



# 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: April 20, 2011

RE: Keebler Company / 167-30014-00151

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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April 20, 2011

Mary Duffy  
Keebler Company  
9445 E US Hwy 40  
Seelyville, IN 47878

Re: 167-30014-00151  
First Significant Revision to  
F167-28736-00151

Dear Ms. Duffy:

Keebler Company was issued Federally Enforceable State Operating Permit (FESOP) No. F167-28736-00151 on May 5, 2010 for a stationary commercial bakery which produces non-yeast leavened and yeast-leavened bakery products, located at 9445 E US Highway 40, Seelyville, IN 47878. On December 16, 2010, the Office of Air Quality (OAQ) received an application from the source requesting to:

- (a) Expand the varieties of products baked on Line 1 to include yeast-leavened food products.
- (b) Add one (1) new cooking line, identified as Line 4.
- (c) Remove the frozen dough line.
- (d) Revise the potential to emit calculations for sanitation and cleaning chemical usage.
- (e) Include potential to emit calculations for the two (2) noncontact cooling towers.
- (f) Add a source-wide limit on VOC emissions so that the source can remain below the Title V threshold for this pollutant.

The attached Technical Support Document (TSD) provides additional explanation of the changes to the source and permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

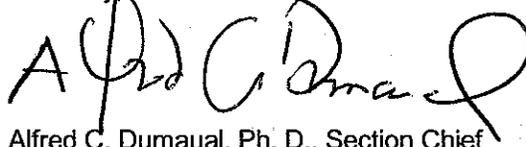
1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

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 Meredith Jones, of my staff, at 317-234-5176 or 1-800-451-6027, and ask for extension 4-5176.

Sincerely,



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

Attachments: Technical Support Document  
Revised permit  
Updated calculations

ACD/MWJ

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



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New Source Construction and Federally Enforceable
State Operating Permit
OFFICE OF AIR QUALITY

Keebler Company
9445 E US Highway 40
Seelyville, Indiana 47878

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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 FESOP under 326 IAC 2-8.

Operation Permit No.: F167-28736-00151
Issued by/Original Signed by: Alfred C. Dumauval, Ph. D., Section Chief, Permits Branch, Office of Air Quality
Issuance Date: May 5, 2010
Expiration Date: May 5, 2015

First Significant Permit Revision No.: 167-30014-00151
Issued by: Alfred C. Dumauval, Ph. D., Section Chief, Permits Branch, Office of Air Quality
Issuance Date: April 20, 2011
Expiration Date: May 5, 2015

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

---

The Permittee owns and operates a stationary commercial bakery which produces non-yeast leavened and yeast-leavened bakery products.

Source Address:	9445 E US Highway 40, Seelyville, Indiana 47878
General Source Phone Number:	(812) 877-1588
SIC Code:	2052
County Location:	Vigo
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) cooking line, identified as Line 1, consisting of the following:
  - (1) One (1) natural gas-fired oven, identified as Bakery Oven No. 1 (OV1), constructed in 1960, exhausting through Stacks OV1\_01 through OV1\_06, with a maximum heat input capacity of 9.5 MMBtu per hour.
  - (2) Baking of non-yeast and yeast-leavened food products.
- (b) One (1) cooking line, identified as Line 2, consisting of the following:
  - (1) One (1) natural gas-fired oven, identified as Bakery Oven No. 2 (OV2), constructed in 1963 and modified in 1997, exhausting through Stacks OV2\_01 through OV2\_07, with a maximum heat input capacity of 12.35 MMBtu per hour.
  - (2) Baking of non-yeast and yeast-leavened food products.
- (c) One (1) cooking line, identified as Line 3, consisting of the following:
  - (1) One (1) natural gas-fired oven, identified as Bakery Oven No. 3 (OV3), constructed prior to 1970, exhausting through Stacks OV3\_01 through OV3\_03, with a maximum heat input capacity of 4.3 MMBtu per hour.
  - (2) Baking of pancakes and non-yeast leavened food products.

- (d) One (1) cooking line, identified as Line 4, consisting of the following:
  - (1) One (1) natural gas-fired oven, identified as Bakery Oven No. 4 (SV200), approved for construction in 2011, exhausting through Stacks SV200\_01 through SV200\_05, with a maximum heat input capacity of 12.0 MMBtu per hour.
  - (2) Baking of non-yeast and yeast-leavened food products.
- (e) Six (6) flour storage silos, identified as S1 through S6, constructed in 1979, with a storage capacity of 63 tons, each, and a loading rate of 7 tons per hour, total.
- (f) Sanitation and cleaning chemical usage with potential uncontrolled VOC emissions exceeding 15 lbs/day.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) One (1) natural gas-fired boiler with a heat input capacity of 3.34 MMBtu per hour.
- (b) Nine (9) natural gas-fired water heaters, with a total heat input capacity of 1.95 MMBtu per hour.
- (c) Five (5) natural gas-fired process heaters, with a total heat input capacity of 3.28 MMBtu per hour.
- (d) Two (2) noncontact cooling towers, identified as North Cooling Tower and South Cooling Tower, constructed in 1996 and 2009, respectively, each with potential uncontrolled emissions meeting the exemption levels under 326 IAC 2-7-1(21)(A) and (B).
- (e) Package marking with potential VOC uncontrolled emissions from ink usage meeting the exemption levels under 326 IAC 2-7-1(21)(A) and (B).

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2 (a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-8-1]

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

### B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

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- (a) This permit, F167-28736-00151, 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.5 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.6 Enforceability [326 IAC 2-8-6][IC 13-17-12]

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

**B.7 Severability [326 IAC 2-8-4(4)]**

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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.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

**B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
  - (i) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
  - (ii) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent 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.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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

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

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality,  
Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to F167-28736-00151 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.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.18 Permit Renewal [326 IAC 2-8-3(h)]**

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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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a

certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 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, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP 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.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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  
  
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 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]

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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]

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The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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.

### **Testing Requirements [326 IAC 2-8-4(3)]**

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

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- (a) For performance testing required by this permit, 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 a 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 a 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 2-8-4][326 IAC 2-8-5(a)(1)]**

### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

### **C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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

## **Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

### **C.12 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]**

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

### C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

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- (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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

### C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
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) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, 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.

## **Stratospheric Ozone Protection**

### **C.17 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) cooking line, identified as Line 1, consisting of the following:
  - (1) One (1) natural gas-fired oven, identified as Bakery Oven No. 1 (OV1), constructed in 1960, exhausting through Stacks OV1\_01 through OV1\_06, with a maximum heat input capacity of 9.5 MMBtu per hour.
  - (2) Baking of non-yeast and yeast-leavened food products.
- (b) One (1) cooking line, identified as Line 2, consisting of the following:
  - (1) One (1) natural gas-fired oven, identified as Bakery Oven No. 2 (OV2), constructed in 1963 and modified in 1997, exhausting through Stacks OV2\_01 through OV2\_07, with a maximum heat input capacity of 12.35 MMBtu per hour.
  - (2) Baking of non-yeast and yeast-leavened food products.
- (c) One (1) cooking line, identified as Line 3, consisting of the following:
  - (1) One (1) natural gas-fired oven, identified as Bakery Oven No. 3 (OV3), constructed prior to 1970, exhausting through Stacks OV3\_01 through OV3\_03, with a maximum heat input capacity of 4.3 MMBtu per hour.
  - (2) Baking of pancakes and non-yeast leavened food products.
- (d) One (1) cooking line, identified as Line 4, consisting of the following:
  - (1) One (1) natural gas-fired oven, identified as Bakery Oven No. 4 (SV200), approved for construction in 2011, exhausting through Stacks SV200\_01 through SV200\_05, with a maximum heat input capacity of 12.0 MMBtu per hour.
  - (2) Baking of non-yeast and yeast-leavened food products.
- (f) Sanitation and cleaning chemical usage with potential uncontrolled VOC emissions exceeding 15 lbs/day.

### Insignificant Activities

- (a) One (1) natural gas-fired boiler with a heat input capacity of 3.34 MMBtu per hour.
- (b) Nine (9) natural gas-fired water heaters, with a total heat input capacity of 1.95 MMBtu per hour.
- (c) Five (5) natural gas-fired process heaters, with a total heat input capacity of 3.28 MMBtu per hour.
- (d) Two (2) noncontact cooling towers, identified as North Cooling Tower and South Cooling Tower, constructed in 1996 and 2009, respectively, each with potential uncontrolled emissions meeting the exemption levels under 326 IAC 2-7-1(21)(A) and (B).

- (e) Package marking with potential VOC uncontrolled emissions from ink usage meeting the exemption levels under 326 IAC 2-7-1(21)(A) and (B).

(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 2-8-4(1)]**

#### **D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 8-1-6]**

Pursuant to 326 IAC 8-1-6, VOC emissions from Line 1, Line 2, Line 3, Line 4, and the entire source shall be limited as follows:

- (a) VOC emissions from Line 1, not including natural gas combustion, shall be less than 24.70 tons per year.
- (b) VOC emissions from Line 2, not including natural gas combustion, shall be less than 24.50 tons per year.
- (c) VOC emissions from Line 3, not including natural gas combustion, shall be less than 24.50 tons per year.
- (d) VOC emissions from Line 4, not including natural gas combustion, shall be less than 24.50 tons per year.
- (e) VOC emission from the entire source shall be less than 99.0 tons per year.

Compliance with these limits, combined with the potential to emit VOC from the natural gas combustion from Line 1, Line 2, Line 3, and Line 4, shall limit the VOC emissions from each line to less than 25 tons per twelve (12) consecutive month period and render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable. Compliance with these limits will limit potential VOC emissions from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period and render 326 IAC 2-7 (Part 70 Permits) not applicable.

#### **D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan is required for Line 1, Line 2, Line 3, and Line 4. Section B - Preventative Maintenance Plan contains this Permittee's obligation with regard to the preventative maintenance plan required by this condition.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **D.1.3 Record Keeping Requirements - Line 3**

- (a) To document the compliance status with Condition D.1.1(c), the following records shall be maintained for each product formulation during any calendar month for Line 3:

- (1) The amount (in pounds) of each flavoring used;
- (2) The effective percent by weight VOC content of each flavoring used;

All calculations used to determine these parameters should be kept as part of the monthly record.

- (b) The Permittee shall use the records required by Condition D.1.3(a) to determine the VOC emissions from Line 3 for each calendar month. VOC emissions shall be calculated using the following equation:

$$VOC_t = \frac{(\sum_{j=1}^m VOC_j)}{2000}$$

Where:  $VOC_t$  = Total Line 3 VOC emissions (tons/month)  
 $VOC_j$  = VOC content in flavor (%) \* Flavor Usage (pounds/month)  
m = Number of VOC-containing flavors  
j = A given flavoring

- (c) The Permittee shall use the monthly VOC emission data required in Condition D.1.3(b) to calculate the combined 12-month rolling total of VOC emissions from Line 3 for each calendar month.

#### D.1.4 Record Keeping Requirements - Line 1, Line 2, and Line 4

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- (a) To document the compliance status with Condition D.1.1(a), (b), and (d) the following records shall be maintained for each product formulation produced during any calendar month for Line 1, Line 2, and Line 4:

- (1) The initial baker's percent of yeast to the nearest tenth of a percent;
- (2) The total yeast action time, in hours, to the nearest tenth of an hour;
- (3) The final (spike) baker's percent of yeast to the nearest tenth of a percent;
- (4) The spiking time, in hours, to the nearest tenth of an hour; and
- (5) The weight, in tons, of each product formulation produced.

All calculations used to determine these parameters should be kept as part of the monthly record.

