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

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: December 22, 2011

RE: Pretzels, Inc. / 179-30763-00028

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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New Source Review and Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Pretzels, Inc.
123 Harvest Rd
Bluffton, Indiana 46714

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

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

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

Operation Permit No.: M179-30763-00028	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 22, 2011 Expiration Date: December 22, 2021

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary snack manufacturing source.

Source Address:	123 Harvest Rd, Bluffton, Indiana 46714
General Source Phone Number:	260-824-4838
SIC Code:	2052 (Cookies and Crackers)
County Location:	Wells
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) cooking line, identified as Line 5, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

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

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

(b) One (1) cooking line, identified as Line 6, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

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

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

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

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

(2) One (1) cheese curl coating area, identified as coating 7, applying soybean oil and cheese. The coating is applied in an enclosed tumbler.

Note: There is no yeast used in the cheese curl baking operation.

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

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

(2) One (1) cheese curl coating area, identified as coating 8, applying soybean oil and cheese. The coating is applied in an enclosed tumbler.

Note: There is no yeast used in the cheese curl baking operation.

(e) One (1) cooking line, identified as Line 9, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

(1) One (1) natural gas-fired cooker, identified as Line 9 Cooker (9C), constructed in 1997, exhausting through Stack 9-C, heat input capacity: 3.0 million British thermal units per hour.

(2) One (1) natural gas-fired oven, identified as Line 9 Oven (9O), constructed in 1997, exhausting though Stacks 9-1, 9-2, 9-3, 9-4, 9-5, heat input capacity: 5.0 million British thermal units per hour.

(f) One (1) cooking line, identified as Line 10, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

(1) One (1) natural gas-fired cooker, identified as Line 10 Cooker (10C), constructed in 1997, exhausting through Stack 10-C, heat input capacity: 3.0 million British thermal units per hour.

(2) One (1) natural gas-fired oven, identified as Line 10 Oven (10O), constructed in 1997, exhausting though Stacks 10-1, 10-2, 10-3, 10-4, 10-5, heat input capacity: 5.0 million British thermal units per hour.

(g) One (1) cooking line, identified as Line 11, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

(1) One (1) natural gas-fired cooker, identified as Line 11 Cooker (11C), constructed in 2001, exhausting through Stack 11-C, heat input capacity: 3.0 million British thermal units per hour.

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

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

(h) One (1) cooking line, identified as Line 12, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

(1) One (1) natural gas-fired cooker, identified as Line 12 Cooker (12C), constructed in 2009, with a maximum heat input capacity of 0.6 MMBtu/hr, and exhausting through stack 12C.

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

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

(i) One (1) cooking line, identified as Line 14, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

(1) One (1) electric cooker identified as Line 14 Cooker (14C), constructed in 2006, exhausting through Stack 14-C.

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

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

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

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

(m) Two natural-gas fired water heaters, identified as WH-1 and WH-2, approved for construction in 2011, with a maximum heat input capacity of 1.5 million British thermal units per hour, each (total of 3.0 MMBtu/hr).

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

(o) One (1) storage silo, identified as SILO 2, constructed in 2009, pneumatically loaded/emptied with a blower/vacuum system, exhausting inside using a polypropylene filter, maximum capacity: 175,000 pounds of flour per day.

(p) One (1) pretzel line, identified as Line 13, approved for construction in 2011, with a maximum capacity of 1,340 pounds of flour per hour, consisting of:

(1) One (1) natural gas-fired cooker, identified as Line 13 Cooker (13C), approved for construction in 2011, with a maximum heat input rating of 0.6 MMBtu/hr, and exhausting through stack 13-C.

(2) One (1) natural gas-fired oven, identified as Line 13 Oven (13O), approved for construction in 2011, with a maximum heat input capacity of 10.5 MMBtu/hr, and exhausting through stacks 13-1, 13-2, 13-3, 13-4, and 13-5.

(3) One (1) natural gas-fired oven radiant tube, identified as 13R, approved for construction in 2011, with a maximum heat input capacity of 2.5 MMBtu/hr, and exhausting through stacks 13-1, 13-2, 13-3, 13-4, and 13-5.

