**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: September 7, 2012

RE: Hartford Bakery, Inc. / 163-31955-00040

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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) 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.



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

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

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

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

Enclosures
FNTV-PMOD.doc 3/27/08

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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September 7, 2012

Mr. Robert Renock
Hartford Bakery, Inc.
500 N. Fulton Avenue
Evansville, IN 47110

Re: 163-31955-00040
Significant Permit Modification to
Part 70 Permit Renewal No.: T163-27317-00040

Dear Mr. Renock:

Hartford Bakery, Inc. was issued Part 70 Operating Permit Renewal T163-27317-00040 on April 17, 2009 for a wholesale bakery. A letter requesting changes to this permit was received on May 29, 2012. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the inclusion of two existing flour silos as well as the existing proof boxes, weigh hoppers, bag breakers, and mixers. The application also includes the addition of a VOC BACT limit for the existing bun production line.

For your convenience, the entire Part 70 Operating Permit as modified will be provided at issuance.

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 John Haney, OAQ, 100 North Senate Avenue, MC 61-53 1003 IGCN, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for John Haney or extension 4-5328, or dial (317) 234-5328.

Sincerely,

Jenny Acker

Jenny Acker, Section Chief
Permits Branch
Office of Air Quality

JLA/jeh
cc: File – Vanderburgh County
Southwest Regional Office
U.S. EPA, Region V
Vanderburgh County Health Department
Compliance and Enforcement Branch

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# Part 70 Operating Permit
# OFFICE OF AIR QUALITY

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

(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. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| Operation Permit No.: T163-27317-00040 | |
|---|---|
| Issued by: Original Signed<br>Matthew Stuckey, Branch Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: April 17, 2009<br><br>Expiration Date: April 17, 2014 |

Significant Permit Modification No. 163-27910-00040, issued on July 29, 2009.

| Significant Permit Modification No.: 163-31955-00040 | |
|---|---|
| Issued by:<br>Jenny Acker<br>Jenny Acker, Section Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: September 7, 2012<br><br>Expiration Date: April 17, 2014 |

TABLE OF CONTENTS

**A. SOURCE SUMMARY ..... 4**
A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)] [326 IAC 2-7-1(22)]
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]
A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]
A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

**B. GENERAL CONDITIONS ..... 7**
B.1 Definitions [326 IAC 2-7-1]
B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]
B.3 Term of Conditions [326 IAC 2-1.1-9.5]
B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]
B.5 Severability [326 IAC 2-7-5(5)]
B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]
B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]
B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)] [326 IAC 1-6-3]
B.11 Emergency Provisions [326 IAC 2-7-16]
B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]
B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]
B.16 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]
B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]
B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]
B.20 Source Modification Requirement [326 IAC 2-7-10.5]
B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]
B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]
B.24 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

**C. SOURCE OPERATION CONDITIONS ..... 18**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**
C.1 Opacity [326 IAC 5-1]
C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]
C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
C.4 Fugitive Dust Emissions [326 IAC 6-4]
C.5 Stack Height [326 IAC 1-7]
C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

**Testing Requirements [326 IAC 2-7-6(1)]**
C.7 Performance Testing [326 IAC 3-6]

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

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**
C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**
C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**
C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]
C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**
C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1. EMISSIONS UNIT OPERATION CONDITIONS ..... 25**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**
D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-2]
D.1.2 Particulate [326 IAC 6-3-2]
D.1.3 Preventative Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**
D.1.4 Volatile Organic Compounds

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**
D.1.5 Record Keeping Requirements
D.1.6 Reporting Requirements

**D.2. EMISSIONS UNIT OPERATION CONDITIONS ..... 28**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**
D.2.1 Particulate Matter Limitations (PM) [326 IAC 6-2-3]
D.2.2 Preventative Maintenance Plan [326 IAC 2-7-5(13)]

**D.3. EMISSIONS UNIT OPERATION CONDITIONS ..... 29**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**
D.3.1 Particulate [326 IAC 6-3-2]
D.3.2 Preventative Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**
D.3.3 Particulate Control [326 IAC 2-2]

Certification ..... 31
Emergency Occurrence Report ..... 32
Quarterly Report ..... 34
Quarterly Deviation and Compliance Monitoring Report ..... 36

## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary wholesale bakery.

| | |
|---|---|
| Source Address: | 500 N. Fulton Avenue, Evansville, Indiana 47710 |
| General Source Phone Number: | (812) 425-4642 |
| SIC Code: | 2051 |
| County Location: | Vanderburgh |
| Source Location Status: | Nonattainment for $PM_{2.5}$ standard<br>Attainment for all other criteria pollutants |
| Source Status: | Part 70 Operating Permit Program<br>Minor Source, under PSD, Emission Offset, and Nonattainment NSR Rules<br>Minor Source, under Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]

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

(a) One (1) bread dough conveyance system, including, but not limited to, pneumatic conveyance process equipment and piping, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2012, with a maximum throughput of 12,000 pounds of dry ingredients per hour. The conveyance system includes the following emission units:

(1) Two (2) weigh hoppers, installed prior to 1980, identified as Hoppers 1A and 1B, each with a capacity of 1,400 pounds, each equipped with fabric bag filters for control of particulate matter emissions, exhausting inside.

(2) One (1) bag breaker, identified as Breaker 1, with a capacity of 1,200 pounds per hour, exhausting to the weigh hoppers.

(3) Two (2) mixers, constructed in 1990 and 1997, identified as Mixers 1A and 1B, each with a capacity of 2,000 pounds, exhausting to the weigh hoppers.

(b) One (1) bun dough conveyance system, including, but not limited to, pneumatic conveyance process equipment and piping, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2012, with a maximum throughput of 4,657 pounds of dry ingredients per hour. The conveyance system includes the following emission units:

(1) One (1) weigh hopper, installed prior to 1980, identified as Hopper 3, with a capacity of 1,400 pounds, equipped with a fabric bag filter for control of particulate matter emissions, exhausting inside.

(2) One (1) bag breaker, identified as Breaker 3, with a capacity of 1,200 pounds per hour, exhausting to the weigh hopper.

(3) One (1) mixer, constructed in 1998, identified as Mixer 3, with a capacity of 2,000 pounds, exhausting to the weigh hopper.

(c) One (1) bread production line, identified as Line 1, constructed in 1975, with a maximum production rate of 12,000 pounds per hour, consisting of the following:

(1) One (1) proof box, identified as Proof1.

(2) One (1) natural gas-fired oven, identified as Oven1, with a maximum heat input capacity of 7.0 MMBtu per hour, exhausting to Stacks 1 and 2.

(d) One (1) bun production line, identified as Line 3, constructed in 1998, with a maximum production rate of 4,657 pounds per hour, consisting of the following:

(1) One (1) proof box, identified as Proof3.

(2) One (1) natural gas-fired oven, identified as Oven3, with a maximum heat input capacity of 6.3 MMBtu per hour, exhausting to Stack 3.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

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

(a) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:

(1) Two (2) 2.00625 million British thermal units per hour (MMBtu/hr) natural gas fired boilers, constructed in 1974 and 1975. [326 IAC 6.5-1-2(b)(3)]

(2) One (1) 1.3375 million British thermal units per hour (MMBtu/hr) natural gas fired boiler, constructed in 1951. [326 IAC 6.5-1-2(b)(3)]

(b) Combustion source flame safety purging on startup.

(c) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(d) Heat exchanger cleaning and repair.

(e) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(g) Activities with potential emissions within any of the following thresholds: equal to or less than 5 pounds per hour or 25 pounds per day $PM_{10}$, $SO_2$, or $NO_x$; equal to or less than 3 pounds per hour or 15 pounds per day VOC; equal to or less than 25 pounds per day CO; equal to or less than 0.6 tons per year or 3.29 pounds per day Pb; or greater than 1 pound per day but less than 5 pounds per day or 1 ton per year single HAP (and not regulated by a NESHAP):

(1) Two (2) indoor flour storage silos, installed in 1968 and permitted in 2012, identified as Silos1 and 2, each with a maximum capacity of 6,600 pounds per hour, each equipped with integral fabric bag filters for control of particulate matter emissions, exhausting inside. [326 IAC 6.5-1-2(a)]

(2) Three (3) outdoor flour storage silos, installed in 1974, identified as Silos 3, 4, and 5, each with a maximum capacity of 16,410 pounds per hour, each equipped with integral fabric bag filters for control of particulate matter emissions, exhausting to atmosphere. [326 IAC 6.5-1-2(a)]

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

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

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

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

(a) This permit, T163-27317-00040, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

### B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

### B.5 Severability [326 IAC 2-7-5(5)]

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

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(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 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and

(2) 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) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)] [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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Southwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304.

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

Indiana Department of Environmental Management
Compliance 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 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T163-27317-00040 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or

anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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 2-7 until IDEM, OAQ takes

final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:

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

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
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 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

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

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

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

Indiana Department of Environmental Management
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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.24 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.2 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.3 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.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

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

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work

or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
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 that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

**Testing Requirements [326 IAC 2-7-6(1)]**

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

(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 that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

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

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

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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

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.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). 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) 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.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

**Facility Description [326 IAC 2-7-5(14)]:**

(c) One (1) bread production line, identified as Line 1, constructed in 1975, with a maximum production rate of 12,000 pounds per hour, consisting of the following:

(1) One (1) proof box, identified as Proof1.

(2) One (1) natural gas-fired oven, identified as Oven1, with a maximum heat input capacity of 7.0 MMBtu per hour, exhausting to Stacks 1 and 2.

(d) One (1) bun production line, identified as Line 3, constructed in 1998, with a maximum production rate of 4,657 pounds per hour, consisting of the following:

(1) One (1) proof box, identified as Proof3.

(2) One (1) natural gas-fired oven, identified as Oven3, with a maximum heat input capacity of 6.3 MMBtu per hour, exhausting to Stack 3.

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

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

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

Pursuant to 326 IAC 8-1-6 and SSM 163-31953-00040, BACT has been determined to be the following for the bun line, identified as Line 3:

(a) VOC emissions attributable to proofing and fermentation from the bun production line, identified as Line 3 (consisting of the oven (Oven3) and the proof box (Proof3)), shall not exceed 46.7 tons per twelve (12) consecutive month period.

(b) The source shall operate the proof box (Proof3) in accordance with the manufacturer's design and operating specifications.

(c) In order to ensure proper operation and to minimize potential emissions, the source shall perform proof box cleaning operations for the proof box (Proof3), on a tiered cleaning schedule and perform at a minimum, the following operations, or their equivalent, in accordance with their Sanitation Standard Operating Procedure:

(1) Weekly Cleaning Procedure:

(A) Scrape any dough from the conveyor, grids, and supports;
(B) Scrape any dough from the floor;
(C) Sweep the proof box floor from the center out;
(D) Wet the entire floor with cleaning solvent mixture and then rinse;
(E) Scrape any dough from the bun pans; and
(F) Wash the pans, if necessary.

(2) Monthly Cleaning Procedure:

(A) Wet mop the floor of the proof box.

(3) Semi-Annually Cleaning Procedure:

(A) Wash down the interior walls in small sections with cleaning solvent mixture and then rinse.

D.1.2 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2(b)(3)]

Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from Oven1 and Oven3 shall each not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).

D.1.3 Preventative Maintenance Plan [326 IAC 2-7-5(12)]

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**

D.1.4 Volatile Organic Compounds

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

$$1.1 \times \sum_{m=1}^{12}\left(\sum_{i=1}^{n}\frac{E_i * B_i}{2000\,lb/ton}\right)_m \text{ tons of VOC per twelve consecutive month period}$$

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

The emission factor for each type of donut dough shall be calculated using the following equation:

E = 0.95Y + 0.195ti - 0.51S - 0.86ts + 1.90

Where:
E = Pounds of VOC per ton of baked dough;
Y = Initial baker's percent of yeast;
ti = Total yeast action time in hours;
S = Final (spike) baker's percent of yeast; and
ts = Spiking time in hours.

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

D.1.5 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1 and D.1.4, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emissions limits established in Condition D.1.1.

(1) The dates of the compliance period:

(2) The amount of each type of bread produced during each compliance period;

(3) Information necessary to calculate the VOC emission factor for each type of bread made during the compliance period, including:

(A) The initial baker's percent of yeast;

(B) The total yeast action time in hours;

(C) The final (spike) baker's percent of yeast; and

(D) The spiking time in hours.

(4) The weight of VOCs emitted for each compliance period.

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required to be maintained by this condition.

D.1.6 Reporting Requirements

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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(14)]:**

Insignificant Activities

(a) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:

(1) Two (2) 2.00625 million British thermal units per hour (MMBtu/hr) natural gas fired boilers, constructed in 1974 and 1975. [326 IAC 6.5-1-2(b)(3)]

(2) One (1) 1.3375 million British thermal units per hour (MMBtu/hr) natural gas fired boiler, constructed in 1951. [326 IAC 6.5-1-2(b)(3)]

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

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

D.2.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2(b)(3)]

Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from each of the natural gas-fired boilers shall not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).

D.2.2 Preventative Maintenance Plan [326 IAC 2-7-5(12)]

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.

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(14)]**:

(a) One (1) bread dough conveyance system, including, but not limited to, pneumatic conveyance process equipment and piping, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2012, with a maximum throughput of 12,000 pounds of dry ingredients per hour. The conveyance system includes the following emission units:

(1) Two (2) weigh hoppers, installed prior to 1980, identified as Hoppers 1A and 1B, each with a capacity of 1,400 pounds, each equipped with fabric bag filters for control of particulate matter emissions, exhausting inside.

(2) One (1) bag breaker, identified as Breaker 1, with a capacity of 1,200 pounds per hour, exhausting to the weigh hoppers.

(3) Two (2) mixers, constructed in 1990 and 1997, identified as Mixers 1A and 1B, each with a capacity of 2,000 pounds, exhausting to the weigh hoppers.

(b) One (1) bun dough conveyance system, including, but not limited to, pneumatic conveyance process equipment and piping, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2012, with a maximum throughput of 4,657 pounds of dry ingredients per hour. The conveyance system includes the following emission units:

(1) One (1) weigh hopper, installed prior to 1980, identified as Hopper 3, with a capacity of 1,400 pounds, equipped with a fabric bag filter for control of particulate matter emissions, exhausting inside.

(2) One (1) bag breaker, identified as Breaker 3, with a capacity of 1,200 pounds per hour, exhausting to the weigh hopper.

(3) One (1) mixer, constructed in 1998, identified as Mixer 3, with a capacity of 2,000 pounds, exhausting to the weigh hopper.

Insignificant Activities

(g) Activities with potential emissions within any of the following thresholds: equal to or less than 5 pounds per hour or 25 pounds per day $PM_{10}$, $SO_2$, or $NO_x$; equal to or less than 3 pounds per hour or 15 pounds per day VOC; equal to or less than 25 pounds per day CO; equal to or less than 0.6 tons per year or 3.29 pounds per day Pb; or greater than 1 pound per day but less than 5 pounds per day or 1 ton per year single HAP (and not regulated by a NESHAP):

(1) Two (2) indoor flour storage silos, installed in 1968 and permitted in 2012, identified as Silos1 and 2, each with a maximum capacity of 6,600 pounds per hour, each equipped with integral fabric bag filters for control of particulate matter emissions, exhausting inside. [326 IAC 6.5-1-2(a)]

(2) Three (3) outdoor flour storage silos, installed in 1974, identified as Silos 3, 4, and 5, each with a maximum capacity of 16,410 pounds per hour, each equipped with integral fabric bag filters for control of particulate matter emissions, exhausting to atmosphere. [326 IAC 6.5-1-2(a)]

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

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

D.3.1 Minor Limits for PSD and Nonattainment NSR [326 IAC 2-2] [326 IAC 2-1.1-5]

The PM, $PM_{10}$, and $PM_{2.5}$ emissions from the following operations shall not exceed the emission limits listed in the table below:

| Emission Unit(s) | PM Limit (lb/hr) | $PM_{10}$ Limit (lb/hr) | $PM_{2.5}$ Limit (lb/hr) |
|---|---|---|---|
| Flour Silo (Silo 1) | 1.04 | 1.04 | 1.04 |
| Flour Silo (Silo 2) | 1.04 | 1.04 | 1.04 |
| Flour Silo (Silo 3) | 2.58 | 2.58 | 2.58 |
| Flour Silo (Silo 4) | 2.58 | 2.58 | 2.58 |
| Flour Silo (Silo 5) | 2.58 | 2.58 | 2.58 |

Compliance with these limits, combined with the potential to emit PM, $PM_{10}$, and $PM_{2.5}$ from other emission units at the source, shall limit the PM and $PM_{10}$ emissions to less than 250 tons per twelve (12) consecutive month period, each, and the $PM_{2.5}$ emissions to less than 100 tons per twelve (12) consecutive month period from the entire source. This shall render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

D.3.2 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from each of the following facilities shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf):

Silo 1, Silo 2, Silo 3, Silo 4, Silo 5, Hopper 1A, Hopper 1B, Breaker 1, Mixer 1A, Mixer 1B, Hopper 3, Breaker 3, and Mixer 3.

