



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: October 2, 2008

RE: Holsum of Fort Wayne, Inc. / 003-24986-00259

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Holsum of Fort Wayne, Inc.
136 Murray Street
Fort Wayne, Indiana 46803**

(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.

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M003-24986-00259	
Issued by: Original signed by	Issuance Date: October 2, 2008
Alfred C. Dumauual, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date: October 2, 2018

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary bread bakery.

Source Address:	136 Murray Street, Fort Wayne, Indiana 46803
Mailing Address:	P.O. Box 11468, Fort Wayne, IN 46858
General Source Phone Number:	(812) 425-4642
SIC Code:	2051
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) natural gas-fired baking oven, with a maximum heat input capacity of 3.742 million British thermal units (MMBtu) per hour and maximum baking rate of 7,500 pounds of bread per hour, constructed in 1964, and exhausting to stacks #1, #2, and #3.
- (b) One (1) natural gas-fired boiler, with a maximum heat input capacity of 4.2 million British thermal units (MMBtu) per hour, constructed in 1959, and exhausting to stack #4.
- (c) One (1) natural gas-fired boiler, with a maximum heat input capacity of 5.2 million British thermal units (MMBtu) per hour, constructed in 2000, and exhausting to stack #5.
- (d) Three (3) flour storage silos, each with a maximum capacity of 360,000 pounds and a maximum throughput rate of 7.5 tons of flour per hour, constructed in 1963, equipped with a pneumatic conveyance system, using filter bags for control, and venting into the building.
- (e) Six (6) natural gas-fired space heaters, including the following:
 - (1) One (1) space heater, with a maximum heat input capacity of 0.22 MMBtu/hr.
 - (2) Four (4) space heaters, each with a maximum heat input capacity of 0.15 MMBtu/hr.
 - (3) One (1) space heater, with a maximum heat input capacity of 0.09 MMBtu/hr.
- (f) Three (3) natural gas-fired tube heaters, including the following:
 - (1) One (1) tube heater, with a maximum heat input capacity of 0.25 MMBtu/hr.

- (2) Two (2) tube heaters, each with a maximum heat input capacity of 0.12 MMBtu/hr.
- (g) Three (3) natural gas-fired furnaces, including the following:
 - (1) One (1) residential type furnace, with a maximum heat input capacity of 0.113 MMBtu/hr.
 - (2) One (1) residential type furnace, with a maximum heat input capacity of 0.09 MMBtu/hr.
 - (3) One (1) furnace, located in the old office building, with a maximum heat input capacity of 0.1 MMBtu/hr.
- (h) One (1) closed top cold degreaser, constructed before 1980, and located in the vehicle maintenance shop.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M003-24986-00259, is issued for a fixed term of ten (10) 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) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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.5 Severability

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

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

B.7 Duty to Provide Information

- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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

- (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 an "authorized individual" 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M003-24986-00259 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) 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) 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 2-6.1 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.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.15 Source Modification Requirement

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

B.16 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under 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, at reasonable times, 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, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.19 Credible Evidence [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 2-6.1-5(a)(1)]

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

C.4 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.5 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.6 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.7 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
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.8 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.9 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 2-6.1-5(a)(2)]

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

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

monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.

- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected 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 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) natural gas-fired baking oven, with a maximum heat input capacity of 3.742 million British thermal units (MMBtu) per hour and maximum baking rate of 7,500 pounds of bread per hour, constructed in 1964, and exhausting to stacks #1, #2, and #3.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Preventative Maintenance Plan [326 IAC 1-6-3]

A Preventative Maintenance Plan, in accordance with Section C - Preventative Maintenance Plan, of this permit, is required for this facility.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) natural gas-fired boiler, with a maximum heat input capacity of 4.2 million British thermal units (MMBtu) per hour, constructed in 1959, and exhausting to stack #4.
- (c) One (1) natural gas-fired boiler, with a maximum heat input capacity of 5.2 million British thermal units (MMBtu) per hour, constructed in 2000, and exhausting to stack #5.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6-2-3(d), particulate emissions from the 4.2 MMBtu/hr boiler, which was existing and in operation before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.

D.2.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, particulate emissions from the 5.2 MMBtu/hr boiler, which was constructed after September 12, 1983, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input.

D.2.3 Preventative Maintenance Plan [326 IAC 1-6-3]

A Preventative Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan, of this permit, is required for these facilities.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) Three (3) flour storage silos, each with a maximum capacity of 360,000 pounds and a maximum throughput rate of 7.5 tons of flour per hour, constructed in 1963, equipped with a pneumatic conveyance system, using filter bags for control, and venting into the building.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable PM emission rate from each storage silo shall not exceed 15.8 pounds per hour when operating at a process weight rate of 15,000 pounds per hour.

