INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 1, 2009

RE: Pretzels, Inc. / 179-27901-00028

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot12/3/07

IDEM

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Tony Mann
Pretzels, Inc.
P.O. Box 503
Bluffton, IN 46714-9007

June 1, 2009

Re: 179-27901-00028
First Notice-Only Change to
M179-20416-00028

Dear Mr. Mann:

Pretzels, Inc. was issued Minor Source Operating Permit (MSOP) No. M179-20416-00028 on February 26, 2007 for a stationary snack manufacturing source located at 123 Harvest Road, Bluffton, Indiana. On May 8, 2009, the Office of Air Quality (OAQ) received an application from the source relating to the construction and operation of a new cooking line, consisting of one (1) natural gas-fired oven and one (1) cooker, that is of the same type as the other permitted cooking lines. The new cooking line will comply with the same applicable requirements and permit terms and conditions as the existing cooking lines, but will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3. The uncontrolled/unlimited potential to emit of the entire source will continue to be less than the threshold levels specified in 326 IAC 2-7. The addition of the new cooking line to the permit is considered a notice-only change pursuant to 326 IAC 2-6.1-6(d)(13). Pursuant to the provisions of 326 IAC 2-6.1-6, the permit is hereby revised as follows with the deleted language as ~~strikeouts~~ and new language **bolded.**

A.2 Emission Units and Pollution Control Equipment Summary

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

. . .

(i) One (1) cooking line, identified as Line 14, consisting of the following:

(1) One (1) natural gas-fired cooker, identified as Line 14 Cooker (14C), approved for construction in 2009, exhausting through stack 14-C.

(2) One (1) natural gas-fired oven, identified as Line 14 Oven (14O), approved for construction in 2009, exhausting through stacks 14-1, 14-2, 14-3, 14-4, and 14-5, heat input capacity: 7.7 million British thermal units per hour.

~~(i)~~ **(j)** Natural gas-fired space heaters, identified as SH, constructed in 1998, heat input capacity: 1.6 million British thermal units per hour, total.

IDEM, OAQ has decided to make additional revisions to the permit as described below. The permit has been revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

(a) Several of IDEM's branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to "Permit Administration and Development Section" and the "Permits Branch" have been changed to "Permit Administration and Support Section". References to "Asbestos Section", "Compliance Data Section", "Air Compliance Section", and "Compliance Branch" have been changed to "Compliance and Enforcement Branch". The permit

has been revised as follows:

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

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) All occurrences of IDEM mailing addresses have been revised to include a mail code (MC) as follows:

Compliance and Enforcement Branch:	**MC 61-53 IGCN 1003**
Permit Administration and Support Section:	**MC 61-53 IGCN 1003**
Technical Support and Modeling Section:	**MC 61-50 IGCN 1003**

(c) IDEM has begun implementing a new procedure and will no longer list the name or title of the Authorized Individual (A.I.) in the permit document. Section A.1 has been updated as follows:

~~Authorized Individual: Director of Operations~~

(d) In order to correct a typographical error, Condition C.12(b) has been revised from the terminology "one-hundred and twenty" to "one hundred twenty" as follows:

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

...

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one- hundred ~~and~~ twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit. A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Summer Keown, of my staff, at 317-234-5175 or 1-800-451-6027, and ask for extension 4-5175.

Sincerely,

Alfred C. Dumaual, Ph. D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit and calculations

ACD/SJK

cc: File - Wells County
Wells County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section

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Minor Source Operating Permit
OFFICE OF AIR QUALITY

Pretzels, Inc.
123 Harvest Road
Bluffton, Indiana 46714

(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.

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.

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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 2-6.1-6, applicable to those conditions.

Operation Permit No.: MSOP 179-20416-00028	
Issued by: *Original document signed by:* Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: February 26, 2007 Expiration Date: February 26, 2012

Notice-Only Change No.: 179-27901-00028	
Issued by: Alfred C. Dumaual, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: June 1, 2009 Expiration Date: February 26, 2012

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY 4
A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]
A.2 Emission Units and Pollution Control Equipment Summary

SECTION B GENERAL CONDITIONS 7
B.1 Definitions [326 IAC 2-1.1-1]
B.2 Permit Term [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]
B.3 Term of Conditions [326 IAC 2-1.1-9.5]
B.4 Enforceability
B.5 Severability
B.6 Property Rights or Exclusive Privilege
B.7 Duty to Provide Information
B.8 Certification
B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]
B.10 Preventive Maintenance Plan [326 IAC 1-6-3]
B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]
B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]
B.13 Permit Renewal [326 IAC 2-6.1-7]
B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]
B.15 Source Modification Requirement [326 IAC 2-2-2] [326 IAC 2-3-2]
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] [IC13-17-3-2] [IC 13-30-3-1]
B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]
B.18 Annual Fee Payment [326 IAC 2-1.1-7]
B.19 Credible Evidence [326 IAC 1-1-6]

