will be equal to 12,075 pounds per hour.

Response to Comment 1:

IDEM, OAQ has revised Section A.2 and D.1, item (a) as follows:

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

- (a) One (1) natural gas fired baking oven, identified as Bun Oven, constructed in 1969, with a ~~combined~~ maximum production of 5,400 pounds per hour of bread and buns, with a maximum heat capacity of 3.055 MMBtu per hour, exhausting at stacks 1 and 2.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Baking Ovens

- (a) One (1) natural gas fired baking oven, identified as Bun Oven, constructed in 1969, with a ~~combined~~ maximum production of 5,400 pounds per hour of bread and buns, with a maximum heat capacity of 3.055 MMBtu per hour, exhausting at stacks 1 and 2.

...

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

Comment 2:

The Permittee stated that the provisions of 326 IAC 2-3 (Emission Offset) are not applicable to the modification because the overall emission increases for VOC and NOx (even prior to the permit limitation of 60 tons per year) are below the Emission Offset significant levels. Therefore, Section D.1.1(a) should be amended to omit the statement, "...and to render the requirements of 326 IAC 2-3 not applicable..."

Response to Comment 2:

As described in the TSD, the source is located in LaPorte County which was designated as nonattainment for ozone under the 8-hour standard, effective June 15, 2004. The existing source is classified as a major source under the provisions of 326 IAC 2-3 (Emission Offset) because it has the potential to emit greater than 100 tons per year of VOC. On March 15, 2005 the Permittee submitted an application and requested the removal of the bread oven (BD1) and construction of a bread oven (BD2). The potential to emit of VOC from the bread oven (BD2) is equal to 89.5 tons per year. However, the Permittee requested to operate the bread oven (BD2) with VOC emissions limited to 60 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. According to the Permittee, the average actual emissions for 2003 and 2004 from the bread oven (BD1) were equal to 39.4 tons per year. The net emissions increase from the modification without the limit (89.5 minus past actuals (39.4)) is equal to 50.1 tons per year, which is greater than 40 tons per year, the significant threshold level for VOC under Emission Offset (326 IAC 2-3); while the net emissions increase from the modification with the limit (Limited PTE (60) minus Past Actuals (39.4)) is equal to 20.8 tons per year, which is less than 40 tons per year, the significant thresholds level for VOC under Emission Offset (the source is located in a moderate nonattainment area). Therefore, compliance with the above limits ensures minor modification status under 326 IAC 2-3 (Emission Offset). No changes were made to Condition D.1.1(a).

Comment 3:

The Permittee requested the following changes to the Technical Support Document (TSD)

- (a) Page 1 of 11, item 1 under the History section which states "Revision to the maximum production of buns in the existing baking oven, identified as Bun Oven, from 20,525 to

5,400 pounds per hour of bread and buns.” should be clarified such that 20,525 pounds per hour is specified as the combined production rate of both existing ovens, while the production rate of Bread Oven (BD2) and Bun Oven is specified as 12,075 and 5,400 pounds per hour, respectively.

- (b) Page 7 of 11, item A.2 (a) under the Proposed Changes section should be revised to remove the word “combined.”
- (c) Page 4 of 11, item (c) under the Source Status section should be revised from “These emissions are based upon the Technical Support Document (TSD) for Part Permit Renewal...” to “These emissions are based upon the Technical Support Document (TSD) for Part 70 Permit Renewal...”

