



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: September 30, 2009

RE: Interstate Brands Corporation / 005-27625-00078

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

## Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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## Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Interstate Brand Corporation  
3060 National Road  
Columbus, Indiana 47201**

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M005-27625-00078	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: September 30, 2009  Expiration Date: September 30, 2019

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary bakery source.

Source Address:	3060 National Road, Columbus, Indiana 47201
Mailing Address:	3060 National Road, Columbus, Indiana 47201
General Source Phone Number:	(812) 372-4443
SIC Code:	2051
County Location:	Bartholomew
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) natural gas-fired sweet roll oven, modified in 2007 to a soft cake lap oven, identified as Unit No. 1, constructed in 1968, exhausting to Stacks S1 and S2, capacity: 8,040 pounds per hour, rated at 2.9 million British thermal units per hour. Operations include flour and sugar transfer operations, dough and cake mixing operation, gluing operation, a pan coating operation and wrapping.
- (b) One (1) natural gas-fired band oven, identified as Unit No. 8, constructed in 1965, exhausting to Stacks S11, S11A and S11B, capacity: 2,448 pounds per hour, rated at 2.1 million British thermal units per hour. Operations include flour and sugar transfer operations, dough and cake mixing operation, gluing operation and wrapping.
- (c) One (1) natural gas-fired cake pan washer, identified as Unit No. 9, constructed in 1983, exhausting to Stacks S14 and S15, capacity: 17,010 pounds per hour, rated at 0.5 million British thermal units per hour.
- (d) One (1) natural gas-fired boiler, identified as Boiler No. 1, constructed in 1974, exhausting to Stack S12, rated at: 14.6 million British thermal units per hour.
- (e) One (1) natural gas-fired boiler, identified as Boiler No. 2, constructed in 1987, exhausting to Stack S13, rated at: 8.4 million British thermal units per hour.
- (f) Source-wide natural gas-fired fryers, each equipped with flour and sugar transfer operations, dough mixing operations, and a common wrapping operation consisting of:

- (1) One (1) fryer, identified as Fryer No. 2, constructed in 1968, exhausting to Stacks S6, S6A and S6B, rated at 0.6 million British thermal units per hour, capacity: 1,560 pounds per hour;
  - (2) One (1) jumbo fryer, identified as Fryer No. 5, constructed in 1984, exhausting to Stacks S8, S8A and S8B, rated at 1.26 million British thermal units per hour, capacity: 3,246 pounds per hour;
  - (3) One (1) pie/stix fryer, identified as Fryer No. 7, constructed in 2000, exhausting to Stacks S3 and S4, rated at 3.6 million British thermal units per hour, capacity: 4,559 pounds per hour;
  - (4) One (1) gem donut fryer, identified as Fryer No. 10, constructed in 1970, exhausting to Stacks S16, S16A and S16B, rated at 1.08 million British thermal units per hour, capacity: 10,247 pounds per hour; and
  - (5) One (1) gem donut fryer, identified as Fryer No. 11, constructed in 1970, exhausting to Stacks S17 and S17A, rated at 0.6 million British thermal units per hour, capacity: 8,439 pounds per hour.
- (g) One (1) maintenance shop, constructed prior to 1965, consisting of welding, torch cutting, metal lathe, drilling and grinding operations, equipped with a water based parts washer.
- (h) One (1) wrapping maintenance shop, constructed in 1982, equipped with a water based parts washer.
- (i) Two (2) storage silos used to store sugar, constructed in 1965, including pneumatic transfer operations.
- (j) Two (2) storage silos, identified as Semco 1 and Semco 2, used to store flour, constructed in 1965, including pneumatic transfer operations.
- (k) Two (2) storage silos, identified as F&F 1 and F&F 2, used to store flour, constructed in 1983, including pneumatic transfer operations.
- (l) Three (3) ink jet printers, installed in 2003, one (1) ink jet label printer, installed in 2006, one Markum printer, installed in 2000, and one Linx printer, installed in 1998. Combined actual annual throughput of ink and make up solution for all printers is less than 200 total gallons per year.
- (m) The following miscellaneous storage tanks, each with a capacity less than 8,000 gallons:
- (1) Two (2) frying fat storage tanks constructed in 1960, capacity: 4,500 gallons and 1972, capacity: 6,300 gallons, both modified to palm oil storage tanks in 2009;
  - (2) One (1) Soya oil storage tank constructed in 1985, capacity: 6,700 gallons;
  - (3) Two (2) liquid fructose storage tanks constructed in 1970, capacity 6,000 gallons and 1975, capacity: 6,700 gallons; and
  - (4) Two (2) liquid chocolate storage tanks constructed in 1960, capacity: 7,200 gallons, each.
  - (5) One (1) palm oil storage tank constructed in 1968, capacity: 4,500 gallons.

- (6) Two (2) used palm oil storage tanks, constructed in 1968, capacity: 5,175 gallons and 2001, capacity: 1,550 gallons.
- (n) The following miscellaneous storage tanks, each with a capacity less than 1,000 gallons:
  - (1) One (1) motor oil storage tank constructed in 1970, capacity: 275 gallons; and
  - (2) Two (2) used oil storage tanks constructed in 1973 and 1996, capacity: 275 gallons, each.
  - 3) Two (2) motor oil storage tanks constructed in 1992, capacity: 275 gallons, each.
- (o) Two (2) diesel fuel storage tanks, constructed in 1992, capacity: 15,000 gallons, each.
- (p) Two (2) natural gas-fired space heaters, constructed in 1986, rated at 0.12 million British thermal units per hour, each.
- (q) Seven (7) natural gas-fired space heaters, constructed in 1990, rated at 0.1 million British thermal units per hour, each.
- (r) One (1) natural gas-fired space heater, constructed in 1990, rated at 0.18 million British thermal units per hour.
- (s) One (1) natural gas-fired space heater, constructed in 1986, rated at 0.135 million British thermal units per hour.
- (t) Two (2) natural gas-fired space heaters, constructed in 1990, rated at 0.16 million British thermal units per hour, each.
- (u) Two (2) natural gas-fired space heaters, constructed in 1986, rated at 0.2 million British thermal units per hour, each.
- (v) One (1) natural gas-fired space heater, constructed in 1986, rated at 0.165 million British thermal units per hour.
- (w) One (1) natural gas –fired space heater constructed in 2005, rated at 0.06 million British Thermal units per hour.

## **SECTION B GENERAL CONDITIONS**

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

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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 2-1.1-1) shall prevail.

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

- 
- (a) This permit, M005-27625-00078, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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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**

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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**

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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**

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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**

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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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

#### B.8 Certification

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

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

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- (a) All terms and conditions of permits established prior to M005-27625-00078 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, 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 one hundred twenty (120) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

**B.15 Source Modification Requirement**

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

**B.16 Inspection and Entry**

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

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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 permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

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

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(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

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

**B.19 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

#### C.3 Opacity [326 IAC 5-1]

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

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

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

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

#### C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (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  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

#### **C.8 Performance Testing [326 IAC 3-6]**

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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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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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 2-6.1-5(a)(2)]**

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

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

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

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

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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**

### **C.13 Response to Excursions or Exceedances**

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

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

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

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

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

- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (d) One (1) natural gas-fired boiler, identified as Boiler No. 1, constructed in 1974, exhausting to Stack S12, rated at: 14.6 million British thermal units per hour.
- (e) One (1) natural gas-fired boiler, identified as Boiler No. 2, constructed in 1987, exhausting to Stack S13, rated at: 8.4 million British thermal units per hour.

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

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

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the two (2) boilers, identified as Boiler No. 1 and Boiler No. 2.

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

Pursuant to 326 IAC 6-3-2(e), particulate emissions from any facility used for indirect heating purposes which has 250 million British thermal units per hour heat input of less and which began operation after June 8, 1972, shall in no case exceed 0.6 pound per million British thermal units heat input. Therefore, the PM emissions from Boiler No. 1 shall be limited to 0.6 pound per million British thermal units heat input.

#### D.1.3 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating Constructed after September 21, 1983) the PM emissions from Boiler No. 2, rated at 8.40 million British thermal units per hour, shall be limited to 0.482 pounds per million British thermal units heat input.

This limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input.

Q = The total source maximum operating capacity in million British thermal units per hour.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (f) Source-wide natural gas-fired fryers, each equipped with flour and sugar transfer operations, dough mixing operations, and a common wrapping operation consisting of:
- (1) One (1) fryer, identified as Fryer No. 2, constructed in 1968, exhausting to Stacks S6, S6A and S6B, rated at 0.6 million British thermal units per hour, capacity: 1,560 pounds per hour;
  - (2) One (1) jumbo fryer, identified as Fryer No. 5, constructed in 1984, exhausting to Stacks S8, S8A and S8B, rated at 1.26 million British thermal units per hour, capacity: 3,246 pounds per hour;
  - (3) One (1) pie/stix fryer, identified as Fryer No. 7, constructed in 2000, exhausting to Stacks S3 and S4, rated at 3.6 million British thermal units per hour, capacity: 4,559 pounds per hour;
  - (4) One (1) gem donut fryer, identified as Fryer No. 10, constructed in 1970, exhausting to Stacks S16, S16A and S16B, rated at 1.08 million British thermal units per hour, capacity: 10,247 pounds per hour; and
  - (5) One (1) gem donut fryer, identified as Fryer No. 11, constructed in 1970, exhausting to Stacks S17 and S17A, rated at 0.6 million British thermal units per hour, capacity: 8,439 pounds per hour.