D.3.3 Preventative Maintenance Plan [326 IAC 2-7-5(12)]

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

D.3.4 Particulate Control

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

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE AND ENFORCEMENT BRANCH
# PART 70 OPERATING PERMIT
# CERTIFICATION

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

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

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

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

## PART 70 OPERATING PERMIT
## EMERGENCY OCCURRENCE REPORT

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

**This form consists of 2 pages** **Page 1 of 2**

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

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N |
| Type of Pollutants Emitted: TSP, PM-10, $SO_2$, VOC, $NO_X$, 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

## Part 70 Quarterly Report

| | |
|---|---|
| Source Name: | Hartford Bakery, Inc. |
| Source Address: | 500 N. Fulton Avenue, Evansville, Indiana 47710 |
| Part 70 Permit No.: | T163-27317-00040 |
| Facility: | Bun Line (Line 3) |
| Parameter: | Volatile Organic Compounds (VOC) attributable to proofing and fermentation |
| Limit: | 46.7 tons per year, according to the equation: |

$$1.1 * \sum_{m=1}^{12}\left(\sum_{i=1}^{n}\frac{E_i * B_i}{2000\,lb/ton}\right)_m \quad \text{tons of VOC per 12 consecutive month period}$$

Where:

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

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

E = 0.95Y + 0.195ti - 0.51S - 0.86ts + 1.90

Where:

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

QUARTER: YEAR:

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature:_____
Date: _____
Phone: _____

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE AND ENFORCEMENT BRANCH
# PART 70 OPERATING PERMIT
# QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

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

**Months: _____ to _____ Year: _____**

Page 1 of 2

| | |
|---|---|
| This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. 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". | |
| ☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. | |
| ☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD | |
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |

| | |
|---|---|
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

# Indiana Department of Environmental Management
# Office of Air Quality

## Technical Support Document (TSD) for a Significant Source Modification to a Part 70 Source and a Significant Permit Modification

### Source Description and Location

| | |
|---|---|
| Source Name: | Hartford Bakery, Inc. |
| Source Location: | 500 N. Fulton Avenue, Evansville, IN 47710 |
| County: | Vanderburgh |
| SIC Code: | 2051 |
| Operation Permit No.: | T163-27317-00040 |
| Operation Permit Issuance Date: | April 17, 2009 |
| Significant Source Modification No.: | 163-31953-00040 |
| Significant Permit Modification No.: | 163-31955-00040 |
| Permit Reviewer: | John Haney |

### Existing Approvals

The source was issued Part 70 Operating Permit No. T163-27317-00040 on April 17, 2009. The source has since received the following approval:

(a) Significant Permit Modification No. 163-27910-00040, issued on July 29, 2009.

### County Attainment Status

The source is located in Vanderburgh County.

| Pollutant | Designation |
|---|---|
| $SO_2$ | Better than national standards. |
| CO | Unclassifiable or attainment effective November 15, 1990. |
| $O_3$ | Attainment effective January 30, 2006, for the Evansville area, including Vanderburgh County, 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]Attainment effective October 18, 2000, for the 1-hour ozone standard for the Evansville area, including Vanderburgh County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Unclassifiable or attainment effective October 27, 2011, for $PM_{2.5}$.

(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. Vanderburgh 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) $PM_{2.5}$
U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Vanderburgh County as nonattainment for $PM_{2.5}$. On March 7, 2005, the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for $PM_{2.5}$ promulgated on May 8, 2008. These rules became effective on July 15, 2008. Therefore, direct $PM_{2.5}$ and $SO_2$ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Vanderburgh County has been classified as attainment or unclassifiable in Indiana for all other regulated 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.

## Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

| **Pollutant** | **Emissions** (tons/yr) |
|---|---|
| PM | 1.11 |
| $PM_{10}$ | 1.14 |
| $PM_{2.5}$ | 1.14 |
| $SO_2$ | 1.64 |
| VOC | 132.56 |
| CO | 6.73 |
| $NO_X$ | 8.01 |
| GHGs as $CO_2e$ | Less than 100,000 |
| Acetaldehyde | Less than 10 |
| Total HAPs | Less than 25 |

(a) This existing source is not a major stationary source under PSD (326 IAC 2-2) because no regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more, 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 one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3) because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.

(c) This existing source is not a major stationary source under nonattainment new source review rules (326 IAC 2-1.1-5) since direct $PM_{2.5}$ and $SO_2$ are not emitted at a rate of 100 tons per year or more.

(d) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions 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).

(e) These emissions, excluding GHGs, are based upon the Technical Support Document (TSD) for Significant Permit Modification No. 163-27910-00040.

(f) The emissions of GHGs have been estimated to be less than one hundred thousand (100,000) tons of $CO_2$ equivalent emissions ($CO_2e$) per year.

## Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Hartford Bakery, Inc. on April 17, 2009, relating to the inclusion of two existing flour silos as well as the existing proof boxes, weigh hoppers, bag breakers, and mixers. The application also includes the addition of a VOC BACT limit for the existing bun production line. The following is a list of the proposed and modified emission units and pollution control devices:

(a) One (1) bread dough conveyance system, including, but not limited to, pneumatic conveyance process equipment and piping, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2012, with a maximum throughput of 12,000 pounds of dry ingredients per hour. The conveyance system includes the following emission units:

(1) Two (2) weigh hoppers, installed prior to 1980, identified as Hoppers 1A and 1B, each with a capacity of 1,400 pounds, each equipped with fabric bag filters for control of particulate matter emissions, exhausting inside.

(2) One (1) bag breaker, identified as Breaker 1, with a capacity of 1,200 pounds per hour, exhausting to the weigh hoppers.

(3) Two (2) mixers, constructed in 1990 and 1997, identified as Mixers 1A and 1B, each with a capacity of 2,000 pounds, exhausting to the weigh hoppers.

(b) One (1) bun dough conveyance system, including, but not limited to, pneumatic conveyance process equipment and piping, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2012, with a maximum throughput of 4,657 pounds of dry ingredients per hour. The conveyance system includes the following emission units:

(1) One (1) weigh hopper, installed prior to 1980, identified as Hopper 3, with a capacity of 1,400 pounds, equipped with a fabric bag filter for control of particulate matter emissions, exhausting inside.

(2) One (1) bag breaker, identified as Breaker 3, with a capacity of 1,200 pounds per hour, exhausting to the weigh hopper.

(3) One (1) mixer, constructed in 1998, identified as Mixer 3, with a capacity of 2,000 pounds, exhausting to the weigh hopper.

(c) One (1) bread production line, identified as Line 1, constructed in 1975, with a maximum production rate of 12,000 pounds per hour, consisting of the following:

(1) One (1) proof box, identified as Proof1.

(2) One (1) natural gas-fired oven, identified as Oven1, with a maximum heat input capacity of 7.0 MMBtu per hour, exhausting to Stacks 1 and 2.

(d) One (1) bun production line, identified as Line 3, constructed in 1998, with a maximum production rate of 4,657 pounds per hour, consisting of the following:

(1) One (1) proof box, identified as Proof3.

(2) One (1) natural gas-fired oven, identified as Oven3, with a maximum heat input capacity of 6.3 MMBtu per hour, exhausting to Stack 3.

Insignificant Activities

(g) Activities with potential emissions within any of the following thresholds: equal to or less than 5 pounds per hour or 25 pounds per day $PM_{10}$, $SO_2$, or $NO_x$; equal to or less than 3 pounds per hour or 15 pounds per day VOC; equal to or less than 25 pounds per day CO; equal to or less than 0.6 tons per year or 3.29 pounds per day Pb; or greater than 1 pound per day but less than 5 pounds per day or 1 ton per year single HAP (and not regulated by a NESHAP):

(1) Two (2) indoor flour storage silos, installed in 1968 and permitted in 2012, identified as Silos1 and 2, each with a maximum capacity of 6,600 pounds per hour, each equipped with integral fabric bag filters for control of particulate matter emissions, exhausting inside. [326 IAC 6.5-1-2(a)]

(2) Three (3) outdoor flour storage silos, installed in 1974, identified as Silos 3, 4, and 5, each with a maximum capacity of 16,410 pounds per hour, each equipped with integral fabric bag filters for control of particulate matter emissions, exhausting to atmosphere. [326 IAC 6.5-1-2(a)]

**"Integral Part of the Process" Determination**

On August 10, 2010, the Permittee submitted information requesting that the fabric bag filters for the two flour storage silos constructed in 1968 be considered integral for the raw material storage system because they are similar in design and have the same function as previously approved integral fabric bag filters for the three flour storage silos constructed in 1974. IDEM, OAQ has evaluated this information and has agreed with the Permittee that the fabric bag filters for the two flour storage silos constructed in 1968 are similar in design and function as the fabric bag filters for the three flour storage silos constructed in 1974. Therefore, the fabric bag filters for the two flour storage silos constructed in 1968 will be considered integral for the raw material storage system.

## Enforcement Issues

IDEM is aware that there is a pending enforcement action for exceeding the 326 IAC 8-1-6 avoidance limit for the bun production line. IDEM is also aware that additional emission units may have been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

IDEM, OAQ has recently been incorporating VOC emissions from proof boxes into a facility's potential to emit summary and considering a proof box and oven to be one facility with VOC emissions from proofing assumed to be 10% of the emissions calculated for fermentation.

## Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

## Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency."

The following tables are used to determine the appropriate permit level under 326 IAC 2-7-10.5. These tables reflect the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| **Increase in PTE Before Controls of the New/Unaccounted Emission Units*** | |
|---|---|
| **Pollutant** | **Potential To Emit** (tons/yr) |
| PM | 22.83 |
| $PM_{10}$ | 6.42 |
| $PM_{2.5}$ | 6.42 |
| $SO_2$ | 0 |
| VOC | 15.00 |
| CO | 0 |
| $NO_X$ | 0 |
| Acetaldehyde | 0.45 |
| Total HAPs | 0.45 |

* This includes the following previously unaccounted emission units: two flour silos (installed in 1968) with integral fabric bag filters for control (including loading and conveying), bread dough conveyance system, bun dough conveyance system, and two proof boxes (Proof1 and Proof3).

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

| PTE Change of the Modified Process** | | | |
|---|---|---|---|
| **Pollutant** | **PTE Before Modification** (tons/yr) | **PTE After Modification** (tons/yr) | **Increase from Modification** (tons/yr) |
| PM | 3.39 | 6.78 | 3.39 |
| $PM_{10}$ | 1.19 | 2.38 | 1.19 |
| $PM_{2.5}$ | 1.19 | 2.38 | 1.19 |
| $SO_2$ | 0 | 0 | 0 |
| VOC | 0 | 0 | 0 |
| CO | 0 | 0 | 0 |
| $NO_X$ | 0 | 0 | 0 |
| HAPs | 0 | 0 | 0 |

** This includes the following emission units: three flour silos (installed in 1974) with integral fabric bag filters for control (including loading and conveying).

| Total PTE Increase due to the Modification | | | |
|---|---|---|---|
| **Pollutant** | **PTE of New/Unaccounted Emission Units** (tons/yr) | **Net Increase to PTE of Modified Process** (tons/yr) | **Total PTE for New and Modified Units** (tons/yr) |
| PM | 22.83 | 3.39 | 26.22 |
| $PM_{10}$ | 6.42 | 1.19 | 7.61 |
| $PM_{2.5}$ | 6.42 | 1.19 | 7.61 |
| $SO_2$ | 0 | 0 | 0 |
| VOC | 15.00 | 0 | 15.00 |
| CO | 0 | 0 | 0 |
| $NO_X$ | 0 | 0 | 0 |
| Acetaldehyde | 0.45 | 0 | 0.45 |
| Total HAPs | 0.45 | 0 | 0.45 |

This source modification is subject to 326 IAC 2-7-10.5(g)(2) because the modification is subject to 326 IAC 8-1-6. This source modification is also subject to 326 IAC 2-7-10.5(g)(4)(A) because the potential to emit PM is greater than twenty-five (25) tons per year before control.

Additionally, the modification will be incorporated into the Part 70 Operating Permit Renewal through a significant permit modification issued pursuant to 326 IAC 2-7-12(d) because a case-by-case determination of an emission limitation and a significant change in monitoring and record keeping requirements in the Part 70 permit are proposed.

## Permit Level Determination – PSD, Emission Offset, and Nonattainment NSR

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source modification and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

| | **Potential to Emit** (tons/yr) | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| **Process / Emission Unit** | **PM** | **$PM_{10}$** | **$PM_{2.5}$*** | **$SO_2$** | **VOC** | **CO** | **$NO_X$** | **GHGs** | **Worse Case Single HAP**** | **Total HAPs** |
| **Silo Loading** | 42.93 | 42.93 | 42.93 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Dry Ingredient Conveyance** | 63.94 | 48.71 | 48.71 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Bread Line (Line 1)** | 0.06 | 0.23 | 0.23 | 0.02 | 118.34 | 2.52 | 3.01 | 3,629 | 3.54 | 3.60 |
| **Bun Line (Line 3)** | 0.05 | 0.21 | 0.21 | 0.02 | 46.85 | 2.27 | 2.71 | 3,266 | 1.41 | 1.46 |
| **Insignificant Activities** | 0.04 | 0.17 | 0.17 | 0.01 | 0.13 | 1.93 | 2.30 | 2,774 | 0.00 | 0.04 |
| Total for Source | 107.03 | 92.25 | 92.25 | 0.05 | 165.32 | 6.73 | 8.01 | 9,669 | 4.95 | 5.10 |
| PSD Major Source Thresholds | 250 | 250 | NA | 250 | 250 | 250 | 250 | 100,000 $CO_2e$ | 250 | 250 |
| Emission Offset/ Nonattainment NSR Major Source Thresholds | NA | NA | 100 | 100 | NA | NA | NA | NA | NA | NA |

*$PM_{2.5}$ listed is direct $PM_{2.5}$.
**The worst case single HAP is acetaldeyhde.

This modification to an existing minor stationary source is not major because the emissions increase is less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

This modification to an existing minor stationary source is not major because the emissions increase is less than the Emission Offset and Nonattainment NSR major levels. Therefore, pursuant to 326 IAC 2-3 and 326 IAC 2-1.1-5, the Emission Offset and Nonattainment NSR requirements do not apply.

PSD Avoidance Limits
The source has uncontrolled potential to emit greater than 250 tons per year of PM and $PM_{10}$, as indicated in Appendix A of this Technical Support Document. Therefore, 326 IAC 2-2 would have applied to the source. However, the source has decided to limit their PM and $PM_{10}$ emissions below the major source threshold as follows:

| **Emission Unit(s)** | **PM Limit** (lb/hr) | **$PM_{10}$ Limit** (lb/hr) |
|---|---|---|
| Flour Silo (Silo 1) | 1.04 | 1.04 |
| Flour Silo (Silo 2) | 1.04 | 1.04 |
| Flour Silo (Silo 3) | 2.58 | 2.58 |
| Flour Silo (Silo 4) | 2.58 | 2.58 |
| Flour Silo (Silo 5) | 2.58 | 2.58 |

Compliance with the above limits, combined with the potential to emit PM and $PM_{10}$ from other emission units at the source, shall limit the PM and $PM_{10}$ emissions from the entire source to less

than 250 tons per twelve (12) consecutive month period for PM and $PM_{10}$, each. This shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

Nonattainment NSR Avoidance Limits
The source has uncontrolled potential to emit greater than 100 tons per year of $PM_{2.5}$, as indicated in Appendix A of this Technical Support Document. Therefore, 326 IAC 2-1.1-5 (Nonattainment NSR) would have applied to the source. However, the source has decided to limit their $PM_{2.5}$ emissions below the major source threshold as follows:

| **Emission Unit(s)** | **$PM_{2.5}$ Limit** (lb/hr) |
|---|---|
| Flour Silo (Silo 1) | 1.04 |
| Flour Silo (Silo 2) | 1.04 |
| Flour Silo (Silo 3) | 2.58 |
| Flour Silo (Silo 4) | 2.58 |
| Flour Silo (Silo 5) | 2.58 |

Compliance with the above limits, combined with the potential to emit $PM_{2.5}$ from other emission units at the source, shall limit the $PM_{2.5}$ emissions from the entire source to less than 100 tons per twelve (12) consecutive month period for $PM_{2.5}$. This shall render the requirements of 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

## Federal Rule Applicability Determination

**NSPS:**

(a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60.40c, Subpart Dc, are not included in this permit for the three natural gas fired boilers because each boiler has a heat input capacity less than 10 MMBtu/hr.

(b) The requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978, 40 CFR 60.110, Subpart K, are not included for the following tanks because each tank does not store a petroleum liquid, as defined in 40 CFR 60.111(b):

- Three (3) vegetable oil tanks, installed in 1971, two with a capacity of 17,000 pounds each and one with a capacity of 23,000 pounds.
- Two (2) sugar solution tanks, one installed in 1971 with a capacity of 67,000 pounds and one installed in 1974 with a capacity of 128,035 pounds.

(c) The requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, 40 CFR 60.110a, Subpart Ka, are not included for the two pan oil tanks because each tank does not store a petroleum liquid, as defined in 40 CFR 60.111a(b).

- Two (2) pan oil tanks, installed between 1980 and 1990, each with a capacity of 48,000 pounds.

(d) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60.110b,

Subpart Kb, are not included for the following tanks because each tank has a volume less than 75 $m^3$ (19,813 gallons).

- Two (2) pan oil tanks, installed between 1980 and 1990, each with a capacity of 48,000 pounds.
- Two (2) blend tanks, installed in 1987, each with a capacity of 4,000 pounds.
- Four (4) bread solution holding tanks, installed in 1987, each with a capacity of 4,000 pounds.
- Two (2) bun solution holding tanks, installed in 1987, each with a capacity of 4,000 pounds.
- One (1) refrigerated holding tank, installed in 1987, with a capacity of 4,000 pounds.
- Two (2) cream yeast tanks, installed in 1994, each with a capacity of 48,000 pounds.

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

**NESHAP:**

(f) The requirements of the National Emissions Standards for Hazardous Air Pollutants for the Manufacturing of Nutritional Yeast, 40 CFR 63.2130, Subpart CCCC are not included in this permit because the source does not manufacture nutritional yeast as described in 40 CFR 63.2131(a)(1).

(g) The requirements of the National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63.7480, Subpart DDDDD, are not included in this permit because the NESHAP applies only to major sources of hazardous air pollutants. Since the limited potential to emit of any single HAP is less than 10 tons per year and the potential to emit of all combined HAPs is less than 25 tons per year, Hartford Bakery, Inc. is an area source of HAPs; therefore, Hartford Bakery, Inc. is not subject to this NESHAP.

(h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63.11193, Subpart JJJJJJ (326 IAC 20-1), are not included in the permit because all of the source's boilers are gas-fired boilers, as defined by 40 CFR 63.11237, and are specifically exempted under 40 CFR 63.11195(e).