SECTION C SOURCE OPERATION CONDITIONS 12

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]
C.2 Permit Revocation [326 IAC 2-1.1-9]
C.3 Opacity [326 IAC 5-1]
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
C.6 Fugitive Dust Emissions [326 IAC 6-4]
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Testing Requirements [326 IAC 2-6.1-5(a)(2)]
C.8 Performance Testing [326 IAC 3-6]

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

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]
C.10 Compliance Monitoring [326 IAC 2-1.1-11]
C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Corrective Actions and Response Steps
C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]
C.13 Malfunctions Report [326 IAC 1-6-2]
C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]
C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

D.1 EMISSIONS UNIT OPERATION CONDITIONS: One (1) storage silo, SILO 17

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]
D.1.1 Particulate [326 IAC 6-3-2(d)]

Annual Notification 19

Malfunction Report..... 20

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a snack manufacturing source.

Source Address:	123 Harvest Road, Bluffton, Indiana 46714
Mailing Address:	P.O. Box 503, Bluffton, Indiana 46714
General Source Phone Number:	260-824-5784
SIC Code:	2052
County Location:	Wells
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) cooking line, identified as Line 5, consisting of the following:

(1) One (1) electric cooker, identified as Line 5 Cooker (5C), exhausting through Stack 5-C.

(2) One (1) natural gas-fired oven, identified as Line 5 Oven (5O), constructed in 1994, exhausting though Stacks 5-1, 5-2, 5-3, 5-4, 5-5, heat input capacity: 3.10 million British thermal units per hour.

(b) One (1) cooking line, identified as Line 6, consisting of the following:

(1) One (1) electric cooker, identified as Line 6 Cooker (6C), constructed in 2005, exhausting through Stack 6-C.

(2) One (1) natural gas-fired oven, identified as Line 6 Oven (6O), constructed in 2005, exhausting though Stacks 6-1, 6-2, 6-3, 6-4, 6-5, heat input capacity: 3.3 million British thermal units per hour.

(c) One (1) cooking/oven line, identified as Line 7, consisting of the following:

(1) One (1) natural gas-fired oven, identified as Line 7 Oven (7O), constructed in 1998, exhausting through Stack 7, heat input capacity: 1.5 million British thermal units per hour.

(2) One (1) food coating area, identified as coating 7, applying soybean oil and cheese.

(d) One (1) cooking/oven line, identified as Line 8, consisting of the following:

(1) One (1) natural gas-fired oven, identified as Line 8 Oven (8O), constructed in 1998, exhausting through Stack 8, heat input capacity: 1.5 million British thermal units per hour.

(2) One (1) food coating area, identified as coating 8, applying soybean oil and cheese.

(e) One (1) cooking line, identified as Line 9, consisting of the following:

(1) One (1) natural gas-fired cooker, identified as Line 9 Cooker (9C), constructed in 1997, exhausting through Stack 9-C, heat input capacity: 3 million British thermal units per hour.

(2) One (1) natural gas-fired oven, identified as Line 9 Oven (9O), constructed in 1997, exhausting though Stacks 9-1, 9-2, 9-3, 9-4, 9-5, heat input capacity: 5 million British thermal units per hour.

(f) One (1) cooking line, identified as Line 10, consisting of the following:

(1) One (1) natural gas-fired cooker, identified as Line 10 Cooker (10C), constructed in 1997, exhausting through Stack 10-C, heat input capacity: 3 million British thermal units per hour.

(2) One (1) natural gas-fired oven, identified as Line 10 Oven (10O), constructed in 1997, exhausting though Stacks 10-1, 10-2, 10-3, 10-4, 10-5, heat input capacity: 5 million British thermal units per hour.

(g) One (1) cooking line, identified as Line 11, consisting of the following:

(1) One (1) natural gas-fired cooker, identified as Line 11 Cooker (11C), constructed in 2001, exhausting through Stack 11-C, heat input capacity: 3 million British thermal units per hour.

(2) One (1) natural gas-fired oven, identified as Line 11 Oven (11O), constructed in 2001, exhausting though Stacks 11-1, 11-2, 11-3, 11-4, 11-5, heat input capacity: 10.5 million British thermal units per hour.