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

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

#### D.2.1 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the five (5) fryers.

#### D.2.2 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 process shall be limited by one of 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:

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

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

<b>Emission Unit Type</b>	<b>Maximum throughput (lbs/hr)</b>	<b>Maximum throughput (tons/hr)</b>	<b>326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)</b>
Fryer No. 2	1560	0.78	3.5
Jumbo Fryer	3246	1.62	5.7
Pie/Stix Fryer	4559	2.28	7.1
Fryer No. 10	10247	5.12	12.3
Fryer No. 11	8439	4.22	10.8

### SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description:

- (a) One (1) natural gas-fired sweet roll oven, modified in 2007 to a soft cake lap oven, identified as Unit No. 1, constructed in 1968, exhausting to Stacks S1 and S2, capacity: 8,040 pounds per hour, rated at 2.9 million British thermal units per hour. Operations include flour and sugar transfer operations, dough and cake mixing operation, gluing operation, a pan coating operation and wrapping.
- (b) One (1) natural gas-fired band oven, identified as Unit No. 8, constructed in 1965, exhausting to Stacks S11, S11A and S11B, capacity: 2,448 pounds per hour, rated at 2.1 million British thermal units per hour. Operations include flour and sugar transfer operations, dough and cake mixing operation, gluing operation and wrapping.
- (i) Two (2) storage silos used to store sugar, constructed in 1965, including pneumatic transfer operations.
- (j) Two (2) storage silos, identified as Semco 1 and Semco 2, used to store flour, constructed in 1965, including pneumatic transfer operations.
- (k) Two (2) storage silos, identified as F&F 1 and F&F 2, used to store flour, constructed in 1983, including pneumatic transfer operations.

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

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

##### D.3.1 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the two (2) ovens and six (6) storage silos.

##### D.3.2 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 process shall be limited by one of 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:

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

<b>Emission Unit Type</b>	<b>Maximum Batch Filling Rate (lbs/hr)</b>	<b>Maximum Batch Filling Rate (tons/hr)</b>	<b>326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)</b>
F & F Flour Silos Receiving	18000.0	9.00	17.87
F & F Flour - Excess Returned	3600.0	1.80	6.08
Semco Flour Silos Receiving	18000.0	9.00	17.87
Semco Flour - Excess Returned	7200.0	3.60	9.67
Granulated Sugar Silos Receiving	18000.0	9.00	17.87
Granulated Sugar Sifter to Grinder Bin	3000.0	1.50	5.38
Transfer into Powdered Sugar Use Bin	4500.0	2.25	7.06
Powdered Sugar Icing Scale	3000.0	1.50	5.38
Granulated Sugar Sifter into Use Bin	3000.0	1.50	5.38
Granulated Sugar Return to Use Bin	6000.0	3.00	8.56

**Compliance Determination Requirements**

**D.3.3 Particulate Control**

- (a) In order to comply with Condition D.3.2, the dust collectors for particulate control shall be in operation and control emissions from four (4) flour silos, Semco flour - excess returned, two (2) granulated sugar silos, transfer into powdered sugar use bin, and granulated sugar return to use bin facilities at all times the four (4) flour silos, Semco flour - excess returned, two (2) granulated sugar silos, transfer into powdered sugar use bin, and granulated sugar return to use bin facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

**Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]**

**D.3.4 Visible Emissions Notations**

- (a) Visible emission notations of the Dust Collectors Stack exhausts, identified as F & F flour system baghouse, Semco flour silo baghouse, granulated sugar silo baghouse and granulated sugar grinder receiving bin baghouse shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

**D.3.5 Record Keeping Requirements**

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- (a) To document compliance with Condition D.3.4, the Permittee shall maintain records of visible emission notations of the Dust Collectors Stack exhausts, identified as F & F flour system baghouse, Semco flour silo baghouse, granulated sugar silo baghouse and granulated sugar grinder receiving bin baghouse once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT (MSOP)  
CERTIFICATION**

Source Name: Interstate Brand Corporation  
Source Address: 3060 National Road, Columbus, Indiana 47201  
Mailing Address: 3060 National Road, Columbus, Indiana 47201  
MSOP No.: M005-27625-00078

**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:

Date:

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	Interstate Brand Corporation
<b>Address:</b>	3060 National Road
<b>City:</b>	Columbus, Indiana 47201
<b>Phone #:</b>	(812) 372-4443
<b>MSOP #:</b>	M005-27625-00078

I hereby certify that Interstate Brand Corporation is :

still in operation.

no longer in operation.

I hereby certify that Interstate Brand Corporation is :

in compliance with the requirements of MSOP M005-27625-00078.

not in compliance with the requirements of MSOP M005-27625-00078.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

### MALFUNCTION REPORT

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER: (317) 233-6865

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_  
INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Interstate Brands Corporation</b>
<b>Source Location:</b>	<b>3060 National Road, Columbus, Indiana 47201</b>
<b>County:</b>	<b>Bartholomew</b>
<b>SIC Code:</b>	<b>2051</b>
<b>Permit Renewal No.:</b>	<b>M005-27625-00078</b>
<b>Permit Reviewer:</b>	<b>Sarah Conner, Ph. D.</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Interstate Brands Corporation relating to the operation of a bakery source.

**History**

On March 17, 2009, Interstate Brands Corporation submitted an application to the OAQ requesting to renew its operating permit. Interstate Brands Corporation was issued a MSOP on July 21, 2004.

**Permitted Emission Units and Pollution Control Equipment**

- (a) One (1) natural gas-fired sweet roll oven, modified in 2007 to a soft cake lap oven, identified as Unit No. 1, constructed in 1968, exhausting to Stacks S1 and S2, capacity: 8,040 pounds per hour, rated at 2.9 million British thermal units per hour.
- (b) One (1) natural gas-fired band oven, identified as Unit No. 8, constructed in 1965, exhausting to Stacks S11, S11A and S11B, capacity: 2,448 pounds per hour, rated at 2.1 million British thermal units per hour.
- (c) One (1) natural gas-fired cake pan washer, identified as Unit No. 9, constructed in 1983, exhausting to Stacks S14 and S15, capacity: 17,010 pounds per hour, rated at 0.5 million British thermal units per hour.
- (d) One (1) natural gas-fired boiler, identified as Boiler No. 1, constructed in 1974, exhausting to Stack S12, rated at: 14.6 million British thermal units per hour.
- (e) One (1) natural gas-fired boiler, identified as Boiler No. 2, constructed in 1987, exhausting to Stack S13, rated at: 8.4 million British thermal units per hour.
- (f) Source-wide natural gas-fired fryers, rated at 8.34 million British thermal units per hour, total, consisting of:
  - (1) One (1) fryer, identified as Fryer No. 1, constructed in 1968, exhausting to Stacks S5, S5A and S5B, rated at 0.6 million British thermal units per hour, capacity: 1,375 pounds per hour;
  - (2) One (1) fryer, identified as Fryer No. 2, constructed in 1968, exhausting to Stacks S6, S6A and S6B, rated at 0.6 million British thermal units per hour, capacity: 1,375 pounds per hour;

- (3) One (1) jumbo fryer, identified as Fryer No. 5, constructed in 1984, exhausting to Stacks S8, S8A and S8B, rated at 1.26 million British thermal units per hour, capacity: 3,246 pounds per hour;
  - (4) One (1) donut fryer, identified as Fryer No. 6, constructed in 1984, exhausting to Stacks S7 and S7A, rated at 0.6 million British thermal units per hour, capacity: 1,447 pounds per hour;
  - (5) One (1) pie/stix fryer, identified as Fryer No. 7, constructed in 2000, exhausting to Stacks S3 and S4, rated at 3.6 million British thermal units per hour, capacity: 4,559 pounds per hour;
  - (6) One (1) gem donut fryer, identified as Fryer No. 10, constructed in 1970, exhausting to Stacks S16, S16A and S16B, rated at 1.08 million British thermal units per hour, capacity: 10,247 pounds per hour; and
  - (7) One (1) gem donut fryer, identified as Fryer No. 11, constructed in 1970, exhausting to Stacks S17 and S17A, rated at 0.6 million British thermal units per hour, capacity: 8,439 pounds per hour.
- (g) One (1) maintenance shop, constructed prior to 1965, consisting of welding, torch cutting, metal lathe, drilling and grinding operations, equipped with a parts washer, capacity: less than 145 gallons of solvent per year.
  - (h) One (1) wrapping operation, constructed in 1982, equipped with a parts washer, capacity: less than 145 gallons of solvent per year.
  - (i) One (1) production operation, consisting of a flour and sugar transfer operation, dough and cake mixing operation, gluing operation and a pan coating operation.
  - (j) Two (2) storage silos used to store sugar, constructed in 1965, including pneumatic transfer operations.
  - (k) Two (2) storage silos, identified as Semco 1 and Semco 2, used to store flour, constructed in 1965, including pneumatic transfer operations.
  - (l) Three (3) ink jet printers, installed in 2003, capacity: 9.2 gallons of ink per year and sixty-three (63) gallons of make up solution per year.
  - (m) The following miscellaneous storage tanks, each with a capacity less than 8,000 gallons:
    - (1) Two (2) frying fat storage tanks constructed in 1960, capacity: 4,500 gallons and 1972, capacity: 6,300 gallons;
    - (2) One (1) Soya oil storage tank constructed in 1985, capacity: 6,700 gallons;
    - (3) Two (2) liquid fructose storage tanks constructed in 1970, capacity 6,000 gallons and 1975, capacity: 6,700 gallons; and
    - (4) Two (2) liquid chocolate storage tanks constructed in 1960, capacity: 7,200 gallons, each.
  - (n) The following miscellaneous storage tanks, each with a capacity less than 1,000 gallons:
    - (1) One (1) motor oil storage tank constructed in 1970, capacity: 275 gallons; and

- (2) Two (2) used oil storage tanks constructed in 1973 and 1996, capacity: 275 gallons, each.
- (o) Two (2) diesel fuel storage tanks, constructed in 1992, capacity: 15,000 gallons, each.
- (p) Two (2) natural gas-fired space heaters, constructed in 1986, rated at 0.12 million British thermal units per hour, each.
- (q) Seven (7) natural gas-fired space heaters, constructed in 1990, rated at 0.1 million British thermal units per hour, each.
- (r) One (1) natural gas-fired space heater, constructed in 1990, rated at 0.18 million British thermal units per hour.
- (s) One (1) natural gas-fired space heater, constructed in 1986, rated at 0.135 million British thermal units per hour.
- (t) Two (2) natural gas-fired space heaters, constructed in 1990, rated at 0.16 million British thermal units per hour, each.
- (u) Two (2) natural gas-fired space heaters, constructed in 1986, rated at 0.2 million British thermal units per hour, each.
- (v) One (1) natural gas-fired space heater, constructed in 1986, rated at 0.165 million British thermal units per hour.