**CAM:**

(i) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

(1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

| CAM Applicability Analysis | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Emission Unit** | **Control Device Used** | **Emission Limitation** (Y/N) | **Uncontrolled PTE** (tons/yr) | **Controlled PTE** (tons/yr) | **Part 70 Major Source Threshold** (tons/yr) | **CAM Applicable** (Y/N) | **Large Unit** (Y/N) |
| Flour Silo (Silo 1): PM | Bag Filter | Y | 41.26 | --- | 100 | N | --- |
| Flour Silo (Silo 1): $PM_{10}/PM_{2.5}$ | Bag Filter | Y | 14.45 | --- | 100 | N | --- |
| Flour Silo (Silo 2): PM | Bag Filter | Y | 41.26 | --- | 100 | N | --- |
| Flour Silo (Silo 2): $PM_{10}/PM_{2.5}$ | Bag Filter | Y | 14.45 | --- | 100 | N | --- |
| Flour Silo (Silo 3): PM | Bag Filter | Y | 112.85 | 1.13 | 100 | Y | N |
| Flour Silo (Silo 3): $PM_{10}/PM_{2.5}$ | Bag Filter | Y | 39.53 | --- | 100 | N | --- |
| Flour Silo (Silo 4): PM | Bag Filter | Y | 112.85 | 1.13 | 100 | Y | N |
| Flour Silo (Silo 4): $PM_{10}/PM_{2.5}$ | Bag Filter | Y | 39.53 | --- | 100 | N | --- |
| Flour Silo (Silo 5): PM | Bag Filter | Y | 112.85 | 1.13 | 100 | Y | N |
| Flour Silo (Silo 5): $PM_{10}/PM_{2.5}$ | Bag Filter | Y | 39.53 | --- | 100 | N | --- |
| Hopper/Breaker (1A): $PM/PM_{10}/PM_{2.5}$ | Bag Filter | N* | --- | --- | --- | N | --- |
| Mixer (1A): PM | Bag Filter | Y | 7.52 | --- | 100 | N | --- |
| Mixer (1A): $PM_{10}/PM_{2.5}$ | Bag Filter | Y | 2.05 | --- | 100 | N | --- |
| Hopper/Breaker (1B): $PM/PM_{10}/PM_{2.5}$ | Bag Filter | N* | --- | --- | --- | N | --- |
| Mixer (1B): PM | Bag Filter | Y | 7.52 | --- | 100 | N | --- |
| Mixer (1B): $PM_{10}/PM_{2.5}$ | Bag Filter | Y | 2.05 | --- | 100 | N | --- |
| Hopper/Breaker (3): $PM/PM_{10}/PM_{2.5}$ | Bag Filter | N* | --- | --- | --- | N | --- |
| Mixer (3): PM | Bag Filter | Y | 7.52 | --- | 100 | N | --- |
| Mixer (3): $PM_{10}/PM_{2.5}$ | Bag Filter | Y | 2.05 | --- | 100 | N | --- |

* There are no applicable emission standards or work practices for these emission units due to their low emission rates.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to Flour Silos 3, 4, and 5 for PM upon issuance of the Title V Renewal. A CAM plan must be submitted as part of the Renewal application.

## State Rule Applicability Determination

**326 IAC 2-2 (PSD)**

(a) According to Part 70 Operating Permit No. T163-27317-00040, the potential to emit of all attainment regulated pollutants was less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) were not applicable to the source.

(b) According to Significant Source Modification No. 163-31953-00040, the source has the potential to emit greater than 250 tons per year of PM and $PM_{10}$. Therefore, 326 IAC 2-2 would have applied to the source. However, the source has decided to limit their PM and

$PM_{10}$ emissions below the major source threshold. Compliance with these limits, combined with the potential to emit PM and $PM_{10}$ from other emission units at the source, shall limit the PM and $PM_{10}$ emissions from the entire source to less than 250 tons per twelve (12) consecutive month period, each. This shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

**326 IAC 2-3 (Emission Offset) and 326 IAC 2-1.1-5 (Nonattainment NSR)**

(a) VOC and $NO_x$

(1) The requirements of 326 IAC 2-3 (Emission Offset) apply to major sources or major modifications constructed in an area designated as nonattainment. Vanderburgh County was designated as nonattainment for 8-hour ozone from June 2004 until October 2007. All unaccounted emission units were installed prior to 2004 and therefore were not evaluated under 326 IAC 2-3. Also, no significant modifications were made to this source while the county was in nonattainment. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) were not applicable to the source during this time period.

(2) Effective October 19, 2007, Vanderburgh County has been re-classified as attainment in Indiana for 8-hour ozone. Therefore, 326 IAC 2-3 does not apply to this source.

(b) $PM_{10}$

Vanderburgh County has always been designated as attainment for $PM_{10}$. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) have never applied to the source for $PM_{10}$.

(c) $PM_{10}$ as a Surrogate for $PM_{2.5}$

(1) U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, designated Vanderburgh County as nonattainment for $PM_{2.5}$. On March 7, 2005, the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources were not potentially liable for a violation of the Clean Air Act, the OAQ followed the U.S. EPA's guidance to regulate $PM_{10}$ emissions as a surrogate for $PM_{2.5}$ emissions pursuant to the requirements of Emission Offset, 326 IAC 2-3.

(2) The requirements of 326 IAC 2-3 (Emission Offset) apply to major sources or major modifications constructed in an area designated as nonattainment. Vanderburgh County was designated as nonattainment for $PM_{2.5}$ from January 2005 until July 2008. All unaccounted emission units were installed prior to 2004 and therefore were not evaluated under 326 IAC 2-3. Also, no significant modifications were made to this source while the county was in nonattainment. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) were not applicable to the source during that time.

(3) In order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for $PM_{2.5}$ promulgated on May 8, 2008. These rules became effective on July 15, 2008. Therefore, on and after July 15, 2008, $PM_{10}$ emissions are no longer reviewed, as a surrogate for $PM_{2.5}$, pursuant to 326 IAC 2-3 (Emission Offset).

(d) $PM_{2.5}$ and $SO_2$

(1) U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Vanderburgh County as nonattainment for $PM_{2.5}$. On March 7, 2005, the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for $PM_{2.5}$ promulgated on May 8, 2008. These rules became effective on July 15, 2008. Therefore, direct $PM_{2.5}$ and $SO_2$ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.

(2) All unaccounted emission units were installed prior to 2004 and therefore were not evaluated under 326 IAC 2-1.1-5.

(3) According to Significant Source Modification No. 163-31953-00040, the source has the potential to emit greater than 100 tons per year of $PM_{2.5}$. Therefore, 326 IAC 2-1.1-5 (Nonattainment NSR) would have applied to the source. However, the source has decided to limit their $PM_{2.5}$ emissions below the major source threshold. Compliance with these limits, combined with the potential to emit $PM_{2.5}$ from other emission units at the source, shall limit the $PM_{2.5}$ emissions from the entire source to less than 100 tons per twelve (12) consecutive month period for $PM_{2.5}$. This shall render the requirements of 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**
This modification will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**326 IAC 2-6 (Emission Reporting)**
This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and $PM_{10}$ is less than 250 tons per year each; and the potential to emit of CO, $NO_x$, and $SO_2$ is less than 2,500 tons per year each. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2006, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

**326 IAC 5-1 (Opacity Limitations)**
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2).

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**
326 IAC 6.5-1-2 applies to sources or facilities located in Vanderburgh County that are not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10 and have a potential to emit (PTE) 100 tons or more per year of particulate. According to the Technical Support Document (TSD) for Significant Permit Modification No. 163-27910-00040, the source had limited PM PTE less than 100 tons per year. However, as a result of this modification, the source will have a limited PM PTE greater than 100 tons per year. Consequently, this source is subject to 326 IAC 6.5 because it is located in Vanderburgh County and its limited PM PTE is equal to or greater than 100 tons per year. However, this source is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. Therefore, 326 IAC 6.5-1-2 applies as follows:

(a) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from each of the following facilities shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf):

Silo 1, Silo 2, Silo 3, Silo 4, Silo 5, Hopper 1A, Breaker 1A, Mixer 1A, Hopper 1B, Breaker 1B, Mixer 1B, Hopper 3, Breaker 3, and Mixer 3.

(b) Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from each of the following facilities shall not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf):

Oven1 (Bread Oven), Oven3 (Bun Oven), two (2) 2.00625 MMBtu/hr natural gas-fired boilers, and one (1) 1.3375 MMBtu/hr natural gas-fired boiler.

These are new requirements that are replacing the existing 326 IAC 6-2 and 326 IAC 6-3 limits.

**326 IAC 6-2 (Sources of Indirect Heating)**
This source is not subject to the requirements of 326 IAC 6-2 because the facility is subject to the requirements of 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County) as stated above. Pursuant to the applicability requirements (326 IAC 6-2-1(e)), if any limitation established by this rule is inconsistent with applicable limitations contained in 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) or 326 IAC 12 (New Source Performance Standards), then the limitations contained in 326 IAC 6.5 or 326 IAC 12 prevail.

The emission limitations for the natural gas-fired boilers in Condition D.2.1 are no longer applicable and have been removed.

**326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)**
This source is not subject to the requirements of 326 IAC 6-3 because the facility is subject to the requirements of 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County) as stated above. Pursuant to the applicability requirements (326 IAC 6-3-1(c)(3)), if a particulate matter limitation established in 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) is more stringent than the particulate limitation established in 326 IAC 6-3, then 326 IAC 6-3 shall not apply.

The emission limitations for the bread oven and the bun oven in Condition D.1.2 and the three flour silos in Condition D.3.1 are no longer applicable and have been removed.

**326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)**
This source is not subject to 326 IAC 326 IAC 7-1.1 because its $SO_2$ PTE is less than 25 tons per year or 10 pounds per hour.

**326 IAC 8-1-6 (New Facilities; General Reduction Requirements)**
(a) The bread production line, identified as Line 1, is not subject to 326 IAC 8-1-6 because it was constructed prior to January 1, 1980.

(b) The bun production line, identified as Line 3, is subject to 326 IAC 8-1-6 because it exceeded the 326 IAC 8-1-6 avoidance limit of 24.8 pounds per hour, which was made federally enforceable pursuant to Significant Permit Modification No. 163-27910-00040, issued July 29, 2009. Therefore, IDEM, OAQ has performed a BACT analysis, which was based on the Draft "Top Down Approach: BACT Guidance" by USEPA, Office of Air Quality Planning Standards, March 15, 1990.

IDEM, OAQ has determined that the following requirements represent BACT for the bun line, identified as Line 3:

(a) VOC emissions attributable to proofing and fermentation from the bun production line, identified as Line 3 (consisting of the oven (Oven3) and the proof box (Proof3)), shall not exceed 46.7 tons per twelve (12) consecutive month period.

(b) The source shall operate the proof box (Proof3) in accordance with the manufacturer's design and operating specifications.

(c) In order to ensure proper operation and to minimize potential emissions, the source shall perform proof box cleaning operations for the proof box (Proof3), on a tiered cleaning schedule and perform at a minimum, the following operations, or their equivalent, in accordance with their Sanitation Standard Operating Procedure:

(1) Weekly Cleaning Procedure:

(A) Scrape any dough from the conveyor, grids, and supports;
(B) Scrape any dough from the floor;
(C) Sweep the proof box floor from the center out;
(D) Wet the entire floor with cleaning solvent mixture and then rinse;
(E) Scrape any dough from the bun pans; and
(F) Wash the pans, if necessary.

(2) Monthly Cleaning Procedure:

(A) Wet mop the floor of the proof box.

(3) Semi-Annually Cleaning Procedure:

(A) Wash down the interior walls in small sections with cleaning solvent mixture and then rinse.

See Appendix B of this Technical Support Document for the detailed BACT Analysis.

The existing avoidance limit has been replaced with this new requirement pursuant to VOC BACT (326 IAC 8-1-6).

**Compliance Determination, Monitoring and Testing Requirements**

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

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

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

(a) VOC Compliance Determination

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

$$1.1 \times \sum_{m=1}^{12}\left(\sum_{i=1}^{n}\frac{E_i * B_i}{2000\,lb/ton}\right)_m \text{ tons of VOC per twelve consecutive month period}$$

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

The emission factor for each type of donut dough shall be calculated using the following equation:

E = 0.95Y + 0.195ti - 0.51S - 0.86ts + 1.90

Where:
E = Pounds of VOC per ton of baked dough;
Y = Initial baker's percent of yeast;
ti = Total yeast action time in hours;
S = Final (spike) baker's percent of yeast; and
ts = Spiking time in hours.

The compliance equation has been revised in order to include the VOC emissions from the proof box. VOC emissions from proofing shall be assumed to be 10% of the emissions calculated for fermentation based on the "Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017, December 1992). This is a Title I change.

(b) Emission Controls Operation

(1) Bag filters on the flour silos for particulate emissions control shall be in operation and control particulate emissions whenever the flour silos (Silos 1 through 5) are in operation.

(2) Bag filters on Hoppers 1A and 1B for particulate emissions control shall be in operation and control particulate emissions whenever any of the following emission units are in operation: Hopper 1A, Hopper 1B, Breaker 1, Mixer 1A, and Mixer 1B.

(3) Bag filters on Hopper 3 for particulate emissions control shall be in operation and control particulate emissions whenever any of the following emission units are in operation: Hopper 3, Breaker 3, and Mixer 3.

These requirements are required to ensure compliance with 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) and to render 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

There are no compliance monitoring requirements applicable to this modification.

**Proposed Changes**

The changes listed below have been made to Part 70 Operating Permit No. T163-27317-00040. These corrections, changes, and removals may include Title I changes (ex changes that add or modify synthetic minor emission limits). Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

(a) On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlying provisions. The change is only to the site of these rules in Section A – General Information, Section A – Emission Units and Pollution Control Equipment Summary, Section A – Insignificant Activities, Section B – Preventative Maintenance Plan, Section B – Emergency Provisions, Section B – Operational Flexibility, Section C – Risk Management Plan, the Facility Descriptions, and Section D – Preventative Maintenance Plan.

(b) For clarity, IDEM, OAQ has changed references to the general conditions such as "in accordance with Section B", "in accordance with Section C", or other similar language to "Section C...contains the Permittee's obligations with regard to the records required by this condition.

(c) IDEM, OAQ has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore, all references to timelines have been revised to "no later than" or "not later than" except for the timelines in subparagraphs (b)(4) and (b)(5) of Section B - Emergency Provisions and Section B - Annual Fee Payment, in which the underlying rules state "within".

(d) 326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official".

(e) IDEM, OAQ has decided to clarify what rule requirements a certification needs to meet. IDEM, OAQ 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.

(f) IDEM, OAQ has revised Section B - Duty to Provide Information by removing the statement that the submittal by the Permittee requires the certification by the "responsible official".

(g) To clarify that Section B - Certification only states what a certification must be and to make the language consistent with the rule, IDEM, OAQ has revised the condition.

(h) IDEM, OAQ has added a new paragraph (b) to handle a future situation where the Permittee adds units that need preventive maintenance plans developed. IDEM, OAQ has decided to clarify other aspects of Section B - Preventive Maintenance Plan to be consistent with the rule.

(i) IDEM, OAQ is revising Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-7-5(3)(C)(ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report.

(j) IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, Section B - Deviation from Permit Requirements and Conditions

has been removed and the requirements of that condition have been added to Section C - General Reporting Requirements. Paragraph (d) of Section C - General Reporting Requirements has been removed because IDEM, OAQ already states the timeline and certification needs of each report in the condition requiring the report.

(k) IDEM, OAQ has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.

(l) IDEM, OAQ has decided to state that no notice is required for approved changes in Section B - Permit Revision Under Economic Incentives and Other Programs.

(m) IDEM has decided to reference 326 IAC 2 in Section B - Source Modification Requirement, rather than the specific construction rule.

(n) Section C - Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour has been removed because all of the source's processes are exempt under 326 IAC 6-3-1(c). Particulate matter limitations established in 326 IAC 6.5 are more stringent.

(o) IDEM, OAQ has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.

(p) IDEM, OAQ has revised Section C - Incineration to more closely reflect the two underlying rules.

(q) IDEM, OAQ has removed the first paragraph of Section C - Performance Testing due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.

(r) IDEM, OAQ has revised Section C - Compliance Monitoring. The reference to recordkeeping has been removed due to the fact that other conditions already address recordkeeping. The voice of the condition has been changed to clearly indicate that it is the Permittee that must follow the requirements of the condition.

(s) IDEM, OAQ has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.

(t) IDEM, OAQ has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.

(u) IDEM, OAQ has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions

minimization. The start of the timelines was revised from "the receipt of the test results" to "the date of the test". There was confusion if the "receipt" was by IDEM, the Permittee or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.

(v) IDEM, OAQ decided to remove paragraph (c) of Section C - Emission Statement since it was duplicative of the requirement in Section C - General Reporting Requirements.

(w) The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.

(x) On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions included the incorporation of the U.S. EPA's definition of reasonable possibility. The permit previously sited to the EPA definition. Also, the revisions resulted in changes to other rule sites listed in the permit. Neither of these changes are changes to the underlying provisions. The change is only to the site of these rules in Section C – General Reporting and Section C - Record Keeping.

(y) IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping.

(z) IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.

(aa) IDEM, OAQ has decided to simplify the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.

(bb) The word "status" has been added to Section D - Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.

(cc) The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report to match the underlying rule.

(dd) The word "status" has been added to Section D – Record Keeping Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.

(ee) IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.

(ff) The source status in Section A.1 has been revised to indicate the source is minor under Nonattainment NSR and to clarify that it is a nested source within a non-listed source.

(gg) Sections A.2, D.1, and D.3 have been clarified to include the unaccounted emission units.

(hh) Sections A.3, D.2, and D.3 have been revised to cite 326 IAC 6.5-1-2 as opposed to 326 IAC 6-2-3 or 326 IAC 6-3-2, which no longer apply.

(ii) The 326 IAC 8-1-6 avoidance limit in Condition D.1.1 has been replaced with VOC BACT requirements according to the appropriate BACT analysis. The corresponding reporting form has also been revised.

(jj) The particulate limits for the ovens in Condition D.1.2 pursuant to 326 IAC 6-3-2, which no longer apply, have been replaced with limits pursuant to 326 IAC 6.5-1-2.

(kk) The compliance equation has been revised in order to include the VOC emissions from the proof box. VOC emissions from proofing shall be assumed to be 10% of the emissions calculated for fermentation based on the "Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017, December 1992). .