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, M179-30763-00028, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

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

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

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

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

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(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.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, 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 Permittee shall implement the PMPs.

(c) 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.

(d) 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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M179-30763-00028 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

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

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

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

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

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

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

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

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

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

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.

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

B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Violation of any conditions of this permit.

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

The Permittee shall not operate an incinerator 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]

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

(a) 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.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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.13 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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.

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

C.14 Malfunctions Report [326 IAC 1-6-2]

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

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

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

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

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

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

(b) Unless otherwise specified in this permit, 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 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

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

(c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

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

(o) One (1) storage silo, identified as SILO 2, constructed in 2009, pneumatically loaded/emptied with a blower/vacuum system, exhausting inside using a polypropylene filter, maximum capacity: 175,000 pounds of flour per day.

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

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

D.1.1 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the one (1) storage silo, identified as SILO 1, shall not exceed 9.76 pounds per hour when operating at a process weight rate of 3.65 tons per hour.

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the one (1) storage silo shall, identified as SILO 2, shall not exceed 9.76 pounds per hour when operating at a process weight rate of 3.65 tons per hour.

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

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

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

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.3 Particulate Control

In order to comply with Condition D.1.1, the silo filters shall be in operation at all times the all times SILO 1 and SILO 2 are in operation.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) cooking line, identified as Line 5, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

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

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

(b) One (1) cooking line, identified as Line 6, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

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

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

(e) One (1) cooking line, identified as Line 9, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

(1) One (1) natural gas-fired cooker, identified as Line 9 Cooker (9C), constructed in 1997, exhausting through Stack 9-C, heat input capacity: 3.0 million British thermal units per hour.

(2) One (1) natural gas-fired oven, identified as Line 9 Oven (9O), constructed in 1997, exhausting though Stacks 9-1, 9-2, 9-3, 9-4, 9-5, heat input capacity: 5.0 million British thermal units per hour.

(f) One (1) cooking line, identified as Line 10, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

(1) One (1) natural gas-fired cooker, identified as Line 10 Cooker (10C), constructed in 1997, exhausting through Stack 10-C, heat input capacity: 3.0 million British thermal units per hour.

(2) One (1) natural gas-fired oven, identified as Line 10 Oven (10O), constructed in 1997, exhausting though Stacks 10-1, 10-2, 10-3, 10-4, 10-5, heat input capacity: 5.0 million British thermal units per hour.

(g) One (1) cooking line, identified as Line 11, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

(1) One (1) natural gas-fired cooker, identified as Line 11 Cooker (11C), constructed in 2001, exhausting through Stack 11-C, heat input capacity: 3.0 million British thermal units per hour.

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

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

(h) One (1) cooking line, identified as Line 12, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

(1) One (1) natural gas-fired cooker, identified as Line 12 Cooker (12C), constructed in 2009, with a maximum heat input capacity of 0.6 MMBtu/hr, and exhausting through stack 12C.

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

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

(i) One (1) cooking line, identified as Line 14, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

(1) One (1) electric cooker identified as Line 14 Cooker (14C), constructed in 2006, exhausting through Stack 14-C.

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

(p) One (1) pretzel line, identified as Line 13, approved for construction in 2011, with a maximum capacity of 1,340 pounds of flour per hour, consisting of:

(1) One (1) natural gas-fired cooker, identified as Line 13 Cooker (13C), approved for construction in 2011, with a maximum heat input rating of 0.6 MMBtu/hr, and exhausting through stack 13-C.

(2) One (1) natural gas-fired oven, identified as Line 13 Oven (13O), approved for construction in 2011, with a maximum heat input capacity of 10.5 MMBtu/hr, and exhausting through stacks 13-1, 13-2, 13-3, 13-4, and 13-5.

(3) One (1) natural gas-fired oven radiant tube, identified as 13R, approved for construction in 2011, with a maximum heat input capacity of 2.5 MMBtu/hr, and exhausting through stacks 13-1, 13-2, 13-3, 13-4, and 13-5.