- (b) The Permittee shall use the records required by Condition D.1.4(a) to determine and record the VOC emission factor for yeast (pound of VOC per ton of baked product) for each product formulation baked in Line 1, Line 2, and Line 4 during any calendar month. The Permittee shall derive the VOC emission factor using the following equation:

$$EF_{VOC,k} = (0.95 * Y_i) + (0.195 * t_i) - (0.51 * S) - (0.86t_s) + 1.90$$

Where:  $EF_{VOC,k}$  = VOC emission factor, in pounds of VOC per ton of baked product, for each product formulation. Each formulation which results in a change in the equation variables must have a different VOC emission factor.

$Y_i$  = Initial baker's percent of yeast to the nearest tenth of a percent (baker's percent of an ingredient refers to the weight of that ingredient per 100 pounds of flour in the formula)

$t_i$  = Total yeast action time, in hours, to the nearest tenth of an hour (includes all time between the moment the yeast comes in contact with water and the moment the product enters the oven)

S = Final (spike) baker's percent of yeast to the nearest tenth of a percent

$t_s$  = Spiking time in hours to the nearest tenth of an hour

k = A given yeast-leavened product

- (c) To document the compliance status with Condition D.1.1(a), (b), and (d), the following records shall be maintained for each product formulation during any calendar month:

- (1) The amount (in pounds) of each flavoring used;
- (2) The effective percent by weight VOC content of each flavoring used;

All calculations used to determine these parameters should be kept as part of the monthly record.

- (d) The Permittee shall use the records required by Condition D.1.4(a), (b), and (c) to determine the VOC emissions from flavorings used and from the manufacture of yeast-leavened products produced by Line 1, Line 2, and Line 4 for each calendar month. VOC emissions shall be calculated using the following equation:

$$VOC_t = \frac{(\sum_{k=1}^n EF_{VOC,k} * P_k) + (\sum_{j=1}^m VOC_j)}{2000}$$

Where:  $VOC_t$  = Total VOC emissions (tons/month) for Line 1, Line 2, or Line 4

$EF_{VOC,k}$  = VOC Emission factor, in pounds of VOC emitted per ton of baked product, for each product formation number k as specified in Condition D.1.4(b)

$P_k$  = Weight (in tons) of each product formulation i produced each calendar month

$VOC_j$  = VOC content in flavor (%) \* Flavor Usage (pounds/month)

k = A given yeast-leavened product

n = Total number of yeast-leavened products produced

m = Total number of VOC-containing flavors used

j = A given flavoring

- (e) The Permittee shall use the monthly VOC emission data required in Condition D.1.4(d) to calculate the twelve (12) month rolling total of VOC emissions each from Line 1, Line 2, and Line 4, for each calendar month.

#### D.1.5 Record Keeping Requirements - Entire Source

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- (a) To document the compliance status with Condition D.1.1(e), the following records shall be maintained during any calendar month:

- (1) The records specified in Conditions D.1.3 and D.1.4;
- (2) The amount of each VOC-containing cleaning or sanitizing chemical used (or purchased);
- (3) The VOC content of each cleaning or sanitizing chemical.

All calculations used to determine these parameters should be kept as part of the monthly record.

- (b) The Permittee shall use the records required by Condition D.1.5(a) to determine the VOC emissions from the entire source for each calendar month. VOC emissions shall be calculated using the following equation:

Where:

$VOC_{sw}$	=	Source-wide VOC emissions (tons/month)
$VOC_{Line 1}$	=	VOC emissions from Line 1 as calculated in Condition D.1.4(d) (tons/month)
$VOC_{Line 2}$	=	VOC emissions from Line 2 as calculated in Condition D.1.4(d) (tons/month)
$VOC_{Line 3}$	=	VOC emissions from Line 3 as calculated in Condition D.1.3(b) (tons/month)
$VOC_{Line 4}$	=	VOC emissions from Line 4 as calculated in Condition D.1.4(d) (tons/month)
$M_i$	=	cleaner/sanitizer product usage for product $i$ (tons/month)
$VOC_i$	=	VOC content for cleaner/sanitizer product $i$ (%)
$b$	=	Total number of cleaner/sanitizer products used
$i$	=	a given cleaner/sanitizer product
$EV_m$	=	constant determined by source to account for additional VOC emissions at the source (0.14 tons/month)

- (c) The Permittee shall use the monthly VOC emission data required in Condition D.1.5(b) to calculate the combined 12-month rolling total of source-wide VOC emissions for each calendar month.

#### D.1.6 Reporting Requirement

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A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (e) Six (6) flour storage silos, identified as S1 through S6, constructed in 1979, with a storage capacity of 63 tons, each, and a loading rate of 7 tons per hour, total.

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

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

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Pursuant to 326 IAC 6-3-2(e) the particulate emission rate from the six (6) flour storage silos, identified as S1 through S6, shall not exceed 15.1 pounds per hour, total.

This limitation is based on the following equation:

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

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

Where: E = Rate of emission in pounds per hour, and  
P = Process weight rate in tons per hour

### SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

Insignificant Activities:

- (a) One (1) natural gas-fired boiler with a heat input capacity of 3.34 MMBtu per hour, constructed in 1978.
- (b) Nine (9) natural gas-fired water heaters, with a total heat input capacity of 1.95 MMBtu per hour.

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

**D.3.1 Particulate Matter Limitations [326 IAC 6-2-3]**

Pursuant to 326 IAC 6-2-3(e), particulate matter emissions from the one (1) insignificant natural gas boiler and the nine (9) insignificant natural gas-fired water heaters shall not exceed 0.6 pound per MMBtu.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Keebler Company  
Source Address: 9445 E US Highway 40, Seelyville, Indiana 47878  
FESOP Permit No.: F167-28736-00151

**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**

**100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Keebler Company  
Source Address: 9445 E US Highway 40, Seelyville, Indiana 47878  
FESOP Permit No.: F167-28736-00151

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

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

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

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

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

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

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

**FESOP Quarterly Report**

Source Name: Keebler Company  
 Source Address: 9445 E US Highway 40, Seelyville, Indiana 47878  
 FESOP Permit No.: F167-28736-00151  
 Facility: Line 1  
 Parameter: VOC from baking with yeast and flavorings  
 Limit: Less than 24.7 tons per twelve (12) consecutive month period, using the following equation:

$$VOC_t = \frac{(\sum_{k=1}^n EF_{VOC,k} * P_k) + (\sum_{j=1}^m VOC_j)}{2000}$$

Where:  $VOC_t$  = Total VOC emissions (tons/month) for Line 1  
 $EF_{VOC,k}$  = VOC emission factor, in pounds of VOC emitted per ton of baked product, for each product formation number x as specified in Condition D.1.4(b)  
 $P_k$  = Weight (in tons) of each product formulation i produced each calendar month  
 $VOC_j$  = VOC content in flavor (%) \* Flavor Usage (pounds/month)  
 k = A given yeast-leavened product  
 n = Total number of yeast-leavened products produced  
 m = Total number of VOC-containing flavors used  
 j = A given flavoring

YEAR: \_\_\_\_\_

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

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

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

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

**FESOP Quarterly Report**

Source Name: Keebler Company  
 Source Address: 9445 E US Highway 40, Seelyville, Indiana 47878  
 FESOP Permit No.: F167-28736-00151  
 Facility: Line 2  
 Parameter: VOC from baking with yeast and flavorings  
 Limit: Less than 24.5 tons per twelve (12) consecutive month period, using the following equation:

$$VOC_t = \frac{(\sum_{k=1}^n EF_{VOC,k} * P_k) + (\sum_{j=1}^m VOC_j)}{2000}$$

Where:  $VOC_t$  = Total VOC emissions (tons/month) for Line 2  
 $EF_{VOC,k}$  = VOC emission factor, in pounds of VOC emitted per ton of baked product, for each product formation number x as specified in Condition D.1.4(b)  
 $P_k$  = Weight (in tons) of each product formulation i produced each calendar month  
 $VOC_j$  = VOC content in flavor (%) \* Flavor Usage (pounds/month)  
 k = A given yeast-leavened product  
 n = Total number of yeast-leavened products produced  
 m = Total number of VOC-containing flavors used  
 j = A given flavoring

YEAR: \_\_\_\_\_

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

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

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

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

**FESOP Quarterly Report**

Source Name: Keebler Company  
 Source Address: 9445 E US Highway 40, Seelyville, Indiana 47878  
 FESOP Permit No.: F167-28736-00151  
 Facility: Line 3  
 Parameter: VOC from flavorings  
 Limit: Less than 24.5 tons per twelve (12) consecutive month period, using the following equation:

$$VOC_t = \frac{(\sum_{j=1}^m VOC_j)}{2000}$$

Where:  $VOC_t$  = Total Line 3 VOC emissions (tons/month)  
 $VOC_j$  = VOC content in flavor (%) \* Flavor Usage (pounds/month)  
 m = Number of VOC-containing flavors  
 j = A given flavoring

YEAR: \_\_\_\_\_

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

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

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

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

**FESOP Quarterly Report**

Source Name: Keebler Company  
 Source Address: 9445 E US Highway 40, Seelyville, Indiana 47878  
 FESOP Permit No.: F167-28736-00151  
 Facility: Line 4  
 Parameter: VOC from baking with yeast and flavorings  
 Limit: Less than 24.5 tons per twelve (12) consecutive month period, using the following equation:

$$VOC_t = \frac{(\sum_{k=1}^n EF_{VOC,k} * P_k) + (\sum_{j=1}^m VOC_j)}{2000}$$

Where:  $VOC_t$  = Total VOC emissions (tons/month) for Line 4  
 $EF_{VOC,k}$  = VOC emission factor, in pounds of VOC emitted per ton of baked product, for each product formation number x as specified in Condition D.1.4(b)  
 $P_k$  = Weight (in tons) of each product formulation i produced each calendar month  
 $VOC_j$  = VOC content in flavor (%) \* Flavor Usage (pounds/month)  
 k = A given yeast-leavened product  
 n = Total number of yeast-leavened products produced  
 m = Total number of VOC-containing flavors used  
 j = A given flavoring

YEAR: \_\_\_\_\_

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

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

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

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

**FESOP Quarterly Report**

Source Name: Keebler Company  
 Source Address: 9445 E US Highway 40, Seelyville, Indiana 47878  
 FESOP Permit No.: F167-28736-00151  
 Facility: Entire Source  
 Parameter: VOC emissions  
 Limit: Less than 99.0 tons per twelve (12) consecutive month period, using the following equation:

Where:  
 $VOC_{sw}$  = Source-wide VOC emissions (tons/month)  
 $VOC_{Line\ 1}$  = VOC emissions from Line 1 as calculated in Condition D.1.4(d) (tons/month)  
 $VOC_{Line\ 2}$  = VOC emissions from Line 2 as calculated in Condition D.1.4(d) (tons/month)  
 $VOC_{Line\ 3}$  = VOC emissions from Line 3 as calculated in Condition D.1.3(b) (tons/month)  
 $VOC_{Line\ 4}$  = VOC emissions from Line 4 as calculated in Condition D.1.4(d) (tons/month)  
 $M_i$  = cleaner/sanitizer product usage for product  $i$  (tons/month)  
 $VOC_i$  = VOC content for cleaner/sanitizer product  $i$  (%)  
 $b$  = Total number of cleaner/sanitizer products used  
 $i$  = a given cleaner/sanitizer product  
 $EV_m$  = constant determined by source to account for additional VOC emissions at the source (0.14 tons/month)

YEAR: \_\_\_\_\_

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

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

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

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Keebler Company  
Source Address: 9445 E US Highway 40, Seelyville, Indiana 47878  
FESOP Permit No.: F167-28736-00151

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

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

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

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

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

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

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

Mail to: Permit Administration & Support Section  
Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Keebler Company  
9445 E US Highway 40  
Seelyville, Indiana 47878

Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_  
(Company Name)
4. I hereby certify that Keebler Company, located at 9445 E US Highway 40, Seelyville, Indiana 47878, has constructed and will operate the commercial bakery which produces non-yeast leavened and yeast-leavened bakery products and frozen dough in conformity with the requirements and intent of the permit application, received by the Office of Air Quality on December 9, 2009, and as permitted pursuant to the New Source Construction Permit and FESOP No. F167-28736-00151, issued on \_\_\_\_\_.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature \_\_\_\_\_  
Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_. My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_  
Name \_\_\_\_\_ (typed or printed)

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

Technical Support Document (TSD) for a Significant Permit Revision to a  
Federally Enforceable State Operating Permit (FESOP)

**Source Description and Location**

<b>Source Name:</b>	<b>Keebler Company</b>
<b>Source Location:</b>	<b>9445 E US Highway 40, Seelyville, IN 47878</b>
<b>County:</b>	<b>Vigo</b>
<b>SIC Code:</b>	<b>2052</b>
<b>Operation Permit No.:</b>	<b>F167-28736-00151</b>
<b>Operation Permit Issuance Date:</b>	<b>May 5, 2010</b>
<b>Significant Permit Revision No.:</b>	<b>167-30014-00151</b>
<b>Permit Reviewer:</b>	<b>Meredith W. Jones</b>

On December 16, 2010, the Office of Air Quality (OAQ) received an application from Keebler Company related to a modification to an existing stationary commercial bakery which produces non-yeast leavened and yeast-leavened bakery products.