(ll) The particulate limits for the boilers in Condition D.2.1 pursuant to 326 IAC 6-2-3, which no longer apply, have been replaced with limits pursuant to 326 IAC 6.5-1-2.

(mm) Minor limits for the flour silos have been added as Condition D.3.1 in order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) no applicable to the source; all subsequent conditions have been renumbered. These are new requirements.

(nn) The particulate limits for the silos in renumbered Condition D.3.2 pursuant to 326 IAC 6-3-2, which no longer apply, have been replaced with limits pursuant to 326 IAC 6.5-1-2.

The permit has been revised as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(~~15~~**14**)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary wholesale bakery.

| | |
|---|---|
| Source Address: | 500 N. Fulton Avenue, Evansville, Indiana 47710 |
| ~~Mailing Address:~~ | ~~500 N. Fulton Avanue, Evansville, IN 47710~~ |
| General Source Phone Number: | (812) 425-4642 |
| SIC Code: | 2051 |
| County Location: | Vanderburgh |
| Source Location Status: | Nonattainment for $PM_{2.5}$ standard<br>Attainment for all other criteria pollutants |
| Source Status: | Part 70 Operating Permit Program<br>Minor Source, under PSD**,** ~~and~~ Emission Offset**, and Nonattainment NSR** Rules<br>Minor Source, **under** Section 112 of the Clean Air Act Not 1 of 28 Source Categories |

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(~~15~~**14**)]

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

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

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

**(a) One (1) bread dough conveyance system, including, but not limited to, pneumatic conveyance process equipment and piping, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2012, with a maximum**

**throughput of 12,000 pounds of dry ingredients per hour. The conveyance system includes the following emission units:**

**(1) Two (2) weigh hoppers, installed prior to 1980, identified as Hoppers 1A and 1B, each with a capacity of 1,400 pounds, each equipped with fabric bag filters for control of particulate matter emissions, exhausting inside.**

**(2) One (1) bag breaker, identified as Breaker 1, with a capacity of 1,200 pounds per hour, exhausting to the weigh hoppers.**

**(3) Two (2) mixers, constructed in 1990 and 1997, identified as Mixers 1A and 1B, each with a capacity of 2,000 pounds, exhausting to the weigh hoppers.**

**(b) One (1) bun dough conveyance system, including, but not limited to, pneumatic conveyance process equipment and piping, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2012, with a maximum throughput of 4,657 pounds of dry ingredients per hour. The conveyance system includes the following emission units:**

**(1) One (1) weigh hopper, installed prior to 1980, identified as Hopper 3, with a capacity of 1,400 pounds, equipped with a fabric bag filter for control of particulate matter emissions, exhausting inside.**

**(2) One (1) bag breaker, identified as Breaker 3, with a capacity of 1,200 pounds per hour, exhausting to the weigh hopper.**

**(3) One (1) mixer, constructed in 1998, identified as Mixer 3, with a capacity of 2,000 pounds, exhausting to the weigh hopper.**

**(c) One (1) bread production line, identified as Line 1, constructed in 1975, with a maximum production rate of 12,000 pounds per hour, consisting of the following:**

**(1) One (1) proof box, identified as Proof1.**

**(2) One (1) natural gas-fired oven, identified as Oven1, with a maximum heat input capacity of 7.0 MMBtu per hour, exhausting to Stacks 1 and 2.**

**(d) One (1) bun production line, identified as Line 3, constructed in 1998, with a maximum production rate of 4,657 pounds per hour, consisting of the following:**

**(1) One (1) proof box, identified as Proof3.**

**(2) One (1) natural gas-fired oven, identified as Oven3, with a maximum heat input capacity of 6.3 MMBtu per hour, exhausting to Stack 3.**

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(~~15~~**14**)]

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

(a) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:

(1) Two (2) 2.00625 million British thermal units per hour (MMBtu/hr) natural gas

fired boilers, constructed in 1974 and 1975. ~~[326 IAC 6-2-3]~~ **[326 IAC 6.5-1-2(b)(3)]**

(2) One (1) 1.3375 million British thermal units per hour (MMBtu/hr) natural gas fired boiler, constructed in 1951. ~~[326 IAC 6-2-3]~~ **[326 IAC 6.5-1-2(b)(3)]**

* * * * *

~~(g) Activities with emissions equal to or less than the following requirements: 25 lbs per day particulate matter, SO2, or NOX, 15 lbs per day VOC, or 3.29 lbs per day Pb, including:~~

~~(1) A raw material storage system consisting of three (3) flour storage silos which are filled pneumatically, each with a maximum capacity of 16,410 pounds per hour, using a pressure equalization bag at the top for product recovery. [326 IAC 6-3-2]~~

**(g) Activities with potential emissions within any of the following thresholds: equal to or less than 5 pounds per hour or 25 pounds per day $PM_{10}$, $SO_2$, or $NO_x$; equal to or less than 3 pounds per hour or 15 pounds per day VOC; equal to or less than 25 pounds per day CO; equal to or less than 0.6 tons per year or 3.29 pounds per day Pb; or greater than 1 pound per day but less than 5 pounds per day or 1 ton per year single HAP (and not regulated by a NESHAP):**

**(1) Two (2) indoor flour storage silos, installed in 1968 and permitted in 2012, identified as Silos1 and 2, each with a maximum capacity of 6,600 pounds per hour, each equipped with integral fabric bag filters for control of particulate matter emissions, exhausting inside. [326 IAC 6.5-1-2(a)]**

**(2) Three (3) outdoor flour storage silos, installed in 1974, identified as Silos 3, 4, and 5, each with a maximum capacity of 16,410 pounds per hour, each equipped with integral fabric bag filters for control of particulate matter emissions, exhausting to atmosphere. [326 IAC 6.5-1-2(a)]**

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. ~~The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~ Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

* * * * *

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) ~~Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that,~~ **A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:**

**(i) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and**

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

(b) ~~One (1) certification shall be included, using~~ **The 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.

* * * * *

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

* * * * *

(c) The annual compliance certification report shall include the following:

* * * * *

The submittal by the Permittee does require ~~the~~ **a** certification ~~by~~ **that meets** the **requirements of 326 IAC 2-7-6(1) by a** "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5~~(1),(3) and (13)~~**(12)**] ~~[326 IAC 2-7-6(1) and (6)]~~ [326 IAC 1-6-3]

(a) ~~If require by specific condition(s) in section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:~~ **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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).**

**The Permittee shall implement the PMPs.**

(~~b~~**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 ~~or potential to emit~~. The PMPs **and their submittal** do not require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

(~~c~~**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.11 Emergency Provisions [326 IAC 2-7-16]

* * * * *

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

* * * * *

(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:

* * * * *

The notification which shall be submitted by the Permittee does not require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

* * * * *

* * * * *

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(~~9~~**8**) be revised in response to an emergency.

* * * * *

~~(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report. Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by an "responsible official" need only referenced by the date of the original report.~~

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

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

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

~~using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.~~

~~The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.~~

B.~~16~~**15** Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

* * * * *

B.~~17~~**16** Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

* * * * *

* * * * *

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if,

subsequent to the completeness determination, the Permittee fails to submit by the deadline specified**, pursuant to 326 IAC 2-7-4(a)(2)(D),** in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.~~18~~**17** Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

* * * * *

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

* * * * *

Any such application ~~shall be certified~~ **does require a certification that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

* * * * *

B.~~19~~**18** Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision **or notice** shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

* * * * *

B.~~20~~**19** Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b)~~,~~ **or** (c)~~, or (e)~~ without a prior permit revision, if each of the following conditions is met:

* * * * *

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)~~,~~ **or** (c)~~, or (e)~~. The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1)~~,~~ **and** (c)(1)~~, and (e)(2)~~.

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

* * * * *

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

* * * * *

B.~~21~~**20** Source Modification Requirement [326 IAC 2-7-10.5]

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

B.~~22~~**21** Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

* * * * *

B.~~23~~**22** Transfer of Ownership or Operational Control [326 IAC 2-7-11]

* * * * *

(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:

* * * * *

~~The~~ **Any such** application ~~which shall be submitted by the Permittee~~ does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

* * * * *

B.~~24~~**23** Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

* * * * *

B.~~25~~**24** Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

* * * * *

~~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~~**1** 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:

* * * * *

C.~~3~~**2** Open Burning [326 IAC 4-1] [IC 13-17-9]

* * * * *

C.~~4~~**3** Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator ~~or incinerate any waste or refuse~~ except as provided in 326 IAC 4-2 ~~and 326 IAC 9-1-2~~ **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.~~5~~**4** Fugitive Dust Emissions [326 IAC 6-4]

* * * * *

**C.5 Stack Height [326 IAC 1-7]**

**The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.**

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

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

* * * * *

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

* * * * *

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

Unless otherwise specified in this permit, **for** all monitoring ~~and record keeping~~ requirements not already legally required**, the Permittee** shall be ~~implemented within~~ **allowed up to** ninety (90) days **from the date** of permit issuance or ~~ninety (90) days~~ of initial start-up, whichever is later~~. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required~~**, to begin such** monitoring~~related to that equipment~~. If due to circumstances beyond ~~its~~ **the Permittee's** control, ~~that equipment~~ **any monitoring equipment required by this permit** cannot be installed and operated ~~within~~ **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:

* * * * *

The notification which shall be submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

* * * * *

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

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

C.~~11~~**10** Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

* * * * *

C.~~12~~**11** Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

* * * * *

C.~~13~~**12** Risk Management Plan [326 IAC 2-7-5(~~12~~**11**)] [40 CFR 68]

* * * * *

C.~~14~~**13** Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

(a) ~~Upon detecting an excursion or exceedance, the~~ **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 ~~and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions)~~. ~~Corrective actions~~ **The response** may include, but ~~are~~ **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 ~~within the indicator range, designated condition, or below the applicable emission limitation~~ **normal** or ~~standard, as applicable~~ **usual manner of operation**.

* * * * *

(e) The Permittee shall ~~maintain~~ **record** the ~~following records:~~ **reasonable response steps taken.**

~~(1) monitoring data;~~

~~(2) monitor performance data, if applicable; and~~

~~(3) corrective actions taken.~~

C.~~15~~**14** Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall ~~take appropriate response actions. The Permittee shall~~ submit a description of ~~these~~ **its** response actions to IDEM, OAQ, ~~within thirty (30)~~ **no later than seventy-five (75)** days ~~of receipt~~ **after the date** of the test ~~results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented~~.

(b) A retest to demonstrate compliance shall be performed ~~within~~ **no later than** one hundred ~~twenty (120)~~ **eighty (180)** days ~~of receipt of~~ **after** the ~~original~~ **date of the** test ~~results~~. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred ~~twenty (120)~~ **eighty (180)** days is not practicable, IDEM, OAQ may extend the retesting deadline~~.~~

* * * * *

The response action documents submitted pursuant to this condition do require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

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

~~(a)~~ Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

* * * * *

The emission statement does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.~~17~~**16** General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. **Support information includes the following:**

**(AA) All calibration and maintenance records.**
**(BB) All original strip chart recordings for continuous monitoring instrumentation.**
**(CC) Copies of all reports required by the Part 70 permit.**

**Records of required monitoring information include the following:**

**(AA) The date, place, as defined in this permit, and time of sampling or measurements.**
**(BB) The dates analyses were performed.**
**(CC) The company or entity that performed the analyses.**
**(DD) The analytical techniques or methods used.**
**(EE) The results of such analyses.**
**(FF) The operating conditions as existing at the time of sampling or measurement.**

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 ~~implemented within~~ **allowed up to** ninety (90)

days **from the date** of permit issuance or ~~ninety (90) days~~ **the date** of initial start-up, whichever is later**, to begin such record keeping**.

C.~~18~~**17** General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. **Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph.** 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 ~~within~~ **not later than** thirty (30) days ~~of~~ **after** the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(34). **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.**

(b) ~~The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:~~ **The address for report submittal is:**

* * * * *

* * * * *

~~(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

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

C.~~19~~**18** Compliance with 40 CFR 82 and 326 IAC 22-1

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

~~(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.~~

~~(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.~~

~~(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161~~.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

~~Emissions Unit~~ **Facility** Description **[326 IAC 2-7-5(14)]**:

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

**(c) One (1) bread production line, identified as Line 1, constructed in 1975, with a maximum production rate of 12,000 pounds per hour, consisting of the following:**

**(1) One (1) proof box, identified as Proof1.**

**(2) One (1) natural gas-fired oven, identified as Oven1, with a maximum heat input capacity of 7.0 MMBtu per hour, exhausting to Stacks 1 and 2.**

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

**(d) One (1) bun production line, identified as Line 3, constructed in 1998, with a maximum production rate of 4,657 pounds per hour, consisting of the following:**

**(1) One (1) proof box, identified as Proof3.**

**(2) One (1) natural gas-fired oven, identified as Oven3, with a maximum heat input capacity of 6.3 MMBtu per hour, exhausting to Stack 3.**

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

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

~~Pursuant to CP 163-9331-00040, issued on May 4, 1998, and SPM NO. 163-27910-00040, the VOC emissions from the bun oven, identified as 3, excluding those from natural gas combustion, shall not exceed 24.80 tons per twelve (12) consecutive month period.~~

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

**Pursuant to 326 IAC 8-1-6 and SSM 163-31953-00040, BACT has been determined to be the following for the bun line, identified as Line 3:**

**(a) VOC emissions attributable to proofing and fermentation from the bun production line, identified as Line 3 (consisting of the oven (Oven3) and the proof box (Proof3)), shall not exceed 46.7 tons per twelve (12) consecutive month period.**

**(b) The source shall operate the proof box (Proof3) in accordance with the manufacturer's design and operating specifications.**

**(c) In order to ensure proper operation and to minimize potential emissions, the source shall perform proof box cleaning operations for the proof box (Proof3), on a tiered cleaning schedule and perform at a minimum, the following operations, or their equivalent, in accordance with their Sanitation Standard Operating Procedure:**

**(1) Weekly Cleaning Procedure:**

**(A) Scrape any dough from the conveyor, grids, and supports;**
**(B) Scrape any dough from the floor;**
**(C) Sweep the proof box floor from the center out;**
**(D) Wet the entire floor with cleaning solvent mixture and then rinse;**
**(E) Scrape any dough from the bun pans; and**
**(F) Wash the pans, if necessary.**

**(2) Monthly Cleaning Procedure:**

**(A) Wet mop the floor of the proof box.**

**(3) Semi-Annually Cleaning Procedure:**

**(A) Wash down the interior walls in small sections with cleaning solvent mixture and then rinse.**

D.1.2 Particulate **Matter Limitations Except Lake County** ~~[326 IAC 6-3-2]~~ **[326 IAC 6.5-1-2(b)(3)]**

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

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

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

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

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

**Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from Oven1 and Oven3 shall each not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).**

D.1.3 Preventative Maintenance Plan [326 IAC 2-7-5(~~13~~**12**)]

A Preventive Maintenance Plan~~, in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ 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.**

D.1.4 Volatile Organic Compounds

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

**1.1 x** $\sum_{m=1}^{12}\left(\sum_{i=1}^{n}\frac{E_i * B_i}{2000\,lb/ton}\right)_m$ ~~≤ 24.80~~ tons of VOC per twelve consecutive month period

* * * * *

D.1.5 Record Keeping Requirements

(a) To document **the** compliance **status** with Conditions D.1.1 and D.1.4, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emissions limits established in Condition D.1.1.

* * * * *

(b) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements **contains the Permittee's obligation with regard to the records required to be maintained by this condition**~~, of this permit~~.

