



*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: April 17, 2009  
RE: Hartford Bakery, Inc. / 163-27317-00040  
FROM: Matthew Stuckey, Deputy 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, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

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

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

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
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*Thomas W. Easterly*  
Commissioner

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Indianapolis, Indiana 46204  
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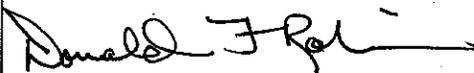
## Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

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

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions

Operation Permit No.: T163-27317-00040	
Issued by:  Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: April 17, 2009  Expiration Date: April 17, 2014

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

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

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The Permittee owns and operates a stationary wholesale bakery.

Source Address:	500 N. Fulton Avenue, Evansville, Indiana 47710
Mailing Address:	500 N. Fulton Avenue, Evansville, IN 47710
General Source Phone Number:	(812)425-4642
SIC Code:	2051
County Location:	Vanderburgh
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

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

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

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This stationary source has the following insignificant activities, as defined in 326 IAC 2-7-1(21):

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

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

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

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

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

## SECTION B GENERAL CONDITIONS

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

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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][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

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- (a) This permit, T163-27317-00040, 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) 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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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 [326 IAC 2-7-7] [IC 13-17-12]

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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 [326 IAC 2-7-5(5)]

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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)]

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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)]

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- (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 the "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 no later than April 15 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, Indiana 46204-2251

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]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) 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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 Emergency Provisions [326 IAC 2-7-16]

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Southwest 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: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865  
Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304.

- (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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, 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]**

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- (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 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][326 IAC 2-7-10.5]**

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- (a) All terms and conditions of permits established prior to T163-27317-00040 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

**B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]**

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

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

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

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

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating 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.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months 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 2-7 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.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]**

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- (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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- 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)]

**B.19 Permit Revision Under Economic Incentives and Other Programs**

[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

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- (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.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

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- (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 limitations provided in 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make 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 emissions increases and decreases at 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.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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

**B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]**

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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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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.24 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.25 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 [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 Opacity [326 IAC 5-1]

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

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

C.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). 326 IAC 6-4-2(4) is not federally enforceable.

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

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

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
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 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 14-10-1, 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 2-7-6(1)]**

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

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- (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 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.8 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later. 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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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.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (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 [326 IAC 2-7-5][326 IAC 2-7-6]**

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) 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.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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

**C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (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.15 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 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.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of 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  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

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.17 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 or ninety (90) days of initial start-up, whichever is later.

C.18 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (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.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

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

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

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

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-2]

Pursuant to CP 163-9331-00040, issued on May 4, 1998, the VOC emissions from the bun oven, identified as 3, shall not exceed twenty-four (24) tons per twelve (12) consecutive month period and render the requirements of 326 IAC 8-1-6 not applicable.

Compliance with the above limit shall limit the VOC emissions from the bun oven to less than 25 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 8-1-6 (BACT) and 326 IAC 2-2 (PSD) not applicable for CP 163-9331-00040.

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

Pursuant to 326 IAC 6-3-2, the Permittee shall comply with the PM limits, when operating at the associated process weight rates, as shown in the table below:

Unit	Process Weight Rate (ton/hr)	PM Limit (lb/hr)
Bread oven (1)	6	13.6
Bun oven (3)	2.33	7.2

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

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

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

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

#### D.1.3 Preventative Maintenance Plan [326 IAC 2-7-5(13)]

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

## Compliance Determination Requirements

### D.1.4 Volatile Organic Compounds

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Compliance with the VOC limit contained in D.1.1 shall be determined by the following equation:

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

Where:

$B_i$  = The amount of bread of type  $i$  produced during month  $m$  (tons/month);  
 $E_i$  = The VOC emission factor for type  $i$  bread (lb of VOC/ton of bread); and  
 $m$  = The compliance period is one (1) calendar month.