#### **Emission Units and Pollution Control Equipment Constructed and Operated without a Permit**

The source also consists of the following emission units that were constructed and operated without a permit:

- (a) One (1) ink jet label printer, installed in 2006. One Markum printer, installed in 2000. One Linx printer, installed in 1998. Combined annual throughput of ink and make up solution for all printers is less than 200 total gallons per year.
- (b) The following miscellaneous storage tanks, each with a capacity less than 6,000 gallons:
  - (5) One (1) palm oil storage tank constructed in 1968, capacity: 4,500 gallons.
  - (6) Two (2) used palm oil storage tanks, constructed in 1968, capacity: 5,175 gallons and 2001, capacity: 1,550 gallons.
- (c) The following miscellaneous storage tanks, each with a capacity less than 1,000 gallons:
  - (3) Two (2) motor oil storage tanks constructed in 1992, capacity: 275 gallons, each.
- (d) Two (2) storage silos, identified as F&F 1 and F&F 2, used to store flour, constructed in 1983, including pneumatic transfer operations.
- (e) One (1) natural gas-fired space heater constructed in 2005, rated at 0.06 million British Thermal units per hour.

#### **Modified Emission Units and Pollution Control Equipment**

- (a) One (1) natural gas-fired sweet roll oven, modified in 2007 to a soft cake lap oven, identified as Unit No. 1, constructed in 1968, exhausting to Stacks S1 and S2, capacity:

8,040 pounds per hour, rated at 2.9 million British thermal units per hour. Operations include flour and sugar transfer operations, dough and cake mixing operation, gluing operation, a pan coating operation and wrapping.

- (b) One (1) natural gas-fired band oven, identified as Unit No. 8, constructed in 1965, exhausting to Stacks S11, S11A and S11B, capacity: 2,448 pounds per hour, rated at 2.1 million British thermal units per hour. Operations include flour and sugar transfer operations, dough and cake mixing operation, gluing operation and wrapping.
- (f) Source-wide natural gas-fired fryers, each equipped with flour and sugar transfer operations, dough mixing operations, and a common wrapping operation consisting of:
  - (2) One (1) fryer, identified as Fryer No. 2, constructed in 1968, exhausting to Stacks S6, S6A and S6B, rated at 0.6 million British thermal units per hour, capacity: 1,560 pounds per hour;
- (g) One (1) maintenance shop, constructed prior to 1965, consisting of welding, torch cutting, metal lathe, drilling and grinding operations, equipped with a water based parts washer.
- (h) One (1) wrapping maintenance shop, constructed in 1982, equipped with a water based parts washer.
- (l) Three (3) ink jet printers, installed in 2003, one (1) ink jet label printer, installed in 2006, one Markum printer, installed in 2000, and one Linx printer, installed in 1998. Combined actual annual throughput of ink and make up solution for all printers is less than 200 total gallons per year.
- (m) The following miscellaneous storage tanks, each with a capacity less than 8,000 gallons:
  - (1) Two (2) frying fat storage tanks constructed in 1960, capacity: 4,500 gallons and 1972, capacity: 6,300 gallons, both modified to palm oil storage tanks in 2009;

#### **Emission Units and Pollution Control Equipment Removed From the Source**

- (f) Source-wide natural gas-fired fryers, rated at 8.34 million British thermal units per hour, total, consisting of:
  - (1) One (1) fryer, identified as Fryer No. 1, constructed in 1968, exhausting to Stacks S5, S5A and S5B, rated at 0.6 million British thermal units per hour, capacity: 1,375 pounds per hour; and
  - (4) One (1) donut fryer, identified as Fryer No. 6, constructed in 1984, exhausting to Stacks S7 and S7A, rated at 0.6 million British thermal units per hour, capacity: 1,447 pounds per hour.

#### **Existing Approvals**

The source has been operating under MSOP M005-16926-00078, issued July 21, 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 MSOP Renewal:

(a) Section D.3

The original Section D.3 has been revised in this renewal. Section D.3 contained the rule applicability for 326 IAC 8-3 (Organic Solvent Degreasing Operations) for the parts washer that is part of the wrapping operation. The two (2) parts washers, one (1) in the maintenance operation and one (1) in the wrapping operation no longer use solvents containing VOC, they are now water based; therefore, the requirements of 326 IAC 8-3 do not apply to the two (2) parts washers. Section D.3 now contains the applicable requirements for the dry ingredient storage and conveying at the source.

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

(a) All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

(b) Section D.4

Section D.4 has been removed from this renewal. Section D.4 contained the requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b, Subpart, Kb, 326 IAC 12), which is not applicable to any of the storage tanks at the source. The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b, Subpart, Kb, 326 IAC 12) are not required for the two (2) frying fat storage tanks, the two (2) liquid fructose storage tanks, the two (2) liquid chocolate storage tanks, the one (1) motor oil storage tank and one (1) of the used oil storage tanks because each tank was constructed prior to July 23, 1984. In addition, the requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b, Subpart, Kb, 326 IAC 12) are not required for the one (1) Soya oil storage tank, the one (1) other used oil storage tank and the two (2) diesel fuel storage tanks because each tank has a capacity less than seventy-five (75) cubic meters (19,800 gallons).

## Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit".

(a) The ink jet label printer, Markum printer, Linx printer, used palm oil storage tank and space heater each have the potential to emit all regulated pollutants at exempt levels specified in 326 IAC 2-1.1-3(e) and would not require prior approval to construct or operate pursuant to 326 IAC 2-1.1-3(e).

- (b) The palm oil storage tank, used palm oil storage tank and two (2) motor oil storage tanks are pre-existing and unlisted in their previous MSOP No. 005-16926-00078, issued on July 21, 2004. However, each of these units have the potential to emit all regulated pollutants at exempt levels specified in 326 IAC 2-1.1-3(e) and would not require prior approval to construct or operate pursuant to 326 IAC 2-1.1-3(e).
- (c) Two (2) storage silos, identified as F&F 1 and F&F 2, are pre-existing and unlisted in their previous MSOP No. 005-16926-00078, issued on July 21, 2004. These units would have qualified for a notice-only change pursuant to 326 IAC 2-6.1-6(d)(13) because these storage silos are the same type of emission units that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission units.
- (d) Modifications were made to the sweet roll oven, the band oven, the fryers, the maintenance shop, the wrapping maintenance shop and the printers. These would all qualify for a notice-only changes pursuant to 326 IAC 2-6.1-6(d)(2) because these are minor changes in descriptive information concerning the source or emissions unit or units.
- (e) The frying fat storage tanks were converted to palm oil storage tanks. The palm oil storage tanks have the potential to emit all regulated pollutants at exempt levels specified in 326 IAC 2-1.1-3(e) and would not require prior approval to construct or modify pursuant to 326 IAC 2-1.1-3(e).

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 Bartholomew County

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, 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> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for 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. Bartholomew 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**  
 Bartholomew County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**  
 Bartholomew County has been classified as attainment or unclassifiable in Indiana for 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, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, 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.

<b>Pollutant</b>	<b>tons/year</b>
*PM	133.72
*PM <sub>10</sub>	52.68
*PM <sub>2.5</sub>	52.29
SO <sub>2</sub>	0.10
VOC	31.41
CO	13.92
NO <sub>x</sub>	16.57

<b>HAPs</b>	<b>tons/year</b>
Hexane	0.298
Methanol	0.193
Formaldehyde	0.012
All other single HAPs	negligible
<b>Total</b>	<b>0.506</b>

\*Potential throughput of each ingredient (flour and sugar) is bottlenecked by the amount that is required to run all the production lines simultaneously at the source. Therefore, the potential to emit particulate from dry ingredient storage and conveying were based on the bottleneck information provided by the source (see Appendix A for details).

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

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year.

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of Part 70 applicability.

#### **Potential to Emit After Issuance**

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

#### **Federal Rule Applicability**

- (a) The requirements of the New Source Performance Standards for Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971 (40 CFR 60.40, Subpart D), are not included in the permit for the two (2) boilers identified as Boiler 1 and Boiler 2, because each boiler is rated at less than two hundred and fifty (250) MMBtu per hour.
- (b) The requirements of the New Source Performance Standards for Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 (40 CFR 60.40Da, Subpart Da), are not included in the permit for the two (2) boilers identified as Boiler 1 and Boiler 2, because each boiler is rated at less than two hundred and fifty (250) MMBtu per hour.
- (c) The requirements of the New Source Performance Standards for Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60.40b, Subpart Db), are not included in the permit for two (2) boilers identified as Boiler 1 and Boiler 2, because each boiler is rated at less than one hundred (100) MMBtu per hour.