(3) One (1) natural gas-fired oven radiant tube identified as (11R), constructed in 2001, exhausting though Stacks 11-1, 11-2, 11-3, 11-4, 11-5, heat input capacity: 2.5 million British thermal units per hour.

(h) One (1) cooking line, identified as Line 12, consisting of the following:

(1) One (1) electric cooker identified as Line 12 Cooker (12C), constructed in 2006, exhausting through Stack 12-C.

(2) One (1) natural gas-fired oven identified as Line 12 Oven (12O), constructed in 2006, exhausting through Stacks 12-1, 12-2, 12-3, 12-4, 12-5, heat input capacity: 10.5 million British thermal units per hour.

(3) One (1) natural gas-fired oven radiant tube identified as (12R), constructed in 2006, exhausting through Stacks 12-1, 12-2, 12-3, 12-4, 12-5, heat input capacity: 1.50 million British thermal units per hour.

(i) One (1) cooking line, identified as Line 14, consisting of the following:

(1) One (1) natural gas-fired cooker, identified as Line 14 Cooker (14C), approved for construction in 2009, exhausting through stack 14-C.

(2) One (1) natural gas-fired oven, identified as Line 14 Oven (14O), approved for construction in 2009, exhausting through stacks 14-1, 14-2, 14-3, 14-4, and 14-5, heat input capacity: 7.7 million British thermal units per hour.

(j) Natural gas-fired space heaters, identified as SH, constructed in 1998, heat input capacity: 1.6 million British thermal units per hour, total.

(k) Natural gas-fired radiant tube heaters, identified as RTH, constructed in 1998, heat input capacity: 0.5 million British thermal units per hour, total.

(l) Natural gas-fired packing heaters, identified as PH, constructed in 1998, heat input capacity: 0.4 million British thermal units per hour, total.

(m) Natural gas-fired water heaters, identified as WH, constructed in 1998, heat input capacity: 1.5 million British thermal units per hour, total.

(n) One (1) storage silo, identified as SILO, constructed in 1992, pneumatically loaded/emptied with a blower/vacuum system, exhausting inside using a polypropylene filter, capacity: 175,000 pounds, throughput:150,000 pounds per day.

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, 179-20416-00028, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

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

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

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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 PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(a) All terms and conditions of permits established prior to 179-20416-00028 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
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 ninety (90) days prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

Indiana Department of Environmental Management
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

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] [IC13-17-3-2] [IC 13-30-3-1]

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

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management
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]

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

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

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

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

SECTION C **SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

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

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

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
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 Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

Indiana Department of Environmental Management
Compliance 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]

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

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

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

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

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

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

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

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

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

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

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

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

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

Indiana Department of Environmental Management
Compliance 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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(m) One (1) storage silo, identified as SILO, constructed in 1992, pneumatically loaded/emptied with a blower/vacuum system, exhausting inside using a polypropylene filter, capacity: 175,000 pounds, throughput:150,000 pounds per day.

(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 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the one (1) storage silo shall not exceed 8.80 pounds per hour when operating at a process weight rate of 3.125 tons per hour.

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

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

MINOR SOURCE OPERATING PERMIT CERTIFICATION

Source Name: Pretzels, Inc.
Source Address: 123 Harvest Road, Bluffton, Indiana 46714
Mailing Address: P.O. Box 503, Bluffton, Indiana 46714
Permit No.: MSOP 179-20416-00028

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify) _____

☐ Report (specify) _____

☐ Notification (specify) _____

☐ Affidavit (specify) _____

☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

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).

Source Name:	**Pretzels, Inc.**
Address:	**123 Harvest Road**
City:	**Bluffton, Indiana 46714**
Phone #:	**260-824-5784**
MSOP #:	**179-20416-00028**

I hereby certify that Pretzels, Inc. is

☐ still in operation.
☐ no longer in operation.

I hereby certify that Pretzels, Inc. is

☐ in compliance with the requirements of MSOP 179-20416-00028.
☐ not in compliance with the requirements of MSOP 179-20416-00028.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

_____

_____

Attachment A: Emission Calculations
Summary

Company Name: **Pretzels, Inc.**
Address City IN Zip: **123 Harvest Road, Bluffton, IN 46714**
Notice-Only Change Number: **179-27901-00028**
Reviewer: **Summer Keown**
Date: **May 20, 2009**