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

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

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

A Preventive Maintenance Plan is required for these facilities. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	Pretzels, Inc.
Address:	123 Harvest Rd
City:	Bluffton, Indiana 46714
Phone #:	260-824-4838
MSOP #:	M179-30763-00028

I hereby certify that Pretzels, Inc. is:

☐ still in operation.
☐ no longer in operation.

I hereby certify that Pretzels, Inc. is:

☐ in compliance with the requirements of MSOP M179-30763-00028.
☐ not in compliance with the requirements of MSOP M179-30763-00028.

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

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

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____

_____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	**Pretzels, Inc.**
Source Location:	**123 Harvest Rd, Bluffton, IN 46714**
County:	**Wells**
SIC Code:	**2052 (Cookies and Crackers)**
Permit Renewal No.:	**M179-30763-00028**
Permit Reviewer:	**Christine L. Filutze**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Pretzels, Inc. relating to the operation of a snack manufacturing source. On August 4, 2011, Pretzels, Inc. submitted an application to the OAQ requesting to renew its operating permit. Pretzels, Inc. was issued a MSOP (M179-20416-00028) on February 26, 2007.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) cooking line, identified as Line 5, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

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

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

(b) One (1) cooking line, identified as Line 6, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

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

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

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

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

(2) One (1) cheese curl coating area, identified as coating 7, applying soybean oil and cheese. The coating is applied in an enclosed tumbler.

Note: There is no yeast used in the cheese curl baking operation.

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

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

(2) One (1) cheese curl coating area, identified as coating 8, applying soybean oil and cheese. The coating is applied in an enclosed tumbler.

Note: There is no yeast used in the cheese curl baking operation.

(e) One (1) cooking line, identified as Line 9, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

(1) One (1) natural gas-fired cooker, identified as Line 9 Cooker (9C), constructed in 1997, exhausting through Stack 9-C, heat input capacity: 3.0 million British thermal units per hour.

(2) One (1) natural gas-fired oven, identified as Line 9 Oven (9O), constructed in 1997, exhausting though Stacks 9-1, 9-2, 9-3, 9-4, 9-5, heat input capacity: 5.0 million British thermal units per hour.

(f) One (1) cooking line, identified as Line 10, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

(1) One (1) natural gas-fired cooker, identified as Line 10 Cooker (10C), constructed in 1997, exhausting through Stack 10-C, heat input capacity: 3.0 million British thermal units per hour.

(2) One (1) natural gas-fired oven, identified as Line 10 Oven (10O), constructed in 1997, exhausting though Stacks 10-1, 10-2, 10-3, 10-4, 10-5, heat input capacity: 5.0 million British thermal units per hour.

(g) One (1) cooking line, identified as Line 11, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

(1) One (1) natural gas-fired cooker, identified as Line 11 Cooker (11C), constructed in 2001, exhausting through Stack 11-C, heat input capacity: 3.0 million British thermal units per hour.

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

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

(h) One (1) cooking line, identified as Line 12, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

(1) One (1) natural gas-fired cooker, identified as Line 12 Cooker (12C), constructed in 2009, with a maximum heat input capacity of 0.6 MMBtu/hr, and exhausting through stack 12C.

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

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

(i) One (1) cooking line, identified as Line 14, with a maximum capacity of 1,340 pounds of flour per hour, consisting of the following:

(1) One (1) electric cooker identified as Line 14 Cooker (14C), constructed in 2006, exhausting through Stack 14-C.

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

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

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

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

(m) Two natural-gas fired water heaters, identified as WH-1 and WH-2, approved for construction in 2011, with a maximum heat input capacity of 1.5 million British thermal units per hour, each (total of 3.0 MMBtu/hr).

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

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

The source also consists of the following emission units that were constructed and/or are operating without a permit:

(a) One (1) storage silo, identified as SILO 2, constructed in 2009, pneumatically loaded/emptied with a blower/vacuum system, exhausting inside using a polypropylene filter, maximum capacity: 175,000 pounds of flour per day.

New Emission Units and Pollution Control Equipment

The source also consists of the following new emission units:

(a) One (1) pretzel line, identified as Line 13, approved for construction in 2011, with a maximum capacity of 1,340 pounds of flour per hour, consisting of:

(1) One (1) natural gas-fired cooker, identified as Line 13 Cooker (13C), approved for construction in 2011, with a maximum heat input rating of 0.6 MMBtu/hr, and exhausting through stack 13-C.