**Existing Approvals**

The source was issued FESOP No. F167-28736-00151 on May 5, 2010.

**County Attainment Status**

The source is located in Vigo County.

<b>Pollutant</b>	<b>Designation</b>
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective February 6, 2006, for the Terre Haute area, including Vigo County, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

- (a) *Ozone Standards*  
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. Vigo 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) *PM<sub>2.5</sub>*  
Vigo County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions, and the effective date of these rules was July 15, 2008. Indiana has three years from



<i>Process/ Emission Unit</i>	<b>Potential To Emit of the Entire Source Prior to Revision (tons/year)</b>								
	<i>PM</i>	<i>PM<sub>10</sub></i>	<i>PM<sub>2.5</sub></i>	<i>SO<sub>2</sub></i>	<i>NO<sub>x</sub></i>	<i>VOC</i>	<i>CO</i>	<i>Total HAPs</i>	<i>Worst Single HAP</i>
<b>Total PTE of Entire Source</b>	<b>16.34</b>	<b>6.78</b>	<b>6.78</b>	<b>0.08</b>	<b>15.20</b>	<b>&lt;81.41</b>	<b>12.77</b>	<b>0.94</b>	<b>0.65 (acetaldehyde)</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
<p>*A bottleneck exists in the loading of the flour storage silos, the result being that only one silo can be loaded at a time. Therefore, uncontrolled potential emissions were calculated such that instead of all six silos being loaded at once, only one silo is capable of being loaded at any given moment. The PTE of PM was previously miscalculated and has been corrected.</p> <p>These emissions are based upon the technical support document for FESOP No. F167-28736-00151, issued on May 5, 2010. However, it was discovered that potential emissions from natural gas combustion from ovens were incorrectly listed in this document. These numbers have therefore been updated to correctly reflect the potential to emit of the source. Potential HAP emissions from Line 2- yeast have also been updated pursuant to the addendum to the technical support document for FESOP No. F167-28736-00151.</p>									

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Keebler Company on December 16, 2010, relating to:

- (a) The expansion of the varieties of products baked on Line 1 to include yeast-leavened food products.
- (b) The addition of one (1) new cooking line, identified as Line 4.
- (c) The removal of the frozen dough line.
- (d) The revision of potential to emit calculations for sanitation and cleaning chemical usage.
- (e) Inclusion of potential to emit calculations for the two (2) noncontact cooling towers.
- (f) The addition of a source-wide limit on VOC emissions so that the source can remain below the Title V threshold for this pollutant.

The following is a list of the new emission units:

- (a) One (1) cooking line, identified as Line 4, consisting of the following:



Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f)(1)(E)(iv), because the revision involves the construction of one (1) new cooking line, identified as Line 4, with potential to emit (PTE) greater than 25 tons per year.

**PTE of the Entire Source After Issuance of the FESOP Revision**

The table below summarizes the potential to emit of the entire source reflecting adjustment of existing limits, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit		Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
		PM	PM <sub>10</sub> *	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Line 1	Flavorings	0.00	0.00	0.00	0.00	0.00	<24.7	0.00	0.00	0.00
	<b>Yeast</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>		<b>0.00</b>	<b>0.65</b>	<b>0.65</b>
	Natural Gas Combustion	0.08	0.32	0.32	0.02	4.16	0.23	3.50	0.08	0.08 (hexane)
	Total for Line 1	0.08	0.32	0.32	0.02	4.16	<b>&lt;24.93</b>	3.50	<del>0.08</del> <b>0.73</b>	<del>0.08</del> <b>0.65</b> (hexane) (acetaldehyde)
Line 2	Flavorings	0.00	0.00	0.00	0.00	0.00	<24.5	0.00	0.00	0.00
	Yeast	0.00	0.00	0.00	0.00	0.00		0.00	0.65	0.65 (acetaldehyde)
	Natural Gas Combustion	0.10	0.41	0.41	0.03	5.41	0.30	4.54	0.10	0.10 (hexane)
	Total for Line 2	0.10	0.41	0.41	0.03	5.41	<b>&lt;24.98</b>	4.54	0.75	0.65 (acetaldehyde)
Line 3	Flavorings	0.00	0.00	0.00	0.00	0.00	<24.5	0.00	0.00	0.00
	Natural Gas Combustion	0.04	0.14	0.14	0.01	1.88	0.10	1.58	0.03	0.04 (hexane)
	Total for Line 3	0.04	0.14	0.14	0.01	1.88	<24.6	1.58	0.03	0.04 (hexane)
Line 4	<b>Flavorings</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<24.5	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
	<b>Yeast</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>		<b>0.00</b>	<b>0.65</b>	<b>0.65</b>
	Natural Gas Combustion	0.10	0.40	0.40	0.03	5.26	0.29	4.42	0.09	0.10 (hexane)
	Total for Line 4	0.10	0.40	0.40	0.03	5.26	<b>&lt;24.79</b>	4.42	0.75	0.65 (acetaldehyde)

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Insignificant Natural Gas Combustion	0.07	0.29	0.29	0.02	3.75	0.21	3.15	0.07	0.07 (hexane)
Ink Usage	0.00	0.00	0.00	0.00	0.00	0.65	0.00	0.00	0.00
Sanitation Chemicals	0.00	0.00	0.00	0.00	0.00	<del>5.85</del> <b>12.31</b>	0.00	0.00	0.00
Flour Storage Silos**	16.05	5.62	5.62	0.00	0.00	0.00	0.00	0.00	0.00
<b>Cooling Towers</b>	<b>6.90</b>	<b>6.90</b>	<b>6.90</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
Total PTE of Entire Source	<del>18.25</del> <b>23.34</b>	<del>34.89</del> <b>14.08</b>	<del>34.89</del> <b>14.08</b>	<del>0.08</del> <b>0.12</b>	<del>15.20</del> <b>20.46</b>	<del>&lt;81.44</del> <b>&lt;99</b>	<del>12.77</del> <b>17.19</b>	<del>0.94</del> <b>2.34</b>	<del>0.65</del> <b>1.95</b> (acetaldehyde)
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

\*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

\*\*A bottleneck exists in the loading of the flour storage silos, the result being that only one silo can be loaded at a time. Therefore, uncontrolled potential emissions were calculated such that instead of all six silos being loaded at once, only one silo is capable of being loaded at any given moment. The PTE of PM was previously miscalculated and has been corrected.

These emissions are based upon the technical support document for FESOP No. F167-28736-00151, issued on May 5, 2010. However, it was discovered that potential emissions from natural gas combustion from ovens were incorrectly listed in this document. These numbers have therefore been updated to correctly reflect the potential to emit of the source. Potential HAP emissions from Line 2- yeast have also been updated pursuant to the addendum to the technical support document for FESOP No. F167-28736-00151.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted)

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)								
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Line 1	Flavorings	0.00	0.00	0.00	0.00	0.00	<24.7	0.00	0.00
	Yeast	0.00	0.00	0.00	0.00	0.00		0.00	0.65 (acetaldehyde)
	Natural Gas Combustion	0.08	0.32	0.32	0.02	4.16	0.23	3.50	0.08 (hexane)
	Total for Line 1	0.08	0.32	0.32	0.02	4.16	<b>&lt;24.93</b>	3.50	0.73 (acetaldehyde)

<i>Process/ Emission Unit</i>		<b>Potential To Emit of the Entire Source After Issuance of Revision (tons/year)</b>								
		<i>PM</i>	<i>PM<sub>10</sub>*</i>	<i>PM<sub>2.5</sub></i>	<i>SO<sub>2</sub></i>	<i>NOx</i>	<i>VOC</i>	<i>CO</i>	<i>Total HAPs</i>	<i>Worst Single HAP</i>
Line 2	Flavorings	0.00	0.00	0.00	0.00	0.00	<24.5	0.00	0.00	0.00
	Yeast	0.00	0.00	0.00	0.00	0.00		0.00	0.65	0.65 (acetaldehyde)
	Natural Gas Combustion	0.10	0.41	0.41	0.03	5.41	0.30	4.54	0.10	0.10 (hexane)
	Total for Line 2	0.10	0.41	0.41	0.03	5.41	<24.8	4.54	0.75	0.65 (acetaldehyde)
Line 3	Flavorings	0.00	0.00	0.00	0.00	0.00	<24.5	0.00	0.00	0.00
	Natural Gas Combustion	0.04	0.14	0.14	0.01	1.88	0.10	1.58	0.03	0.04 (hexane)
	Total for Line 3	0.04	0.14	0.14	0.01	1.88	<24.6	1.58	0.03	0.04 (hexane)
Line 4	Flavorings	0.00	0.00	0.00	0.00	0.00	<24.5	0.00	0.00	0.00
	Yeast	0.00	0.00	0.00	0.00	0.00		0.00	0.65	0.65 (acetaldehyde)
	Natural Gas Combustion	0.10	0.40	0.40	0.03	5.26	0.29	4.42	0.09	0.1 (hexane)
	Total for Line 4	0.10	0.40	0.40	0.03	5.26	<24.79	4.42	0.75	0.65 (acetaldehyde)
Insignificant Natural Gas Combustion		0.07	0.29	0.29	0.02	3.75	0.21	3.15	0.07	0.07 (hexane)
Ink Usage		0.00	0.00	0.00	0.00	0.00	0.65	0.00	0.00	0.00
Sanitation Chemicals		0.00	0.00	0.00	0.00	0.00	12.31	0.00	0.00	0.00
Flour Storage Silos**		16.05	5.62	5.62	0.00	0.00	0.00	0.00	0.00	0.00
Cooling Towers		6.90	6.90	6.90	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total PTE of Entire Source</b>		<b>23.34</b>	<b>14.08</b>	<b>14.08</b>	<b>0.12</b>	<b>20.46</b>	<b>&lt;99</b>	<b>17.19</b>	<b>2.34</b>	<b>1.95 (acetaldehyde)</b>
Title V Major Source Thresholds		NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds		250	250	250	250	250	250	250	NA	NA

\*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

\*\*A bottleneck exists in the loading of the flour storage silos, the result being that only one silo can be loaded at a time. Therefore, uncontrolled potential emissions were calculated such that instead of all six silos being loaded at once, only one silo is capable of being loaded at any given moment. The PTE of PM was previously miscalculated and has been corrected.