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

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

Where:

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

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

### D.1.5 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1 and D.1.4, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emissions limits established in Condition D.1.1.
- (1) The dates of the compliance period;
  - (2) The amount of each type of bread produced during each compliance period;
  - (3) Information necessary to calculate the VOC emission factor for each type of bread made during the compliance period, including:
    - (A) The initial baker's percent of yeast;
    - (B) The total yeast action time in hours;
    - (C) The final (spike) baker's percent of yeast; and
    - (D) The spiking time in hours.
  - (4) The weight of VOCs emitted for each compliance period.

- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.6 Reporting Requirements

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

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

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

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

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

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

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

#### D.2.2 Preventative Maintenance Plan [326 IAC 2-7-5(13)]

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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:

- (g) Activities with emissions equal to or less than the following requirements: 25 lbs per day particulate matter, SO<sub>2</sub>, or NO<sub>x</sub>, 15 lbs per day VOC, or 3.29 lbs per day Pb, including:
- (1) A raw material storage system consisting of three (3) flour storage silos which are filled pneumatically, each with a maximum capacity of 16,410 pounds per hour, using a pressure equalization bag at the top for product recovery. [326 IAC 6-3-2]

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

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

#### D.3.1 Particulate [326 IAC 6-3-2]

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

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

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

#### D.3.2 Preventative Maintenance Plan [326 IAC 2-7-5(13)]

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

### Compliance Determination Requirements

#### D.3.3 Particulate Control [326 IAC 2-2]

In order to comply with Condition D.3.1, the respective pressure equalization bags for particulate control, including those integral to the process, shall be in operation and control particulate emissions from the respective facilities listed in this section at all times those facilities are in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Hartford Bakery, Inc.  
Source Address: 500 N. Fulton Avenue, Evansville, Indiana 47710  
Mailing Address: 500 N. Fulton Avenue, Evansville, IN 47710  
Part 70 Permit No.: T163-27317-00040

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Hartford Bakery, Inc.  
Source Address: 500 N. Fulton Avenue, Evansville, Indiana 47710  
Mailing Address: 500 N. Fulton Avenue, Evansville, IN 47710  
Part 70 Permit No.: T163-27317-00040

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), 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
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

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

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

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

A certification is not required for this report.

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

**Part 70 Quarterly Report**

Source Name: Hartford Bakery, Inc.  
Source Address: 500 N. Fulton Avenue, Evansville, Indiana 47710  
Mailing Address: 500 N. Fulton Avenue, Evansville, IN 47710  
Part 70 Permit No.: T163-27317-00040  
Facility: One natural gas fired bun oven  
Parameter: Volatile Organic Compounds (VOC)  
Limit: Twenty-four (24) tons per year, according to the equation:

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

Where:

$B_i$  = The amount of bread of type  $i$  produced during month  $m$  (tons/month);  
 $E_i$  = The VOC emission factor for type  $i$  bread (lb of VOC/ton of bread); and  
 $m$  = The compliance period is one (1) calendar month.

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

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

Where:

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

QUARTER:

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	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: Hartford Bakery, Inc.  
Source Address: 500 N. Fulton Avenue, Evansville, Indiana 47710  
Mailing Address: 500 N. Fulton Avenue, Evansville, IN 47710  
Part 70 Permit No.: T163-27317-00040

**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>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	

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

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

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

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

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

Attach a signed certification to complete this report.

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

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

**Source Background and Description**

Source Name:	Hartford Bakery, Inc.
Source Location:	500 N. Fulton Avenue, Evansville, IN 47710
County:	Vanderburgh
SIC Code:	2051
Permit Renewal No.:	T163-27317-00040
Permit Reviewer:	Kristen Layton

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

**History**

On December 31, 2008, Hartford Bakery, Inc. submitted an application to the OAQ requesting to renew its operating permit. Hartford Bakery, Inc. was issued a Part 70 Operating Permit Renewal on October 8, 2004.