Response to Comment 3:

Although IDEM, OAQ agrees with the above requested revisions, no changes have been made to the TSD because IDEM, OAQ prefers that the TSD reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

**Appendix A: Emissions Calculations
VOC Emissions From
New Bread Oven B2**

Company Name: Holsum of Fort Wayne, Inc.
Address: 800 Boyd Boulevard, LaPorte, Indiana 46350
SSM to TV: 091-20967
SPM to TV: 091-21007
Plt ID: 091-00106
Reviewer: ERG/SD
Date: April 29, 2005

Maximum Bread Production (lb buns per hour) =	12,075
* Emission Factor (lb VOC per ton buns) =	3.38
PTE of VOC (tons per year) =	89.5

METHODOLOGY

As per AP-42, Chapter 9.9.6 - Bread Baking (02/97), the VOC emission factor from the bread baking process can be estimated with the following equation:

$$* \text{E.F. (lb VOC/ton of baked bread)} = 0.95 Y_i + 0.195 t_i - 0.51S - 0.86t_s + 1.90 = \mathbf{3.38}$$

where:

Initial baker's percent of yeast (Y_i) = 3.59
 Total yeast action time in hours (t_i) = 2.5
 Final (spike) baker's percent of yeast (S) = 2.54
 Spiking time in hours (t_s) = 1.3

$$\text{PTE of VOC (ton/year)} = \text{Max. Bread Production (lbs/hour)} * \text{VOC EF (lbVOC/ton buns)} * 1 \text{ ton}/2000 \text{ lbs} * 8760 \text{ hours/year} * 1 \text{ ton}/2000 \text{ lbs.}$$

**Appendix A: Emission Calculations
Natural Gas Combustion Only
One (1) New Bread Oven**

Company Name: Holsum of Fort Wayne, Inc.
Address: 800 Boyd Boulevard, LaPorte, Indiana 46350
SSM to TV: 091-20967
SPM to TV: 091-21007
Plt ID: 091-00106
Reviewer: ERG/SD
Date: April 29, 2005

Heat Input Capacity
(MMBtu/hour)

Potential Throughput
(MMCF/year)

7.82 (1unit total)

68.5

	Pollutant					
	* PM	* PM10	SO ₂	** NO _x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84
Potential To Emit (tons/year)	0.26	0.26	0.02	3.43	0.19	2.88

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

**Emission factor for NOx (Uncontrolled) = 100 lb/MMCF.

METHODOLOGY

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas Combustion Only
One (1) New Bread Oven

Company Name: Holsum of Fort Wayne, Inc.
Address: 800 Boyd Boulevard, LaPorte, Indiana 46350
SSM to TV: 091-20967
Plt ID: 091-00106
Reviewer: ERG/SD
Date: April 29, 2005

HAPs - Organics

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	7.19E-05	4.11E-05	2.57E-03	6.17E-02	1.16E-04

HAPs - Metals

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	1.71E-05	3.77E-05	4.80E-05	1.30E-05	7.19E-05

TOTAL HAPs (tons/year) = 6.46E-02

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors as provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Net Emissions Change**

Company Name: Holsum of Fort Wayne, Inc.
Address: 800 Boyd Boulevard, LaPorte, Indiana 46350
SSM to TV: 091-20967
SPM to TV: 091-21007
Pit ID: 091-00106
Reviewer: ERG/SD
Date: April 29, 2005

Potential to Emit from the Bread Oven (tons per year)

	PM	PM10	SO₂	NOx	VOC	CO
* Limited PTE (New Bread Oven Production)	0.00	0.00	0.00	0.00	60.0	0.00
** Past Actuals (Existing Bread Oven Production)	0.00	0.00	0.00	0.00	39.4	0.00
Net Emission Change from Modification	0.00	0.00	0.00	0.00	20.6	0.00
Future PTE (New Bread Oven - NG Combustion)	0.26	0.26	0.02	3.43	0.19	2.88
TOTALS	0.26	0.26	0.02	3.43	20.8	2.88

* The Permittee has requested a BACT limit pursuant to 326 IAC 8-1-6 for the new bread oven equal to 60 tons per year.