These emissions are based upon the technical support document for FESOP No. F167-28736-00151, issued on May 5, 2010. However, it was discovered that potential emissions from natural gas combustion from ovens were incorrectly listed in this document. These numbers have therefore been updated to correctly reflect the potential to emit of the source. Potential HAP emissions from Line 2- yeast have also been updated pursuant to the addendum to the technical support document for FESOP No. F167-28736-00151.

(a) *FESOP Status*

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) VOC emission from the entire source shall be less than 99.0 tons per year.

Compliance with these limits will limit potential VOC emissions from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period and render 326 IAC 2-7 (Part 70 Permits) not applicable.

(b) *PSD Minor Source*

This modification to an existing PSD minor stationary source will not change the PSD minor status because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

<b>Federal Rule Applicability Determination</b>
---

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers (40 CFR Part 63, Subpart Q) (326 IAC 20-4) are not included in the permit for the two (2) noncontact cooling tower because these units are not operated with chromium-based water treatment chemicals and the source is not a major source of HAPs.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

<b>State Rule Applicability Determination</b>
---

The following state rules are applicable to the proposed revision:

**326 IAC 2-8-4 (FESOP)**

This revision to an existing Title V minor stationary source will not change the minor status because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

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

This modification to an existing PSD minor stationary source will not change the PSD minor status because the potential to emit of all regulated attainment pollutants from the entire source will continue to

be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

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

The proposed revision is not subject to the requirements of 326 IAC 2-4.1 because the unlimited potential to emit of HAPs from the new units are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs, each.

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

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

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

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary 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.

**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 (Fugitive Particulate Matter Emission Limitations) because the source does not have potential fugitive particulate emissions greater than 25 tons per year.

Line 4

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

Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 pound per hour are exempt from this rule. The potential particulate emissions from the one (1) new cooking line, identified as Line 4, are less than 0.551 pound per hour. Therefore, Line 4 is not subject to the requirements of this rule.

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

The unlimited VOC potential emissions from Line 4 are greater than twenty-five (25) tons per year. However, the source shall limit VOC emissions from Line 4 to less than twenty-five (25) tons per year.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the source shall comply with the following:

VOC emissions from Line 4, excluding natural gas combustion, shall be less than 24.50 tons per year.

Compliance with this limit, combined with the potential VOC emissions from natural gas combustion associated with this line, shall limit the potential to emit VOC from Line 4 to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

There are no other 326 IAC 8 Rules that are applicable to this emission unit.

### Cooling Towers

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

The two (2) noncontact cooling towers, identified as North Cooling Tower and South Cooling Tower, are not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because pursuant to 326 IAC 6-3-1(b)(11) noncontact cooling tower systems are exempt from the requirements of this rule.

<b>Compliance Determination, Monitoring and Testing Requirements</b>
--

- (a) The compliance determination and monitoring requirements applicable to this proposed revision are as follows:

#### Line 3

- (1) To determine compliance with the VOC emission limits, the following records shall be maintained for each product formulation during any calendar month for Line 3:

- (A) The amount (in pounds) of each flavoring used;
- (B) The effective percent by weight VOC content of each flavoring used;

All calculations used to determine these parameters should be kept as part of the monthly record.

- (2) The Permittee shall use the records required above to determine the VOC emissions from Line 3 for each calendar month. VOC emissions shall be calculated using the following equation:

$$VOC_t = \frac{(\sum_{j=1}^m VOC_j)}{2000}$$

Where:  $VOC_t$  = Total Line 3 VOC emissions (tons/month)  
 $VOC_j$  = VOC content in flavor (%) \* Flavor Usage (pounds/month)  
 $m$  = Number of VOC-containing flavors  
 $j$  = A given flavoring

- (3) The Permittee shall use the monthly VOC emission data to calculate the combined 12-month rolling total of VOC emissions from Line 3 for each calendar month.

#### Line 1, Line 2, and Line 4

- (1) To determine compliance with the VOC emission limits, the following records shall be maintained for each product formulation produced during any calendar month for Line 1, Line 2, and Line 4:

- (A) The initial baker's percent of yeast to the nearest tenth of a percent;

- (B) The total yeast action time, in hours, to the nearest tenth of an hour;
- (C) The final (spike) baker's percent of yeast to the nearest tenth of a percent; and
- (D) The spiking time, in hours, to the nearest tenth of an hour;
- (E) The weight, in tons, of each product formulation produced.

All calculations used to determine these parameters should be kept as part of the monthly record.

- (2) The Permittee shall use the records required above to determine and record the VOC emission factor for yeast (pound of VOC per ton of baked product) for each product formulation baked in Line 1, Line 2, and Line 4 during any calendar month. The Permittee shall derive the VOC emission factor using the following equation:

$$EF_{VOC,k} = (0.95 * Y_i) + (0.195 * t_i) - (0.51 * S) - (0.86t_s) + 1.90$$

Where:  $EF_{VOC,k}$  = VOC emission factor, in pounds of VOC per ton of baked product, for each product formulation. Each formulation which results in a change in the equation variables must have a different VOC emission factor.

$Y_i$  = Initial baker's percent of yeast to the nearest tenth of a percent (baker's percent of an ingredient refers to the weight of that ingredient per 100 pounds of flour in the formula)

$t_i$  = Total yeast action time, in hours, to the nearest tenth of an hour (includes all time between the moment the yeast comes in contact with water and the moment the product enters the oven)

$S$  = Final (spike) baker's percent of yeast to the nearest tenth of a percent

$t_s$  = Spiking time in hours to the nearest tenth of an hour

$k$  = A given yeast-leavened product

- (3) To show compliance with the limits for Line 1, Line 2, and Line 4, the following records shall be maintained for each product formulation during any calendar month:

- (A) The amount (in pounds) of each flavoring used;
- (B) The effective percent by weight VOC content of each flavoring used;

All calculations used to determine these parameters should be kept as part of the monthly record.

- (4) The Permittee shall use the records required above to determine the VOC emissions from flavorings used and from the manufacture of yeast-leavened products produced by Line 1, Line 2, and Line 4 for each calendar month. VOC emissions shall be calculated using the following equation:

$$VOC_t = \frac{(\sum_{k=1}^n EF_{VOC,k} * P_i) + (\sum_{j=1}^m VOC_j)}{2000}$$

Where:  $VOC_t$  = Total VOC emissions (tons/month) for Line 1, Line 2, or Line 4  
 $EF_{VOC,k}$  = VOC Emission factor, in pounds of VOC emitted per ton of baked product, for each product formation number  $x$  as specified in Condition D.1.2(b)  
 $P_i$  = Mass (in tons) of each product formulation  $i$  produced each calendar month  
 $VOC_j$  = VOC content in flavor (%) \* Flavor Usage (pounds/month)  
 $k$  = A given yeast-leavened product  
 $n$  = Total number of yeast-leavened products produced  
 $m$  = Total number of VOC-containing flavors used  
 $j$  = A given flavoring

- (5) The Permittee shall use the monthly VOC emission data required above to calculate the combined twelve (12) month rolling total of VOC emissions from Line 1, Line 2, and Line 4 for each calendar month.

Entire Source

- (1) To determine compliance with the VOC emission limits, the following records shall be maintained for each product formulation produced during any calendar month for Line 1, Line 2, and Line 4:

- (A) The records specified in Conditions D.1.3 and D.1.4;  
(B) The amount of each VOC-containing cleaning or sanitizing chemical used (or purchased);  
(C) The VOC content of each cleaning or sanitizing chemical.

All calculations used to determine these parameters should be kept as part of the monthly record.

- (2) The Permittee shall use the records required by Condition D.1.5(a) to determine the VOC emissions from the entire source for each calendar month. VOC emissions shall be calculated using the following equation:

Where:

$VOC_{sw}$  = Source-wide VOC emissions (tons/month)  
 $VOC_{Line 1}$  = VOC emissions from Line 1 as calculated in Condition D.1.4(d) (tons/month)  
 $VOC_{Line 2}$  = VOC emissions from Line 2 as calculated in Condition D.1.4(d) (tons/month)  
 $VOC_{Line 3}$  = VOC emissions from Line 3 as calculated in Condition D.1.3(b) (tons/month)  
 $VOC_{Line 4}$  = VOC emissions from Line 4 as calculated in Condition D.1.4(d) (tons/month)  
 $M_i$  = cleaner/sanitizer product usage for product  $i$  (tons/month)  
 $VOC_j$  = VOC content for cleaner/sanitizer product  $i$  (%)  
 $b$  = Total number of cleaner/sanitizer products used  
 $i$  = a given cleaner/sanitizer product

$EV_m =$  constant determined by source to account for additional VOC emissions at the source (0.14 tons/month)

- (3) The Permittee shall use the monthly VOC emission data required in Condition D.1.5(b) to calculate the combined 12-month rolling total of source-wide VOC emissions for each calendar month.

### Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (a) The expansion of the varieties of products baked on Line 1 to include yeast-leavened food products.
- (b) The addition of one (1) new cooking line, identified as Line 4.
- (c) The removal of the frozen dough line.
- (d) The revision of potential to emit calculations for sanitation and cleaning chemical usage.
- (e) Potential to emit calculations for the two (2) noncontact cooling towers.
- (f) The addition of a source-wide limit on VOC emissions so that the source can remain below the Title V threshold for this pollutant.

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) cooking line, identified as Line 1, consisting of the following:
  - ...
  - (2) Baking of non-yeast **and yeast**-leavened food products.
  - ...
- (d) **One (1) cooking line, identified as Line 4, consisting of the following:**
  - (1) **One (1) natural gas-fired oven, identified as Bakery Oven No. 4 (SV200), approved for construction in 2011, exhausting through Stacks SV200\_01 through SV200\_05, with a maximum heat input capacity of 12.0 MMBtu per hour.**
  - (2) **Baking of non-yeast and yeast-leavened food products.**
- (~~de~~) Six (6) flour storage silos, identified as S1 through S6, constructed in 1979, with a storage capacity of 63 tons, each, and a loading rate of 7 tons per hour, total.
- (~~ef~~) Sanitation and cleaning chemical usage with potential uncontrolled VOC emissions exceeding 15 lbs/day.

#### A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

...

~~(d) Frozen dough line with potential uncontrolled emissions meeting the exemption levels under 326 IAC 2-7-1(21)(A) and (B).~~

**(d) Two (2) noncontact cooling towers, identified as North Cooling Tower and South Cooling Tower, constructed in 1996 and 2009, respectively, each with potential uncontrolled emissions meeting the exemption levels under 326 IAC 2-7-1(21)(A) and (B).**

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

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

...

(2) Baking of non-yeast **and yeast**-leavened food products.

...

**(d) One (1) cooking line, identified as Line 4, consisting of the following:**

**(1) One (1) natural gas-fired oven, identified as Bakery Oven No. 4 (SV200), approved for construction in 2011, exhausting through Stacks SV200\_01 through SV200\_05, with a maximum heat input capacity of 12.0 MMBtu per hour.**

**(2) Baking of non-yeast and yeast-leavened food products.**

**(f) Sanitation and cleaning chemical usage with potential uncontrolled VOC emissions exceeding 15 lbs/day.**

**Insignificant Activities**

**(a) One (1) natural gas-fired boiler with a heat input capacity of 3.34 MMBtu per hour.**

**(b) Nine (9) natural gas-fired water heaters, with a total heat input capacity of 1.95 MMBtu per hour.**

**(c) Five (5) natural gas-fired process heaters, with a total heat input capacity of 3.28 MMBtu per hour.**

**(d) Two (2) noncontact cooling towers, identified as North Cooling Tower and South Cooling Tower, constructed in 1996 and 2009, respectively, each with potential uncontrolled emissions meeting the exemption levels under 326 IAC 2-7-1(21)(A) and (B).**

**(e) Package marking with potential VOC uncontrolled emissions from ink usage meeting the exemption levels under 326 IAC 2-7-1(21)(A) and (B).**

(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 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 8-1-6]

---

Pursuant to 326 IAC 8-1-6, VOC emissions from Line 1, Line 2, ~~and~~ Line 3, **Line 4, and the entire source** shall be limited as follows:

...