(2) One (1) natural gas-fired oven, identified as Line 13 Oven (13O), approved for construction in 2011, with a maximum heat input capacity of 10.5 MMBtu/hr, and exhausting through stacks 13-1, 13-2, 13-3, 13-4, and 13-5.

(3) One (1) natural gas-fired oven radiant tube, identified as 13R, approved for construction in 2011, with a maximum heat input capacity of 2.5 MMBtu/hr, and exhausting through stacks 13-1, 13-2, 13-3, 13-4, and 13-5.

Existing Approvals

Since the issuance of the MSOP (M179-20416-00028) on February 26, 2007, the source has constructed or has been operating under the following additional approvals:

(a) Notice-Only Change 179-27901-00028 issued on June 1, 2009.

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

Enforcement Issue

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

IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Wells County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.
[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Wells County has

been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Wells County has been classified as attainment for $PM_{2.5}$. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective, June 28, 2011.. Therefore, direct $PM_{2.5}$ and SO_2 emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Wells County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	70.93
PM_{10}	72.95
$PM_{2.5}$	72.95
SO_2	0.21
VOC*	46.70
CO	29.73
NO_x	35.39
GHGs as CO_2e	42,727
Single HAP	0.64 (hexane)
Total HAP	0.67

* VOC emissions from each Pretzel Baking Line is 5.59 tpy. The emissions from the two (2) cheese curl coating areas (Line 7 and Line 8) are negligible (see TSD Appendix A).

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants, excluding GHGs, is less than 100 tons per year. However, PM, PM10, PM2.5, VOC, CO, and NOx are equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

(d) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO_2 equivalent emissions (CO_2e) per year, and it is not in one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

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

(b) The requirements of the New Source Performance Standard for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971, 326 IAC 12 (40 CFR 60, Subpart D), are not included in the permit for the natural gas-fired heaters (SH, RTH, PH, WH-1, WH-2) since each has a maximum heat input capacity of less than 250 MMBtu/hr.

(c) The requirements of the New Source Performance Standard for Electric Utility Steam Generating Units for Which Construction Is Commenced After September 18, 1978, 326 IAC 12 (40 CFR 60, Subpart Da), are not included in the permit for the natural gas-fired heaters (SH, RTH, PH, WH-1, WH-2) since each has a maximum heat input capacity of less than 250 MMBtu/hr.

(d) The requirements of the New Source Performance Standard for Industrial-Commercial-Institutional Steam Generating Units (which construction commenced after June 19, 1984), 326 IAC 12 (40 CFR 60, Subpart Db), are not included in the permit for the natural gas-fired heaters (SH, RTH, PH, WH-1, WH-2) since each has a maximum heat input capacity of less than 100 MMBtu/hr.

(e) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60.40c, Subpart Dc), which is incorporated by reference as 326 IAC 12, are not included in the permit for the natural gas-fired heaters (SH, RTH, PH, WH-1, WH-2) since each has a maximum design heat input capacity of less than 10 MMBtu/hr.

(f) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

(g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
The potential to emit of all criteria pollutants is less than two-hundred fifty (250) tons per year. Therefore, the requirements of 326 IAC 2-2 do not apply.

326 IAC 2-4.1
The operation of the entire source will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule 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 the permit:

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

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

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

326 IAC 6.5 PM Limitations Except Lake County
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 PM Limitations for Lake County
This source is not subject to 326 IAC 6.5 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas combustion facilities at this source are not used for indirect heating. Therefore, the requirements of 326 IAC 6-2 are not applicable.

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

(a) Pursuant to 326 IAC 6-3-2, the particulate from the two (2) storage silos, identified as SILO 1 and SILO 2, shall be limited by the following:

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

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

The allowable rate of particulate emissions from SILO 1 and SILO 2 shall not exceed 9.76 pounds per hour, from each silo, when operating at a process weight rate of 3.65 tons per hour per silo.