- (d) The requirements of the New Source Performance Standard for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60.40c, Subpart Dc), are not included in the permit for two (2) boilers identified as Boiler 1 and Boiler 2, since their 1974 and 1987 construction dates are prior to the June 9, 1989 applicability date of NSPS Subpart Dc.
- (e) The requirements of the New Source Performance Standard for Standards of Performance for Grain Elevators (40 CFR 60.300, Subpart DD), are not included in the permit for the four (4) flour and two (2) sugar storage silos, because the storage silos are not equipped with grain elevators.
- (f) The requirements of the New Source Performance Standard for the Graphic Arts Industry: Publication Rotogravure Printing (40 CFR 60.430, Subpart QQ, 326 IAC 12) are not included in the permit for the six (6) printers at the source are not publication rotogravure printing presses.
- (g) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b, Subpart, Kb, 326 IAC 12) are not required for two (2) liquid fructose storage tanks, two (2) liquid chocolate storage tanks, one (1) palm oil storage tank, one (1) used palm oil storage tank (constructed in 1968) and one (1) used oil storage tank (constructed in 1973) and (1) motor oil storage tank (constructed in 1970) because each tank was constructed prior to July 23, 1984.
- (h) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b, Subpart, Kb, 326 IAC 12) are not required for one (1) Soya oil storage tank, one (1) used oil storage tank (constructed in 1996), one (1) used palm oil storage tank (constructed in 2001), two (2) motor oil storage tanks (constructed in 1992) and two (2) diesel fuel storage tanks because each tank has a capacity less than seventy-five (75) cubic meters (19,800 gallons).
- (i) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, 40 CFR 63.460, Subpart T (326 IAC 20-6), are not included in the permit for the two (2) parts washers that are part of the one (1) maintenance operation and the one (1) wrapping operation because the two (2) parts washers do not use halogenated solvents. The two (2) parts washers use water based cleaners.
- (k) The requirements of the NESHAP for National Emission Standard for Hazardous Air Pollutants for the Printing and Publishing Industry, 40 CFR 63.820, Subpart KK (326 IAC 20-18), are not included in the permit because this source is not a major source of hazardous air pollutants (HAPs).
- (l) The requirements of the NESHAP for National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles, 40 CFR 63.4280, Subpart OOOO (326 IAC 20-77), are not included in the permit because this source is not a major source of hazardous air pollutants (HAPs).
- (m) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

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

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

This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

#### **326 IAC 2-6 (Emission Reporting)**

This source is located in Bartholomew County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

#### **326 IAC 5-1 (Opacity Limitations)**

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

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

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

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

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

The source is not subject to the requirements of 326 IAC 6-5, because the paved and unpaved roads have potential fugitive particulate emissions less than 25 tons per year.

#### **326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)**

All emission units at the source have potential to emit less than twenty-five (25) tons per year and less than ten (10) pounds per hour of sulfur dioxide; therefore, all emission units at the source are not subject to the requirements of 326 IAC 7-1.1

#### **326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**

The source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from any emission unit at the source is less than twenty-five (25) tons per year.

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

The source is located in Bartholomew County and was in existence prior to October 7, 1974; therefore, the requirements of 326 IAC 8-6-1 do not apply to this source.

#### **326 IAC 8-9 (Volatile Organic Liquid Vessels)**

The source-wide storage tanks are not subject to the requirements of 326 IAC 8-9 (Volatile Organic Liquid Vessels) because the source is located in Bartholomew County.

## State Rule Applicability – Individual Facilities

### Boilers and Heaters

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

Pursuant to 326 IAC 6-2-3, Particulate emissions from indirect heating facilities existing and in operation before September 21, 1983, shall be limited by the following equation:

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

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBTU/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet.

$$Pt = 50 \times 0.67 \times 22 / 76.5 \times (14.6)^{0.75} \times 1^{0.25} = 1.29 \text{ lb PM/MMBtu}$$

Pursuant to 326 IAC 6-2-3(e), particulate emissions from any facility used for indirect heating purposes which has 250 MMBtu/hr heat input or less and which began operation after June 8, 1972, shall in no case exceed 0.6 lb/MMBtu heat input. Therefore, the particulate emissions from one (1) natural gas-fired boiler, identified as Boiler No. 1, constructed in 1974, shall not exceed 0.6 pound per million British thermal units.

The potential to emit PM emissions from Boiler No.1 is:

$$14.6 \text{ MMBtu/hr} \times 8,760 \text{ hrs/yr} \times 1 \text{ MMCF/1,000 MMBtu} = 127.9 \text{ MMCF/yr} = \text{Potential Throughput}$$
$$127.9 \text{ MMCF/yr} \times \text{Emission Factor of } 1.9 \text{ lb/MMCF} = \text{lbs/year} \times 1 \text{ year}/8,760 \text{ hrs} = 0.028 \text{ lbs/hr}$$

$$(0.028 \text{ lb/hr}/14.6 \text{ MMBtu/hr}) = 0.002 \text{ lb PM per MMBtu}$$

Therefore, Boiler No. 1 will be able to comply with this rule.

#### 326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)

(a) Pursuant to 326 IAC 6-2-4, indirect heating units constructed after September 21, 1983 shall be limited using the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input.

Q = The total source maximum operating capacity in million British thermal units per hour.

$Pt = 1.09 / ((8.40 + 14.6 \text{ mmBtu/hr})^{0.26}) = 0.482$  pounds per million British thermal units

Therefore, the particulate emissions from one (1) natural gas-fired boiler, identified as Boiler No. 2, constructed in 1987, shall not exceed of 0.482 pound per million British thermal units.

The potential to emit PM emissions from Boiler No.2 is:

$8.40 \text{ MMBtu/hr} \times 8,760 \text{ hrs/yr} \times 1 \text{ MMCF}/1,000 \text{ MMBtu} = 73.6 \text{ MMCF/yr} = \text{Potential Throughput}$

$73.6 \text{ MMCF/yr} \times \text{Emission Factor of } 1.9 \text{ lb/MMCF} = \text{lbs/year} \times 1 \text{ year}/8,760 \text{ hrs} = 0.016 \text{ lbs/hr}$

$(0.016 \text{ lb/hr}/8.40 \text{ MMBtu/hr}) = 0.002 \text{ lb PM per MMBtu}$

Therefore, Boiler No. 2 will be able to comply with this rule.

- (b) The space heaters are exempt from the requirements of 326 IAC 6-2 because they are not sources of indirect heating.

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

- (a) The boilers, identified as Boiler No. 1 and Boiler No. 2, are each exempt from the requirements of 326 IAC 6-3 since they are sources of indirect heating.
- (b) Pursuant to 326 IAC 6-3-1(b)(14), the source-wide space heaters are not subject to the requirements of 326 IAC 6-3 because the source-wide space heaters have potential particulate emissions less than 0.551 pounds per hour.

#### Fryers

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

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from each of the listed emission units shall be limited by the following:

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

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

<b>Emission Unit Type</b>	<b>*Maximum throughput (lbs/hr)</b>	<b>Maximum throughput (tons/hr)</b>	<b>326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)</b>	<b>Max PTE Particulate (lb/hour)</b>
Fryer No. 2	1560	0.78	3.5	0.62
Jumbo Fryer	3246	1.62	5.7	1.30
Pie/Stix Fryer	4559	2.28	7.1	1.82
Fryer No. 10	10247	5.12	12.3	4.10
Fryer No. 11	8439	4.22	10.8	3.38

\*The bottleneck rates were not taken into account for the applicability of 326 IAC 6-3-2. The maximum batch filling rates for each emission unit were used to determine the applicability of 326 IAC 6-3-2.

The potential PM emissions from each of the natural gas-fired fryers are less than each of the allowable PM emission rates. Therefore, each of the natural gas-fired fryers will be able to comply with 326 IAC 6-3-2 without the use of control devices.

Ingredient Storage and Conveying

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

The requirements of 326 IAC 6-3-2 are applicable to each of the ingredient storage and conveying emission units. Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from each of the listed emission units shall be limited by the following:

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

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

<b>Emission Unit Type</b>	<b>*Maximum Batch Filling Rate (lbs/hr)</b>	<b>Maximum Batch Filling Rate (tons/hr)</b>	<b>326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)</b>	<b>Max PTE Particulate (lb/hour)</b>
F & F Flour Silos Receiving	18000.0	9.00	17.87	28.26
F & F Flour - Excess Returned	3600.0	1.80	6.08	5.65
Semco Flour Silos Receiving	18000.0	9.00	17.87	28.26
Semco Flour - Excess Returned	7200.0	3.60	9.67	11.30
Granulated Sugar Silos Receiving	18000.0	9.00	17.87	28.26
Granulated Sugar Sifter to Grinder Bin	3000.0	1.50	5.38	4.71
Transfer into Powdered Sugar Use Bin	4500.0	2.25	7.06	7.07
Powdered Sugar Icing Scale	3000.0	1.50	5.38	4.71
Granulated Sugar Sifter into Use Bin	3000.0	1.50	5.38	4.71
Granulated Sugar Return to Use Bin	6000.0	3.00	8.56	9.42

\*The bottleneck rates were not taken into account for the applicability of 326 IAC 6-3-2. The maximum batch filling rates for each emission unit were used to determine the applicability of 326 IAC 6-3-2. The potential to emit particulate from the following emission units: F & F flour -excess returned, granulated sugar sifter to grinder bin, powdered sugar icing scale, and granulated sugar sifter into use bin, are each less than the allowable particulate emission rates. These facilities are able to comply with 326 IAC 6-3-2 without the use of controls.