** The past average actuals were provided by the Permittee for years 2003 and 2004.

Appendix B

Best Available Control Technology (BACT) Determinations

Source Background and Description

Source Name:	Holsum of Fort Wayne, Inc.
Source Location:	800 Boyd Boulevard, LaPorte, Indiana 46350
County:	LaPorte
SIC Code:	2051
Part 70 No.:	091-17680-00106
Issued:	October 15, 2004
SSM No.:	091-20967-00106
SPM No.:	091-21007-00106
Permit Reviewer:	ERG/SD

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) has performed the following Best Available Control Technology (BACT) review for the modification to the existing bakery, owned and operated by Holsum of Fort Wayne, Inc. located at 800 Boyd Boulevard, LaPorte, Indiana 46350. The modification consists of adding one (1) new bread oven (BD2) and removing the existing one (1) bread oven (BD1).

Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), BACT is required for all facilities constructed after January 1, 1980 that have potential VOC emissions of equal to or greater than twenty-five (25) tons per year and are not regulated by other rules in 326 IAC 8. Based on the calculations (see Appendix A) and the analysis of applicable state regulations (see State Rule Applicability section of TSD), the modification at this source is subject to the requirements of 326 IAC 8-1-6.

IDEM, OAQ conducts BACT analyses in accordance with the *“Top-Down” Best Available Control Technology* process, which outlines the steps for conducting a top-down BACT analysis. Those steps are listed below:

- (a) Identify all potentially available control options;
- (b) Eliminate technically infeasible control options;
- (c) Rank remaining control technologies by control effectiveness;
- (d) Evaluate the most effective controls and document the results as necessary; and
- (e) Select BACT.

In accordance with EPA guidance, the BACT analysis should take into account the energy, environmental, and economic impacts. Emission reductions may be achieved through the application of available control techniques, changes in process design, and/or operational limitations. This BACT determination is based on the following information:

- (a) The BACT analysis information submitted by Holsum of Fort Wayne, Inc. on March 15, 2005;
- (b) Information from vendors/suppliers;
- (c) The EPA RACT/BACT/LAER (RBLCL) Clearinghouse; and
- (d) State and local air quality permits.

VOC BACT

The VOC emissions from the bread oven line are mainly from the yeast fermentation process. Holsum of Fort Wayne, Inc. has proposed to install and operate one (1) new bread oven line at their existing bakery. The potential to emit of VOC from the new bread oven line is greater than twenty-five (25) tons per year. The proposed bread oven line (BD2) will replace the existing bread oven line (BD1). Since this process is not regulated by any other rule in 326 IAC 8, the Permittee is required to control VOC emissions from the new bread oven line pursuant to the provisions of 326 IAC 8-1-6 (BACT).

Step 1 – Regulatory Database Review and Identify Control Options

The following databases and control technologies were reviewed to identify and evaluate the various BACT requirements currently in place to control VOC emissions from the bakery operations:

- (a) IDEM, OAQ searched EPA's RACT/BACT/LAER Clearinghouse (RBLC) for SIC code 2051. The search identified three (3) bakeries; Freud Baking Company of Glendale, California (1999), Maple Leaf Bakery of Oxnard, California (1999) and Holsum Bakery of Arizona (1996); while a search for Indiana resulted in two (2) bakeries; Kroger Company (2002), and Interstate Brands (1997). A review of the permits is listed below.

<u>Company</u>	<u>PBLD ID</u>	<u>Date Issued and State</u>	<u>Type of Operation</u>	<u>BACT Requirements</u>	<u>Note</u>
Maple Leaf Bakery	CA-0854	10/06/98 (CA)	Baking Oven	Catalytic Oxidizer	Located in an Ozone Non-attainment Area
Freund Baking Company	CA-0859	07/16/97 (CA)	Baking Oven	Catalytic Oxidizer	Located in an Ozone Non-attainment Area
Holsum Bakery	AZ-0029	03/01/96 (AZ)	Baking Oven	Quencher/Scrubber 49.9 tons/yr of VOC	Located in an Ozone Non-attainment Area
Interstate Brands	Indiana's Permit: F097-7413-00171	12/12/97 (IN)	Baking Oven	91.4 tons/yr of VOC from the entire source	Located in an Ozone Attainment Area
Kroger Co. – Indianapolis Bakery	Indiana's Permit: SPR097-16909-00161	May 1, 2003	Baking Oven	49 tons/yr of VOC from the bread oven line (no controls)	Located in an Ozone Non-attainment Area

- (b) IDEM, OAQ and the Permittee identified and evaluated the following available technologies to control VOC emissions from bakery operations:

- (1) Regenerative Thermal Oxidizer;
- (2) Catalytic Oxidation;
- (3) Carbon Adsorption;
- (4) Scrubber;
- (5) Biofiltration; and
- (6) Condensation.