The maximum potential to emit particulate from SILO 1 is 8.02 pounds per hour before controls. Therefore, SILO 1 is able to comply with this rule.

The maximum potential to emit particulate from SILO 2 is 8.02 pounds per hour before controls. Therefore, SILO 2 is able to comply with this rule.

The silo filters shall be in operation at all times SILO 1 and SILO 2 are in operation, in order to comply with this limit.

(b) The unrestricted potential particulate emissions from each individual natural gas units, from each individual pretzel production line, and from each cheese curl coating line is less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-2(b)(14), the requirements of 326 IAC 6-3 are not applicable to the natural gas units, the pretzel production lines, or the cheese curl coating areas.

326 IAC 8-1-6 (New facilities; general reduction requirements)
The eight (8) pretzel production lines and two (2) cheese coating areas, each line and area has potential VOC emissions of less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

There are no other 326 IAC 8 rules that apply.

Recommendation

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

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

An application for the purposes of this review was received on August 4, 2011

Conclusion

The operation of this snack manufacturing source shall be subject to the conditions of the attached New Source Review and MSOP Renewal No. M179-30763-00028.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Christine L. Filutze 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) 233-8397 or toll free at 1-800-451-6027 extension (3-8397).

(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

Attachment A: Emission Calculations
Summary

Company Name: **Pretzels, Inc.**
Address City IN Zip: **123 Harvest Rd, Bluffton, IN 46714**
Permit Number: **M179-30763-00028**
Reviewer: **Christine L. Filutze**
Date: **November 2, 2011**

Uncontrolled Potential Emissions

Emission Source	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	Single HAP	Total HAPs
Natural Gas Combustion (Existing Units)	0.56	2.24	2.24	0.18	29.43	1.62	24.72	35,535	0.53 (hexane)	0.56
Baking Lines 5, 6, 9, 10, 11, 12, 14 (existing)*	0.00	0.00	0.00	0.00	0.00	39.16	0.00	0	0.00	0.00
SILO (Dry Material Transfer)	35.13	35.13	35.13	0.00	0.00	0.00	0.00	0	0.00	0.00
SILO 2 (Dry Material Transfer)	35.13	35.13	35.13	0.00	0.00	0.00	0.00	0	0.00	0.00
Line 13 - Natural Gas Combustion (new)	0.11	0.45	0.45	0.04	5.96	0.33	5.00	7,192	0.11 (hexane)	1.12E-01
Baking Line 13 (new)	0.00	0.00	0.00	0.00	0.00	5.59	0.00	0	0.00	0.00
Totals:	**70.93**	**72.95**	**72.95**	**0.21**	**35.39**	**46.70**	**29.73**	**42,727**	**0.64 (hexane)**	**0.67**

*VOC for Each Existing Pretzel Baking Line = 5.59 tpy
*There is no yeast used in the cheese curl baking operation, therefore there are no VOC calculations for lines 7 and 8.

Emissions from the enclosed tumbling of baked cheese curls to apply powdered cheese and soybean oil are expected to be negligible.
Since there are no emission factors for handling and mixing powdered cheese, AP-42, Ch. 9.9.1 emission facors are used for a conservative estimate.
Pursuant to Table 9.9.1-2, there is no data available for grain handling or mixing. Therefore, particulate emissions from handling and mixing the cheese curl coating are expected to be negligible.

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

Company Name: **Pretzels, Inc.**
Address City IN Zip: **123 Harvest Rd, Bluffton, IN 46714**
Permit Number: **M179-30763-00028**
Reviewer: **Christine L. Filutze**
Date: **November 2, 2011**

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
67.2	1000	588.7

Existing Units:	MMBtu/hr	Existing Units:	MMBtu/hr
Line 5 (5O)	3.1	Line 12 (12C, 12O, 12R)	12.6
Line 6 (6O)	3.3	Line 14 (14O)	7.7
Line 7 (7O)	1.5	SH	1.6
Line 8 (8O)	1.5	RTH	0.5
Line 9 (9C, 9O)	8.0	PH	0.4
Line 10 (10C, 10O)	8.0	WH-1 & WH-2	3.0
Line 11 (11C, 11O, 11R)	16.0	**Total:**	67.2

***Replaced two (2) 0.75 MMBtu/hr Water Heaters with two (2) 1.5 MMBtu/hr heaters (2011)

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.56	2.24	0.18	29.43	1.62	24.72

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. Assume PM10=PM2.5
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

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

See next page for HAPs emissions calculations.