In order to comply with 326 IAC 6-3-2, the dust collectors for particulate control shall be in operation and control emissions from four (4) flour silos, Semco flour -excess returned, two (2) granulated sugar silos, transfer into powdered sugar use bin, and granulated sugar return to use bin facilities at all times the four (4) flour silos, Semco flour sifter, two (2) granulated sugar silos, transfer into powdered sugar use bin, and granulated sugar return to use bin facilities are in operation.

### Printers

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

Pursuant to 326 IAC 6-3-1(b)(14), the six (6) printers are not subject to the requirements of 326 IAC 6-3 because each of the six (6) printers have potential particulate emissions less than 0.551 pounds per hour.

#### 326 IAC 8-5-5 (Graphics Arts Operations)

The six (6) printers are not subject to the requirements of 326 IAC 8-5-5 because the printers are not packaging rotogravure, publishing rotogravure or flexographic printing facilities and each of the six (6) printers each have the potential to emit VOC less than twenty-five (25) tons per year.

### Parts Washers

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

- (a) Pursuant to 326 IAC 6-3-1(b)(14), the one (1) maintenance shop, which consists of a parts washer and a welding operation, is not subject to the requirements of 326 IAC 6-3 because the one (1) maintenance shop has potential particulate emissions less than 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-1(b)(14), the one (1) wrapping operation, which consists of a parts washer, is not subject to the requirements of 326 IAC 6-3 because the one (1) wrapping operation has no potential to emit particulate matter (i.e., less than 0.551 pounds per hour).

#### 326 IAC 8-3 (Organic Solvent Degreasing Operations)

Pursuant to 8-3-1(a)(1) the parts washer that is part of the one (1) maintenance operation is not subject to the provisions of 326 IAC 8-3 because it was constructed prior to January 1, 1980 and is located in Bartholomew County. In addition parts washer that is part of the one (1) maintenance operation and the parts washer that is part of the one (1) wrapping operation are not subject to 326 IAC 8-3 because they each use water based solvents and 326 IAC 8-3 only applies to organic solvent degreasing operations that use solvents containing VOC.

### Storage Tanks, Ovens, Cake Pan Washer and Production Operation

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

- (a) Pursuant to 326 IAC 6-3-1(b)(14), the source-wide storage tanks are not subject to the requirements of 326 IAC 6-3 because they do not have the potential to emit particulate matter (i.e., less than 0.551 pounds per hour).

- (b) Pursuant to 326 IAC 6-3-1(b)(14), the one (1) natural gas-fired sweet roll oven is not subject to the requirements of 326 IAC 6-3 because the one (1) natural gas-fired sweet roll oven has potential particulate emissions less than 0.551 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-1(b)(14), the one (1) natural gas-fired band oven is not subject to the requirements of 326 IAC 6-3 because the one (1) natural gas-fired band oven has potential particulate emissions less than 0.551 pounds per hour.
- (d) Pursuant to 326 IAC 6-3-1(b)(14), the one (1) natural gas-fired cake pan washer is not subject to the requirements of 326 IAC 6-3 because the one (1) natural gas-fired cake pan washer has potential particulate emissions less than 0.551 pounds per hour.
- (e) Pursuant to 326 IAC 6-3-1(b)(14), the one (1) production operation, which consists of a flour and sugar transfer operation, dough and cake mixing operation, gluing operation and a pan coating operation, is not subject to the requirements of 326 IAC 6-3 because the one (1) production operation has potential particulate emissions less than 0.551 pounds per hour.

### Compliance Determination and Monitoring Requirements

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

- (a) Each of the four (4) flour silos, Semco flour -excess returned, two (2) granulated sugar silos, into powdered sugar use bin, and granulated sugar return to use bin facilities have applicable compliance monitoring requirements as specified below:

Emission Unit/Control	Operating Parameters	Frequency	Range	Excursions and Exceedances
Dust Collectors Stack exhausts, identified as F & F system baghouse, Semco silo baghouse, granulated sugar silo baghouse and granulated sugar grinder receiving bin baghouse	Visible Emissions	Once per day	Normal-Abnormal	Response Steps

### Recommendation

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

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

An application for the purposes of this review was received on March 17, 2009. Additional information was received on April 23, 2009, April 24, 2009, May 7, 2009, May 14, 2009, May 15, 2009, May 19, 2009, May 21, 2009, May 28, 2009, June 24, 2009, June 29, 2009 and July 10, 2009.

### Conclusion

The operation of this bakery source shall be subject to the conditions of the attached MSOP Renewal No. M005-27625-00078.

**Appendix A: Emissions Calculations  
Summary from Entire Source**

**Company Name: Interstate Brands Corporation  
Address City IN Zip: 3060 National Road, Columbus, Indiana 47201  
Permit Number: M005-27625-00078  
Reviewer: Sarah Conner, Ph. D.  
Date: 7/10/2009**

**Uncontrolled Emissions (tons per year)**

Facility	PM	PM10	PM2.5	SO2	NOx	VOC	CO
Combustion	0.315	1.26	1.26	0.099	16.57	0.912	13.92
Frying	12.86	10.61	10.61	-	-	1.37	-
Parts Washer / Glues	-	-	-	-	-	6.805	-
Welding	0.006	0.006	0.006	-	-	-	-
Storage Tanks	-	-	-	-	-	0.022	-
Ingredient Storage and Conveying	118.60	40.37	40.37	-	-	-	-
Printing	-	-	-	-	-	0.870	-
Yeast Baking	-	-	-	-	-	21.430	-
Paved Roads	0.95	0.18	0.02	-	-	-	-
Unpaved Roads	0.99	0.25	0.03	-	-	-	-
<b>Total</b>	<b>133.72</b>	<b>52.68</b>	<b>52.29</b>	<b>0.10</b>	<b>16.57</b>	<b>31.41</b>	<b>13.92</b>
<b>MSOP Thresholds</b>	<b>250</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>
<b>PSD Major Source Thresholds</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>

**HAPs Emissions (tons per year)**

Facility	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium
Combustion	3.48E-04	1.99E-04	0.012	0.298	0.001	8.29E-05	1.82E-04
Welding	-	-	-	-	-	-	-
Printing	-	-	-	-	-	-	-
<b>Total</b>	<b>3.48E-04</b>	<b>1.99E-04</b>	<b>0.012</b>	<b>0.298</b>	<b>5.64E-04</b>	<b>8.29E-05</b>	<b>1.82E-04</b>

Facility	Chromium	Manganese	Nickel	Methanol	Total
Combustion	2.32E-04	6.30E-05	3.48E-04	-	0.313
Welding	-	2.16E-04	-	-	2.16E-04
Printing	-	-	-	0.193	0.193
<b>Total</b>	<b>2.32E-04</b>	<b>6.30E-05</b>	<b>3.48E-04</b>	<b>0.193</b>	<b>0.506</b>

**Appendix A: Emissions Calculations**  
**Emissions from Dry Ingredient Storage and Conveying**

Company Name: Interstate Brands Corporation  
 Address City IN Zip: 3060 National Road, Columbus, Indiana 47201  
 Permit Number: M005-27625-00078  
 Reviewer: Sarah Conner, Ph. D.  
 Date: 7/10/2009

The uncontrolled potential emissions of particulate from dry ingredient storage and conveying before controls are estimated using AP-42 Table 11.12-2 emission factors for the uncontrolled truck unloading of cement supplement to elevated storage silo (pneumatic).

AP-42 Table 11.12-2 reference	Process	Emission Factor (lbs/ton)*		Filter Unit Control Efficiency	
		PM	PM10	PM	PM10
3-05-011-17	Pneumatic	3.14	1.10	99.7%	99.7%
3-05-011-10	Remove from bins to mixer	0.995	0.2780		
3-05-011-05	Transfer (hand adds)	0.0021	0.00099		

**Potential to Emit (PTE) of Particulate (PM and PM10)**

Emission Unit	Potential Ingredient Throughput (lbs/hr)**	Potential Ingredient Throughput (tons/hr)**	Uncontrolled PTE of PM (lbs/hour)	Uncontrolled PTE of PM10 (lbs/hour)	Uncontrolled PTE of PM (tons/yr)	Uncontrolled PTE of PM10 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)
F & F Flour Silo Receiving	1726.0	0.86	2.71	0.95	11.87	4.16	3.6E-02	1.2E-02
***F & F Flour - Excess Returned	172.6	0.09	0.27	0.09	1.19	0.42	3.6E-03	1.2E-03
F & F Flour - Remove from Draw Bins	1726.0	0.86	0.86	0.24	3.76	1.05	N/A	N/A
F & F Flour - Hand adds	2828.0	1.41	2.97E-03	1.40E-03	1.30E-02	6.13E-03	N/A	N/A
Semco Flour Silo Receiving	1232.0	0.62	1.93	0.68	8.47	2.97	2.5E-02	8.9E-03
***Semco Flour - Excess Returned	123.2	0.06	0.19	0.07	0.85	0.30	2.5E-03	8.9E-04
Semco Flour - Remove from Draw Bins	1232.0	0.62	0.61	0.17	2.68	0.75	N/A	N/A
Granulated Sugar Silo Receiving	4688.0	2.34	7.36	2.58	32.24	11.29	9.7E-02	3.4E-02
Sugar Grinder Bin	1992.0	1.00	3.13	1.10	13.70	4.80	4.1E-02	1.4E-02
Transfer into Powdered Sugar Use Bin	1992.0	1.00	3.13	1.10	13.70	4.80	4.1E-02	1.4E-02
***Powdered Sugar - Excess Returned	199.2	0.10	0.31	0.11	1.37	0.48	4.1E-03	1.4E-03
Powdered Sugar Icing Scale - Remove from scale	1992.0	1.00	0.99	0.28	4.34	1.21	N/A	N/A
Granulated Sugar Use Bins	2696.0	1.35	4.23	1.48	18.54	6.49	5.6E-02	1.9E-02
Granulated Draw Bins - Remove from bin	2696.0	1.35	1.34	0.37	5.87	1.64	N/A	N/A
Bag Sugars in Toppings - Hand Adds	1110.0	0.56	1.17E-03	5.49E-04	5.10E-03	2.41E-03	N/A	N/A
Hand Added Powders in Toppings	112.0	0.06	1.18E-04	5.54E-05	5.15E-04	2.43E-04	N/A	N/A
<b>Totals</b>					<b>118.6</b>	<b>40.4</b>	<b>0.3</b>	<b>0.1</b>

**Methodology**

\* Emission Factors from AP-42 Table 11.12-2 for uncontrolled truck unloading of cement supplement to elevated storage silo (pneumatic) 3-05-011-17, Truck loading (truck mix) 3-05-011-10 and sand transfer 3-05-011-05.