**(d) VOC emissions from Line 4, not including natural gas combustion, shall be less than 24.50 tons per year.**

**(e) VOC emission from the entire source shall be less than 99.0 tons per year.**

Compliance with these limits, combined with the potential to emit VOC from the natural gas combustion from Line 1, Line 2, ~~and~~ Line 3, **and Line 4**, shall limit the VOC emissions from each line to less than 25 tons per twelve (12) consecutive month period and render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable. Compliance with these limits, ~~combined with the potential to emit VOC from all other emission units at the source,~~ will also limit potential VOC emissions from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period and render 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

---

A Preventive Maintenance Plan is required for Line 1, Line 2, ~~and~~ Line 3, **and Line 4**. Section B - Preventative Maintenance Plan contains this Permittee's obligation with regard to the preventative maintenance plan required by this condition.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.3 Record Keeping Requirements - ~~Line 1 and~~ Line 3

---

(a) To document the compliance status with Condition D.1.1 ~~(a)~~ and (c), the following records shall be maintained for each product formulation during any calendar month for ~~Line 1 and~~ Line 3:

...

(b) The Permittee shall use the records required by Condition D.1.3(a) to determine the VOC emissions from ~~Line 1 and~~ Line 3 for each calendar month. VOC emissions shall be calculated using the following equation:

$$VOC_t = \frac{(\sum_{j=1}^m VOC_j)}{2000}$$

Where:  $VOC_t$  = Total ~~Line 1 or~~ Line 3 VOC emissions (tons/month)  
 $VOC_j$  = VOC content in flavor (%) \* Flavor Usage (pounds/month)  
 $m$  = Number of VOC-containing flavors  
 $j$  = A given flavoring

(c) The Permittee shall use the monthly VOC emission data required in Condition D.1.3(b) to calculate the combined 12-month rolling total of VOC emissions from ~~Line 1 and~~ Line 3 for each calendar month.

D.1.4 Record Keeping Requirements - **Line 1, Line 2, and Line 4**

---

(a) To document the compliance status with Condition D.1.1 **(a), (b), and (d)** the following records shall be maintained for each product formulation produced during any calendar month for **Line 1, Line 2, and Line 4**:

...

- (3) The final (spike) baker's percent of yeast to the nearest tenth of a percent; ~~and~~
- (4) The spiking time, in hours, to the nearest tenth of an hour; **and**  
...
- (b) The Permittee shall use the records required by Condition D.1.4(a) to determine and record the VOC emission factor for yeast (pound of VOC per ton of baked product) for each product formulation baked in **Line 1**, Line 2, **and Line 4** during any calendar month. The Permittee shall derive the VOC emission factor using the following equation:  
...
- (c) To document the compliance status with Condition D.1.1(a), (b), **and (d)**, the following records shall be maintained for each product formulation during any calendar month:  
...
- (d) The Permittee shall use the records required by Condition D.1.4(a), (b), and (c) to determine the VOC emissions from flavorings used and from the manufacture of yeast-leavened products produced by **Line 1**, Line 2, **and Line 4** for each calendar month. VOC emissions shall be calculated using the following equation:

$$VOC_t = \frac{(\sum_{k=1}^n EF_{VOC,k} * P_k) + (\sum_{j=1}^m VOC_j)}{2000}$$

Where:  $VOC_t$  = Total VOC emissions (tons/month) for **Line 1**, Line 2, **or Line 4**  
 $EF_{VOC,k}$  = VOC Emission factor, in pounds of VOC emitted per ton of baked product, for each product formation number k as specified in Condition D.1.4(b)  
 $P_k$  = Weight (in tons) of each product formulation i produced each calendar month  
 $VOC_j$  = VOC content in flavor (%) \* Flavor Usage (pounds/month)  
k = A given yeast-leavened product  
n = Total number of yeast-leavened products produced  
m = Total number of VOC-containing flavors used  
j = A given flavoring

- (e) The Permittee shall use the monthly VOC emission data required in Condition D.1.4(d) to calculate the combined twelve (12) month rolling total of VOC emissions from **Line 1**, Line 2, **and Line 4** for each calendar month.

#### **D.1.5 Record Keeping Requirements - Entire Source**

---

- (a) **To document the compliance status with Condition D.1.1(e), the following records shall be maintained during any calendar month:**
  - (1) **The records specified in Conditions D.1.3 and D.1.4;**
  - (2) **The amount of each VOC-containing cleaning or sanitizing chemical used (or purchased);**
  - (3) **The VOC content of each cleaning or sanitizing chemical.**

**All calculations used to determine these parameters should be kept as part of the monthly record.**

- (b) The Permittee shall use the records required by Condition D.1.5(a) to determine the VOC emissions from the entire source for each calendar month. VOC emissions shall be calculated using the following equation:

**Where:**

$VOC_{sw}$  = Source-wide VOC emissions (tons/month)  
 $VOC_{Line 1}$  = VOC emissions from Line 1 as calculated in Condition D.1.4(d) (tons/month)  
 $VOC_{Line 2}$  = VOC emissions from Line 2 as calculated in Condition D.1.4(d) (tons/month)  
 $VOC_{Line 3}$  = VOC emissions from Line 3 as calculated in Condition D.1.3(b) (tons/month)  
 $VOC_{Line 4}$  = VOC emissions from Line 4 as calculated in Condition D.1.4(d) (tons/month)  
 $M_i$  = cleaner/sanitizer product usage for product  $i$  (tons/month)  
 $VOC_i$  = VOC content for cleaner/sanitizer product  $i$  (%)  
 $b$  = Total number of cleaner/sanitizer products used  
 $i$  = a given cleaner/sanitizer product  
 $EV_m$  = constant determined by source to account for additional VOC emissions at the source (0.14 tons/month)

- (c) The Permittee shall use the monthly VOC emission data required in Condition D.1.5(b) to calculate the combined 12-month rolling total of source-wide VOC emissions for each calendar month.

D.1.56 Reporting Requirement

---

...

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (de) Six (6) flour storage silos, identified as S1 through S6, constructed in 1979, with a storage capacity of 63 tons, each, and a loading rate of 7 tons per hour, total.

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

...

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

FESOP Quarterly Report

Source Name: Keebler Company  
Source Address: 9445 E US Highway 40, Seelyville, Indiana 47878  
Mailing Address: 9445 E US Highway 40, Seelyville, IN 47878  
FESOP Permit No.: F167-28736-00151

Facility: Line 1  
 Parameter: VOC from **baking with yeast and** flavorings  
 Limit: Less than 24.7 tons per twelve (12) consecutive month period, using the following equation:

$$VOC_t = \frac{(\sum_{j=1}^m VOC_j)}{2000}$$

~~Where: VOC<sub>t</sub> = Total Line 1 or Line 3 VOC emissions (tons/month)  
 VOC<sub>j</sub> = VOC content in flavor (%) \* Flavor Usage (pounds/month)  
 m = Number of VOC-containing flavors  
 j = A given flavoring~~

$$VOC_t = \frac{(\sum_{k=1}^n EF_{VOC,k} * P_k) + (\sum_{j=1}^m VOC_j)}{2000}$$

Where: VOC<sub>t</sub> = Total VOC emissions (tons/month) for Line 1  
 EF<sub>VOC,k</sub> = VOC emission factor, in pounds of VOC emitted per ton of baked product, for each product formation number x as specified in Condition D.1.4(b)  
 P<sub>k</sub> = Weight (in tons) of each product formulation i produced each calendar month  
 VOC<sub>j</sub> = VOC content in flavor (%) \* Flavor Usage (pounds/month)  
 k = A given yeast-leavened product  
 n = Total number of yeast-leavened products produced  
 m = Total number of VOC-containing flavors used  
 j = A given flavoring

...

~~Attach a signed certification to complete this report.~~

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

FESOP Quarterly Report

Source Name: Keebler Company  
 Source Address: 9445 E US Highway 40, Seelyville, Indiana 47878  
 Mailing Address: ~~9445 E US Highway 40, Seelyville, IN 47878~~  
 FESOP Permit No.: F167-28736-00151  
 Facility: Line 2  
 Parameter: VOC from baking with yeast and flavorings  
 Limit: Less than 24.5 tons per twelve (12) consecutive month period, using the following equation:

$$VOC_t = \frac{(\sum_{k=1}^n EF_{VOC,k} * P_k) + (\sum_{j=1}^m VOC_j)}{2000}$$

Where: VOC<sub>t</sub> = Total VOC emissions (tons/month) for ~~Over~~ Line 2  
 EF<sub>VOC,k</sub> = VOC emission factor, in pounds of VOC emitted per ton of baked product, for each product formation number x as specified in Condition D.1.4(b)  
 P<sub>k</sub> = Weight (in tons) of each product formulation i produced each calendar month  
 VOC<sub>j</sub> = VOC content in flavor (%) \* Flavor Usage (pounds/month)  
 k = A given yeast-leavened product  
 n = Total number of yeast-leavened products produced  
 m = Total number of VOC-containing flavors used

j = A given flavoring  
 ...

~~Attach a signed certification to complete this report.~~

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

**FESOP Quarterly Report**

**Source Name:** Keebler Company  
**Source Address:** 9445 E US Highway 40, Seelyville, Indiana 47878  
**FESOP Permit No.:** F167-28736-00151  
**Facility:** Line 4  
**Parameter:** VOC from baking with yeast and flavorings  
**Limit:** Less than 24.5 tons per twelve (12) consecutive month period, using the following equation:

$$VOC_t = \frac{(\sum_{k=1}^n EF_{VOC,k} * P_k) + (\sum_{j=1}^m VOC_j)}{2000}$$

Where:  $VOC_t$  = Total VOC emissions (tons/month) for Line 4  
 $EF_{VOC,k}$  = VOC emission factor, in pounds of VOC emitted per ton of baked product, for each product formation number x as specified in Condition D.1.4(b)  
 $P_k$  = Weight (in tons) of each product formulation i produced each calendar month  
 $VOC_j$  = VOC content in flavor (%) \* Flavor Usage (pounds/month)  
 k = A given yeast-leavened product  
 n = Total number of yeast-leavened products produced  
 m = Total number of VOC-containing flavors used  
 j = A given flavoring

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Keebler Company  
 Source Address: 9445 E US Highway 40, Seelyville, Indiana 47878  
 FESOP Permit No.: F167-28736-00151  
 Facility: Entire Source  
 Parameter: VOC emissions  
 Limit: Less than 99.0 tons per twelve (12) consecutive month period, using the following equation:

Where:

$VOC_{sw}$  = Source-wide VOC emissions (tons/month)  
 $VOC_{Line 1}$  = VOC emissions from Line 1 as calculated in Condition D.1.4(d) (tons/month)  
 $VOC_{Line 2}$  = VOC emissions from Line 2 as calculated in Condition D.1.4(d) (tons/month)  
 $VOC_{Line 3}$  = VOC emissions from Line 3 as calculated in Condition D.1.3(b) (tons/month)  
 $VOC_{Line 4}$  = VOC emissions from Line 4 as calculated in Condition D.1.4(d) (tons/month)  
 $M_i$  = cleaner/sanitizer product usage for product  $i$  (tons/month)  
 $VOC_i$  = VOC content for cleaner/sanitizer product  $i$  (%)  
 $b$  = Total number of cleaner/sanitizer products used  
 $i$  = a given cleaner/sanitizer product  
 $EV_m$  = constant determined by source to account for additional VOC emissions at the source (0.14 tons/month)

YEAR: \_\_\_\_\_

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

--	--	--	--

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (a) IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.
- (b) IDEM, OAQ has decided to clarify Section B - Certification to be consistent with the rule.
- (c) IDEM has decided to clarify what rule requirements a certification needs to meet. IDEM has decided to remove the last sentence dealing with the need for certification from the forms because the conditions requiring the forms already address this issue.
- (d) The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report to match the underlying rule.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary commercial bakery which produces non-yeast leavened and yeast-leavened bakery products ~~and frozen dough~~.