The pound per hour limitation was calculated using the following equation:

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

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

D.3.2 Preventative Maintenance Plan [326 IAC 1-6-3]

A Preventative Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan, of this permit, is required for these facilities.

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

D.3.3 Particulate Control

Pursuant to operating permit no. 003-6247-00259, issued on August 4, 1997 and in order to comply with Condition D.3.1, the dry filters used to control PM emissions from the silos shall be in operation at all times when these storage silos are in operation.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Holsum of Fort Wayne, Inc.
Address:	136 Murray Street
City:	Fort Wayne, Indiana 46803
Phone #:	(812) 425-4642
MSOP #:	M003-24986-00259

I hereby certify that Holsum of Fort Wayne, Inc. is :

still in operation.

no longer in operation.

I hereby certify that Holsum of Fort Wayne, Inc. is :

in compliance with the requirements of MSOP M003-24986-00259.

not in compliance with the requirements of MSOP M003-24986-00259.

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

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

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-6865

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Holsum of Fort Wayne, Inc.
Source Location:	136 Murray Street, Fort Wayne, Indiana 46803
County:	Allen
SIC Code:	2051
Permit Renewal No.:	M003-24986-00259
Permit Reviewer:	Summer Keown

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Holsum of Fort Wayne, Inc. relating to the operation of a bread bakery.

History

On July 3, 2008, Holsum of Fort Wayne, Inc. submitted an application to the OAQ requesting to renew its operating permit. Holsum of Fort Wayne, Inc. was issued MSOP No. M-003-15594-00259 on September 23, 2002.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) natural gas-fired baking oven, with a maximum heat input capacity of 3.742 million British thermal units (MMBtu) per hour and maximum baking rate of 7,500 pounds of bread per hour, constructed in 1964, and exhausting to stacks #1, #2, and #3.
- (b) One (1) natural gas-fired boiler, with a maximum heat input capacity of 4.2 million British thermal units (MMBtu) per hour, constructed in 1959, and exhausting to stack #4.
- (c) One (1) natural gas-fired boiler, with a maximum heat input capacity of 5.2 million British thermal units (MMBtu) per hour, constructed in 2000, and exhausting to stack #5.
- (d) Three (3) flour storage silos, each with a maximum capacity of 360,000 pounds and a maximum throughput rate of 7.5 tons of flour per hour, constructed in 1963, equipped with a pneumatic conveyance system, using filter bags for control, and venting into the building.
- (e) Six (6) natural gas-fired space heaters, including the following:
 - (1) One (1) space heater, with a maximum heat input capacity of 0.22 MMBtu/hr.
 - (2) Four (4) space heaters, each with a maximum heat input capacity of 0.15 MMBtu/hr.
 - (3) One (1) space heater, with a maximum heat input capacity of 0.09 MMBtu/hr.
- (f) Three (3) natural gas-fired tube heaters, including the following:
 - (1) One (1) tube heater, with a maximum heat input capacity of 0.25 MMBtu/hr.

- (2) Two (2) tube heaters, each with a maximum heat input capacity of 0.12 MMBtu/hr.
- (g) Three (3) natural gas-fired furnaces, including the following:
 - (1) One (1) residential type furnace, with a maximum heat input capacity of 0.113 MMBtu/hr.
 - (2) One (1) residential type furnace, with a maximum heat input capacity of 0.09 MMBtu/hr.
 - (3) One (1) furnace, located in the old office building, with a maximum heat input capacity of 0.1 MMBtu/hr.
- (h) One (1) closed top cold degreaser, constructed before 1980, and located in the vehicle maintenance shop.

Existing Approvals

The source was issued MSOP No. 003-15594-00259 on September 23, 2002.

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

Enforcement Issue

IDEM is aware that the permit renewal application was not submitted in a timely manner. IDEM is reviewing this matter and will take appropriate action.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Allen County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective February 12, 2007, for the Fort Wayne area, including Allen County, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) Ozone Standards
 - (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
 - (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
 - (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM2.5**
Allen County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**
Allen County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (c) **Fugitive Emissions**
Fugitive emissions are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this MSOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit (tons/year)							
	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NO _x	HAPs
Bread Baking	--	--	--	--	66.7	--	--	2.00
Boilers	0.07	0.31	0.31	0.02	023	3.46	4.12	0.18
Heaters	0.01	0.06	0.06	0.00	0.04	0.63	0.75	0.03
Baking Oven Combustion	0.03	0.12	0.12	0.00	0.01	0.16	0.19	0.07
Flour Storage Silos	0.10	0.03	0.03	--	--	--	--	--
Total Emissions	0.21	0.52	0.52	0.02	66.98	4.25	5.06	2.28