D.1.6 Reporting Requirements

A quarterly summary of the information to document **the** compliance **status** with Condition D.1.1 shall be submitted ~~to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within~~ **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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).**

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

~~Emissions Unit~~ **Facility** Description **[326 IAC 2-7-5(14)]**:

**Insignificant Activities**

(a) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:

(1) Two (2) 2.00625 million British thermal units per hour (MMBtu/hr) natural gas fired boilers, constructed in 1974 and 1975. ~~[326 IAC 6-2-3]~~ **[326 IAC 6.5-1-2(b)(3)]**

(2) One (1) 1.3375 million British thermal units per hour (MMBtu/hr) natural gas fired boiler, constructed in 1951. ~~[326 IAC 6-2-3]~~ **[326 IAC 6.5-1-2(b)(3)]**

(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 Limitation**s** ~~(PM)~~ **Except Lake County** ~~[326 IAC 6-2-3]~~ **[326 IAC 6.5-1-2(b)(3)]**

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

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

**Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from each of the natural gas-fired boilers shall not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).**

D.2.2 Preventative Maintenance Plan [326 IAC 2-7-5(~~13~~**12**)]

A Preventive Maintenance Plan~~, in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ 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.**

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

~~Emissions Unit~~ **Facility** Description **[326 IAC 2-7-5(14)]**:

**(a) One (1) bread dough conveyance system, including, but not limited to, pneumatic conveyance process equipment and piping, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2012, with a maximum throughput of 12,000 pounds of dry ingredients per hour. The conveyance system includes the following emission units:**

**(1) Two (2) weigh hoppers, installed prior to 1980, identified as Hoppers 1A and 1B, each with a capacity of 1,400 pounds, each equipped with fabric bag filters for control of particulate matter emissions, exhausting inside.**

**(2) One (1) bag breaker, identified as Breaker 1, with a capacity of 1,200 pounds per hour, exhausting to the weigh hoppers.**

**(3) Two (2) mixers, constructed in 1990 and 1997, identified as Mixers 1A and 1B, each with a capacity of 2,000 pounds, exhausting to the weigh hoppers.**

**(b) One (1) bun dough conveyance system, including, but not limited to, pneumatic conveyance process equipment and piping, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2012, with a maximum throughput of 4,657 pounds of dry ingredients per hour. The conveyance system includes the following emission units:**

**(1) One (1) weigh hopper, installed prior to 1980, identified as Hopper 3, with a capacity of 1,400 pounds, equipped with a fabric bag filter for control of particulate matter emissions, exhausting inside.**

**(2) One (1) bag breaker, identified as Breaker 3, with a capacity of 1,200 pounds per hour, exhausting to the weigh hopper.**

**(3) One (1) mixer, constructed in 1998, identified as Mixer 3, with a capacity of 2,000 pounds, exhausting to the weigh hopper.**

**Insignificant Activities**

~~(g) Activities with emissions equal to or less than the following requirements: 25 lbs per day particulate matter, SO2, or NOX, 15 lbs per day VOC, or 3.29 lbs per day Pb, including:~~

~~(1) A raw material storage system consisting of three (3) flour storage silos which are filled pneumatically, each with a maximum capacity of 16,410 pounds per hour, using a pressure equalization bag at the top for product recovery. [326 IAC 6-3-2]~~

**(g) Activities with potential emissions within any of the following thresholds: equal to or less than 5 pounds per hour or 25 pounds per day $PM_{10}$, $SO_2$, or $NO_x$; equal to or less than 3 pounds per hour or 15 pounds per day VOC; equal to or less than 25 pounds per day CO; equal to or less than 0.6 tons per year or 3.29 pounds per day Pb; or greater than 1 pound per day but less than 5 pounds per day or 1 ton per year single HAP (and not regulated by a NESHAP):**

**(1) Two (2) indoor flour storage silos, installed in 1968 and permitted in 2012, identified as Silos1 and 2, each with a maximum capacity of 6,600 pounds per hour, each equipped with integral fabric bag filters for control of particulate matter emissions, exhausting inside. [326 IAC 6.5-1-2(a)]**

**(2) Three (3) outdoor flour storage silos, installed in 1974, identified as Silos 3, 4, and 5, each with a maximum capacity of 16,410 pounds per hour, each equipped with integral fabric bag filters for control of particulate matter emissions, exhausting to atmosphere. [326 IAC 6.5-1-2(a)]**

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

**D.3.1 Minor Limits for PSD and Nonattainment NSR [326 IAC 2-2] [326 IAC 2-1.1-5]**

**The PM, $PM_{10}$, and $PM_{2.5}$ emissions from the following operations shall not exceed the emission limits listed in the table below:**

| Emission Unit(s) | PM Limit (lb/hr) | $PM_{10}$ Limit (lb/hr) | $PM_{2.5}$ Limit (lb/hr) |
|---|---|---|---|
| Flour Silo (Silo 1) | 1.04 | 1.04 | 1.04 |
| Flour Silo (Silo 2) | 1.04 | 1.04 | 1.04 |
| Flour Silo (Silo 3) | 2.58 | 2.58 | 2.58 |
| Flour Silo (Silo 4) | 2.58 | 2.58 | 2.58 |
| Flour Silo (Silo 5) | 2.58 | 2.58 | 2.58 |

**Compliance with these limits, combined with the potential to emit PM, $PM_{10}$, and $PM_{2.5}$ from other emission units at the source, shall limit the PM and $PM_{10}$ emissions to less than 250 tons per twelve (12) consecutive month period, each, and the $PM_{2.5}$ emissions to less**

**than 100 tons per twelve (12) consecutive month period from the entire source. This shall render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.**

D.3.~~1~~**2** Particulate **Matter Limitations Except Lake County** ~~[326 IAC 6-3-2]~~ **[326 IAC 6.5-1-2(a)]**

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

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

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

**Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from each of the following facilities shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf):**

**Silo 1, Silo 2, Silo 3, Silo 4, Silo 5, Hopper 1A, Hopper 1B, Breaker 1, Mixer 1A, Mixer 1B, Hopper 3, Breaker 3, and Mixer 3.**

D.3.~~2~~**3** Preventative Maintenance Plan [326 IAC 2-7-5(~~13~~**12**)]

A Preventive Maintenance Plan~~, in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ 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.**

D.3.~~3~~**4** Particulate Control ~~[326 IAC 2-2]~~

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

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

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

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

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

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

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

This form consists of 2 pages Page 1 of 2

| |
|---|
| ☐ This is an emergency as defined in 326 IAC 2-7-1(12)<br>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and<br>• 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



| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N |
| Type of Pollutants Emitted: TSP, PM-10, $SO_2$, VOC, $NO_X$, CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# Compliance and Enforcement Branch

## Part 70 Quarterly Report

| | |
|---|---|
| Source Name: | Hartford Bakery, Inc. |
| Source Address: | 500 N. Fulton Avenue, Evansville, Indiana 47710 |
| ~~Mailing Address:~~ | ~~500 N. Fulton Avanue, Evansville, IN 47710~~ |
| Part 70 Permit No.: | T163-27317-00040 |
| Facility: | ~~One natural gas fired bun oven~~ **Bun Line (Line 3)** |
| Parameter: | Volatile Organic Compounds (VOC)~~, excluding emissions from natural gas combustion~~ **attributable to proofing and fermentation** |
| Limit: | ~~24.80~~ **46.7** tons per year, according to the equation: |

$$\mathbf{1.1} * \sum_{m=1}^{12}\left(\sum_{i=1}^{n}\frac{E_i * B_i}{2000\,lb/ton}\right)_m \leq \cancel{24.80} \text{ tons of VOC per 12 consecutive month period}$$

Where:

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

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

E = 0.95Y + 0.195ti - 0.51S - 0.86ts + 1.90

Where:

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

QUARTER: YEAR:

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance and Enforcement Branch
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

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

Months: _____ to: _____Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. **Proper notice submittal under Section B – Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C – General Reporting.** 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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

| | |
|---|---|
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |

| | |
|---|---|
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |

| | |
|---|---|
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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

## Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 163-31953-00040 and Significant Permit Modification No. 163-31955-00040. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

## IDEM Contact

(a) Questions regarding this proposed permit can be directed to John Haney 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) 234-5328 or toll free at 1-800-451-6027 extension 4-5328.

(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

**Appendix A: Emissions Calculations**
**Emissions Summary**

**Company Name:** Harford Bakery, Inc.
**Address City IN Zip:** 500 N. Fulton Avenue, Evansville, Indiana 47110
**Significant Source Modification No.:** 163-31953-00040
**Significant Permit Modification No.:** 163-31955-00040
**Permit Reviewer:** John Haney
**Date:** July 6, 2012

**UNCONTROLLED POTENTIAL TO EMIT (tons/yr)**

| Emission Units | | PM | $PM_{10}$ | $PM_{2.5}$ | $SO_2$ | $NO_x$ | VOC | CO | Single HAP (Acetaldehyde) | Total HAPs | GHGs (as $CO_2e$) |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Silo Loading | | 429.31 | 150.39 | 150.39 | 0 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 |
| Dry Ingredient Conveyance | Flour Silos | 429.31 | 150.39 | 150.39 | 0 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 |
| | Bread Line (Line 1) | 15.13 | 4.16 | 4.16 | 0 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 |
| | Bun Line (Line 3) | 5.88 | 1.62 | 1.62 | 0 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 |
| Bread Line (Line 1) | Proofing | 0 | 0 | 0 | 0 | 0 | 10.74 | 0 | 0.32 | 0.32 | 0 |
| | Fermentation | 0 | 0 | 0 | 0 | 0 | 107.43 | 0 | 3.22 | 3.22 | 0 |
| | Natural Gas Combustion | 0.06 | 0.23 | 0.23 | 0.02 | 3.01 | 0.17 | 2.52 | 0.00 | 0.06 | 3,629 |
| Bun Line (Line 3) | Proofing | 0 | 0 | 0 | 0 | 0 | 4.25 | 0 | 0.13 | 0.13 | 0 |
| | Fermentation | 0 | 0 | 0 | 0 | 0 | 42.54 | 0 | 1.28 | 1.28 | 0 |
| | Natural Gas Combustion | 0.05 | 0.21 | 0.21 | 0.02 | 2.71 | 0.15 | 2.27 | 0.00 | 0.05 | 3,266 |
| Insignificant Activities | | 0.04 | 0.17 | 0.17 | 0.01 | 2.30 | 0.13 | 1.93 | 0.00 | 0.04 | 2,774 |
| **PLANT-WIDE TOTAL** | | **879.78** | **307.17** | **307.17** | **0.05** | **8.01** | **165.41** | **6.73** | **4.95** | **5.10** | **9,669** |

**LIMITED POTENTIAL TO EMIT (tons/yr)**

| Emission Units | | PM | $PM_{10}$ | $PM_{2.5}$ | $SO_2$ | $NO_x$ | VOC | CO | Single HAP (Acetaldehyde) | Total HAPs | GHGs (as $CO_2e$) |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Silo Loading | | 42.93 | 42.93 | 42.93 | 0 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 |
| Dry Ingredient Conveyance | Flour Silos | 42.93 | 42.93 | 42.93 | 0 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 |
| | Bread Line (Line 1) | 15.13 | 4.16 | 4.16 | 0 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 |
| | Bun Line (Line 3) | 5.88 | 1.62 | 1.62 | 0 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 |
| Bread Line (Line 1) | Proofing | 0 | 0 | 0 | 0 | 0 | 10.74 | 0 | 0.32 | 0.32 | 0 |
| | Fermentation | 0 | 0 | 0 | 0 | 0 | 107.43 | 0 | 3.22 | 3.22 | 0 |
| | Natural Gas Combustion | 0.06 | 0.23 | 0.23 | 0.02 | 3.01 | 0.17 | 2.52 | 0.00 | 0.06 | 3,629 |
| Bun Line (Line 3) | Proofing | 0 | 0 | 0 | 0 | 0 | 46.7 | 0 | 0.13 | 0.13 | 0 |
| | Fermentation | 0 | 0 | 0 | 0 | 0 | | 0 | 1.28 | 1.28 | 0 |
| | Natural Gas Combustion | 0.05 | 0.21 | 0.21 | 0.02 | 2.71 | 0.15 | 2.27 | 0.00 | 0.05 | 3,266 |
| Insignificant Activities | | 0.04 | 0.17 | 0.17 | 0.01 | 2.30 | 0.13 | 1.93 | 0.00 | 0.04 | 2,774 |
| **PLANT-WIDE TOTAL** | | **107.03** | **92.25** | **92.25** | **0.05** | **8.01** | **165.32** | **6.73** | **4.95** | **5.10** | **9,669** |

**Appendix A: Emissions Calculations**
**Particulate Emissions from Silo Loading**

**Company Name: Harford Bakery, Inc.**
**Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 4711**
**Significant Source Modification No.: 163-31953-00040**
**Significant Permit Modification No.: 163-31955-00040**
**Permit Reviewer: John Haney**
**Date: July 6, 2012**

The following calculations determine the emissions from the pneumatic filling of the flour silos

**Control Device Efficiency:**
**Limited: 90%**
**Actual: 99%**

| Emission Unit | | Maximum Capacity | | Emission Factors | | | Uncontrolled | | | Controlled | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | PM | $PM_{10}$ | $PM_{2.5}$ | PM | $PM_{10}$ | $PM_{2.5}$ | PM | $PM_{10}$ | $PM_{2.5}$ |
| ID # | Description | lb/hr | tons/hr | lb/ton | lb/ton | lb/ton | tons/yr | tons/yr | tons/yr | tons/yr | tons/yr | tons/yr |
| Silo 3 | Flour Silo | 16,410 | 8.205 | 3.14 | 1.10 | 1.10 | 112.85 | 39.53 | 39.53 | 1.13 | 0.40 | 0.40 |
| Silo 4 | Flour Silo | 16,410 | 8.205 | 3.14 | 1.10 | 1.10 | 112.85 | 39.53 | 39.53 | 1.13 | 0.40 | 0.40 |
| Silo 5 | Flour Silo | 16,410 | 8.205 | 3.14 | 1.10 | 1.10 | 112.85 | 39.53 | 39.53 | 1.13 | 0.40 | 0.40 |
| | | | | | | **Emissions Before the Modification** | **338.54** | **118.60** | **118.60** | **3.39** | **1.19** | **1.19** |

| Emission Unit | | Maximum Capacity | | Emission Factors | | | Uncontrolled | | | Controlled | | | Limited | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | PM | $PM_{10}$ | $PM_{2.5}$ | PM | $PM_{10}$ | $PM_{2.5}$ | PM | $PM_{10}$ | $PM_{2.5}$ | PM | | $PM_{10}$ | | $PM_{2.5}$ | |
| ID # | Description | lb/hr | tons/hr | lb/ton | lb/ton | lb/ton | tons/yr | tons/yr | tons/yr | tons/yr | tons/yr | tons/yr | tons/yr | lb/hr | tons/yr | lb/hr | tons/yr | lb/hr |
| Silo 1 | Flour Silo | 6,600 | 3.300 | 3.14 | 1.10 | 1.10 | 45.39 | 15.90 | 15.90 | 0.45 | 0.16 | 0.16 | 4.54 | 1.04 | 4.54 | 1.04 | 4.54 | 1.04 |
| Silo 2 | Flour Silo | 6,600 | 3.300 | 3.14 | 1.10 | 1.10 | 45.39 | 15.90 | 15.90 | 0.45 | 0.16 | 0.16 | 4.54 | 1.04 | 4.54 | 1.04 | 4.54 | 1.04 |
| Silo 3 | Flour Silo | 16,410 | 8.205 | 3.14 | 1.10 | 1.10 | 112.85 | 39.53 | 39.53 | 1.13 | 0.40 | 0.40 | 11.28 | 2.58 | 11.28 | 2.58 | 11.28 | 2.58 |
| Silo 4 | Flour Silo | 16,410 | 8.205 | 3.14 | 1.10 | 1.10 | 112.85 | 39.53 | 39.53 | 1.13 | 0.40 | 0.40 | 11.28 | 2.58 | 11.28 | 2.58 | 11.28 | 2.58 |
| Silo 5 | Flour Silo | 16,410 | 8.205 | 3.14 | 1.10 | 1.10 | 112.85 | 39.53 | 39.53 | 1.13 | 0.40 | 0.40 | 11.28 | 2.58 | 11.28 | 2.58 | 11.28 | 2.58 |
| | | | | | | **Emissions After the Modification** | **429.31** | **150.39** | **150.39** | **4.29** | **1.50** | **1.50** | **42.93** | **9.80** | **42.93** | **9.80** | **42.93** | **9.80** |

| | | | | | | |
|---|---|---|---|---|---|---|
| **Emissions Due to Unaccounted Emission Units (Silos 1,2** | **90.77** | **31.80** | **31.80** | **0.91** | **0.32** | **0.32** |
| **Emissions Increase Due to the Modification (Silos 3,4,5** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

**Notes:**
Each silo is bottlenecked by the amount of dry ingredient that can be conveyed pneumatically out of the silo. This is the maximum capacity of the silo for purposes of determining compliance with 326 IAC 2-
The emission factors are from AP-42, Ch. 11.12, Table 11.12-2 for cement unloading (SCC# 3-05-011-17)
$PM_{2.5}$ has been assumed to be equal to $PM_{10}$.

**Methodology:**
Maximum Capacity (tons/hr) = Maximum Capacity (lb/hr) ÷ 2000 lb/ton
Uncontrolled Emissions (tons/yr) = Maximum Capacity (tons/hr) * Emission Factor (lb/ton) * 8760 hr/yr ÷ 2000 lb/tor
Limited PM/$PM_{2.5}$ Emissions (tons/yr) = Uncontrolled PM Emissions (tons/yr) * ( 1 - Limited Control Efficiency)
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) * ( 1 - Actual Control Efficiency)
Emissions Increase Due to the Modification = Emissions After the Modification - Emissions Before the Modificatior

**Appendix A: Emissions Calculations**
**Particulate Emissions from Dry/Mixed Ingredient Conveyance**

**Company Name: Harford Bakery, Inc.**
**Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 4711**
**Significant Source Modification No.: 163-31953-00040**
**Significant Permit Modification No.: 163-31955-00040**
**Permit Reviewer: John Haney**
**Date: July 6, 2012**

The following calculations determine the emissions from the pneumatic conveyance of the flour to various emission units