Source Address: 9445 E US Highway 40, Seelyville, Indiana 47878  
Mailing Address: ~~9445 E US Highway 40, Seelyville, IN 47878~~  
General Source Phone Number: (812) 877-1588  
SIC Code: 2052  
County Location: Vigo  
Source Location Status: Attainment for all criteria pollutants  
Source Status: Federally Enforceable State 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

...

B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

...

- (ii) the certification ~~is~~ **states that**, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

...

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION

Source Name: Keebler Company  
Source Address: 9445 E US Highway 40, Seelyville, Indiana 47878  
~~Mailing Address: 9445 E US Highway 40, Seelyville, IN 47878~~  
FESOP Permit No.: F167-28736-00151

...

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

...

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT

Source Name: Keebler Company  
Source Address: 9445 E US Highway 40, Seelyville, Indiana 47878  
~~Mailing Address: 9445 E US Highway 40, Seelyville, IN 47878~~  
FESOP Permit No.: F167-28736-00151

...

~~A certification is not required for this report.~~

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

FESOP Quarterly Report

Source Name: Keebler Company  
Source Address: 9445 E US Highway 40, Seelyville, Indiana 47878  
~~Mailing Address: 9445 E US Highway 40, Seelyville, IN 47878~~  
FESOP Permit No.: F167-28736-00151  
Facility: Line 3

...

~~Attach a signed certification to complete this report.~~

...

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Keebler Company  
Source Address: 9445 E US Highway 40, Seelyville, Indiana 47878  
~~Mailing Address: 9445 E US Highway 40, Seelyville, IN 47878~~  
FESOP Permit No.: F167-28736-00151

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

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This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements **of this permit**, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

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~~Attach a signed certification to complete this report.~~

...

### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on December 16, 2010.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. 167-30014-00151. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Meredith Jones at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5176 or toll free at 1-800-451-6027 extension 4-5176.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) 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](http://www.idem.in.gov)

Appendix A: Emission Summary

Company Name: Keebler Company  
 Address City IN Zip: 9445 E US Highway 40, Seelyville, IN 47878  
 Significant Permit Revision No: 167-30014-00151  
 Reviewer: Meredith W. Jones  
 Date: 1/26/11

**\*\*Potential to Emit Prior to the Revision\*\***

**Uncontrolled/Unlimited Potential Emissions**

Emission Units		PM	PM10	PM2.5	SO2	VOC	CO	NOx	Single HAP	Total HAPs
Line 1*	Flavorings	0.00	0.00	0.00	0.00	>25	0.00	0.00	0.00	0.00
	Natural Gas Combustion from Oven	0.08	0.32	0.32	0.02	0.23	3.50	4.16	0.07 (hexane)	0.08
	<b>Total for Line 1</b>	<b>0.08</b>	<b>0.32</b>	<b>0.32</b>	<b>0.02</b>	<b>&gt;25</b>	<b>3.50</b>	<b>4.16</b>	<b>0.07 (hexane)</b>	<b>0.08</b>
Line 2*	Flavorings	0.00	0.00	0.00	0.00	>25	0.00	0.00	0.00	0.00
	Yeast**	0.00	0.00	0.00	0.00		0.00	0.00	0.65 (acetaldehyde)	0.65
	Natural Gas Combustion from Oven	0.10	0.41	0.41	0.03	0.30	4.54	5.41	0.10 (hexane)	0.10
<b>Total for Line 2</b>	<b>0.10</b>	<b>0.41</b>	<b>0.41</b>	<b>0.03</b>	<b>&gt;25</b>	<b>4.54</b>	<b>5.41</b>	<b>0.65 (acetaldehyde)</b>	<b>0.75</b>	
Line 3*	Flavorings	0.00	0.00	0.00	0.00	>25	0.00	0.00	0.00	0.00
	Natural Gas Combustion from Oven	0.04	0.14	0.14	0.01	0.10	1.58	1.88	0.03 (hexane)	0.04
	<b>Total for Line 3</b>	<b>0.04</b>	<b>0.14</b>	<b>0.14</b>	<b>0.01</b>	<b>&gt;25</b>	<b>1.58</b>	<b>1.88</b>	<b>0.03 (hexane)</b>	<b>0.04</b>
Insignificant Natural Gas Combustion		0.07	0.29	0.29	0.02	0.21	3.15	3.75	0.07 (hexane)	0.07
Ink Usage		0.00	0.00	0.00	0.00	0.65	0.00	0.00	0.00	0.00
Sanitation Chemicals		0.00	0.00	0.00	0.00	5.85	0.00	0.00	0.00	0.00
Flour Storage Silos		96.27	33.73	33.73	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>		<b>96.56</b>	<b>34.89</b>	<b>34.89</b>	<b>0.08</b>	<b>&gt;100</b>	<b>12.77</b>	<b>15.20</b>	<b>0.65 (acetaldehyde)</b>	<b>0.94</b>

\*The applicant has stated that potential VOC emissions for Lines 1, 2 and 3 are greater than 25 tons per year, each. Therefore, potential emissions calculations are not included for these facilities.

\*\*The potential VOC emissions from yeast for Line 2 include VOC emitted while baking. VOC emitted during fermentation (leavening) is assumed to be 97% ethanol and 3% acetaldehyde (VOC/HAP), based on the following document and supporting information:

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

The product formulation data is considered classified business information. IDEM has reviewed and verified the potential emissions for Lines 1 through 3 and this information has been stored as a confidential file.

The potential emissions from natural gas combustion from ovens were incorrectly listed in the summary sheet of Appendix A: Emission Summary for the technical support document for FESOP No. F167-28736-00151, issued on May 5, 2010. These numbers have therefore been updated to correctly reflect the potential to emit of the source. Potential HAP emissions from Line 2- yeast have also been updated pursuant to the addendum to the technical support document for FESOP No. F167-28736-00151.

**Limited Potential Emissions**

Emission Units		PM	PM10	PM2.5	SO2	VOC	CO	NOx	Single HAP	Total HAPs
Line 1	Flavorings	0.00	0.00	0.00	0.00	<24.7	0.00	0.00	0.00	0.00
	Natural Gas Combustion from Oven	0.08	0.32	0.32	0.02	0.23	3.50	4.16	0.07 (hexane)	0.08
	<b>Total for Line 1</b>	<b>0.08</b>	<b>0.32</b>	<b>0.32</b>	<b>0.02</b>	<b>&lt;24.9</b>	<b>3.50</b>	<b>4.16</b>	<b>0.07 (hexane)</b>	<b>0.08</b>
Line 2	Flavorings	0.00	0.00	0.00	0.00	<24.5	0.00	0.00	0.00	0.00
	Yeast*	0.00	0.00	0.00	0.00		0.00	0.00	0.65 (acetaldehyde)	0.65
	Natural Gas Combustion from Oven	0.10	0.41	0.41	0.03	0.30	4.54	5.41	0.10 (hexane)	0.10
<b>Total for Line 2</b>	<b>0.10</b>	<b>0.41</b>	<b>0.41</b>	<b>0.03</b>	<b>&lt;24.9</b>	<b>4.54</b>	<b>5.41</b>	<b>0.65 (acetaldehyde)</b>	<b>0.75</b>	
Line 3	Flavorings	0.00	0.00	0.00	0.00	<24.5	0.00	0.00	0.00	0.00
	Natural Gas Combustion from Oven	0.04	0.14	0.14	0.01	0.10	1.58	1.88	0.03 (hexane)	0.04
	<b>Total for Line 3</b>	<b>0.04</b>	<b>0.14</b>	<b>0.14</b>	<b>0.01</b>	<b>&lt;24.9</b>	<b>1.58</b>	<b>1.88</b>	<b>0.03 (hexane)</b>	<b>0.04</b>
Insignificant Natural Gas Combustion		0.07	0.29	0.29	0.02	0.21	3.15	3.75	0.07 (hexane)	0.07
Ink Usage		0.00	0.00	0.00	0.00	0.65	0.00	0.00	0.00	0.00
Sanitation Chemicals		0.00	0.00	0.00	0.00	5.85	0.00	0.00	0.00	0.00
Flour Storage Silos		16.05	5.62	5.62	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>		<b>16.34</b>	<b>6.78</b>	<b>6.78</b>	<b>0.08</b>	<b>&lt;81.41</b>	<b>12.77</b>	<b>15.20</b>	<b>0.65 (acetaldehyde)</b>	<b>0.94</b>

\*The potential emissions from yeast for Line 2 include VOC emitted while baking. Lines 1 and 2 do not bake products containing yeast.

Appendix A: Emission Summary

Company Name: Keebler Company  
 Address City IN Zip: 9445 E US Highway 40, Seelyville, IN 47878  
 Significant Permit Revision No: 167-30014-00151  
 Reviewer: Meredith W. Jones  
 Date: 1/26/11

**\*\*Potential to Emit of the Revision\*\***

**Uncontrolled/Unlimited Potential Emissions**

<i>Emission Units</i>		<i>PM</i>	<i>PM10</i>	<i>PM2.5</i>	<i>SO2</i>	<i>VOC</i>	<i>CO</i>	<i>NOx</i>	<i>Single HAP</i>	<i>Total HAPs</i>
Line 1*	Yeast**	0.00	0.00	0.00	0.00	<25	0.00	0.00	0.65 (acetaldehyde)	0.65
Line 4*	Flavorings	0.00	0.00	0.00	0.00	>25	0.00	0.00	0.00	0.00
	Yeast**	0.00	0.00	0.00	0.00		0.00	0.00	0.65 (acetaldehyde)	0.65
	Natural Gas Combustion from Oven	0.10	0.40	0.40	0.03	0.29	4.42	5.26	0.09 (hexane)	0.10
	<b>Total for Line 4</b>	<b>0.10</b>	<b>0.40</b>	<b>0.40</b>	<b>0.03</b>	<b>&gt;25</b>	<b>4.42</b>	<b>5.26</b>	<b>0.65 (acetaldehyde)</b>	<b>0.75</b>
Sanitation Chemicals		0.00	0.00	0.00	0.00	6.46	0.00	0.00	0.00	0.00
Cooling Towers		6.90	6.90	6.90	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>		<b>7.00</b>	<b>7.30</b>	<b>7.30</b>	<b>0.03</b>	<b>&gt;25</b>	<b>4.42</b>	<b>5.26</b>	<b>1.30 (acetaldehyde)</b>	<b>1.40</b>

\*The applicant has stated that potential VOC emissions for Lines 1 and 4 are greater than 25 tons per year, each. Therefore, potential emissions calculations are not included for these facilities.

\*\*The potential VOC emissions from yeast for Lines 1 and 4 include VOC emitted while baking. VOC emitted during fermentation (leavening) is assumed to be 97% ethanol and 3% acetaldehyde (VOC/HAP), based on the following document and supporting information:

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

The product formulation data is considered classified business information. IDEM has reviewed and verified the potential emissions for Lines 1 through 4 and this information has been stored as a confidential file.