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit renewal for this source.
- (b) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, are not included in the permit for the boilers because:
 - (1) The 4.2 MMBtu/hr boiler was constructed before the applicability date of June 9, 1989 and has a maximum heat capacity of less than 10 MMBtu per hour.
 - (2) The 5.2 MMBtu/hr boiler was constructed after the applicability date of June 9, 1989 but has a maximum heat capacity of less than 10 MMBtu per hour.
- (c) The requirements of the New Source Performance Standard For Grain Elevators (40 CFR 60, Subpart DD) are not included in this permit because the source does not perform any grain handling.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.
- (e) The National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) are not included in this permit renewal, because the solvents applied to the closed top cold degreaser do not contain any halogenated HAP specified in 40 CFR 63.460.

State Rule Applicability - Entire Source

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

This source is not 1 of 28 source categories defined in 326 IAC 2-2-1(gg)(1) and was constructed before 1970. An exempt boiler was added in 2000. The potential to emit any regulated pollutant from the entire source is less than two hundred fifty (250) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 are not applicable.

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

This source was constructed prior to July 27, 1997 and the potential HAP emissions from the entire source are less than the major source thresholds. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

State Rule Applicability – Baking Oven

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential emissions of VOC from the baking oven are greater than 25 tons per year. However, this oven was constructed before January 1, 1980. Therefore, 326 IAC 8-1-6 does not apply to this emission unit.

State Rule Applicability - Boilers

326 IAC 6-2-3 (PM Emissions for Sources of Indirect Heating)

The 4.2 MMBtu/hr boiler was constructed before 1972. Pursuant to 326 IAC 6-2-3, boilers existing and in operation before June 8, 1972 shall be limited by the following equation or by 0.8 lbs per MMBtu, whichever is more stringent:

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

Where: C = maximum ground level concentration
Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr)
N = number of stacks
A = plume rise factor
h = stack height (ft)

The emission rate limit calculated using the equation above is:

$$Pt = \frac{50 * 0.67 * 35}{76.5 * 4.2^{0.75} * 1^{0.25}} = 5.22 \text{ lbs/MMBtu}$$

Therefore, the source shall comply with the more stringent PM emission limit for the 4.2 MMBtu/hr boiler, which is 0.8 lbs/MMBtu.

326 IAC 6-2-4 (PM Emissions for Sources of Indirect Heating)

The 5.2 MMBtu/hr boiler was constructed in 2000. Pursuant to 3236 IAC 6-2-4(a), indirect heating facilities constructed after September 12, 1983, shall be limited by the following equation:

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

Where: Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr)

The emission rate limit calculated using the equation above is:

$$Pt = \frac{1.09}{(4.2 + 5.2)^{0.26}} = 0.61 \text{ lbs / MMBtu}$$

However, 326 IAC 6-2-4(a) also states that for Q less than 10 MMBtu per hour, the PM emissions shall not exceed 0.6 pounds per MMBtu. Therefore, the PM emissions from the 5.2 MMBtu/hr boiler shall not exceed 0.6 pounds per MMBtu.

State Rule Applicability - Three (3) Storage Silos

326 IAC 6-3-2 (Process Operations)

The allowable particulate matter (PM) emission rate from each storage silo shall be limited to 15.8 lbs/hr when the process weight rate is 7.5 tons per hour.

The pound per hour limitation was calculated using the following:

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

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

The emission rate limit calculated using the equation above is:

$$E = 4.10(7.5)^{0.67} = 15.8 \text{ lbs / hr}$$

According to the emission calculations, the potential controlled PM emissions from each silo are 5.4 lbs/hr. The filter bags controlling emissions from the three (3) storage silos shall operate at all times when the storage silos are in operation in order to comply with 326 IAC 6-3-2.

State Rule Applicability - Closed Top Cold Degreaser

326 IAC 8-3 (Organic Solvent Degreasing Operation)

This closed top cold degreaser was constructed before 1980 and the source is located in Allen County. Therefore the requirements of 326 IAC 8-3 are not applicable.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is located in Allen County and started operation before October 7, 1974. In addition, the potential VOC emissions from the entire source are less than 100 tons per year. Therefore, the requirements of 326 IAC 8-6 are not applicable.

Recommendation

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

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

An application for the purposes of this review was received on July 3, 2007.