IDEM has received test data from similar facilities showing those facilities have actual emissions above those calculated using the equation from AP-42 Chapter 9.9.6. Information provided by the source regarding the short transfer time between the mixer and the proof box and the proof box and the ovens and the description of the operation appear consistent with those discussed in the EPA document "Alternative Control Technology Document for Bakery Oven Emissions - EPA 453 / R-92-017," issued December 1992. Since this document was used to develop the equation in AP-42 Chapter 9.9.6, IDEM believes the equation is an appropriate method of compliance determination.

**Permitted Emission Units and Pollution Control Equipment**

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

**Insignificant Activities**

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

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

### Existing Approvals

No additional approvals have been issued since the issuance of the Part 70 Operating Permit Renewal (T163-17548-00040) on October 8, 2004.

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

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

- (a) The VOC limit in Condition D.1.1 for the bun oven (oven 3) has been revised to reflect a limit instead of an equation; which is how it was originally written in CP 163-9331-00040, issued on May 4, 1998. This condition was changed in the 2004 Part 70 operating permit renewal to reflect equations instead of a limit. The equations from this condition (which are based on AP-42 Chapter 9.9.6) were moved to a new condition under compliance determination, since they are the method by which the source demonstrates compliance with the limit.
- (b) Preventative Maintenance Plan conditions have been added to Sections D.1 and D.2. Preventative maintenance is necessary to ensure these units are functioning properly.
- (c) Section B – Supersession Revisions  
To clarify the permit term and the term of the conditions, original Conditions B.2 – Permit Term, B.13 – Prior Permits Superseded, and B.16 – Permit Renewal have been modified. Additionally, a new Section B condition, B.3 – Term of Conditions has been added.
- (d) Section B – Termination of Right to Operate  
IDEM has rearranged the permit conditions such that original Condition B.4 – Termination of Right to Operate is now Condition B.14.
- (e) Section B – PMP and Emergency Conditions  
IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of original Condition B.10 – Preventive Maintenance Plan and has amended original Condition B.11 – Emergency Provisions.

- (f) **Section B – Nonroad engines – Permit Amendment or Modification**  
Upon further review, IDEM has decided to remove (d) concerning nonroad engines from original Condition B.17 – Permit Amendment or Modification. 40 CFR 89, Appendix A specifically indicates that states are not precluded from regulating the use and operation of nonroad engines, such as regulations on hours of usage, daily mass emission limits, or sulfur limits on fuel; nor are permits regulating such operations precluded, once the engine is no longer new.
- (g) **Section B – Operational Flexibility**  
For clarification purposes, original Condition B.19 – Operational Flexibility has been revised.
- (e) **326 IAC 6-3-2 and C.1 Condition**  
Revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective on June 12, 2002 and were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 that had been part of the SIP. The new Condition C.1 – Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour has been added to the permit.
- (f) **Section C – Operation of Equipment**  
In order to avoid duplication of requirements which may be included in D sections, Condition C.5 – Operation of Equipment has been removed from the permit.
- (g) **Section C – Instrument Specifications**  
The requirements for instrument specifications were added to the permit as a new condition, Condition C.11 – Instrument Specifications.
- (h) **Section C – Response to Excursions or Exceedances**  
The Permittee is required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Therefore, the new Condition C.14 - Response to Excursions or Exceedances has been added.
- (i) **The emission calculations from the three (3) storage silos have been redone using AP-42 Table 11.12-2.** This has been done because IDEM believes the emission factor for cement supplement unloading to a storage silo (pneumatic) (AP-42, Table 11.12-2) better represents the emissions from a silo storing flour than the emission factor for grain receiving by hopper truck (AP 42, Table 9.9.1-1).

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

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

- (a) The company states that the three (3) flour storage silos are not equipped with baghouses. The silos are entirely encased and are not exposed to the ambient air. They are pneumatically filled from tanker deliver trucks with a maximum pressure of seven (7) pounds per square inch. The company states that each silo is equipped with fabric bag filters that act solely to relieve pressure when the silos are being filled or emptied. The filters create a vacuum that allows the pneumatic conveyance system to move material from the truck to the silos. The company states that these filters are not air pollution control devices. These filters are necessary to create product. Therefore, these control devices would operate regardless of the applicability of air pollution control requirements. The company provided a schematic diagram of the silo system.