Company Name: Keebler Company  
 Address City IN Zip: 9445 E US Highway 40, Seelyville, IN 47878  
 Significant Permit Revision No: 167-30014-00151  
 Reviewer: Meredith W. Jones  
 Date: 1/26/11

**\*\*Potential to Emit After the Revision\*\***

**Uncontrolled/Unlimited Potential Emissions**

Emission Units		PM	PM10	PM2.5	SO2	VOC	CO	NOx	Single HAP	Total HAPs
Line 1*	Flavorings	0.00	0.00	0.00	0.00	>25	0.00	0.00	0.00	0.00
	Yeast**	0.00	0.00	0.00	0.00		0.00	0.00	0.65 (acetaldehyde)	0.65
	Natural Gas Combustion from Oven	0.08	0.32	0.32	0.02	0.23	3.50	4.16	0.07 (hexane)	0.08
	<b>Total for Line 1</b>	<b>0.08</b>	<b>0.32</b>	<b>0.32</b>	<b>0.02</b>	<b>&gt;25</b>	<b>3.50</b>	<b>4.16</b>	<b>0.65 (acetaldehyde)</b>	<b>0.73</b>
Line 2*	Flavorings	0.00	0.00	0.00	0.00	>25	0.00	0.00	0.00	0.00
	Yeast**	0.00	0.00	0.00	0.00		0.00	0.00	0.65 (acetaldehyde)	0.65
	Natural Gas Combustion from Oven	0.10	0.41	0.41	0.03	0.30	4.54	5.41	0.10 (hexane)	0.10
	<b>Total for Line 2</b>	<b>0.10</b>	<b>0.41</b>	<b>0.41</b>	<b>0.03</b>	<b>&gt;25</b>	<b>4.54</b>	<b>5.41</b>	<b>0.65 (acetaldehyde)</b>	<b>0.75</b>
Line 3*	Flavorings	0.00	0.00	0.00	0.00	>25	0.00	0.00	0.00	0.00
	Natural Gas Combustion from Oven	0.04	0.14	0.14	0.01	0.10	1.58	1.88	0.03 (hexane)	0.04
	<b>Total for Line 3</b>	<b>0.04</b>	<b>0.14</b>	<b>0.14</b>	<b>0.01</b>	<b>&gt;25</b>	<b>1.58</b>	<b>1.88</b>	<b>0.03 (hexane)</b>	<b>0.04</b>
Line 4*	Flavorings	0.00	0.00	0.00	0.00	>25	0.00	0.00	0.00	0.00
	Yeast**	0.00	0.00	0.00	0.00		0.00	0.00	0.65 (acetaldehyde)	0.65
	Natural Gas Combustion from Oven	0.10	0.40	0.40	0.03	0.29	4.42	5.26	0.09 (hexane)	0.10
	<b>Total for Line 4</b>	<b>0.10</b>	<b>0.40</b>	<b>0.40</b>	<b>0.03</b>	<b>&gt;25</b>	<b>4.42</b>	<b>5.26</b>	<b>0.65 (acetaldehyde)</b>	<b>0.75</b>
Insignificant Natural Gas Combustion		0.07	0.29	0.29	0.02	0.21	3.15	3.75	0.07 (hexane)	0.07
Ink Usage		0.00	0.00	0.00	0.00	0.65	0.00	0.00	0.00	0.00
Sanitation Chemicals		0.00	0.00	0.00	0.00	12.31	0.00	0.00	0.00	0.00
Flour Storage Silos		96.27	33.73	33.73	0.00	0.00	0.00	0.00	0.00	0.00
Cooling Towers		6.90	6.90	6.90	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>		<b>103.56</b>	<b>42.18</b>	<b>42.18</b>	<b>0.12</b>	<b>&gt;100</b>	<b>17.19</b>	<b>20.46</b>	<b>1.95 (acetaldehyde)</b>	<b>2.34</b>

\*The applicant has stated that potential VOC emissions for Lines 1 through 4 are greater than 25 tons per year, each. Therefore, potential emissions calculations are not included for these facilities.

\*\*The potential VOC emissions from yeast for Lines 1, 2, and 4 include VOC emitted while baking. VOC emitted during fermentation (leavening) is assumed to be 97% ethanol and 3% acetaldehyde (VOC/HAP), based on the following document and supporting information:

1. "Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017, December 1992)

2. Henderson, D.C., 1977, "Commercial Bakeries as a Major Source of Reactive Volatile Organic Gases", U.S. EPA, Region XI Surveillance and Analysis Division

The product formulation data is considered classified business information. IDEM has reviewed and verified the potential emissions for Lines 1 through 4 and this information has been stored as a confidential file.

**Limited Potential Emissions**

Emission Units		PM	PM10	PM2.5	SO2	VOC	CO	NOx	Single HAP	Total HAPs
Line 1	Flavorings	0.00	0.00	0.00	0.00	<24.70	0.00	0.00	0.00	0.00
	Yeast*	0.00	0.00	0.00	0.00		0.00	0.00	0.65 (acetaldehyde)	0.65
	Natural Gas Combustion from Oven	0.08	0.32	0.32	0.02	0.23	3.50	4.16	0.07 (hexane)	0.08
	<b>Total for Line 1</b>	<b>0.08</b>	<b>0.32</b>	<b>0.32</b>	<b>0.02</b>	<b>&lt;24.93</b>	<b>3.50</b>	<b>4.16</b>	<b>0.65 (acetaldehyde)</b>	<b>0.73</b>
Line 2	Flavorings	0.00	0.00	0.00	0.00	<24.5	0.00	0.00	0.00	0.00
	Yeast*	0.00	0.00	0.00	0.00		0.00	0.00	0.65 (acetaldehyde)	0.65
	Natural Gas Combustion from Oven	0.10	0.41	0.41	0.03	0.30	4.54	5.41	0.10 (hexane)	0.10
	<b>Total for Line 2</b>	<b>0.10</b>	<b>0.41</b>	<b>0.41</b>	<b>0.03</b>	<b>&lt;24.8</b>	<b>4.54</b>	<b>5.41</b>	<b>0.65 (acetaldehyde)</b>	<b>0.75</b>
Line 3	Flavorings	0.00	0.00	0.00	0.00	<24.5	0.00	0.00	0.00	0.00
	Natural Gas Combustion from Oven	0.04	0.14	0.14	0.01	0.10	1.58	1.88	0.03 (hexane)	0.04
	<b>Total for Line 3</b>	<b>0.04</b>	<b>0.14</b>	<b>0.14</b>	<b>0.01</b>	<b>&lt;24.6</b>	<b>1.58</b>	<b>1.88</b>	<b>0.03 (hexane)</b>	<b>0.04</b>
Line 4	Flavorings	0.00	0.00	0.00	0.00	<24.5	0.00	0.00	0.00	0.00
	Yeast*	0.00	0.00	0.00	0.00		0.00	0.00	0.65 (acetaldehyde)	0.65
	Natural Gas Combustion from Oven	0.10	0.40	0.40	0.03	0.29	4.42	5.26	0.09 (hexane)	0.10
	<b>Total for Line 4</b>	<b>0.10</b>	<b>0.40</b>	<b>0.40</b>	<b>0.03</b>	<b>&lt;24.79</b>	<b>4.42</b>	<b>5.26</b>	<b>0.65 (acetaldehyde)</b>	<b>0.75</b>
Insignificant Natural Gas Combustion		0.07	0.29	0.29	0.02	0.21	3.15	3.75	0.07 (hexane)	0.07
Ink Usage		0.00	0.00	0.00	0.00	0.65	0.00	0.00	0.00	0.00
Sanitation Chemicals		0.00	0.00	0.00	0.00	12.31	0.00	0.00	0.00	0.00
Flour Storage Silos		16.05	5.62	5.62	0.00	0.00	0.00	0.00	0.00	0.00
Cooling Towers		6.90	6.90	6.90	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>		<b>23.34</b>	<b>14.08</b>	<b>14.08</b>	<b>0.12</b>	<b>&lt;99</b>	<b>17.19</b>	<b>20.46</b>	<b>1.95 (acetaldehyde)</b>	<b>1.59</b>

\*The potential emissions from yeast for Lines 1, 2, and 4 include VOC emitted while baking. Line 3 does not bake products containing yeast.

**Natural Gas Combustion Only**  
**Ovens 1, 2, 3, and 4**

**Company Name: Keebler Company**  
**Address City IN Zip: 9445 E US Highway 40, Seelyville, IN 47878**  
**Significant Permit Revision No: 167-30014-00151**  
**Reviewer: Meredith W. Jones**  
**Date: 1/26/11**

Heat Input Capacity MMBtu/hr		Potential Throughput MMCF/yr
9.50	Oven 1	83.2
12.35	Oven 2	108.2
4.30	Oven 3	37.7
12.00	Oven 4	105.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr - Line 1	0.08	0.32	0.02	4.16	0.23	3.50
Potential Emission in tons/yr - Line 2	0.10	0.41	0.03	5.41	0.30	4.54
Potential Emission in tons/yr - Line 3	0.04	0.14	0.01	1.88	0.10	1.58
Potential Emission in tons/yr - Line 4	0.10	0.40	0.03	5.26	0.29	4.42

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

**Natural Gas Combustion Only**  
**Ovens 1, 2, 3, and 4**  
**HAPs Emissions**

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr - Oven 1	8.738E-05	4.993E-05	3.121E-03	0.07	1.415E-04
Potential Emission in tons/yr - Oven 2	1.136E-04	6.491E-05	4.057E-03	0.10	1.839E-04
Potential Emission in tons/yr - Oven 3	3.955E-05	2.260E-05	1.413E-03	0.03	6.404E-05
Potential Emission in tons/yr - Oven 4	1.104E-04	6.307E-05	3.942E-03	0.09	1.787E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr - Oven 1	2.081E-05	4.577E-05	5.825E-05	1.581E-05	8.738E-05
Potential Emission in tons/yr - Oven 2	2.705E-05	5.950E-05	7.573E-05	2.056E-05	1.136E-04
Potential Emission in tons/yr - Oven 3	9.417E-06	2.072E-05	2.637E-05	7.157E-06	3.955E-05
Potential Emission in tons/yr - Oven 4	2.628E-05	5.782E-05	7.358E-05	1.997E-05	1.104E-04

Methodology is the same as above.

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

**Total HAPs - Oven 1      0.08**  
**Total HAPs - Oven 2      0.10**  
**Total HAPs - Oven 3      0.04**  
**Total HAPs - Oven 4      0.10**

## Potential to Emit VOC from Sanitation Chemicals

Company Name: Keebler Company  
 Address City IN Zip: 9445 E US Highway 40, Seelyville, IN 47878  
 Significant Permit Revision No: 167-30014-00151  
 Reviewer: Meredith W. Jones  
 Date: 1/26/11

## Original Calculations

Mfr	Product	Use	Projected Actual Usage (gal/yr)	Density (lb/gal)	VOC Content (w/w)	Projected Actual VOC Emissions (tpy)
Ecolab	EcoCare 350	Hand sanitizer	50	7.0	75.0%	0.13
Ecolab	EcoCare 360	Hand sanitizer	54	8.2	20.0%	0.04
Ecolab	Eco-Wipes FCS	Sanitizing wipes - tools and equipment	115 lb	na	20.0%	0.01
Ecolab	Lift RT	Floor cleaner in lift truck aisles	792	9.1	9.0%	0.32
Ecolab	Pathways Drain Sanitizer	Sold ring, sanitizer used in drains	98 lb	na	10.0%	0.00
Ecolab	Quorum Clear V	Sanitizer for surfaces in contact with food product/ materials	396	8.3	5.0%	0.08
Ecolab	RTU Surface Sanitizer	Shoe sanitizing	1000	7.4	58.6%	2.17
Ecolab	Soil-Off 2	General purpose cleaner for surfaces in contact with food product/ materials	1188	8.8	3.0%	0.16
Ecolab	Quorum Orange	Cleaner	924	10.5	0.0%	0
Ecolab	Quorum Purple	Cleaner	792	11.0	0.0%	0
Ecolab	Quorum Yellow LP	Cleaner	924	9.8	0.0%	0
Ecolab	Sani-Step	Sanitizer	5,040 lb	na	0.0%	0
<b>Total Actuals (tpy)</b>						<b>2.92</b>

<b>Potential VOC Emissions (tpy)</b>	<b>5.85</b>
Potential Hourly VOC Emissions (lb/hr)	1.34
Potential Daily VOC Emissions (lb/day)	32.05

## Methodology:

Density and VOC content are per manufacturer's MSDS. In cases where the MSDS does not explicitly state VOC or volatiles content, listed components were evaluated individually to determine total VOC content

Emissions (tpy) = (Potential Usage, gal/yr) \* (Density, lb/gal) \* (VOC Content, %) / (2000 lb/ton)

VOC potential emissions are conservatively estimated at two times actual values.