Uncontrolled Potential Emissions

Facility	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Single HAP	Total HAPs
Natural Gas Combustion from Existing Six (6) Pretzel Lines	0.48	1.91	1.91	0.15	25.1	1.38	21.1	0.45 (hexane)	0.47
Fermentation from ExistingSix (6) Pretzel Lines	0.00	0.00	0.00	0.00	0.00	33.6	0.00	0.00	0.00
Dry Material Transfer from Existing Six (6) Pretzel Lines	30.1	30.1	30.1	0.00	0.00	0.00	0.00	0.00	0.00
New Pretzel Line 14	20.17	20.37	20.37	0.02	3.61	5.80	3.04	0.07 (hexane)	0.07
Total for Source	**50.76**	**52.39**	**52.39**	**0.17**	**28.75**	**40.79**	**24.16**	**0.52 (hexane)**	**0.54**

Controlled Potential Emissions

Facility	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Single HAP	Total HAPs
Natural Gas Combustion from Existing Six (6) Pretzel Lines	0.478	1.91	1.91	0.151	25.1	1.38	21.1	0.45 (hexane)	0.47
Fermentation from ExistingSix (6) Pretzel Lines	0.00	0.00	0.00	0.00	0.00	33.6	0.00	0.00	0.00
Dry Material Transfer from Existing Six (6) Pretzel Lines	0.151	0.151	0.151	0.00	0.00	0.00	0.00	0.00	0.00
New Pretzel Line 14	0.17	0.37	0.37	0.02	3.61	5.80	3.04	0.07 (hexane)	0.07
Total for Source	**0.80**	**2.43**	**2.43**	**0.17**	**28.75**	**40.79**	**24.16**	**0.52 (hexane)**	**0.54**

Attachment A: Emission Calculations
New Pretzel Line 14

Company Name: Pretzels, Inc.
Address City IN Zip: 123 Harvest Road, Bluffton, IN 46714
Notice-Only Change Number: 179-27901-00028
Reviewer: Summer Keown
Date: May 20, 2009

Uncontrolled Potential to Emit

	Pollutant						
New Pretzel Line 14	PM	PM10	PM2.5	SO2	NOx	VOC	CO
Natural Gas Combustion	0.07	0.27	0.27	0.02	3.61	0.20	3.04
Fermentation	20.10	20.10	20.10	--	--	5.60	--
Total	**20.17**	**20.37**	**20.37**	**0.02**	**3.61**	**5.80**	**3.04**

	Individual HAPs Emissions				
New Pretzel Line 14	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Natural Gas Combustion	7.59E-05	4.34E-05	2.71E-03	6.50E-02	1.23E-04
Total	**7.59E-05**	**4.34E-05**	**2.71E-03**	**6.50E-02**	**1.23E-04**

	Individual HAPs Emissions					
New Pretzel Line 14	Lead	Cadmium	Chromium	Manganese	Nickel	**All HAPs**
Natural Gas Combustion	1.81E-05	3.97E-05	5.06E-05	1.37E-05	7.59E-05	0.07
Total	**1.81E-05**	**3.97E-05**	**5.06E-05**	**1.37E-05**	**7.59E-05**	**0.07**

Potential to Emit After Control

	Pollutant						
New Pretzel Line 14	PM	PM10	PM2.5	SO2	NOx	VOC	CO
Natural Gas Combustion	0.07	0.27	0.27	0.02	3.61	0.20	3.04
Fermentation	0.10	0.10	0.10	--	--	5.60	--
Total	**0.17**	**0.37**	**0.37**	**0.02**	**3.61**	**5.80**	**3.04**

	Individual HAPs Emissions				
New Pretzel Line 14	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Natural Gas Combustion	7.59E-05	4.34E-05	2.71E-03	6.50E-02	1.23E-04
Total	**7.59E-05**	**4.34E-05**	**2.71E-03**	**6.50E-02**	**1.23E-04**

	Individual HAPs Emissions					
New Pretzel Line 14	Lead	Cadmium	Chromium	Manganese	Nickel	**All HAPs**
Natural Gas Combustion	1.81E-05	3.97E-05	5.06E-05	1.37E-05	7.59E-05	0.07
Total	**1.81E-05**	**3.97E-05**	**5.06E-05**	**1.37E-05**	**7.59E-05**	**0.07**

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

Company Name: **Pretzels, Inc.**
Address City IN Zip: **123 Harvest Road, Bluffton, IN 46714**
Notice-Only Change Number: **179-27901-00028**
Reviewer: **Summer Keown**
Date: **May 20, 2009**

Heat Input Capacity MMBtu/hr		Potential Throughput MMCF/yr
8.3		72
0.55	14C Cooker	
7.7	14O Oven	

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.07	0.27	0.02	3.61	0.20	3.04

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

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	7.59E-05	4.34E-05	2.71E-03	6.50E-02	1.23E-04