Step 2 – Eliminate Technically Infeasible Control Options

Based on the results from the RBLC database search, vendor review, and an evaluation of the control technologies, IDEM, OAQ has determined that the use of carbon adsorption, scrubber, condensation, and biofiltration are not technically feasible options for this source for the following reasons:

Step 5 – Select BACT

IDEM, OAQ has determined that the BACT for the new bread oven line (BD2) at Holsum is the VOC emission limit of 60 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, with no add-on controls. This determination is based on the following reasons:

- (a) Based on the BACT analysis in FESOP No. 097-7413-00170, issued on December 12, 1997 for Interstate Brands Corporation, the BACT for the bread oven #3 was determined to be a VOC emission limit equal to 91.4 tons per year from the entire source with no add-on control. The cost effectiveness for a RTO was estimated at \$4,849 per ton of VOC removed.
- (b) Based on the BACT analysis in SPR No. 097-16909-00161 issued May 1, 2003 to a FESOP (F097-74050-00161, issued June 27, 2002) for Kroger Company – Indianapolis Bakery, the BACT for the bread oven line BD1 was determined to be a VOC emission limit equal to 49 tons per thirteen (13) consecutive month twenty-eight (28) day period from the bread oven BD1 with no add-on control. The cost effectiveness for a RTO was estimated at \$3,500 per ton of VOC removed, while for a catalytic oxidizer it was estimated at \$3,700 per ton of VOC removed.
- (c) The average actual VOC emissions from the source are equal to 39.4 tons per year for 2004 and 2003. The proposed bread oven (BD2) will replace the existing bread oven (BD1), which was constructed in 1969. The production rate after this replacement will decrease from 20,525 pounds per hour of bread and buns to 12,075 pounds per hour of bread and buns
- (d) Cost-effectiveness data were not available for the bakeries with add-on controls listed in RBLC database because the BACT for these bakeries were determined by the state's specific VOC rules. For example, 95% control is required for sources located in South Coast of California that have the potential to emit VOC greater than 50 lbs/day (= 9.1 tons per year).

Specifically, BACT for this source is an emission limit such that VOC emissions from bread oven (BD2) shall not exceed 60.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The monthly VOC emission from the baking oven shall be determined by the following:

$$\text{VOC Emissions (tons/month)} = \frac{3}{n} \sum_{i=1}^{12} (P_i \times \text{Emission Rate}_i)$$

where:

- i = Type of bread;
- P_i = Bread production for type i bread; and
- n = Number of months.

$$\text{Emission Rate (lb VOC/ton of baked bread)} = 0.95 Y_i + 0.195 t_i - 0.51S - 0.86t_s + 1.90$$

where:

- Y_i = Initial baker's percent of yeast;
- t_i = Total yeast action time in hours;
- S = Final (spike) baker's percent of yeast; and
- t_s = Spiking time in hours.

Note: The emission rate equation is from AP-42, Chapter 9.9.6 (Bread Baking).