\*\* Each dry ingredient storage silo has a maximum batch filling rate of 300 lbs/minute, based on truck unloading of 45,000 lb of flour or sugar over 150 minutes, which gives a maximum ingredient throughput of 18,000 lbs/hr for the silos. Pneumatic transfers from the silos for processing was provided by the source. Flour is transferred to multiple locations at a mass rate of 1.48 tons per hour while granular sugar is transferred at a mass rate of 2.34 tons per hour. Potential throughput of each ingredient (flour and sugar) is bottlenecked by the amount that is required to run all the production lines simultaneously.

\*\*\* Excess material (flour or sugar) in one of the pneumatic transfer lines (assumed to be less than 10% of the potential throughput) is recycled back to another location.

Maximum Hourly Throughput (tons/hr) = [Maximum Hourly Throughput (lbs/hr)] / [2000 lbs/ton]

Uncontrolled PTE of PM or PM10 (lbs/hour) = [Maximum Hourly Throughput (tons/hr)] \* [Emission Factor (lbs/ton)]

Uncontrolled PTE of PM or PM10 (tons/year) = [Uncontrolled PTE of PM or PM10 (lbs/hour)] \* [8760 hours/year] / [2000 lbs/ton]

Controlled PTE of PM or PM10 (tons/year) = [Uncontrolled PTE of PM or PM10 (tons/year)] \* [1 - Control Efficiency]

**Compliance with 326 IAC 6-3-2**

Emission Unit Type	Maximum Batch Filling Rate (lbs/min)*	Maximum Batch Filling Rate (lbs/hr)	Maximum Batch Filling Rate (tons/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)	Emission factor (lb/ton)	Max PTE Particulate (lb/hour)
F & F Flour Silos Receiving	300.0	18000.0	9.00	17.87	3.140	28.26
F & F Flour - Excess Returned	60.0	3600.0	1.80	6.08	3.140	5.65
Semco Flour Silos Receiving	300.0	18000.0	9.00	17.87	3.140	28.26
Semco Flour - Excess Returned	120.0	7200.0	3.60	9.67	3.140	11.30
Granulated Sugar Silos Receiving	300.0	18000.0	9.00	17.87	3.140	28.26
Granulated Sugar Sifter to Grinder Bin	50.0	3000.0	1.50	5.38	3.140	4.71
Transfer into Powdered Sugar Use Bin	75.0	4500.0	2.25	7.06	3.140	7.07
Powdered Sugar Excess return	50.0	3000.0	1.50	5.38	3.140	4.71
Granulated Sugar Sifter into Use Bin	50.0	3000.0	1.50	5.38	3.140	4.71
Granulated Sugar Return to Use Bin	100.0	6000.0	3.00	8.56	3.140	9.42

\*The maximum batch filling rate (lbs/min) were provided by the source.

The use of the filter units will ensure compliance with each of the limits above.

**Appendix A: Emissions Calculations  
Welding and Thermal Cutting**

**Company Name: Interstate Brands Corporation  
Address City IN Zip: 3060 National Road, Columbus, Indiana 47201  
Permit Number: M005-27625-00078  
Reviewer: Sarah Conner, Ph. D.  
Date: 7/10/2009**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(carbon steel)	1.00	0.010		0.006	0.0005			0.0001	0.00001	0.00	0.00	0.00001
Stick (E7018 electrode)	2.00	0.018		0.021	0.0009			0.001	0.00003	0.00	0.00	0.00003
Tungsten Inert Gas (TIG)(carbon steel)	2.00	0.008		0.006	0.0005			0.0001	0.00001	0.00	0.00	0.00001
Oxyacetylene(carbon steel)	2.00	0.004		0.006	0.0005			0.00004	0.000004	0.00	0.00	0.000004
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Plasma**	1.00	0.500	2.00	0.0039				0.0005	0.00	0.00	0.00	0.00
<b>EMISSION TOTALS</b>												
Potential Emissions lbs/hr								0.001	0.00005	0.00	0.00	0.00005
Potential Emissions lbs/day								0.034	0.001	0.00	0.00	0.001
Potential Emissions tons/year								<b>0.006</b>	<b>0.0002</b>	<b>0.000</b>	<b>0.000</b>	<b>0.0002</b>

**METHODOLOGY**

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

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

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

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

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

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



**Appendix A: Emission Calculations  
Fryers - Process**

**Company Name: Interstate Brands Corporation  
Address City IN Zip: 3060 National Road, Columbus, Indiana 47201  
Permit Number: M005-27625-00078  
Reviewer: Sarah Conner, Ph. D.  
Date: 7/10/2009**

	**Potential Throughput lbs/hr	**Potential Throughput tons/hr	Potential Throughput tons/yr
Fryer No. 2	1560	0.78	6833
Jumbo Fryer	1828	0.91	8007
Pie/Stix Fryer	1653	0.83	7240
Fryer No. 10	1150	0.58	5037
Fryer No. 11	1150	0.58	5037

Emission Factor in lb/ton	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
	0.800	0.660	0.66	0.00	0.00	0.085	0.00
Potential Emission in tons/yr	2.73	2.25	2.25	0.00	0.00	0.29	0.00
	3.20	2.64	2.64	0.00	0.00	0.34	0.00
	2.90	2.39	2.39	0.00	0.00	0.31	0.00
	2.01	1.66	1.66	0.00	0.00	0.21	0.00
	2.01	1.66	1.66	0.00	0.00	0.21	0.00
<b>Totals</b>	<b>12.9</b>	<b>10.6</b>	<b>10.6</b>	<b>0.0</b>	<b>0.0</b>	<b>1.4</b>	<b>0.0</b>

\*PM emission factor is filterable PM and condensable. PM10 emission factor was calculated from controlled and uncontrolled PM data. PM2.5 emission factor assumed to be equal to PM10.

\*\* Potential throughput is bottlenecked by the amount of each ingredient (flour and sugar) that is required to run all the production lines simultaneously.

**Methodology**

Emission Factors from AP 42, Chapter 9.13, Table 9.13.3-2 (SCC #3-02-036-02)

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

**Compliance with 326 IAC 6-3-2**

Emission Unit Type	Maximum throughput (lbs/hr)	Maximum throughput (tons/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)	Emission factor (lb/ton)	Max PTE Particulate (lb/hour)
Fryer No. 2	1560	0.78	3.5	0.800	0.62
Jumbo Fryer	3246	1.62	5.7	0.800	1.30
Pie/Stix Fryer	4559	2.28	7.1	0.800	1.82
Fryer No. 10	10247	5.12	12.3	0.800	4.10
Fryer No. 11	8439	4.22	10.8	0.800	3.38

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name: Interstate Brands Corporation  
Address City IN Zip: 3060 National Road, Columbus, Indiana 47201  
Permit Number: M005-27625-00078  
Reviewer: Sarah Conner, Ph. D.  
Date: 7/10/2009**

MMBtu/hr		Heat Input Capacity	Potential Throughput	Pollutant							
		MMBtu/hr	MMCF/yr	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO	
soft cake lap oven	2.9										
band oven	2.1										
boiler No. 2	8.4										
boiler No. 1	14.6	37.84	331.5								
cake pan washer	0.5	Total									
fryer No. 2	0.6										
fryer No. 5	1.26										
fryer No. 7	3.6										
fryer No. 10	1.08										
fryer No. 11	0.6										
space heaters	2.2										
<b>Total</b>	<b>37.84</b>										
				Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100	5.5	84
				Potential Emission in tons/yr	0.31	1.26	1.26	0.10	**see below	0.91	13.92

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 is also filterable and condensable PM2.5 combined.

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
HAPs Emissions**

**Company Name: Interstate Brands Corporation  
Address City IN Zip: 3060 National Road, Columbus, Indiana 47201  
Permit Number: M005-27625-00078  
Reviewer: Sarah Conner, Ph. D.  
Date: 7/10/2009**

HAPs - Organic					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.481E-04	1.989E-04	0.012	0.298	5.635E-04

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total (tons/yr)
Potential Emission in tons/yr	8.287E-05	1.823E-04	2.320E-04	6.298E-05	3.481E-04	0.313

Methodology is the same as previous page.