**Control Device Efficiency:**
**Limited: 90%**
**Actual: 99%**

| Emission Unit | | Maximum Capacity | | Emission Factors | | | Uncontrolled | | | Controlled | | | Limited | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | PM | $PM_{10}$ | $PM_{2.5}$ | PM | $PM_{10}$ | $PM_{2.5}$ | PM | $PM_{10}$ | $PM_{2.5}$ | PM | | $PM_{10}$ | | $PM_{2.5}$ | |
| ID # | Description | lb/hr | tons/hr | lb/ton | lb/ton | lb/ton | tons/yr | tons/yr | tons/yr | tons/yr | tons/yr | tons/yr | tons/yr | lb/hr | tons/yr | lb/hr | tons/yr | lb/hr |
| Silo 1 | Flour Silo | 6,600 | 3.300 | 3.14 | 1.10 | 1.10 | 45.39 | 15.90 | 15.90 | 0.45 | 0.16 | 0.16 | 4.54 | 1.04 | 4.54 | 1.04 | 4.54 | 1.04 |
| Silo 2 | Flour Silo | 6,600 | 3.300 | 3.14 | 1.10 | 1.10 | 45.39 | 15.90 | 15.90 | 0.45 | 0.16 | 0.16 | 4.54 | 1.04 | 4.54 | 1.04 | 4.54 | 1.04 |
| Silo 3 | Flour Silo | 16,410 | 8.205 | 3.14 | 1.10 | 1.10 | 112.85 | 39.53 | 39.53 | 1.13 | 0.40 | 0.40 | 11.28 | 2.58 | 11.28 | 2.58 | 11.28 | 2.58 |
| Silo 4 | Flour Silo | 16,410 | 8.205 | 3.14 | 1.10 | 1.10 | 112.85 | 39.53 | 39.53 | 1.13 | 0.40 | 0.40 | 11.28 | 2.58 | 11.28 | 2.58 | 11.28 | 2.58 |
| Silo 5 | Flour Silo | 16,410 | 8.205 | 3.14 | 1.10 | 1.10 | 112.85 | 39.53 | 39.53 | 1.13 | 0.40 | 0.40 | 11.28 | 2.58 | 11.28 | 2.58 | 11.28 | 2.58 |
| Hopper 1A | Weigh Hopper | 4,200 | 2.100 | 0.0048 | 0.0028 | 0.0028 | 0.04 | 0.03 | 0.03 | 0.0004 | 0.0003 | 0.0003 | n/a | n/a | n/a | n/a | n/a | n/a |
| Hopper 1B | Weigh Hopper | 4,200 | 2.100 | 0.0048 | 0.0028 | 0.0028 | 0.04 | 0.03 | 0.03 | 0.0004 | 0.0003 | 0.0003 | | | | | | |
| Breaker 1 | Bag Breaker | 1,200 | 0.600 | 0.0048 | 0.0028 | 0.0028 | 0.01 | 0.007 | 0.007 | 0.0001 | 0.0001 | 0.0001 | | | | | | |
| Mixer 1A | Mixer | 6,000 | 3.000 | 0.572 | 0.156 | 0.156 | 7.52 | 2.05 | 2.05 | 0.08 | 0.02 | 0.02 | | | | | | |
| Mixer 1B | Mixer | 6,000 | 3.000 | 0.572 | 0.156 | 0.156 | 7.52 | 2.05 | 2.05 | 0.08 | 0.02 | 0.02 | | | | | | |
| Hopper 3 | Weigh Hopper | 3,360 | 1.680 | 0.0048 | 0.0028 | 0.0028 | 0.04 | 0.02 | 0.02 | 0.0004 | 0.0002 | 0.0002 | n/a | n/a | n/a | n/a | n/a | n/a |
| Breaker 3 | Bag Breaker | 1,200 | 0.600 | 0.0048 | 0.0028 | 0.0028 | 0.01 | 0.007 | 0.007 | 0.0001 | 0.0001 | 0.0001 | | | | | | |
| Mixer 3 | Mixer | 4,657 | 2.329 | 0.572 | 0.156 | 0.156 | 5.83 | 1.59 | 1.59 | 0.06 | 0.02 | 0.02 | | | | | | |
| | | | | | | **Emissions After the Modification** | **450.32** | **156.17** | **156.17** | **4.50** | **1.56** | **1.56** | **42.93** | **9.80** | **42.93** | **9.80** | **42.93** | **9.80** |

| | | | | | | |
|---|---|---|---|---|---|---|
| **Emissions Due to Unaccounted Emission Units for Raw Material Handling (Silos 1,2** | **90.77** | **31.80** | **31.80** | **0.91** | **0.32** | **0.32** |
| **Emissions Increase Due to the Modification for Raw Material Handling (Silos 3,4,5** | **338.54** | **118.60** | **118.60** | **3.39** | **1.19** | **1.19** |
| **Emissions Due to Unaccounted Emission Units for Line 1 (2 Hoppers, 1 Breaker, and 2 Mixers** | **15.13** | **4.16** | **4.16** | | | |
| **Emissions Due to Unaccounted Emission Units for Line 3 (1 Hopper, 1 Breaker, and 1 Mixer** | **5.88** | **1.62** | **1.62** | | | |

**Notes:**
Each silo is bottlenecked by the amount of dry ingredient that can be conveyed pneumatically from the silo. This is the maximum capacity used for purposes of determining compliance with 326 IAC 2-
The emission factors are from AP-42, Ch. 11.12, Table 11.12-2 (February 2011 revisions) for cement unloading (SCC# 3-05-011-17), hopper loading (SCC# 3-05-011-08), and mixer loading (SCC# 3-05-011-09
$PM_{2.5}$ has been assumed to be equal to $PM_{10}$.
Actual emissions based on 6864 actual hours of operation per year (5.5 day/wk * 24 hr/day * 52 weeks/yr)

**Methodology:**
Maximum Capacity (tons/hr) = Maximum Capacity (lb/hr) ÷ 2000 lb/ton
Uncontrolled Emissions (tons/yr) = Maximum Capacity (tons/hr) * Emission Factor (lb/ton) * 8760 hr/yr ÷ 2000 lb/tor
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) * ( 1 - Actual Control Efficiency)
Emissions Increase Due to the Modification = Emissions After the Modification - Emissions Before the Modificatior
Emissions Due to New Emission Units = Emissions After the Modification - Emissions Before the Modificatior

**Appendix A: Emissions Calculations**
**VOC Emissions from Fermentation**
**(Released at the Oven)**

**Company Name: Harford Bakery, Inc.**
**Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110**
**Significant Source Modification No.: 163-31953-00040**
**Significant Permit Modification No.: 163-31955-00040**
**Permit Reviewer: John Haney**
**Date: July 6, 2012**

| | | | | AP-42, Section 9.9.6 Equation Values | | | | Emission Factor | Potential Emissions | |
|---|---|---|---|---|---|---|---|---|---|---|
| Production Line | Product | Maximum Capacity (lb/hr) | Maximum Throughput (tons/yr) | Initial Baker's % Yeast | Yeast Action Time (hours) | Final (Spike) Baker's % Yeast | Spike Time (hours) | VOC (lb/ton) | VOC (tons/yr) | Acetaldehyde (tons/yr) |
| Line 1 | bread | 12,000 | 52,560.00 | 3.6 | 2.8 | 1.8 | 1.0 | 4.09 | 107.43 | 3.22 |
| Line 3 | buns | 4,657 | 20,397.66 | 3.6 | 2.8 | 1.3 | 1.2 | 4.17 | 42.54 | 1.28 |

**Methodology:**
Maximum Throughput (tons/yr) = Maximum Capacity (lb/hr) * 8760 hr/yr ÷ 2000 lb/ton
Potential Emissions (tons/yr) = Maximum Throughput (tons/yr) * Emission Factor (lb/ton) ÷ 2000 lb/ton

The process VOC emission calculations for the dough fermentation are based upon the following EPA recommended bakery oven emissions:
AP-42 Section 9.9.6

$$VOC = 0.95Yi + 0.195ti - 0.51S - 0.86ts + 1.90$$

where:
Yi = initial baker's percent of yeast to the nearest tenth
ti = total yeast action time in hours to the nearest tenth
S = final (spike) baker's percent of yeast to the nearest tenth
ts = spiking time in hours to the nearest tenth

The equation values for both production lines have been rounded to the nearest tenth.
The equation values for the bread production line (Line 1) are from the Technical Support Document (TSD) for Operating Permit Renewal No. T163-27317-00040.
The equation values for the bun production line (Line 1) are for the production of its highest-emitting product, as supplied by the source.

VOCs emitted during fermentation (leavening) are 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

**Appendix A: Emissions Calculations**
**VOC and HAP Emissions**
**Proof Boxes**

**Company Name:** **Harford Bakery, Inc.**
**Address City IN Zip:** **500 N. Fulton Avenue, Evansville, Indiana 47110**
**Significant Source Modification No.:** **163-31953-00040**
**Significant Permit Modification No.:** **163-31955-00040**
**Permit Reviewer:** **John Haney**
**Date:** **July 6, 2012**

| Production Line | Product | Emission Unit | Uncontrolled Potential VOC from Fermentation (tons/year) | Uncontrolled Potential VOC from Proofing (tons/year) | Uncontrolled Potential Acetaldehyde from Proofing (tons/year) | | Limited VOC Emissions from Fermentation and Proofing (tons/year) |
|---|---|---|---|---|---|---|---|
| Line 1 | bread | proof box | 107.43 | 10.74 | 0.32 | | n/a |
| Line 3 | buns | proof box | 42.54 | 4.25 | 0.13 | | 46.7 |
| **TOTAL** | | | | **15.00** | **0.45** | | |

**Notes:**
VOC emissions from proofing shall be assumed to be 10% of the emissions calculated for fermentation based on the following document:
"Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017. December 1992)
VOCs emitted during fermentation (leavening) are 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

**Methodology:**
VOC Emissions from Proofing (tons/yr) = 0.10 * Fermentation Emissions (tons/yr)
Acetaldehyde Emissions from Proofing (tons/yr) = 0.03 * VOC Emissions from Proofing (tons/yr)

**Appendix A: Emissions Calculations**
**Natural Gas Combustion Only**
**MMBtu/hr <100**
**Bread Oven (Line 1)**

**Company Name: Harford Bakery, Inc.**
**Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110**
**Significant Source Modification No.: 163-31953-00040**
**Significant Permit Modification No.: 163-31955-00040**
**Permit Reviewer: John Haney**
**Date: July 6, 2012**

| Maximum Heat Input Capacity (MMBtu/hr) | HHV MMBtu/MMscf | Potential Throughput (MMcf/yr) |
|---|---|---|
| 7.0 | 1020 | 60.12 |

| | Pollutant | | | | | | |
|---|---|---|---|---|---|---|---|
| | PM* | $PM_{10}$* | direct $PM_{2.5}$* | $SO_2$ | $NO_x$ | VOC | CO |
| Emission Factor (lb/MMcf) | 1.9 | 7.6 | 7.6 | 0.6 | 100 **see below | 5.5 | 84 |
| Potential Emissions (tons/yr) | 0.06 | 0.23 | 0.23 | 0.02 | 3.01 | 0.17 | 2.52 |

* PM emission factor is filterable PM only. $PM_{10}$ emission factor is filterable and condensable $PM_{10}$ combined.
$PM_{2.5}$ emission factor is filterable and condensable $PM_{2.5}$ combined.
** Emission factors for $NO_x$: Uncontrolled = 100, Low $NO_x$ Burner = 50, Low $NO_x$ 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/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr ÷ HHV (MMBtu/MMscf)
Potential Emissions (tons/yr) = Potential Throughput (MMcf/yr) x Emission Factor (lb/MMcf) ÷ 2,000 lb/ton
See page 7 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**
**Natural Gas Combustion Only**
**MMBtu/hr <100**
**Bread Oven (Line 1)**
**HAPs Emissions**

**Company Name: Harford Bakery, Inc.**
**Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110**
**Significant Source Modification No.: 163-31953-00040**
**Significant Permit Modification No.: 163-31955-00040**
**Permit Reviewer: John Haney**
**Date: July 6, 2012**

| | HAPs - Organics | | | | |
|---|---|---|---|---|---|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| Emission Factor (lb/MMcf) | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emissions (tons/yr) | 6.312E-05 | 3.607E-05 | 2.254E-03 | 5.411E-02 | 1.022E-04 |

| | HAPs - Metals | | | | |
|---|---|---|---|---|---|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| Emission Factor (lb/MMcf) | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emissions (tons/yr) | 1.503E-05 | 3.306E-05 | 4.208E-05 | 1.142E-05 | 6.312E-05 |
| | | | | **TOTAL HAPs** | **5.673E-02** |

**Methodology:**
Methodology is the same as page 6.
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See page 8 for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations**
**Natural Gas Combustion Only**
**MMBtu/hr <100**
**Bread Oven (Line 1)**
**Greenhouse Gas Emissions**

**Company Name: Harford Bakery, Inc.**
**Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110**
**Significant Source Modification No.: 163-31953-00040**
**Significant Permit Modification No.: 163-31955-00040**
**Permit Reviewer: John Haney**
**Date: July 6, 2012**

| | Greenhouse Gas | | |
|---|---|---|---|
| | $CO_2$ | $CH_4$ | $N_2O$ |
| Emission Factor (lb/MMcf) | 120,000 | 2.3 | 2.2 |
| Potential Emissions (tons/yr) | 3,607 | 0.1 | 0.1 |
| Summed Potential Emissions (tons/yr) | 3,607 | | |
| $CO_2e$ Total (tons/yr) | 3,629 | | |

**Notes:**
The $N_2O$ emission factor for uncontrolled is 2.2. The $N_2O$ emission factor for low $NO_x$ burner is 0.64.
The 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.
The Greenhouse Warming Potentials (GWP) are from Table A-1 of 40 CFR Part 98 Subpart A.

**Methodology:**
Potential Emissions (tons/yr) = Potential Throughput (MMcf/yr) x Emission Factor (lb/MMcf) ÷ 2,000 lb/ton
$CO_2e$ (tons/yr) = [ $CO_2$ Potential Emissions (tons/yr) * $CO_2$ GWP (1) ] + [ $CH_4$ Potential Emissions (tons/yr) * $CH_4$ GWP (21) ] +
[ $N_2O$ Potential Emissions (tons/yr) * $N_2O$ GWP (310) ]

**Appendix A: Emissions Calculations**
**Natural Gas Combustion Only**
**MMBtu/hr <100**
**Bun Oven (Line 3)**

**Company Name: Harford Bakery, Inc.**
**Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110**
**Significant Source Modification No.: 163-31953-00040**
**Significant Permit Modification No.: 163-31955-00040**
**Permit Reviewer: John Haney**
**Date: July 6, 2012**

| Maximum Heat Input Capacity (MMBtu/hr) | HHV MMBtu/MMscf | Potential Throughput (MMcf/yr) |
|---|---|---|
| 6.3 | 1020 | 54.11 |

| | Pollutant | | | | | | |
|---|---|---|---|---|---|---|---|
| | PM* | $PM_{10}$* | direct $PM_{2.5}$* | $SO_2$ | $NO_x$ | VOC | CO |
| Emission Factor (lb/MMcf) | 1.9 | 7.6 | 7.6 | 0.6 | 100 **see below | 5.5 | 84 |
| Potential Emissions (tons/yr) | 0.05 | 0.21 | 0.21 | 0.02 | 2.71 | 0.15 | 2.27 |

* PM emission factor is filterable PM only. $PM_{10}$ emission factor is filterable and condensable $PM_{10}$ combined.
$PM_{2.5}$ emission factor is filterable and condensable $PM_{2.5}$ combined.
** Emission factors for $NO_x$: Uncontrolled = 100, Low $NO_x$ Burner = 50, Low $NO_x$ 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/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr ÷ HHV (MMBtu/MMscf)
Potential Emissions (tons/yr) = Potential Throughput (MMcf/yr) x Emission Factor (lb/MMcf) ÷ 2,000 lb/ton
See page 10 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**
**Natural Gas Combustion Only**
**MMBtu/hr <100**
**Bun Oven (Line 3)**
**HAPs Emissions**

**Company Name: Harford Bakery, Inc.**
**Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110**
**Significant Source Modification No.: 163-31953-00040**
**Significant Permit Modification No.: 163-31955-00040**
**Permit Reviewer: John Haney**
**Date: July 6, 2012**

| | HAPs - Organics | | | | |
|---|---|---|---|---|---|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| Emission Factor (lb/MMcf) | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emissions (tons/yr) | 5.681E-05 | 3.246E-05 | 2.029E-03 | 4.870E-02 | 9.198E-05 |

| | HAPs - Metals | | | | |
|---|---|---|---|---|---|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| Emission Factor (lb/MMcf) | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emissions (tons/yr) | 1.353E-05 | 2.976E-05 | 3.787E-05 | 1.028E-05 | 5.681E-05 |
| | | | | **TOTAL HAPs** | **5.105E-02** |

**Methodology:**
Methodology is the same as page 9.
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See page 11 for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations**
**Natural Gas Combustion Only**
**MMBtu/hr <100**
**Bun Oven (Line 3)**
**Greenhouse Gas Emissions**

**Company Name: Harford Bakery, Inc.**
**Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110**
**Significant Source Modification No.: 163-31953-00040**
**Significant Permit Modification No.: 163-31955-00040**
**Permit Reviewer: John Haney**
**Date: July 6, 2012**

| | Greenhouse Gas | | |
|---|---|---|---|
| | $CO_2$ | $CH_4$ | $N_2O$ |
| Emission Factor (lb/MMcf) | 120,000 | 2.3 | 2.2 |
| Potential Emissions (tons/yr) | 3,246 | 0.1 | 0.1 |
| Summed Potential Emissions (tons/yr) | 3,246 | | |
| $CO_2e$ Total (tons/yr) | 3,266 | | |

**Notes:**
The $N_2O$ emission factor for uncontrolled is 2.2. The $N_2O$ emission factor for low $NO_x$ burner is 0.64.
The 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.
The Greenhouse Warming Potentials (GWP) are from Table A-1 of 40 CFR Part 98 Subpart A.

**Methodology:**
Potential Emissions (tons/yr) = Potential Throughput (MMcf/yr) x Emission Factor (lb/MMcf) ÷ 2,000 lb/ton
$CO_2e$ (tons/yr) = [ $CO_2$ Potential Emissions (tons/yr) * $CO_2$ GWP (1) ] + [ $CH_4$ Potential Emissions (tons/yr) * $CH_4$ GWP (21) ] +
[ $N_2O$ Potential Emissions (tons/yr) * $N_2O$ GWP (310) ]

**Appendix A: Emissions Calculations**
**Natural Gas Combustion Only**
**MMBtu/hr <100**
**Insignificant Activities**

**Company Name: Harford Bakery, Inc.**
**Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110**
**Significant Source Modification No.: 163-31953-00040**
**Significant Permit Modification No.: 163-31955-00040**
**Permit Reviewer: John Haney**
**Date: July 6, 2012**

| Maximum Heat Input Capacity (MMBtu/hr) | HHV MMBtu/MMscf | Potential Throughput MMCF/yr |
|---|---|---|
| 5.35 | 1020 | 45.95 |

| | Pollutant | | | | | | |
|---|---|---|---|---|---|---|---|
| | PM* | $PM_{10}$* | direct $PM_{2.5}$* | $SO_2$ | $NO_x$ | VOC | CO |
| Emission Factor (lb/MMcf) | 1.9 | 7.6 | 7.6 | 0.6 | 100 **see below | 5.5 | 84 |
| Potential Emissions (tons/yr) | 0.04 | 0.17 | 0.17 | 0.01 | 2.30 | 0.13 | 1.93 |

* PM emission factor is filterable PM only. $PM_{10}$ emission factor is filterable and condensable $PM_{10}$ combined.
$PM_{2.5}$ emission factor is filterable and condensable $PM_{2.5}$ combined.
** Emission factors for $NO_x$: Uncontrolled = 100, Low $NO_x$ Burner = 50, Low $NO_x$ 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/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr ÷ HHV (MMBtu/MMscf)
Potential Emissions (tons/yr) = Potential Throughput (MMcf/yr) x Emission Factor (lb/MMcf) ÷ 2,000 lb/ton
See page 13 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**
**Natural Gas Combustion Only**
**MMBtu/hr <100**
**Insignificant Activities**
**HAPs Emissions**

**Company Name: Harford Bakery, Inc.**
**Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110**
**Significant Source Modification No.: 163-31953-00040**
**Significant Permit Modification No.: 163-31955-00040**
**Permit Reviewer: John Haney**
**Date: July 6, 2012**

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

| | HAPs - Metals | | | | |
|---|---|---|---|---|---|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| Emission Factor (lb/MMcf) | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emissions (tons/yr) | 1.149E-05 | 2.527E-05 | 3.216E-05 | 8.730E-06 | 4.824E-05 |
| | | | | **TOTAL HAPs** | **4.336E-02** |

Methodology is the same as page 12.
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
See page 14 for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations**
**Natural Gas Combustion Only**
**MMBtu/hr <100**
**Insignificant Activities**
**Greenhouse Gas Emissions**

**Company Name: Harford Bakery, Inc.**
**Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110**
**Significant Source Modification No.: 163-31953-00040**
**Significant Permit Modification No.: 163-31955-00040**
**Permit Reviewer: John Haney**
**Date: July 6, 2012**

| | Greenhouse Gas | | |
|---|---|---|---|
| | $CO_2$ | $CH_4$ | $N_2O$ |
| Emission Factor (lb/MMcf) | 120,000 | 2.3 | 2.2 |
| Potential Emissions (tons/yr) | 2,757 | 0.1 | 0.1 |
| Summed Potential Emissions (tons/yr) | 2,757 | | |
| $CO_2e$ Total (tons/yr) | 2,774 | | |

**Notes:**
The $N_2O$ emission factor for uncontrolled is 2.2. The $N_2O$ emission factor for low $NO_x$ burner is 0.64.
The 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.
The Greenhouse Warming Potentials (GWP) are from Table A-1 of 40 CFR Part 98 Subpart A.