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

Company Name: **Pretzels, Inc.**
Address City IN Zip: **123 Harvest Rd, Bluffton, IN 46714**
Permit Number: **M179-30763-00028**
Reviewer: **Christine L. Filutze**
Date: **November 2, 2011**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	6.181E-04	3.532E-04	2.208E-02	5.298E-01	1.001E-03

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.472E-04	3.238E-04	4.121E-04	1.118E-04	6.181E-04

Methodology is the same as previous page.

Total: **5.55E-01**

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

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

Company Name: **Pretzels, Inc.**
Address City IN Zip: **123 Harvest Rd, Bluffton, IN 46714**
Permit Number: **M179-30763-00028**
Reviewer: **Christine L. Filutze**
Date: **November 2, 2011**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120000	2.3	2.2
Potential Emission in tons/yr	35320	0.68	0.65
Summed Potential Emissions in tons/yr		35322	
CO2e Total in tons/yr		35535	

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission

Appendix A: Emission Calculations
Baking Operations (Existing)
From Pretzel Production

Company Name: **Pretzels, Inc.**
Address City IN Zip: **123 Harvest Rd, Bluffton, IN 46714**
Permit Number: **M179-30763-00028**
Reviewer: **Christine L. Filutze**
Date: **November 2, 2011**

Pollutant
Ethanol

Product	Sponge % Yeast	Dough % Yeast	Ferment Time (hours)	Proof Time (hours)	Floor Time (hours)	Product Rate** (lbs/hr)	Product Rate (tons/yr)	Emission Factor (lbs/ton)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)
Seven (7) Exisiting Pretzel Lines, identified as Pretzel Line 5, 6, 9, 10, 11, 12, 14)*	3.00E-07	0.00	0.03	0.00	0.00	9380	41084	1.91	78,327	39.16
								VOC per line =	11,190	5.59

Methodology

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

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

*There is no yeast used in the cheese curl baking operation, therefore no baking VOC calculations for lines 7 and 8.

**Product rate is the total for all 7 lines. Each line has a product rate of 1340 pounds per hour.

Attachment A: Emission Calculations
Baking Operations - Silos (Storage & Transfer of Dry Material)

Company Name: **Pretzels, Inc.**
Address City IN Zip: **123 Harvest Rd, Bluffton, IN 46714**
Permit Number: **M179-30763-00028**
Reviewer: **Christine L. Filutze**
Date: **November 2, 2011**

Storage	Throughput (lbs/day)
Silo 1	175,000
Silo 2	175,000

Total Throughput	
350,000	lbs/day
63875	ton/year

	Pollutant	
	PM (tpy)	PM-10 (tpy)*
Emission Factor (lb/ton)	2.2	2.2
Uncontrolled Emissions	70.26	70.26
Controlled Emissions	0.35	0.35

99.5% Filter Efficiency

Methodology
*Assume PM10=PM2.5
Emission Factors are from AP-42 Chapter 11, Table 11.17-4 product transfer and conveying.

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

Note: For 326 IAC 6-3-2, process weight rate in tons per hour, per silo = 3.65

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

Company Name: **Pretzels, Inc.**
Address City IN Zip: **123 Harvest Rd, Bluffton, IN 46714**
Permit Number: **M179-30763-00028**
Reviewer: **Christine L. Filutze**
Date: **November 2, 2011**

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
13.6	1000	119.1

New Units

MMBtu/hr	Description
0.6	One (1) natural gas-fired cooker (13C)
10.5	One (1) natural gas-fired oven (13O)
2.5	One (1) natural gas-fired oven radiant tube (13R)

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.11	0.45	0.04	5.96	0.33	5.00

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. Assume PM10=PM2.5
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

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

See next page for HAPs emissions calculations.