Conclusion

The operation of this bread bakery shall be subject to the conditions of the attached MSOP Renewal No. M003-24986-00259.

Appendix A: Potential Emissions Summary

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
Permit Number: M003-24986-00259
Reviewer: Summer Keown
Date: July 24, 2008

Uncontrolled Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Bread Baking	Boilers	Heaters	Baking Oven Natural Gas Combustion	Flour Storage Silos	Total
PM	--	0.07	0.01	0.03	70.95	71.06
PM-10 / PM2.5*	--	0.31	0.06	0.12	45.33	45.82
SO2	--	0.02	0.00	0.00	--	0.02
NOx	--	4.12	0.75	0.19	--	5.06
VOC	66.7	0.23	0.04	0.01	--	66.98
CO	--	3.46	0.63	0.16	--	4.25
Total HAPs	--	0.18	0.03	0.07	--	0.28
Worst Case Single HAP	--	0.10 (dichlorobenzene)	0.02 (dichlorobenzene)	0.04 (dichlorobenzene)	--	0.12 (dichlorobenzene)

Total emissions based on rated capacity at 8,760 hours/year
 *PM2.5 is assumed to be equal to PM10.

Controlled Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Bread Baking	Boilers	Heaters	Baking Oven Natural Gas Combustion	Flour Storage Silos	Total
PM	--	0.07	0.01	0.03	0.1	0.21
PM-10 / PM2.5*	--	0.31	0.06	0.12	0.03	0.52
SO2	--	0.02	0.00	0.00	--	0.02
NOx	--	4.12	0.75	0.19	--	5.06
VOC	66.7	0.23	0.04	0.01	--	66.98
CO	--	3.46	0.63	0.16	--	4.25
Total HAPs	--	0.18	0.03	0.07	--	0.28
Worst Case Single HAP	--	0.10 (dichlorobenzene)	0.02 (dichlorobenzene)	0.04 (dichlorobenzene)	--	0.12 (dichlorobenzene)

Total emissions based on rated capacity at 8,760 hours/year

**Appendix A: Emissions Calculations
Natural Gas Combustion Units**

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
Permit Number: M003-24986-00259
Reviewer: Summer Keown
Date: July 24, 2008

	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Pollutant					
			PM*	PM10*	SO2	NOx 100 **see below	VOC	CO
Emission Factor in lb/MMCF			1.9	7.6	0.6		5.5	84
Potential Emissions in tons/yr:								
Baking oven	3.742	32.78	0.03	0.12	0.00	0.19	0.01	0.16
Natural gas-fired boiler (stack #4)	4.2	36.79	0.03	0.14	0.01	1.84	0.10	1.55
Natural gas-fired boiler (stack #5)	5.2	45.55	0.04	0.17	0.01	2.28	0.13	1.91
Six space heaters	0.91	7.97	0.01	0.03	0.00	0.40	0.02	0.33
Three tube heaters	0.49	4.29	0.00	0.02	0.00	0.21	0.01	0.18
Three furnaces	0.303	2.65	0.00	0.01	0.00	0.13	0.01	0.11
TOTAL			0.09	0.37	0.03	4.86	0.27	4.09

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

Methodology

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

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
Permit Number: M003-24986-00259
Reviewer: Summer Keown
Date: July 24, 2008

Emission Factor in lb/MMcf	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	HAPs - Organics					HAPs - Metals				
			Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emissions in tons/yr:												
Baking oven	3.742	32.78	0.00003	0.039	0.0012	0.030	0.0001	0.00001	0.00002	0.00002	0.00001	0.00003
Natural gas-fired boiler (stack #4)	4.2	36.79	0.00004	0.044	0.0014	0.033	0.0001	0.00001	0.00002	0.00003	0.00001	0.00004
Natural gas-fired boiler (stack #5)	5.2	45.55	0.00005	0.055	0.0017	0.041	0.0001	0.00001	0.00003	0.00003	0.00001	0.00005
Six space heaters	0.91	7.97	0.00001	0.010	0.0003	0.007	0.0000	0.00000	0.00000	0.00001	0.00000	0.00001
Three tube heaters	0.49	4.29	0.00000	0.005	0.0002	0.004	0.0000	0.00000	0.00000	0.00000	0.00000	0.00000
Three furnaces	0.303	2.65	0.00000	0.003	0.0001	0.002	0.0000	0.00000	0.00000	0.00000	0.00000	0.00000
TOTAL			0.0001	0.1167	0.0036	0.0875	0.0002	0.0000	0.0001	0.0001	0.0000	0.0001