IDEM, OAQ has evaluated the information submitted and agrees that the fabric bag filters should be considered an integral part of the raw material storage system. Therefore, the permitting level will be determined using the potential to emit after the fabric bag filters. Operating conditions in the proposed permit will specify that the fabric bag filters shall operate at all times when the raw material storage system is in operation.

### Enforcement Issue

There are no enforcement actions pending.

### Emission Calculations

See Appendix A of this document for detailed emission calculations.

### County Attainment Status

The source is located in Vanderburgh County

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective January 30, 2006, for the Evansville area, including Vanderburgh County, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the Evansville area, including Vanderburgh County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM2.5.	

(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 (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM2.5**  
U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Vanderburgh County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM2.5 promulgated on May 8<sup>th</sup>, 2008, and effective on July 15<sup>th</sup> 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**  
Vanderburgh 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

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	3.93
PM <sub>10</sub>	1.45
PM <sub>2.5</sub>	0.75
SO <sub>2</sub>	1.64
VOC	148.86
CO	6.73
NO <sub>x</sub>	8.01
Total HAPs	0.15

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2005 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM <sub>10</sub>	not reported
SO <sub>2</sub>	not reported
VOC	65
CO	2
NO <sub>x</sub>	3
HAP (specify)	not reported

**Part 70 Permit Conditions**

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

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

**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 federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Potential to Emit (tons/year)							
Process/ Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC	NO <sub>x</sub>	CO
<b>Bread Oven (1)</b>	0.1	0.2	0.2	0.9	107.52	3.0	2.5
<b>Bun Oven (2)</b>	0.1	0.2	0.2	0.8	< 24	2.7	2.3
<b>Boilers</b>	0.04	0.17	0.17	0.01	0.13	2.3	1.93
<b>Silos</b>	0.96	0.53	0.53	-	-	-	-
<b>Total</b>	<b>1.11</b>	<b>1.14</b>	<b>1.14</b>	<b>1.64</b>	<b>131.76</b>	<b>8.01</b>	<b>6.73</b>
<b>Major Source Threshold</b>	<b>250</b>	<b>250</b>	<b>100</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>

- (a) This existing stationary source is not major for PSD because the emissions of PM, PM<sub>10</sub>, SO<sub>2</sub>, VOC, NO<sub>x</sub>, and CO are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for PSD because the emissions of PM<sub>2.5</sub> are less than one hundred (<100) tons per year, and it is one of the twenty-eight (28) listed source categories.

- (c) This existing stationary source is not major for Emission Offset and Nonattainment NSR because the emissions of the nonattainment pollutant, PM<sub>2.5</sub>, are less than one hundred (<100) tons per year.
- (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.

### **Federal Rule Applicability**

#### *CAM*

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:
  - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
  - (2) is subject to an emission limitation or standard for that pollutant; and
  - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The three (3) flour storage silos are equipped with pressure equalization bags. The silos are entirely encased and are not exposed to the ambient air. They are pneumatically filled from tanker deliver trucks with a maximum pressure of seven (7) pounds per square inch. The company states that each silo is equipped with fabric bag filters that act solely to relieve pressure when the silos are being filled or emptied. The filters create a vacuum that allows the pneumatic conveyance system to move material from the truck to the silos. The company states that these filters are necessary for the normal and proper operation of the silos and are necessary to create product. Therefore, the pressure equalization bags are inherent process equipment and not considered control devices.

No units in this permit use a control device to meet a limit. Therefore, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 permit renewal.

#### *NSPS*

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

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

This source is not subject to the requirements of 326 IAC 12 or 40 CFR 60, Subpart DD, (60.300 through 60.304), New Source Performance Standards (NSPS) for Grain Elevators, since this source does not contain any grain terminal elevators or grain storage elevators as defined by 40 CFR 60.301. This source contains dry ingredient (e.g. flour, corn meal, etc.) storage silos that are not equipped with grain elevators.