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.0004	0.0021	**Total**
Potential Emission in tons/yr	1.81E-05	3.97E-05	5.06E-05	1.37E-05	7.59E-05	**0.07**

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Attachment A: Emission Calculations
Baking Operations

Company Name: **Pretzels, Inc.**
Address City IN Zip: **123 Harvest Road, Bluffton, IN 46714**
Notice-Only Change Number: **179-27901-00028**
Reviewer: **Summer Keown**
Date: **May 20, 2009**

Fermentation From Pretzel Production

Pollutant
Ethanol

Product	Sponge % Yeast	Dough % Yeast	Ferment Time (hours)	Proof Time (hours)	Floor Time (hours)	Product Rate (lbs/hr)	Product Rate (tons/yr)	Emission Factor (lbs/ton)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)
Pretzel Line 14	3.00E-07	0.00	0.03	0.00	0.00	1340	5869	1.91	11190	5.6

Methodology

Emission Factor in lbs/ton = 0.95 * Sponge % Yeast + 0.195 * (Ferment Time + Proof Time + Floor Time) - 0.51 * Dough % Yeast - 0.86 * (Proof Time + Floor Time) + 1.90.
Emission Rate in tons/yr = Emission Factor (lbs/ton) * Product Rate (tons/yr) / 2000.
Emission Factor is from AP 42, Chapter 9, Section 9.9.6 Bread Baking

A small quantity of yeast is used for pretzel production. For a conservative estimate, it is assumed that there will be some fermentation after the yeast and other dry ingredients are mixed with liquid. The ferment time is the time it takes the mixed ingredients to enter the cooker/oven.

Dry Material Transfer

Throughput

100,000	lbs/day
18250	ton/year

	Pollutant	
	PM	PM-10
Emission Factor (lb/ton)	2.2	2.2
Uncontrolled Emissions (tons/year)	20.1	20.1
Controlled Emissions (tons/yr)	0.100	0.100

99.5% Filter Efficiency

Methodology

Emission Factors are from AP-42 Chapter 11, Table 11.17-4 product transfer and conveying.

The silo emissions are represented using factors for product transfer for lime manufacturing. These emission factors were used because they represent the transfer of a dry material with similar physical properties.

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

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

TO: Tony Mann
Pretzels, Inc.
P.O. Box 503
Bluffton, IN 46714-9007

DATE: June 1, 2009

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

SUBJECT: Final Decision
First Notice-Only Change
179-27901-00028

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:
Steve Huggins - VP of Purchasing, Pretzles, Inc.
Jennifer Aselage - Enineering & Environmental Consultant
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.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 6/1/2009 Pretzels, Inc. 179-27901-00028 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: **CERTIFICATE OF MAILING ONLY**	

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1		Tony Mann Pretzels, Inc. PO Box 503 Bluffton IN 46714-9007 (Source CAATS) via confirmed delivery									
2		Steve Huggins VP of Purchasing Pretzels, Inc. PO Box 503 Bluffton IN 46717-9007 *(RO CAATS)*									
3		Mr. Jim Hotopp 4290 South 750 East Bluffton IN 46714 *(Affected Party)*									
4		Wells County Health Department 223 W. Washington St Bluffton IN 46714-1955 *(Health Department)*									
5		Ms. Joy Haney 5285 East 400 South Columbia City IN 46725 *(Affected Party)*									
6		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 *(Affected Party)*									
7		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 *(Affected Party)*									
8		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 *(Affected Party)*									
9		Mrs. Tera Fredrickson 4860 W 900 S--90 Montpelier IN 47359-9559 *(Affected Party)*									
10		Ms. Kristie Fuller P.O. Box 124 Montpelier IN 47359 *(Affected Party)*									
11		Mr. Christina Furnish 7539 W 1100 S--90 Montpelier IN 47359 *(Affected Party)*									
12		Dr. James Rybarczyk 9815 N. CR. 300 E. Muncie IN 47303 *(Affected Party)*									
13		Mr. Kevin E. Jackson 7858 South 450 West Poneto IN 46781 (Affected Party)									
14		Mr. Neil Potter Southern Wells Comunity Schools 9120 S 300 W Poneto IN 46781 *(Affected Party)*									
15		Mrs. Donna Runkle 7327 W 1000 S--90 Warren IN 46792 *(Affected Party)*									

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Mail Code 61-53

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1		Wells County Board of Commissioners 105 W Market Street, Suite 205, Courthouse Bluffton IN 46714 (Local Official)									
2		Mrs. Jennifer Aselage Engineering & Enivronmental Consultant 3954 New Vision Drive Fort Wayne IN 46845 *(Consultant)*									
3											
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