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

Company Name: **Pretzels, Inc.**
Address City IN Zip: **123 Harvest Rd, Bluffton, IN 46714**
Permit Number: **M179-30763-00028**
Reviewer: **Christine L. Filutze**
Date: **November 2, 2011**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.251E-04	7.148E-05	4.468E-03	1.072E-01	2.025E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.978E-05	6.552E-05	8.340E-05	2.264E-05	1.251E-04

Methodology is the same as previous page.

Total: 0.11

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

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

Company Name: **Pretzels, Inc.**
Address City IN Zip: **123 Harvest Rd, Bluffton, IN 46714**
Permit Number: **M179-30763-00028**
Reviewer: **Christine L. Filutze**
Date: **November 2, 2011**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120000	2.3	2.2
Potential Emission in tons/yr	7148	0.14	0.13
Summed Potential Emissions in tons/yr	7148		
CO2e Total in tons/yr	7192		

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential

Attachment A: Emission Calculations
Baking Operations (New Line)
From Pretzel Production

Company Name: **Pretzels, Inc.**
Address City IN Zip: **123 Harvest Rd, Bluffton, IN 46714**
Permit Number: **M179-30763-00028**
Reviewer: **Christine L. Filutze**
Date: **November 2, 2011**

Pollutant
Ethanol

Product	Sponge % Yeast	Dough % Yeast	Ferment Time (hours)	Proof Time (hours)	Floor Time (hours)	Product Rate (lbs/hr)	Product Rate (tons/yr)	Emission Factor (lbs/ton)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)
Pretzel Line 13	3.00E-07	0.00	0.03	0.00	0.00	1340	5869	1.91	11190	5.59

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Tony Mann
Pretzels, Inc.
PO Box 503
Bluffton, IN 46714

DATE: December 22, 2011

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

SUBJECT: Final Decision
New Source Review and Minor Source Operating Agreement
179-30763-00028

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:
Steve Huggins – CEO
Jennifer Aselage – Engineering & Environmental Consultant
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

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

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Thomas W. Easterly
Commissioner

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(317) 232-8603
Toll Free (800) 451-6027
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December 22, 2011

TO: Wells County Pubic Library

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

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

Applicant Name: Pretzels, Inc.
Permit Number: 179-30763-00028

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

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

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 12/22/2011 Pretzels, Inc. 179-30763-00028 Final			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

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		Tony Mann Pretzels, Inc. PO Box 503 Bluffton IN 46714-9001 (Source CAATS) via confirmed delivery									
2		Steve Huggins CEO Pretzels, Inc. PO Box 503 Bluffton IN 46714-9001 *(RO CAATS)*									
3		Wells County Health Department 223 W. Washington St Bluffton IN 46714-1955 *(Health Department)*									
4		Wells County Public Library 200 W. Washington St Bluffton IN 46714-1999 *(Library)*									
5		Ms. Joy Haney 5285 East 400 South Columbia City IN 46725 *(Affected Party)*									
6		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 *(Affected Party)*									
7		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 *(Affected Party)*									
8		Mrs. Tera Fredrickson 4860 W 900 S--90 Montpelier IN 47359-9559 *(Affected Party)*									
9		Mr. Christina Furnish 7539 W 1100 S--90 Montpelier IN 47359 *(Affected Party)*									
10		Dr. James Rybarczyk 9815 N. CR. 300 E. Muncie IN 47303 *(Affected Party)*									
11		Mr. Kevin E. Jackson 7858 South 450 West Poneto IN 46781 *(Affected Party)*									
12		Mr. Neil Potter Southern Wells Comunity Schools 9120 S 300 W Poneto IN 46781 *(Affected Party)*									
13		Mrs. Donna Runkle 7327 W 1000 S--90 Warren IN 46792 (Affected Party)									
14		Wells County Board of Commissioners 105 W Market Street, Suite 205, Courthouse Bluffton IN 46714 *(Local Official)*									
15		Mrs. Jennifer Aselage Engineering & Enivronmental Consultant 7811 Honeywell Drive Fort Wayne IN 46825 *(Consultant)*									

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1		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)									
2											
3											
4											
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