#### *NESHAP*

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

*Section 112(j) of the Clean Air Act*

- (d) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because (1) the source is not a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs), and (2) the source does not include one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.

**State Rule Applicability - Entire Source**

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

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

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

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

*326 IAC 2-6 (Emission Reporting)*

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2006 and every 3 years after. Therefore, the next emission statement for this source must be submitted by July 1, 2009. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

*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 2-2 and 326 IAC 2-1.1-5 (Prevention of Significant Deterioration and Nonattainment NSR)*

The three (3) storage silos have a potential to emit greater than 250 tpy for PM/PM<sub>10</sub> and greater than 100 tpy for PM<sub>2.5</sub>, however, these units have control devices that have been determined to be integral. Therefore, the emissions from these units are evaluated after control. This makes the source wide potential to emit less than 250 tpy for PM/PM<sub>10</sub>, SO<sub>2</sub>, VOC, NO<sub>x</sub>, and CO and less than 100 tpy for PM<sub>2.5</sub>. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) are not applicable.

The bun oven, identified as 3, has the potential to emit over 40 tpy of VOC. However, in CP 163-9331-00040, issued on May 4, 1998, the source took limits on this unit to ensure VOC emissions did not exceed 25 tpy in order to avoid the requirements of 326 IAC 8-1-6 (BACT). Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) are not applicable to the bun oven.

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

This source is not subject to 326 IAC 2-4.1 (New Source Toxics Control) because the source is not a major source of hazardous air pollutants (HAPs) (i.e., the source does not have the

potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs).

*326 IAC 4-1 (Open Burning)*

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.

*326 IAC 6-4 (Fugitive Dust Emissions)*

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).

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

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

*326 IAC 6.5 (Particulate Matter Limitations Except for Lake County)*

This source is not subject to 326 IAC 6.5 (Particulate Matter Limitations Except for Lake County), even though it is located in Vanderburgh County, because the potential to emit particulate matter (after integral controls) is less than one hundred (100) tons per year, and actual emissions of particulate matter are less than ten (10) tons per year.

**State Rule Applicability – Bread Oven and Bun Oven**

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

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

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

Pursuant to Construction Permit (CP 163-9331-00040), issued May 4, 1998 and 326 IAC 8-1-6 (General Reduction Requirements), the potential to emit volatile organic compound (VOC) from the one (1) bun oven shall not exceed twenty-four (24) tons per year to avoid the requirements of this rule.

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

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

Pursuant to 326 IAC 6-3-2, the Permittee shall comply with the PM limits, when operating at the associated process weight rates, as shown in the table below:

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

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

Unit	Process Weight Rate (ton/hr)	PM Limit (lb/hr)
Bread oven (1)	6	13.6
Bun oven (3)	2.33	7.2

Since the potential emissions are less than the allowable emissions, the bread oven and the bun oven will be in compliance with this requirement.

### State Rule Applicability – Insignificant Activities

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

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

This limitation is based on the following equation:

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

where

$$C = 50 \text{ u/m}^3$$

Pt = emission rate limit (lbs/MMBtu)

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

N = number of stacks

a = plume rise factor (0.67)

h = stack height (ft)

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

$$C = 50$$

$$Q = 1.3375$$

$$N = 1$$

$$a = 0.67$$

$$h = 28$$

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

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

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

$$C = 50$$

$$Q = 1.3375 + 2.00625 = 3.34375$$

$$N = 1 + 1 = 2$$

$$a = 0.67$$

$$h = 28$$

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

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

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

$$C = 50$$

$$Q = 1.3375 + 2.00625 + 2.00625 = 5.35$$

$$N = 1 + 1 + 1 = 3$$

$$a = 0.67$$

$$h = 28$$

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

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

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

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

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

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

For each raw material storage silos:

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

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

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

### Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance determination requirements applicable to this source are as follows:

- (1) Bread and Bun Ovens
  - (a) Volatile Organic Compounds  
Compliance with the VOC limit contained in D.1.1 shall be determined by the following equation:

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

Where:

- $B_i$  = The amount of bread of type  $i$  produced during month  $m$  (tons/month);
- $E_i$  = The VOC emission factor for type  $i$  bread (lb of VOC/ton of bread); and
- $m$  = The compliance period is one (1) calendar month.