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

**Appendix A: Emissions Calculations  
Storage Tanks  
VOC emissions**

**Company Name: Interstate Brands Corporation  
Address City IN Zip: 3060 National Road, Columbus, Indiana 47201  
Permit Number: M005-27625-00078  
Reviewer: Sarah Conner, Ph. D.  
Date: 7/10/2009**

Storage Tanks	Tank Capacity (gallons)	Annual Throughput (gallons/year)	<sup>1</sup> Emission Factor (lbs/1,000 gallon)	VOC PTE (lbs/year)	VOC PTE (lbs/year)
Palm Oil 1 (previously Fry Fat 1)	4,500	841,250	0.02	43.3	<b>0.022</b>
Palm Oil 2 (previously Fry Fat 2)	6,300	Total for these tanks is estimated to be less than 841,430	0.02		
Palm Oil 3 (previously Fry Fat 3)	4,500		0.02		
Used Palm Oil 1	5,175		0.02		
Used Palm Oil 2	1,550		0.02		
Soya Oil	6,700		138,500		
Three (3) Motor oil	275	1,320	0.02		
two (2) used oil	275	2,000	0.02		
Two (2) UST diesel fuel	15,000	340,500	0.02		
<b>Estimated maximum annual throughput given by source = 2,165,000 gallons</b>					

Methodology

Note 1: Emission factor is from WebFIRE (Petroleum and Solvent Evaporation - Petroleum Storage at Refineries - Fixed Roof Tanks - Distillate Fuel #2: Working Loss) SCC 40301021

**Appendix A: Emissions Calculations  
VOC and Particulate Matter  
Printing**

**Company Name: Interstate Brands Corporation  
Address City IN Zip: 3060 National Road, Columbus, Indiana 47201  
Permit Number: M005-27625-00078  
Reviewer: Sarah Conner, Ph. D.  
Date: 7/10/2009**

**Potential to Emit VOC from all six (6) printers**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	**Maximum Average (gal/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Video Jet Ink 16-8200Q (used in four Video Jet printers)	7.5	71.00%	0.0%	71.0%	0.0%	0.00%	0.004	5.33	5.33	0.02	0.52	0.09
Make up Fluid 16-8205 (used in three Video Jet printers)	6.7	100.00%	0.0%	100.0%	0.0%	0.00%	0.010	6.70	6.70	0.07	1.60	0.29
Markum Ink	8.0	96.00%	0.0%	96.0%	0.0%	0.00%	0.002	7.69	7.69	0.01	0.29	0.05
Isopropyl Alcohol (in wipes)	6.5	80.00%	0.0%	80.0%	0.0%	0.00%	0.001	5.20	5.20	0.01	0.16	0.03
Linx Ink	7.9	60.00%	0.0%	60.0%	0.0%	0.00%	0.007	4.75	4.75	0.03	0.82	0.15
Linx Mixed Solvent Base 3501	7.9	30.00%	0.0%	30.0%	0.0%	0.00%	0.024	2.37	2.37	0.06	1.37	0.25
<b>Total VOC from printing</b>												<b>0.87</b>

Printers	Actual Ink or Make Up (gal/yr)	*Actual Printing Hours
Video Jet 1	9.50	7904
Video Jet 2	2.00	1664
Video Jet 3	0.50	416
Video Jet 4 (addition)	0.28	624
Video Jet 1 Make Up	26.10	7904
Video Jet 2 Make Up	5.50	1664
Video Jet 3 Make Up	1.40	416
Markum	4.1	2600
Clean up wipes	8800 wipes about 3.4 gal	
Linx	3.0	416
Linx Make Up	10.0	416

\*Actual printing hours represent the hours the bagging/printing equipment is actually used during a week to estimate actual hours for the year.

\*\*Maximum Average (gal/hr) is estimated based on actual ink/solvent usage provided by the source. Makeup Fluid is used in Video Jet printers and Linx printer. Markum ink is a solid type ink, and solvent laden wipes are used to clean the equipment.

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emissions Calculations  
HAPs Emissions  
Printing**

**Company Name: Interstate Brands Corporation  
Address City IN Zip: 3060 National Road, Columbus, Indiana 47201  
Permit Number: M005-27625-00078  
Reviewer: Sarah Conner, Ph. D.  
Date: 7/10/2009**

**Potential to Emit HAP from all six (6) printers**

Material	Density (lb/gal)	**Maximum Average (gal/hour)	Weight % Methanol	Methanol Emissions (tons/yr)	Total Combined HAPs
Video Jet Ink 16-8200Q (used in four Video Jet printers)	7.5	0.004	35.00%	0.05	0.05
Make up Fluid 16-8205 (used in three Video Jet printers)	6.7	0.010	50.00%	0.15	0.15
Isopropyl Alcohol (in wipes)	6.5	0.001	0.00%	0.00	0.00
Linx Mixed Solvent Base 3501	7.9	0.024	0.00%	0.00	0.00
				0.19	<b>0.19</b>

**METHODOLOGY**

Same as previous page

\*Actual printing hours represent the hours the bagging/printing equipment is actually used during a week to estimate actual hours for the year.

\*\*Maximum Average (gal/hr) is estimated based on actual ink/solvent usage provided by the source. Makeup Fluid is used in Video Jet printers and Linx printer. Markum ink is a solid type ink, and solvent laden wipes are used to clean the equipment.

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emission Calculations  
Honeybun**

**Company Name: Interstate Brands Corporation**  
**Address City IN Zip: 3060 National Road, Columbus, Indiana 47201**  
**Permit Number: M005-27625-00078**  
**Reviewer: Sarah Conner, Ph. D.**  
**Date: 7/10/2009**

Potential Throughput  
tons/yr

6833
------

Potential Throughput  
tons/hr

0.78
------

Potential Throughput  
lbs/hr

Honeybun 

1560
------

	Pollutant
Emission Factor in lb/ton	VOC 6.273
Potential Emission in tons/yr	21.4

**Methodology**

Emission Factors from EPA Alternative Control Technology (ACT) Document for Bakery Oven Emissions (EPA-453/R-92-017), page 1-4

VOC(as ethanol) Emission Factor: The pounds of ethanol per ton of baked bread = 0.40425 + 0.444585 (Yt)

Yt = Y \* t

Y: Baker's percent of yeast to the nearest tenth of a percent.

t: The total time of fermentation to the nearest tenth of an hour.

VOC EF	6.273
--------	-------

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

Y =	13.2
t =	1.0

**Appendix A: Emission Calculations**  
**Fugitive Dust Emissions - Unpaved Roads**

**Company Name:** Interstate Brands Corporation  
**Address City IN Zip:** 3060 National Road, Columbus, Indiana 47201  
**Permit Number:** M005-27625-00078  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** 7/10/2009

**Unpaved Roads at Industrial Site**

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

**Vehicle Information (provided by source)**

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	0.3	1.0	0.3	37.5	10.7	420	0.080	0.0	8.3
Vehicle (leaving plant) (one-way trip)	0.3	1.0	0.3	18.0	5.1	420	0.080	0.0	8.3
<b>Total</b>			<b>0.6</b>		<b>15.8</b>			<b>0.0</b>	<b>16.5</b>

Average Vehicle Weight Per Trip =  $\frac{27.8}{0.08}$  tons/trip  
 Average Miles Per Trip =  $\frac{0.08}{0.08}$  miles/trip

Unmitigated Emission Factor, Ef =  $k \cdot [(s/12)^a] \cdot [(W/3)^b]$  (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-3 Sand/Gravel Processing Plant Road)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2)
W =	27.8	27.8	27.8	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext =  $E \cdot [(365 - P)/365]$

Mitigated Emission Factor, Eext =  $E \cdot [(365 - P)/365]$

where P =  $\frac{125}{365}$  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	7.02	1.79	0.18	lb/mile
Mitigated Emission Factor, Eext =	4.62	1.18	0.12	lb/mile
Dust Control Efficiency =	N/A	N/A	N/A	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.03	0.01	0.00	0.02	0.00	0.00
Vehicle (leaving plant) (one-way trip)	0.03	0.01	0.00	0.02	0.00	0.00
	<b>0.06</b>	<b>0.01</b>	<b>0.00</b>	<b>0.04</b>	<b>0.01</b>	<b>0.00</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) \* (Unmitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)  
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) \* (Mitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)  
 Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) \* (1 - Dust Control Efficiency)

**Abbreviations**

PM = Particulate Matter  
 PM10 = Particulate Matter (<10 um)  
 PM2.5 = Particulate Matter (<2.5 um)  
 PTE = Potential to Emit

**Appendix A: Emission Calculations**  
**Fugitive Dust Emissions - Unpaved Roads**

Company Name: Interstate Brands Corporation  
 Address City IN Zip: 3060 National Road, Columbus, Indiana 47201  
 Permit Number: M005-27625-00078  
 Reviewer: Sarah Conner, Ph. D.  
 Date: 7/10/2009

**Unpaved Roads at Industrial Site**

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	8.0	3.0	24.0	2.3	55.2	360	0.068	1.6	597.3
Vehicle (leaving plant) (one-way trip)	8.0	3.0	24.0	2.3	55.2	360	0.068	1.6	597.3
<b>Total</b>			<b>48.0</b>		<b>110.4</b>			<b>3.3</b>	<b>1194.5</b>

Average Vehicle Weight Per Trip =  $\frac{2.3}{48.0}$  tons/trip  
 Average Miles Per Trip =  $\frac{0.07}{48.0}$  miles/trip

Unmitigated Emission Factor,  $E_f = k \cdot [s/12]^a \cdot [(W/3)^b]$  (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-3 Sand/Gravel Processing Plant Road)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2)
W =	2.3	2.3	2.3	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E \cdot [(365 - P)/365]$

Mitigated Emission Factor,  $E_{ext} = E \cdot [(365 - P)/365]$

where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	2.29	0.58	0.06	lb/mile
Mitigated Emission Factor, $E_{ext} =$	1.51	0.38	0.04	lb/mile
Dust Control Efficiency =	N/A	N/A	N/A	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.68	0.17	0.02	0.45	0.11	0.01
Vehicle (leaving plant) (one-way trip)	0.68	0.17	0.02	0.45	0.11	0.01
	<b>1.37</b>	<b>0.35</b>	<b>0.03</b>	<b>0.90</b>	<b>0.23</b>	<b>0.02</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) \* (Unmitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)  
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) \* (Mitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)  
 Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) \* (1 - Dust Control Efficiency)