Usage was based on September 2009 through January 2010 purchasing records, scaled to an annual total by multiplying by (12 months/ 5 months).

## Revised Calculations

Product	Maximum Emitting Usage Pattern (lbs/yr)	VOC Content (w/w)	HAP Content (w/w)	Potential VOC Emissions (lbs/yr)	Potential VOC Emissions (tons/yr)
<u>Sanitizers</u>					
Eco-Wipes FCS	11,094	20.0%	0.0%	2218.80	1.11
EcoCare 250	2515	20.0%	0.0%	503.00	0.25
EcoCare 275	1956	5.0%	0.0%	97.80	0.05
EcoCare 350	2118	75.0%	0.0%	1588.50	0.79
EcoCare 360	1072	20.0%	0.0%	214.40	0.11
Oxonia Active	419	14.0%	0.0%	58.66	0.03
Pathways Drain Sanitizer	363	10.0%	0.0%	36.30	0.02
Quorum Clear V	6864	5.0%	0.0%	343.20	0.17
RTU Surface Sanitizer	19,126	58.6%	0.0%	11,207.84	5.60
Vortexx	1573	28.4%	0.0%	446.73	0.22
<u>Cleaners</u>					
Antisoil 301	15,490	15.0%	0.0%	2323.5	1.16
Klenz-Solv	2416	20.0%	0.0%	483.2	0.24
KX-3125	2305	80.0%	10.0%	1844	0.92
Lift RT	10,021	9.0%	0.0%	901.89	0.45
Quorum Pink II HF	3185	10.0%	0.0%	318.5	0.16
Quorum Pink II LF	4247	15.0%	0.0%	637.05	0.32
Soil-Off II	46,494	3.0%	0.0%	1394.82	0.70
<b>Total</b>				<b>24,618.19</b>	<b>12.31</b>

## Methodology

Potential VOC Emissions (lbs/yr) = Maximum Emitting Usage Pattern (lbs/yr) \* VOC Content (w/w)

Potential VOC Emissions (tons/yr) = Maximum Emitting Usage Pattern (lbs/yr) \* VOC Content (w/w) \* (1 ton/2000 lbs)

Natural Gas Combustion  
Insignificant Heating Units

Company Name: Keebler Company  
Address City IN Zip: 9445 E US Highway 40, Seelyville, IN 47878  
Significant Permit Revision No: 167-30014-00151  
Reviewer: Meredith W. Jones  
Date: 1/26/11

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Emission Unit	Heat Input (MMBtu/hr)
8.6	75.1	Boiler	3.34
		Water Heaters 1 - 9	1.95
		Process Heaters 1 - 5	3.28
		Total	8.57

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.07	0.29	0.02	3.75	0.21	3.15

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

Methodology

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

Natural Gas Combustion Only - Insignificant Heating Units  
HAPs Emissions

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	7.88E-05	4.50E-05	2.82E-03	0.07	1.28E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.88E-05	4.13E-05	5.26E-05	1.43E-05	7.88E-05

Methodology is the same as above.

Total HAPs = 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.

## Potential to Emit VOC from Ink Usage

Company Name: Keebler Company  
 Address City IN Zip: 9445 E US Highway 40, Seelyville, IN 47878  
 Significant Permit Revision No: 167-30014-00151  
 Reviewer: Meredith W. Jones  
 Date: 1/26/11

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/hr)	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
SI-EA70T	7.65	90%	0.0%	90.0%	0.0%	0.00%	0.01530	6.89	6.89	0.11	2.53	0.46
1C-191BK	6.56	100%	0.0%	100.0%	0.0%	0.00%	0.00116	6.56	6.56	0.01	0.18	0.03
IR-191BK	6.56	100%	0.0%	100.0%	0.0%	0.00%	0.00139	6.56	6.56	0.01	0.22	0.04
LS-ILPB2-5	9.00	100%	0.0%	100.0%	0.0%	0.00%	0.00114	9.00	9.00	0.01	0.25	0.04
16-8530XM	7.16	89%	0.0%	89.0%	0.0%	0.00%	0.00057	6.37	6.37	0.00	0.09	0.02
ITW1122	9.00	100%	0.0%	100.0%	0.0%	0.00%	0.00128	9.00	9.00	0.01	0.28	0.05

## State Potential Emissions

0.15

3.54

0.65

## METHODOLOGY

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/hr)

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

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

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

Potential to Emit Particulate from Flour Storage Silos

Company Name: Keebler Company  
 Address City IN Zip: 9445 E US Highway 40, Seelyville, IN 47878  
 Significant Permit Revision No: 167-30014-00151  
 Reviewer: Meredith W. Jones  
 Date: 1/26/11

Silo ID No.	Material Stored	Installation Date (year)	Storage Capacity (tons/silo)	Loading Rate (tons/hr)	Without Bin-Vent								With Bin-Vent									
					PM Emission Factor - Without Bin-Vent (lb/ton) <sup>1</sup>	PM Emissions (lbs/hr) <sup>2</sup>	PM Emissions (tpy) <sup>3</sup>	PM10 Emission Factor - Without Bin-Vent (lb/ton) <sup>1</sup>	PM10 Emissions (lbs/hr) <sup>2</sup>	PM10 Emissions (tpy) <sup>3</sup>	PM2.5 Emission Factor - Without Bin-Vent (lb/ton) <sup>1</sup>	PM2.5 Emissions (lbs/hr) <sup>2</sup>	PM2.5 Emissions (tpy) <sup>3</sup>	PM Emission Factor - With Bin-Vent (lb/ton) <sup>1</sup>	PM Emissions (lbs/hr) <sup>2</sup>	PM Emissions (tpy) <sup>3</sup>	PM10 Emission Factor - With Bin-Vent (lb/ton) <sup>1</sup>	PM10 Emissions (lbs/hr) <sup>2</sup>	PM10 Emissions (tpy) <sup>3</sup>	PM2.5 Emission Factor - With Bin-Vent (lb/ton) <sup>1</sup>	PM2.5 Emissions (lbs/hr) <sup>2</sup>	PM2.5 Emissions (tpy) <sup>3</sup>
S1 - S6*	Flour	1979	63	7	3.14	21.98	96.27	1.1	7.70	33.73	1.1	7.70	33.73	0.0089	0.062	0.273	0.0049	0.03	0.15	0.0049	0.03	0.15
						<b>Total</b>	<b>96.27</b>			<b>33.73</b>			<b>33.73</b>			<b>0.27</b>			<b>0.15</b>			<b>0.15</b>

**Methodology**

<sup>1</sup>Controlled and Uncontrolled emission factors are from AP-42, Tables 11.12-2, SCC #3-05-011-17 (Cement supplement unloading to elevated storage silo (pneumatic), AP-42, 06/06). There is no emission factor for flour loading in AP-42.

<sup>2</sup>PM (lbs/hr) = PM Emission Factor (lbs/ton) X Loading Rate (tons/hr)

<sup>3</sup>PM (tons/yr)= PM (lbs/hr) X 8,760 (hrs/year) / 2000 (lbs/ton)

Note: Only one silo can be loaded at a time. Therefore, particulate emissions were calculated as though one silo is being loaded continuously.

\*A bottleneck exists in the loading of the flour storage silos, the result being that only one silo can be loaded at a time. Therefore, uncontrolled potential emissions were calculated such that instead of all six silos being loaded at once, only one silo is capable of being loaded at any given moment.

## Potential to Emit Particulate from Cooling Towers

Company Name: Keebler Company

Address City IN Zip: 9445 E US Highway 40, Seelyville, IN 47878

Significant Permit Revision No: 167-30014-00151

Reviewer: Meredith W. Jones

Date: 1/26/11

<i>Emission Unit</i>	<i>Recirculation Rate (gal/min)</i>	<i>Drift Flow Rate (lbs/gal)</i>	<i>Total Dissolved Solids (ppm)</i>	<i>Potential PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions (lbs/hr)</i>	<i>Potential PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions (tons/yr)</i>
North Cooling Tower	340	1.70E-03	20,600	0.71	3.13
South Cooling Tower	410	1.70E-03	20,600	0.86	3.77
<b>Total</b>				<b>1.58</b>	<b>6.90</b>

**Methodology**

Drift Flow Rate (lbs/gal) from US EPA's AP 42, Chapter 13.4, Table 13.4-1 for induced draft towers.

Total Dissolved Solids (ppm) from US EPA's AP 42, Chapter 13.4, Table 13.4-2.

Potential PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions (lbs/hr) = Recirculation Rate (gal/min) \* Drift Flow Rate (lbs/gal) \* Total Dissolved Solids (ppm) \* (60 min/hr)

Potential PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions (tons/yr) = Recirculation Rate (gal/min) \* Drift Flow Rate (lbs/gal) \* Total Dissolved Solids (ppm) \* (60 min/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)



# 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:** Mary Duffy  
Keebler Company  
9445 E US Hwy 40  
Seelyville, IN 47878

**DATE:** April 20, 2011

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

**SUBJECT:** Final Decision  
Significant Permit Revision  
167-30014-00151

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:  
Time McGee (Plant Manager)  
Matthew Page (Smith Aldridge, Inc)  
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)

April 20, 2011

TO: Vigo 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: Keebler Company**  
**Permit Number: 167-30014-00151**

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	MIDENNEY 4/20/2011 Keebler Company 167-30014-00151 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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		

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		Mary Duffy Keebler Company 9445 E US Hwy 40 Seelyville IN 47878 (Source CAATS) via confirmed delivery										
2		Tim McGee Plant Mgr Keebler Company PO Box 309, 9445 E US Hwy 40 Seelyville IN 47878 (RO CAATS)										
3		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
4		Vigo County Board of Commissioners County Annex, 121 Oak Street Terre Haute IN 47807 (Local Official)										
5		Terre Haute City Council and Mayors Office 17 Harding Ave Terre Haute IN 47807 (Local Official)										
6		Vigo County Health Department 147 Oak Street Terre Haute IN 47807 (Health Department)										
7		Vigo Co Public Library 1 Library Square Terre Haute IN 47807-3609 (Library)										
8		J.P. Roehm PO Box 303 Clinton IN 47842 (Affected Party)										
9		Seelyville Town Council and Town Manager PO Box 249 Seelyville IN 47878 (Local Official)										
10		Deb Reeves Vigo County Air Pollution Control 121 Oak Terre Haute IN 47807 (Local Official)										
11		Matthew Page Smith Aldridge, Inc. 6000 Lake Forrest Drive Atlanta GA 30328 (Consultant)										
12		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
13												
14												
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