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

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

Where:

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

These requirements are required to render 326 IAC 8-1-6 (BACT) not applicable.

### **Recommendation**

The staff recommends to the Commissioner that the Part 70 Operating Permit 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 December 31, 2008.

### **Conclusion**

The operation of this stationary wholesale bakery shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T163-27317-00040.

**Appendix A: Emission Calculations  
Summary of Emissions**

**Company Name: Hartford Bakery, Inc.**  
**Address: 500 N. Fulton Avenue, Evansville, Indiana 47710**  
**Title V Renewal: 163-27317-00040**  
**Reviewer: Kristen Layton**  
**Date: December 31, 2008**

<b>Potential to Emit (ton/yr)</b>								
<b>Process</b>	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>SO<sub>2</sub></b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>HAPs</b>
Ovens - Baking	-	-	-	-	-	148.42	-	-
Ovens - Combustion	0.11	0.43	0.43	1.63	5.71	0.31	4.80	0.11
Boilers	0.04	0.17	0.17	0.01	2.30	0.13	1.93	0.04
Silos	338.54	118.60	118.60	-	-	-	-	-
<b>Total</b>	<b>338.69</b>	<b>119.20</b>	<b>119.20</b>	<b>1.64</b>	<b>8.01</b>	<b>148.86</b>	<b>6.73</b>	<b>0.15</b>

<b>Limited Potential to Emit (ton/yr)</b>								
<b>Process</b>	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>SO<sub>2</sub></b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>HAPs</b>
Ovens - Baking	-	-	-	-	-	131.32	-	-
Ovens - Combustion	0.11	0.43	0.43	1.63	5.71	0.31	4.80	0.11
Boilers	0.04	0.17	0.17	0.01	2.30	0.13	1.93	0.04
Silos	0.96	0.53	0.53	-	-	-	-	-
<b>Total</b>	<b>1.11</b>	<b>1.14</b>	<b>1.14</b>	<b>1.64</b>	<b>8.01</b>	<b>131.76</b>	<b>6.73</b>	<b>0.15</b>

<b>Potential to Emit of HAPs (tpy)</b>	
Benzene	1.68E-04
Dichlorobenzene	9.61E-05
Formaldehyde	6.01E-03
Hexane	1.44E-01
Toluene	2.72E-04
Lead	4.00E-05
Cadmium	8.81E-05
Chromium	1.12E-04
Manganese	3.04E-05
Nickel	1.68E-04
<b>Total HAPs</b>	<b>0.15</b>

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

**Company Name: Hartford Bakery, Inc.**  
**Address: 500 N. Fulton Avenue, Evansville, Indiana 47710**  
**Title V Renewal: 163-27317-00040**  
**Reviewer: Kristen Layton**  
**Date: December 31, 2008**

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

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

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

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

Where

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

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

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

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

**Company Name: Hartford Bakery, Inc.**  
**Address: 500 N. Fulton Avenue, Evansville, Indiana 47710**  
**Title V Renewal: 163-27317-00040**  
**Reviewer: Kristen Layton**  
**Date: December 31, 2008**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
13.3 (2 units total)	114.2

	Pollutant						
	PM*	PM <sub>10</sub> *	PM <sub>2.5</sub> *	SO <sub>2</sub>	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	28.5	100 **see below	5.5	84
Potential Emission in tons/yr	0.1	0.4	0.4	1.6	5.7	0.3	4.8

\*PM emission factor is filterable PM only. PM10 and PM2.5 emission factor is filterable and condensable 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/1,020 MMBtu

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

See page 4 for HAPs emissions calculations.