**Abbreviations**

PM = Particulate Matter  
 PM10 = Particulate Matter (<10 um)  
 PM2.5 = Particle Matter (<2.5 um)  
 PTE = Potential to Emit

**Appendix A: Emission Calculations  
Fugitive Dust Emissions - Unpaved Roads**

Company Name: Interstate Brands Corporation  
Address City IN Zip: 3060 National Road, Columbus, Indiana 47201  
Permit Number: M005-27625-00078  
Reviewer: Sarah Conner, Ph. D.  
Date: 7/10/2009

**Unpaved Roads at Industrial Site**

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	0.4	1.0	0.4	37.5	16.0	360	0.068	0.0	10.6
Vehicle (leaving plant) (one-way trip)	0.4	1.0	0.4	18.0	7.7	360	0.068	0.0	10.6
<b>Total</b>			<b>0.9</b>		<b>23.7</b>			<b>0.1</b>	<b>21.3</b>

Average Vehicle Weight Per Trip =  tons/trip  
Average Miles Per Trip =  miles/trip

Unmitigated Emission Factor,  $E_f = k[(s/12)^a][(W/3)^b]$  (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-3 Sand/Gravel Processing Plant Road)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2)
W =	27.8	27.8	27.8	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E_f * [(365 - P)/365]$

Mitigated Emission Factor,  $E_{ext} = E_f * [(365 - P)/365]$

where P =  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	7.02	1.79	0.18	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	4.62	1.18	0.12	lb/mile
Dust Control Efficiency =	N/A	N/A	N/A	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.04	0.01	0.00	0.02	0.01	0.00
Vehicle (leaving plant) (one-way trip)	0.04	0.01	0.00	0.02	0.01	0.00
	<b>0.07</b>	<b>0.02</b>	<b>0.00</b>	<b>0.05</b>	<b>0.01</b>	<b>0.00</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) \* (Unmitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)  
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) \* (Mitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)  
 Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) \* (1 - Dust Control Efficiency)

**Abbreviations**

PM = Particulate Matter  
 PM10 = Particulate Matter (<10 um)  
 PM2.5 = Particle Matter (<2.5 um)  
 PTE = Potential to Emit

**Appendix A: Emission Calculations  
Fugitive Dust Emissions - Paved Roads**

**Company Name:** Interstate Brands Corporation  
**Address City IN Zip:** 3060 National Road, Columbus, Indiana 47201  
**Permit Number:** M005-27625-00078  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** 7/10/2009

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	103.0	3.0	309.0	2.3	710.7	600	0.114	35.1	12816.5
Vehicle (leaving plant) (one-way trip)	103.0	3.0	309.0	2.3	710.7	600	0.114	35.1	12816.5
<b>Total</b>			<b>618.0</b>		<b>1421.4</b>			<b>70.2</b>	<b>25633.0</b>

Average Vehicle Weight Per Trip =  $\frac{2.3}{103.0}$  tons/trip  
 Average Miles Per Trip =  $\frac{70.2}{103.0}$  miles/trip

Unmitigated Emission Factor,  $E_f = [k * (sL/2)^{0.65} * (W/3)^{1.5} - C]$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.082	0.016	0.0024	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	2.3	2.3	2.3	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	0.00036	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.6	0.6	0.6	g/m <sup>2</sup> = Ubiquitous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$

Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$   
 where p =  $\frac{125}{365}$  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
 N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	0.02	0.00	0.00	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	0.02	0.00	0.00	lb/mile
Dust Control Efficiency =	N/A	N/A	N/A	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.16	0.03	0.00	0.14	0.03	0.00
Vehicle (leaving plant) (one-way trip)	0.16	0.03	0.00	0.14	0.03	0.00
	<b>0.32</b>	<b>0.06</b>	<b>0.00</b>	<b>0.29</b>	<b>0.05</b>	<b>0.00</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
 Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

PM = Particulate Matter  
 PM10 = Particulate Matter (<10 um)  
 PM2.5 = Particle Matter (<2.5 um)  
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**Appendix A: Emission Calculations  
Fugitive Dust Emissions - Paved Roads**

**Company Name:** Interstate Brands Corporation  
**Address City IN Zip:** 3060 National Road, Columbus, Indiana 47201  
**Permit Number:** M005-27625-00078  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** 7/10/2009

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (12/2003).

**Vehicle Information (provided by source)**

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	1.1	1.0	1.1	37.5	40.1	150	0.028	0.0	11.1
Vehicle (leaving plant) (one-way trip)	1.1	1.0	1.1	15.0	16.0	150	0.028	0.0	11.1
<b>Total</b>			<b>2.1</b>		<b>56.1</b>			<b>0.1</b>	<b>22.2</b>

Average Vehicle Weight Per Trip =  tons/trip  
 Average Miles Per Trip =  miles/trip

Unmitigated Emission Factor,  $E_f = [k * (sL/2)^{0.65} * (W/3)^{1.5} - C]$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.082	0.016	0.0024	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	26.3	26.3	26.3	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	0.00036	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.6	0.6	0.6	g/m <sup>2</sup> = Ubiquitous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E * [1 - (p/4N)]$

Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$   
 where p =  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
 N =  days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	0.97	0.19	0.03	lb/mile
Mitigated Emission Factor, $E_{ext} =$	0.89	0.17	0.03	lb/mile
Dust Control Efficiency =	N/A	N/A	N/A	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.01	0.00	0.00	0.00	0.00	0.00
Vehicle (leaving plant) (one-way trip)	0.01	0.00	0.00	0.00	0.00	0.00
	<b>0.01</b>	<b>0.00</b>	<b>0.00</b>	<b>0.01</b>	<b>0.00</b>	<b>0.00</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
 Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

PM = Particulate Matter  
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 PM2.5 = Particulate Matter (<2.5 um)  
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Company Name: Interstate Brands Corporation  
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**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	14.1	1.0	14.1	32.5	458.4	780	0.148	2.1	760.5
Vehicle (leaving plant) (one-way trip)	14.1	1.0	14.1	19.0	268.0	780	0.148	2.1	760.5
<b>Total</b>			<b>28.2</b>		<b>726.4</b>			<b>4.2</b>	<b>1521.0</b>

Average Vehicle Weight Per Trip = 25.8 tons/trip  
Average Miles Per Trip = 0.15 miles/trip

Unmitigated Emission Factor,  $E_f = [k * (sL/2)^{0.65} * (W/3)^{1.5} - C]$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.082	0.016	0.0024	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	25.8	25.8	25.8	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	0.00036	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.6	0.6	0.6	g/m <sup>2</sup> = Ubiquitous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer month)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E * [1 - (p/4N)]$

Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$   
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	0.94	0.18	0.03	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	0.86	0.17	0.02	lb/mile
Dust Control Efficiency =	N/A	N/A	N/A	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.36	0.07	0.01	0.33	0.06	0.01
Vehicle (leaving plant) (one-way trip)	0.36	0.07	0.01	0.33	0.06	0.01
	<b>0.72</b>	<b>0.14</b>	<b>0.02</b>	<b>0.66</b>	<b>0.13</b>	<b>0.02</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

PM = Particulate Matter  
PM10 = Particulate Matter (<10 um)  
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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

## SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: A. Wayne Wagers  
Interstate Brands Corporation  
3060 National Road  
Columbus, IN 47201

DATE: September 30, 2009

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

SUBJECT: Final Decision  
Minor Source Operating Permit Renewal  
005-27625-00078

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
Plant Manager - Interstate Brands Corporation  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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[www.idem.IN.gov](http://www.idem.IN.gov)

September 30, 2009

TO: Bartholomew County Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

**Applicant Name: Interstate Brands Corporation**  
**Permit Number: 005-27625-00078**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	GHOTOPP 9/30/2009 Interstate Brands Corp - Dolly Madison 005-27625-00078 Final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		A. Wayne Wagers Interstate Brands Corp - Dolly Madison 3060 National Rd Columbus IN 47201 (Source CAATS) via confirmed delivery										
2		Plant Manager Interstate Brands Corp - Dolly Madison 3060 National Rd Columbus IN 47201 (RO CAATS)										
3		Columbus City Council and Mayors Office 123 Washington St Columbus IN 47201 (Local Official)										
4		Mr. Elbert Held 734 Hutchins Columbus IN 47201 (Affected Party)										
5		Mr. Boris Ladwig 333 2nd St Columbus IN 47201 (Affected Party)										
6		Eileen Booher 1316 Chestnut St. Columbus IN 47201 (Affected Party)										
7		Mr. Lcnfc 1039 Sycamore St Columbus IN 47201 (Affected Party)										
8		Bartholomew Co Public Library 536 Fifth St. Columbus IN 47201-6225 (Library)										
9		Bartholomew County Commissioners 440 Third Street Columbus IN 47202 (Local Official)										
10		Mr. Jean Terpstra 3210 Grove Pkwy Columbus IN 47203 (Affected Party)										
11		August Tindell 31 Reo Street Columbus IN 47201 (Affected Party)										
12		Terry Lowe 1110 Central Ave. Columbus IN 47201 (Affected Party)										
13		Mr. Charles Mitch 3210 Grove Parkway Columbus IN 47203 (Affected Party)										
14		Edinburgh Town Council and Town Manager P.O. Box 65 Edinburgh IN 46124 (Local Official)										
15		Bartholomew County Health Department 440 3rd Street, Suite 303 Columbus IN 47201 (Health Department)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
14			