Methodology is the same as page 2

Total HAPs: 0.21

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

**Appendix A: Emissions Calculations
C and HAP Emissions from Bread Baking**

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
Permit Number: M003-24986-00259
Reviewer: Summer Keown
Date: July 24, 2008

Maximum Baking Rate: 7500 pounds of bread per hour

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

$$\text{VOC E.F.} = 0.95 Y_i + 0.195 t_i - 0.51 S - 0.86 t_s + 1.90$$

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

The percentage of yeast and rise time for each dough formula are confidential information. Based on the technical support document (TSD) for operating permit No. SOP 003-6247-00259, issued on August 4, 1997, the VOC emission factors for worst case scenerio is 4.06 lbs/tons.

Therefore, the potential uncontrolled VOC emissions from bread baking =

$$7500 \text{ lbs/hr} * 1 \text{ ton}/2000 \text{ lbs} * 4.06 \text{ lbs/ton} * 8760 \text{ hrs/yr} * 1 \text{ ton}/2000 \text{ lbs} = \mathbf{66.7 \text{ tons/yr VOC}}$$

VOCs emitted during fermentation (leavening) are assumed to be 97% ethanol and 3% acetaldehyde (VOC/HAP), based on the following document and supporting

1. "Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017, December 1992)
2. Henderson, D.C., 1977, "Commercial Bakeries as a Major Source of Reactive Volatile Organic Gases", U.S. EPA, Region XI Surveillance and Analysis Division

Therefore, acetaldehyde equals:

$$66.7 \text{ tons/yr VOC} * 0.03 = \mathbf{2.00 \text{ tons/yr acetaldehyde (HAP)}}$$

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

Page 5 of 5 TSD App A

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
Permit Number: M003-24986-00259
Reviewer: Summer Keown
Date: July 24, 2008

Process Descriptions:

Silo Capacity: 360,000 gal
Max. Throughput: 7.5 tons/hr
Control Device: filters
*Uncontrolled PM Emission Factor: 0.72 lbs/ton
*Controlled PM Emission Factor: 0.00099 lbs/ton
Uncontrolled PM10 Emission Factor: 0.46 lbs/ton
*Controlled PM10 Emission Factor: 0.0034 lbs/ton

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

* Emission Factors are from AP-42, Table 11.12-2, SCC #3-05-011-07 (Cement unloading to elevated storage silo (pneumatic), AP-42, 06-906), which is the emission factor for pneumatic conveying of cement. There is no emission factor for flour loading in AP-42.

Potential Uncontrolled PM/PM10 Emissions from Each Silo:

Hourly Potential PM Emissions = 7.5 tons/hr x 0.72 lbs/ton = **5.4 lbs/hr per silo**
Annual Potential PM Emissions = 5.4 tons/yr x 8760 hr/yr x 1 ton/2000 lbs = **23.65 tons/yr per silo**

Hourly Potential PM10 / PM2.5** Emissions = 7.5 tons/hr x 0.46 lbs/ton = **3.45 lbs/hr per silo**
Annual Potential PM10 / PM2.5** Emissions = 3.45 tons/yr x 8760 hr/yr x 1 ton/2000 lbs = **15.11 tons/yr per silo**

Potential Uncontrolled PM/PM10/PM2.5 Emissions from All Three Silos:

Total Potential PM Emissions = 23.65 tons/yr per silo x 3 silos = **70.95 tons/yr**
Total Potential PM10 / PM2.5** Emissions = 15.11 tons/yr per silo x 3 silos = **45.33 tons/yr**

Potential Controlled PM/PM10/PM2.5 Emissions from Each Silo:

Hourly Potential PM Emissions = 7.5 tons/hr x 0.00099 lbs/ton = **0.007 lbs/hr per silo**
Annual Potential PM Emissions = 0.007 tons/yr x 8760 hr/yr x 1 ton/2000 lbs = **0.03 tons/yr per silo**

Hourly Potential PM10 / PM2.5** Emissions = 7.5 tons/hr x 0.0034 lbs/ton = **0.00255 lbs/hr per silo**
Annual Potential PM10 / PM2.5** Emissions = 0.00255 tons/yr x 8760 hr/yr x 1 ton/2000 lbs = **0.01 tons/yr per silo**

Potential Controlled PM/PM10/PM2.5 Emissions from All Three Silos:

Total Potential PM Emissions = 0.03 tons/yr per silo x 3 silos = **0.10 tons/yr**
Total Potential PM10 / PM2.5** Emissions = 0.01 tons/yr per silo x 3 silos = **0.03 tons/yr**