**Methodology:**
Potential Emissions (tons/yr) = Potential Throughput (MMcf/yr) x Emission Factor (lb/MMcf) ÷ 2,000 lb/ton
$CO_2e$ (tons/yr) = [ $CO_2$ Potential Emissions (tons/yr) * $CO_2$ GWP (1) ] + [ $CH_4$ Potential Emissions (tons/yr) * $CH_4$ GWP (21) ] +
[ $N_2O$ Potential Emissions (tons/yr) * $N_2O$ GWP (310) ]

# Indiana Department of Environmental Management
# Office of Air Quality

## Appendix B
## Best Available Control Technology (BACT) Analysis Determination

**Source Background and Description**

| | |
|---|---|
| Source Name: | Hartford Bakery, Inc. |
| Source Location: | 500 N. Fulton Avenue, Evansville, IN 47710 |
| County: | Vanderburgh |
| SIC Code: | 2051 |
| Operation Permit No.: | T163-27317-00040 |
| Operation Permit Issuance Date: | April 17, 2009 |
| Significant Source Modification No.: | 163-31953-00040 |
| Significant Permit Modification No.: | 163-31955-00040 |
| Permit Reviewer: | John Haney |

**Background Information**

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) has performed the following Best Available Control Technology (BACT) review for the existing commercial bakery operation of Hartford Bakery, Inc. (Hartford) located at 500 N. Fulton Avenue, Evansville, Indiana 47110. The following emission units each have potential emissions of volatile organic compounds (VOCs) of twenty-five (25) tons or more per year. Pursuant to the provisions of 326 IAC 8-1-6, Best Available Control Technology analyses for VOC were performed for these units:

(e) One (1) bun production line, identified as Line 3, with a maximum production rate of 4,657 pounds per hour, consisting of the following:

(1) One (1) proof box, identified as Proof3-2, constructed in 1998.

(2) One (1) natural gas-fired oven, identified as Oven3, constructed in 1998, with a maximum heat input capacity of 6.3 MMBtu per hour, exhausting to Stacks 3 and 4.

Note: The entire production line is considered one facility for evaluation of 326 IAC 8-1-6.

IDEM, OAQ is performing an evaluation pursuant to the 326 IAC 8-1-6 for the existing bun production line, based on the following:

(a) Pursuant to CP 163-9331-00040, issued on May 4, 1998, Hartford constructed the bun oven and a limit of 24 tons of VOC per twelve (12) consecutive month period was established for the oven to avoid the requirements of 326 IAC 8-1-6.

(b) After the issuance of Significant Permit Modification No. 063-27910-00040 on July 29, 2009, the 326 IAC 8-1-6 avoidance limit for the oven was increased to 24.80 tons per twelve (12) consecutive month period.

(c) On January 20, 2010, a representative of IDEM, OAQ conducted an inspection of the source. On March 2, 2010, IDEM issued a Notice of Violation (NOV) letter to Hartford citing the source for an exceedance of the 24 tons per year emission limit for the Bun Oven that was contained in Operating Permit Renewal No. T163-17548-00040 (issued on October 8, 2004) and Operating Permit Renewal No. T163-27317-00040 (issued on April 17, 2009). The exceedance occurred between the time period of January, 2009 and June, 2009.

(d) IDEM, OAQ has recently been incorporating the previously unaccounted VOC emissions from proof boxes into a facility's potential to emit summary and considering a proof box and oven to be one facility.

(e) Hartford has previously submitted quarterly reporting for its bun production line which shows Line 3 has had actual emissions greater than 22.592 tons of VOC for the entire facility. With the inclusion of the emissions from the proof box (Proof3-2) and natural gas combustion, Line 3 has had actual emissions greater than 25 tons of VOC for the entire Line 3 facility, showing additional noncompliance with 326 IAC 8-1-6 beyond what was stated in the March 2, 2010 NOV letter.

IDEM, OAQ conducts BACT analyses in accordance with the *"Top-Down" Best Available Control Technology Guidance Document* outlined in the 1990 draft U.S. EPA *New Source Review Workshop Manual*, which outlines the steps for conducting a top-down BACT analysis. Those steps are listed below.

(1) Identify all potentially available control options;

(2) Eliminate technically infeasible control options;

(3) Rank remaining control technologies;

(4) Evaluate the most effective controls and document the results; and

(5) Select BACT.

Also in accordance with the *"Top-Down" Best Available Control Technology Guidance Document* outlined in the 1990 draft U.S. EPA *New Source Review Workshop Manual*, BACT analyses take into account the energy, environmental, and economic impacts of the control options. Emission reductions may be determined through the application of available control techniques, process design, and/or operational limitations. Such reductions are necessary to demonstrate that the emissions remaining after application of BACT will not cause adverse environmental effects to public health and the environment.

## VOC BACT Analysis

Step One: Identify All Potentially Available Control Technologies

Based on the information reviewed for this BACT determination, the following potentially available control technologies were identified for controlling VOC emissions, which are emitted in the form of ethanol, from the baking line:

(a) Catalytic Oxidizer:

Catalytic oxidation is the process of oxidizing organic contaminants in a waste gas stream within a heated chamber containing a catalyst bed in the presence of oxygen for sufficient time to completely oxidize the organic contaminants to carbon dioxide and water. The catalyst is used to lower the activation energy of the oxidation reaction. The residence time, temperature, flow velocity and mixing, the oxygen concentration, and type of catalyst used in the combustion chamber affect the oxidation rate and destruction efficiency. Catalytic oxidizers typically require combustion of an auxiliary fuel (e.g., natural gas) to maintain combustion chamber temperature

high enough to completely oxidize the contaminant gases. Catalytic oxidizers operate at lower temperatures and require less fuel than thermal oxidizers, they have a smaller footprint, and they need little or no insulation. Catalytic oxidizers are typically designed to have a residence time of 0.5 seconds or less and combustion chamber temperatures between 600 and 1,200°F. The types of catalysts used include platinum, platinum alloys, copper chromate, copper oxide, chromium, manganese, and nickel. These catalysts are deposited in thin layers on an inert substrate, usually a honeycomb shaped ceramic.

The two types of catalytic oxidation systems include recuperative and regenerative catalytic oxidizers, which are differentiated by the type of heat recovery equipment used. In a recuperative catalytic oxidizer, the waste gas stream is preheated using the heat content of the treated gas stream, resulting in improved oxidizer efficiency and significant fuel cost savings. In a regenerative thermal oxidizer, a high-density media such as a packed ceramic bed, which was heated in a previous cycle, is used to preheat the incoming waste gas stream, resulting in improved oxidizer efficiency and significant fuel cost savings. VOC destruction efficiencies greater than 98% are achievable under certain operating conditions (EPA-453/R-92-017). However, based on the information reviewed for this BACT determination, a VOC destruction efficiency of 95% or a VOC outlet concentration of 10 ppmv or less is achievable on a consistent basis under normal operational conditions for a typical bread baking operation.

(b) Thermal Oxidizer:

Thermal oxidation is the process of oxidizing organic contaminants in a waste gas stream by raising the temperature above the auto-ignition point in the presence of oxygen for sufficient time to completely oxidize the organic contaminants to carbon dioxide and water. The residence time, temperature, flow velocity and mixing, and the oxygen concentration in the combustion chamber affect the oxidation rate and destruction efficiency. Thermal oxidizers typically require combustion of an auxiliary fuel (e.g., natural gas) to maintain combustion chamber temperature high enough to completely oxidize the contaminant gases. Thermal oxidizers are typically designed to have a residence time of one second or less and combustion chamber temperatures between 1,200 and 2,000°F.

The three types of thermal oxidation systems include direct flame, recuperative, and regenerative thermal oxidizers, which are differentiated by the type of heat recovery equipment used. A direct flame thermal oxidizer consists of only a combustion chamber with no heat recovery equipment. In a recuperative thermal oxidizer, the waste gas stream is preheated using the heat content of the treated gas stream, resulting in improved oxidizer efficiency and significant fuel cost savings. In a regenerative thermal oxidizer, a high-density media such as a packed ceramic bed, which was heated in a previous cycle, is used to preheat the incoming waste gas stream, resulting in improved oxidizer efficiency and significant fuel cost savings. In general, thermal oxidizers are less efficient at treating waste gas streams with highly variable flow rates since the variable flow rate results in varying residence times, combustion chamber temperature, and poor mixing. VOC destruction efficiencies greater than 98% are achievable under certain operating conditions (EPA-453/R-92-017). However, a VOC destruction efficiency of 95% is achievable on a consistent basis under normal operational conditions for a typical bakery operation.

(c) Wet Packed Bed Scrubber:

A wet packed bed scrubber is an absorption system in which a waste gas stream is interacted with a scrubbing liquid inside a contact chamber containing a bed of packing media in order to strip contaminant gases from the waste gas stream through the process of dissolution. Water is the most commonly used scrubbing liquid. Other solvents may be used depending on the components of the waste gas stream. Based on information reviewed for this BACT determination, a VOC destruction efficiency of 81% is achievable on a consistent basis under normal operational conditions for a typical bakery operation.

(d) Biofiltration:

Biofiltration is a process in which a waste gas stream is passed through a bed of peat, compost, bark, soil, gravel, or other inorganic media in order to strip organic contaminant gases from the waste gas stream through the process of dissolution in the bed moisture and adsorption to the bed media. Under aerobic conditions, microorganisms naturally present in the bed oxidize the organic contaminant gases within the bed to carbon dioxide, water, and additional biomass through metabolic processes. If the temperature of the waste gas stream is too high, the gas stream must be cooled to an optimum temperature before it can be treated in the biofilter in order to maintain the viability of the microorganisms. In addition, the bed must be monitored and maintained at an optimum moisture content and pH in order to prevent cracking of the bed media and to maintain the viability of the microorganisms.

(e) Carbon Adsorption Unit:

Carbon adsorption is a process by which VOC is retained on a granular carbon surface, which is highly porous and has a very large surface-to-volume ratio. Carbon adsorption systems can operate in two phases: adsorption and desorption. Adsorption is rapid and removes most of the VOCs in the stream. Eventually, the adsorbent becomes saturated with the vapors and the system's efficiency drops. The adsorbent must be regenerated or replaced soon after efficiency begins to decline. In regenerative systems, the adsorbent is reactivated with steam or hot air in order to desorb the absorbate (VOC vapors) from the adsorbent, and the adsorbate and regenerated absorbent can be recovered for reuse or disposal. Non-regenerative systems require the removal of the spent adsorbent and replacement with fresh adsorbent.

(6) Condensation Unit:

Condensation is the process by which the temperature of the waste gas stream is lowered to below the dew points of the contaminants gases in waste gas. A refrigeration condenser normally provides VOC control efficiency greater than 90%.

<u>Step Two: Eliminate Technically Infeasible Control Options</u>

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of carbon adsorption, condensation, and biofiltration systems are not technically feasible options for this source for the following reasons:

(a) Based on the information reviewed for this BACT determination, the use of a biofiltration system is infeasible because the high temperature exhaust stream from the oven would inhibit microbiological activities. The outlet temperature of the ovens would exceed those in the required temperature range for mesophilic bacteria (nominally less than 106° F) and would kill off the microbes. Additionally, during the periods that the oven is shut-down for normal cleaning operations, the biofiltration system would have to be artificially fed in order to maintain system acclimation. Therefore, this technology is not technically feasible, and no further evaluation will be made.

(b) Based on the information reviewed for this BACT determination, the use of carbon adsorption is infeasible because fats and oils in the oven exhaust clog carbon pores. In addition, the ethanol is difficult to strip from the carbon. Therefore, this technology is not technically feasible, and no further evaluation will be made.

(c) Based on the information reviewed for this BACT determination, the condensation method is infeasible because of the low VOC concentrations and high air flows, temperatures, and moisture content in the oven exhaust. In addition, the fats and oils contained in the exhaust reduce the control efficiency and create sanitation concerns. Therefore, this technology is not technically feasible, and no further evaluation will be made.

The following table summarizes other BACT determinations at similar sources or for similar processes that were identified in the EPA's RACT/BACT/LAER Clearinghouse (RBLC) under Process Type Code 70.550 (Bakeries and Snack Food), as well as IDEM, OAQ permits issued to date. The BACT determinations are arranged in descending order in terms of issuance date.

Note: Sources that took limits to render 326 IAC 8-1-6 not applicable are not included in this list.

| Company/ Location | Year Issued | Process Description | Control Device | BACT Emission Limits/Requirements | Reference |
|---|---|---|---|---|---|
| Maplehurst Bakeries, Inc.<br><br>Brownsburg, IN | 2012 | Donut Fryer 6 (Donut Production Line - Moline VI) | None | VOC emission shall be limited to 40.1 tons per twelve (12) consecutive month period.<br><br>The source shall operate the proof box in accordance with manufacturer's and operating specifications.<br><br>The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP). | Indiana Part 70 Significant Source Modification<br><br>SSM 063-31357-00031 |
| Maplehurst Bakeries, Inc.<br><br>Brownsburg, IN | 2012 | Donut Fryer 8 (Donut Production Line - Moline VIII) | None | VOC emission shall be limited to 60.7 tons per twelve (12) consecutive month period.<br><br>The source shall operate the proof box in accordance with manufacturer's and operating specifications.<br><br>The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP). | Indiana Part 70 Significant Source Modification<br><br>SSM 063-31357-00031 |
| Allen Foods, Inc.<br><br>Elkhart, IN | 2012 | Bakery Oven | Catalytic Oxidizer | VOC emissions from the bread oven shall be controlled by a catalytic oxidizer.<br><br>Overall VOC efficiency of the catalytic oxidizer shall be 95%, or the VOC outlet concentration shall not exceed 10 ppmv.<br><br>VOC emissions shall not exceed 2.29 lbs/hr.<br><br>The source shall operate the proof box in accordance with manufacturer's and operating specifications.<br><br>The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP). | Indiana Federally Enforceable State Operating Permit<br><br>F039-29392-00643 |

| Company/ Location | Year Issued | Process Description | Control Device | BACT Emission Limits/Requirements | Reference |
|---|---|---|---|---|---|
| The Kroger Company - Indianapolis Bakery<br><br>Indianapolis, IN | 2012 | Bakery Oven (Bun Line BU4) | Catalytic Oxidizer | VOC emissions from the bun oven shall be controlled by a catalytic oxidizer.<br><br>Overall VOC efficiency of the catalytic oxidizer shall be 95%, or the VOC outlet concentration shall not exceed 10 ppmv.<br><br>VOC emissions from the bun oven shall not exceed 2.75 pounds per hour.<br><br>The source shall operate the proof box in accordance with manufacturer's and operating specifications.<br><br>The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP). | Indiana Federally Enforceable State Operating Permit Significant Permit Revision<br><br>F097-29287-00161 |
| White Castle Systems, Inc.<br><br>Rensselaer, IN | 2011 | Bakery Oven/ Proof Box | Catalytic Oxidizer | VOC emission from the bread baking oven shall be controlled by a catalytic oxidizer.<br><br>Overall VOC efficiency of the catalytic oxidizer shall be 95%, or the VOC outlet concentration shall not exceed 10 ppmv.<br><br>VOC emissions from the bread oven shall not exceed 0.54 lbs/hr<br><br>The source shall operate the proof box in accordance with manufacturer's and operating specifications.<br><br>The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP). | Indiana Minor Source Operating Permit<br><br>M073-29819-00039 |
| Alpha Baking Co., Inc.<br><br>LaPorte, IN | 2011 | Bakery Ovens Proof Boxes | Catalytic Oxidizer | VOC emission from the baking ovens shall be controlled by a catalytic oxidizer.<br><br>Overall VOC efficiency of the catalytic oxidizer shall be 95%, or the VOC outlet concentration shall not exceed 10 ppmv.<br><br>The source shall operate the proof boxes in accordance with manufacturer's and operating specifications.<br><br>The source shall perform proof box cleaning operations for the proof boxes on tiered cleaning schedules in accordance with their Sanitation Standard Operating Procedures (SSOP). | Indiana Federally Enforceable State Operating Permit<br><br>F091-28222-00135 |

| Company/ Location | Year Issued | Process Description | Control Device | BACT Emission Limits/Requirements | Reference |
|---|---|---|---|---|---|
| Harlan Bakeries, Inc.<br><br>Avon, IN | 2008 | Bakery Oven | Catalytic Oxidizer | VOC emissions from the bagel oven shall be controlled by a catalytic oxidizer.<br><br>Overall VOC efficiency of the catalytic oxidizer shall be 95%, or the VOC outlet concentration shall not exceed 10 ppmv.<br><br>VOC emissions shall not exceed 0.36 lbs/hr. | Indiana Minor Source Operating Permit<br><br>M063-24103-00059 |
| Holsum of Fort Wayne, Inc.<br><br>Fort Wayne, IN | 2005 | Bakery Oven | None | VOC emission shall be limited to 60 tons per twelve (12) consecutive month period | Indiana Part 70 Significant Source Modification<br><br>SSM 091-27352-00106 |
| The Kroger Company - Indianapolis Bakery<br><br>Indianapolis, IN | 2003 | Bakery Oven and Chain Lubricant (Bread Line BD1) | None | VOC emissions shall not exceed 49.0 tons per thirteen (13) consecutive twenty-eight (28) day period. | Indiana Federally Enforceable State Operating Permit Significant Permit Revision<br><br>F097-16909-00161 |
| Maple Leaf Bakery<br><br>CA | 1998 | Bakery Oven | Catalytic Oxidizer | 92 % Destruction Removal Efficiency<br><br>Minimal 600°F Operating Temperature | RBLC ID: CA-0854<br><br>Permit No.: 0473-170 |
| Freund Baking Company<br><br>CA | 1997 | Bakery Oven | Catalytic Oxidizer | 95.4 % Destruction Removal Efficiency | RBLC ID: CA-0859<br><br>Permit No.: 328570 |
| Interstate Brands Corporation<br><br>Indianapolis, IN | 1997 | Combined Bakery Ovens and Chain Lubricant | None | VOC emissions shall not exceed 95 tons per thirteen (13) consecutive twenty-eight (28) day period. | Indiana Federally Enforceable State Operating Permit<br><br>F097-7413-00171 |
| Holsum Bakery, Inc.<br><br>AZ | 1996 | Bakery Oven | Quencher / Scrubber | 81 % Control Efficiency<br><br>49.9 tons per year | RBLC ID: AZ-0029<br><br>Permit No.: 95-0432 |
| KBI, Inc.<br><br>Morristown, IN | 1996 | Dough Mixing, Fermentation, and Baking Area | None | VOC emissions shall not exceed a total of 99.9 tons per twelve (12) consecutive month period | Indiana Federally Enforceable State Operating Permit<br><br>F145-15375-00037 |
| Certified Grocers of California, Ltd<br><br>CA | 1990 | Bakery Oven | Catalytic Afterburner | 95% Control Efficiency | RBLC ID: CA-0468<br><br>Permit Nos.: 228274, 219899 |
| Automatic Rolls of Virginia, Inc.<br><br>VA | 1988 | Bakery Oven | None | 13.80 pounds per hour<br><br>23.00 tons per year | RBLC ID: VA-0110<br><br>Permit No.: (7)40761 |