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

**Company Name: Hartford Bakery, Inc.**  
**Address: 500 N. Fulton Avenue, Evansville, Indiana 47710**  
**Title V Renewal: 163-27317-00040**  
**Reviewer: Kristen Layton**  
**Date: December 31, 2008**

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.199E-04	6.853E-05	4.283E-03	1.028E-01	1.942E-04

HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.856E-05	6.282E-05	7.996E-05	2.170E-05	1.199E-04

Methodology is the same as page 3.

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

**Company Name: Hartford Bakery, Inc.**  
**Address: 500 N. Fulton Avenue, Evansville, Indiana 47710**  
**Title V Renewal: 163-27317-00040**  
**Reviewer: Kristen Layton**  
**Date: December 31, 2008**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

5.4 (3 units total)

45.9 (3 units total)

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM <sub>10</sub> *	PM <sub>2.5</sub> *	SO <sub>2</sub>	NO <sub>x</sub> **	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84.0
<b>Potential Emission in tons/yr</b>	<b>0.04</b>	<b>0.17</b>	<b>0.17</b>	<b>0.01</b>	<b>2.30</b>	<b>0.13</b>	<b>1.93</b>

\*PM emission factor is filterable PM only. PM10 and PM2.5 emission factor is filterable and condensable 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/1,020 MMBtu

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

See page 6 for HAPs emissions calculations.

**Appendix A: Emission Calculations  
Natural Gas Combustion  
(MMBtu/hr < 100)**

**From two 2.00625 MMBtu/hr boilers and one 1.3375 MMBtu/hr boiler**

**Company Name: Hartford Bakery, Inc.  
Address: 500 N. Fulton Avenue, Evansville, Indiana 47710  
Title V Renewal: 163-27317-00040  
Reviewer: Kristen Layton  
Date: December 31, 2008**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenze 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.824E-05	2.757E-05	1.723E-03	4.135E-02	7.811E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.149E-05	2.527E-05	3.216E-05	8.730E-06	4.824E-05

Methodology is the same as page 5.

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

**Company Name: Hartford Bakery, Inc.  
Address : 500 N. Fulton Avenue, Evansville, Indiana 47710  
Title V Renewal: 163-27317-00040  
Reviewer: Kristen Layton  
Date: December 31, 2008**

**1. Process Descriptions:**

<b>Max Throughput:</b>	<b>8.205 tons/hr</b>		
<b>Uncontrolled Emission Factors</b>		<b>Controlled Emission Factors</b>	
*PM Emission Factor:	3.14 lbs/ton	*PM Emission Factor:	0.0089 lbs/ton
*PM10 Emission Factor:	1.1 lbs/ton	*PM10 Emission Factor:	0.0049 lbs/ton
*PM2.5 Emission Factor:	1.1 lbs/ton	*PM2.5 Emission Factor:	0.0049 lbs/ton

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

\*Emission Factors are from AP-42, Tables 11.12-2, SCC #3-05-011-17 (Cement supplement unloading to elevated storage silo (pneumatic), AP-42, 06/06). There is no emission factor for flour loading in AP-42.

**2. Potential Uncontrolled PM/PM10/PM2.5 Emissions from Each Silo:**

Unit	Throughput (ton/hr)	Emissions PM (ton/yr)	Emissions PM10 (ton/yr)	Emissions PM2.5 (ton/yr)
1 Silo	8.205	112.85	39.53	39.53
3 Silos	24.615	338.54	118.60	118.60

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

Unit	Throughput (ton/hr)	Emissions PM (ton/yr)	Emissions PM10 (ton/yr)	Emissions PM2.5 (ton/yr)
1 Silo	8.205	0.32	0.18	0.18
3 Silos	24.615	0.96	0.53	0.53

**Methodology**

Emissions (ton/yr) = Throughput (ton/hr) \* Emission Factor (lb/ton) \* 8760 (hr/yr) / 2000 (lb/ton)