**Appendix C: Cost Analysis for Control Devices
Regenerative Thermal Oxidizer (RTO)**

Company Name: Holsum of Fort Wayne, Inc.
Address: 800 Boyd Boulevard, LaPorte, Indiana 46350
SSM to TV: 091-20967
Plt ID: 091-00106
Reviewer: ERG/SD
Date: April 29th, 2005

Regenerative Thermal Oxidizer (RTO)

Design Air Flow Rate (scfm): 8,000 (provided by source)

I. Capital Cost

(formula)

1. Purchased Equipment:

Basic Equipment & Auxiliaries (A)		\$250,500	(provided by source)
Instruments & controls	0.10 A	\$0	
Taxes	0.05 A	\$12,525	(Indiana Tax Code)
Freight	0.05 A	\$5,300	(As per vendor proposal)
Total Purchase Cost (B)		\$268,325	

2. Direct Installation Costs:

Foundations & Supports	0.08 B	\$21,466	
Support Installation	0.08 B	\$21,466	
Erection & Handling	0.14 B	\$37,566	
Electrical	0.04 B	\$30,733	(plus \$20,000 for 3-phase NA 460 volt, 100 amp service drop)
Enclosure			
Piping	0.02 B	\$5,367	
Insulation	0.01 B	\$2,683	
Painting	0.01 B	\$2,683	
Site Preparation (As Required)		\$0	
Facilities and buildings (As required)		\$0	
Total Direct Installation Cost (C)		\$121,964	

Total Direct Capital Cost (TDC) (B+C) \$390,289

3. Indirect Costs:

Engineering	0.10 B	\$26,833	
Loss of Production Cost		\$0	
Construction & Field Expenses	0.05 B	\$13,416	
Start Up	0.02 B	\$5,367	
Performance Tests		\$0	
Contingencies	0.03 B	\$8,050	
Total Indirect Cost (D)		\$53,665	

Total Install Capital Cost (B+C+D) \$443,954

Capital Recovery Factor (7%, 10 year) 0.1424

Capital Recovery Cost (E) \$63,210

**Appendix C: Cost Analysis for Control Devices
Regenerative Thermal Oxidizer (RTO)**

Company Name: Holsum of Fort Wayne, Inc.
Address: 800 Boyd Boulevard, LaPorte, Indiana 46350
SSM to TV: 091-20967
SPM to TV: 091-21007
Pit ID: 091-00106
Reviewer: ERG/SD
Date: April 29th, 2005

II. ANNUALIZED COSTS

1. Direct Operating Costs:

Operating Labor (F)		\$13,563
a. Number of Employees		1.00
b. Cost/Employee/Hour ****		\$24.8 (provided by source)
c. Operating Hours/Year		548
Supervisory Labor (F1)	0.15 F	\$2,034
Maintenance Labor (F2)		\$13,590
a. Number of Employees		1.00
b. Cost/Employee/Hour ****		\$24.8 (provided by source)
c. Operating Hours/Year		548
Maintenance Material (F3)	1 F2	\$13,590
Utilities		
a. Natural Gas		\$5,504
MMBTU/HR Input		0.088 (provided by source)
Operating Hours/Year		8,760
Cost/MMBTU ***		\$7.14 (rate in Indiana)
b. Electricity		\$13,828
KW Requirements/Hr		28.7
KWH/YR		8,760
Cost/KWH ***		\$0.055 (national ave.)
Water		\$0
Air		\$0
Replacement Parts		\$0
Total Direct Operating Cost (G)		\$62,110

2. Indirect Operating Costs:

Overhead	0.6 (F+F1+F2+F3)	\$25,667
Insurance, and Administrative Costs	0.03 (B+C+D)	\$13,319
Total Indirect Operating Cost (H)		\$38,986

3. Heat Recovery Credits (I):

		\$2,379
MMBTU/HR Input		0.088 (provided by source)
Operating Hours/Year		8,760
Unit Heat Efficiency		95%
Heat Exchange Efficiency		65%
Percent Heat Recovery		70%
Cost/MMBTU ***		\$7.14 (rate in Indiana)

Total Annual Operating Cost (G+H-I) \$98,716

Total Annualized Cost	(E+G+H-I)	\$161,927
Uncontrolled PTE (tons/yr)	60.0 (as calculated in Appendix A)	
Overall Control Efficiency		98.0%
Pollution Removed (tons/yr)		58.8
Cost Effectiveness (\$ /ton VOC removed)		\$2,754