Step Three: Rank Remaining Control Technologies by Control Effectiveness

The remaining technically feasible options for controlling VOC emissions from the existing bread baking operation are as follows (listed in descending order of most technically feasible):

| Options for VOC Control | Control Efficiency (%) |
|---|---|
| Catalytic Oxidizer | 95% |
| Thermal Oxidizer | 95% |
| Wet Packed Bed Scrubber | 81% |

IDEM is aware that that the above control technologies may be able to periodically achieve control efficiencies that exceed 95% under certain operating conditions. However, BACT must be achievable on a consistent basis under normal operational conditions. BACT limitations do not necessarily reflect the highest possible control efficiency achievable by the technology on which the emission limitation is based. The permitting authority has the discretion to base the emission limitation on a control efficiency that is somewhat lower than the optimal level. There are several reasons why the permitting authority might choose to do this. One reason is that the control efficiency achievable through the use of the technology may fluctuate so that it would not always achieve its optimal control efficiency. In that case, setting the emission limitation to reflect the highest control efficiency would make violations of the permit unavoidable. To account for this possibility, a permitting authority must be allowed a certain degree of discretion to set the emission limitation at a level that does not necessarily reflect the highest possible control efficiency, but will allow the Permittee to achieve compliance consistently. While we recognize that greater than 95% may be achievable as an average during testing, IDEM allows for sources to include a safety factor, or margin of error, to allow for minor variations in the operation of the emission units and the control device.

Step Four: Evaluate Top Control Alternatives

Further evaluation including economic, energy, and environmental impacts are required for controlling VOC emissions from each donut production line. Annualized costs were determined in accordance with the EPA guidance (EPA's Office of Air Quality Planning and Standards Control Cost Manual), with other relevant information provided by the respective equipment vendors, inputs from plant personnel, and engineering judgment.

(a) Catalytic Oxidizer

The source proposed three possibilities for controlling potential VOC emissions from the bun production line:

(1) Control the Proof Box and Oven:

The first option evaluated was to control the VOC emissions from the proof box and oven for the bun production line. This option would include the installation of a clean room surrounding the proof box as well as the conveyor system between the proof box and the oven. Additional air handlers would be required to direct airflow to a catalytic oxidizer, which would be installed after the oven.

(2) Control the Proof Box Only:

The second option evaluated was to control VOC emissions from the proof box for the bun production line. This option would include the installation of clean room surrounding the proof box as well as the conveyor system between the proof box and the oven. Additional air handlers would be required to direct airflow to a catalytic oxidizer.

(3) Control the Oven Only:

The third option evaluated was to control the VOC emissions from the oven for the bun production line. This option would include the installation of a catalytic oxidizer to control emissions from only the oven.

(b) Thermal Oxidizer

The source proposed three possibilities for controlling potential VOC emissions from the bun production line:

(1) Control the Proof Box and Oven:

The first option evaluated was to control the VOC emissions from the proof box and oven for the bun production line. This option would include the installation of a clean room surrounding the proof box as well as the conveyor system between the proof box and the oven. Additional air handlers would be required to direct airflow to a catalytic oxidizer, which would be installed after the oven.

(2) Control the Proof Box Only:

The second option evaluated was to control VOC emissions from the proof box for the bun production line. This option would include the installation of clean room surrounding the proof box as well as the conveyor system between the proof box and the oven. Additional air handlers would be required to direct airflow to a catalytic oxidizer.

(3) Control the Oven Only:

The third option evaluated was to control the VOC emissions from the oven for the bun production line. This option would include the installation of a catalytic oxidizer to control emissions from only the oven.

(c) Wet Packed Bed Scrubber

Based on information reviewed for this BACT determination, the costs associated with installing a wet packed bed scrubber were not evaluated since the cost of the technology is significantly higher than that of a catalytic oxidizer. A wet scrubber would require substantial amounts of water requiring treatment at a wastewater treatment plant (WWTP). VOCs could potentially volatilize from the wastewater during the transference or conveyance to the WWTP, as well as, during treatment at the WWTP. To avoid this problem, the sewage system and WWTP would need to be designed to minimize the volatilization of VOCs or capture and control VOCs emitted the ambient air. Therefore, no further evaluation will be made.

Pursuant to Section IV.D.2.c of EPA's BACT Guidance Document, costs that are within the range of normal costs for a control method may be reviewed in comparison to similar sources. This comparison may allow for the elimination of a technologically- and otherwise economically-feasible control option, provided that the costs of pollutant removal for the subject source are unduly high when compared to the costs borne by sources in recent BACT determinations.

The technologically-feasible options for controlling VOC emissions from the bun production line and the costs estimated for Hartford to purchase and operate each control method are summarized in Appendix C. The cost effectiveness for similar controls at similar facilities are not available for comparison for the proof boxes because there are currently no sources within the United States or any other country where control devices have been known to be implemented for VOC control of proof boxes. The costs for installing and operating control devices to control emissions from only the oven are comparable with previously performed Best Available Control Technology (BACT) determinations.

| Bakery Line | Cost for Controlling VOCs from Entire Line (Proof Box* & Oven) ($ / Ton Removed) | Cost for Controlling VOCs from Proof Box* Only ($ / Ton Removed) | Cost for Controlling VOCs from Oven Only ($ / Ton Removed) |
|---|---|---|---|
| Bun Line with Catalytic Oxidizer Control | $15,558 | $171,282 | $7,175 |
| Bun Line with Thermal Oxidizer Control | $17,112 | $188,396 | $8,885 |

Note:
*Costs associated with controlling proof boxes are theoretical. These types of facilities have never been required to control VOC emissions.

(a) Cost Analysis for Controlling the Proof Box and Oven with a Catalytic Oxidizer:

The cost associated with controlling the combined 46.79 tons of VOC emitted from the oven (Oven3) and the proof box (Proof3) has been determined to be $15,558 per ton of VOC removed.

(b) Cost Analysis for Controlling the Proof Box Only with a Catalytic Oxidizer:

The cost associated with controlling the 4.25 tons of VOC emitted from the proof box (Proof3) has been determined to be $171,282 per ton of VOC removed.

(c) Cost Analysis for Controlling the Oven Only with a Catalytic Oxidizer:

The cost associated with controlling the 42.54 tons of VOC emitted from the oven (Oven3) has been determined to be $7,175 per ton of VOC removed.

(d) Cost Analysis for Controlling the Proof Box and Oven with a Thermal Oxidizer:

The cost associated with controlling the combined 46.79 tons of VOC emitted from the oven (Oven3) and the proof box (Proof3) has been determined to be $17,112 per ton of VOC removed.

(e) Cost Analysis for Controlling the Proof Box Only with a Thermal Oxidizer:

The cost associated with controlling the 4.25 tons of VOC emitted from the proof box (Proof3) has been determined to be $188,396 per ton of VOC removed.

(f) Cost Analysis for Controlling the Oven Only with a Thermal Oxidizer:

The cost associated with controlling the 42.54 tons of VOC emitted from the oven (Oven3) has been determined to be $8,885 per ton of VOC removed.

The source proposes that requiring add-on controls for the bun line would place them at a significant economic disadvantage in the baking industry. The source proposes to limit VOC emissions from the oven (Oven3) and the proof box (Proof3).

Step Five: Select BACT

IDEM, OAQ has determined that the following requirements represent BACT for the existing bun production line, identified as Line 3:

(a) VOC emissions attributable to proofing and fermentation from the bun production line, identified as Line 3 (consisting of the oven (Oven3) and the proof box (Proof3)), shall not exceed 46.7 tons per twelve (12) consecutive month period.

(b) The source shall operate the proof box (Proof3) in accordance with the manufacturer's design and operating specifications.

(c) In order to ensure proper operation and to minimize potential emissions, the source shall perform proof box cleaning operations for the proof box (Proof3), on a tiered cleaning schedule and perform at a minimum, the following operations, or their equivalent, in accordance with their Sanitation Standard Operating Procedure:

(1) Weekly Cleaning Procedure:

(A) Scrape any dough from the conveyor, grids, and supports;
(B) Scrape any dough from the floor;
(C) Sweep the proof box floor from the center out;
(D) Wet the entire floor with cleaning solvent mixture and then rinse;
(E) Scrape any dough from the bun pans; and
(F) Wash the pans, if necessary.

(2) Monthly Cleaning Procedure:

(A) Wet mop the floor of the proof box.

(3) Semi-Annually Cleaning Procedure:

(A) Wash down the interior walls in small sections with cleaning solvent mixture and then rinse.

Compliance with the above limits and conditions will satisfy the requirements of 326 IAC 8-1-6 (BACT).

**IDEM Contact**

Questions regarding this BACT Analysis can be directed to John Haney at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5328 or toll free at 1-800-451-6027 extension 4-5328.

**Appendix C: Cost Analyses for Control Devices**
**Controlling Bun Line (Line 3)**

**Company Name:** Hartford Bakery, Inc.
**Address City IN Zip:** 500 N. Fulton Avenue, Evansville, Indiana 47710
**Significant Source Modification No.:** 163-31953-00040
**Significant Permit Modification No.:** 163-31955-00040
**Permit Reviewer:** John Haney
**Date:** June 6, 2012

| Thermal Oxidizer Control | | | Units Controlled | | |
|---|---|---|---|---|---|
| | | | Option 1 Proof Box & Oven | Option 2 Proof Box Only | Option 3 Oven Only |
| **DIRECT COST (Pollution Control Equipment)** | | **Unit Cost** | **TOTAL ($)** | **TOTAL ($)** | **TOTAL ($)** |
| Direct Purchased Equipment | | | | | |
| | Equipment Total (*see notes for full description) | A = | $1,553,180 | $1,553,180 | $275,000 |
| | Instrumentation | 0.10 A | included | included | included |
| | Sales Taxes | 0.07 A | $108,723 | $108,723 | $19,250 |
| | Freight | 0.05 A | included | included | included |
| Total Equipment Costs | | **B =** | **$1,661,903** | **$1,661,903** | **$294,250** |
| | | | | | |
| Direct Installation Cost | | | | | |
| | Foundation and Support | 0.08 B | $132,952 | $132,952 | $23,540 |
| | Handling and Erection | 0.14 B | $232,666 | $232,666 | $41,195 |
| | Piping | 0.02 B | $33,238 | $33,238 | $5,885 |
| | Insulation | 0.01 B | $16,619 | $16,619 | $2,943 |
| | Painting | 0.01 B | $16,619 | $16,619 | $2,943 |
| | Electrical | 0.04 B | $66,476 | $66,476 | $11,770 |
| | Site Preparation | contractor quote | $211,250 | $211,250 | $211,250 |
| | Other | | $0 | $0 | $0 |
| Total Direct Installation Costs | | | **$709,821** | **$709,821** | **$299,525** |
| | | | | | |
| **TOTAL Direct Investment (TDI) = (Total Equipment Cost + Total Direct Installation Cost)** | | **TDI =** | **$2,371,723** | **$2,371,723** | **$593,775** |
| | | | | | |
| **Indirect Installation Costs** | | | | | |
| | Engineering and Supervision | 0.10 B | $166,190 | $166,190 | $29,425 |
| | Construction and Field Expenses | 0.05 B | $83,095 | $83,095 | $14,713 |
| | Contractor Fees | 0.10 B | $166,190 | $166,190 | $29,425 |
| | Start-up | 0.02 B | $33,238 | $33,238 | $5,885 |
| | Performance Tests | 0.01 B | $16,619 | $16,619 | $2,943 |
| | Overall Contingencies | 0.03 B | $49,857 | $49,857 | $8,828 |
| | Working Capital | | $0 | $0 | $0 |
| **Total Indirect Installation Costs (TIC)** | | **TIC =** | **$515,190** | **$515,190** | **$91,218** |
| | | | | | |
| **TOTAL CAPITAL INVESTMENT (TCI) = (TDI +TIC)** | | **TCI =** | **$2,886,913** | **$2,886,913** | **$684,993** |
| | | | | | |
| **ANNUAL OPERATION & MAINTENANCE** | | | | | |
| Direct Operating Costs (DA) | | | | | |
| | Operating Labor - Operator (0.5 hr/shift) | $26.46/hr | $14,487 | $14,487 | $14,487 |
| | Operating Labor - Supervisor | 15% of operator | $2,173 | $2,173 | $2,173 |
| | | | | | |
| | Maintenance Labor (0.5 hr/shift) | $34.17/hr | $18,708 | $18,708 | $18,708 |
| | Maintenance Material | same as maintenance labor | $18,708 | $18,708 | $18,708 |
| | Replacement Parts | | $0 | $0 | $0 |
| | Natural Gas (2.00 MMBtu/hr) | $8.256/MMBtu | $136,059 | $136,059 | $136,059 |
| | Electricity (19 kWh) | $0.0742/kWh | $11,547 | $11,547 | $11,547 |
| Total Direct Operating Costs (DA) | | **DA =** | **$201,682** | **$201,682** | **$201,682** |
| | | | | | |
| Indirect Operating Costs (IC) | | | | | |
| | Overhead | 60% of total labor and materials | $32,446 | $32,446 | $32,446 |
| | Administrative Charges | 0.02 TCI | $57,738 | $57,738 | $13,700 |
| | Property Tax | 0.01 TCI | $28,869 | $28,869 | $6,850 |
| | Insurance | 0.01 TCI | $28,869 | $28,869 | $6,850 |
| | Capital Recovery Cost (Assumes 7% interest over 10 years) | 0.14238 TCI | $411,039 | $411,039 | $97,529 |
| Total Indirect Operating Costs (IA) | | **IA =** | **$147,922** | **$147,922** | **$59,845** |
| | Heat Recovery Credits | | $0 | $0 | $0 |
| **Total Operating Costs (DA + IA - Heat Recovery Credits)** | | **TOC =** | **$349,604** | **$349,604** | **$261,527** |
| | | | | | |
| **Total Annualized Cost (Capital Recovery Cost + TOC)** | | **TAC =** | **$760,643** | **$760,643** | **$359,057** |
| | | | | | |
| Proposed Permitted VOC Emissions (Tons) = | | | 46.79 | 4.25 | 42.54 |
| Tons VOC Removed @ 95.0% = | | | 44.45 | 4.04 | 40.41 |
| Cost per Ton VOC Removed (TAC / Tons VOC Removed) = | | | **$17,112** | **$188,395** | **$8,885** |

**NOTES:**
Equipment total for Option 1 includes $1,278,180 for the clean room and $275,000 for one oxidizer
Equipment total for Option 2 includes $1,278,180 for the clean room and $275,000 for one oxidizer
Equipment total for Option 3 includes $275,000 for one oxidizer.

**Appendix C: Cost Analyses for Control Devices**
**Controlling Bun Line (Line 3)**

**Company Name: Hartford Bakery, Inc.**
**Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47710**
**Significant Source Modification No.: 163-31953-00040**
**Significant Permit Modification No.: 163-31955-00040**
**Permit Reviewer: John Haney**
**Date: June 6, 2012**

| **Catalytic Oxidizer Control** | | | **Units Controlled** | | |
|---|---|---|---|---|---|
| | | | **Option 1 Proof Box & Oven** | **Option 2 Proof Box Only** | **Option 3 Oven Only** |
| **DIRECT COST (Pollution Control Equipment)** | | **Unit Cost** | **TOTAL ($)** | **TOTAL ($)** | **TOTAL ($)** |
| Direct Purchased Equipment | | | | | |
| | Equipment Total (*see notes for full description) | A = | $1,558,880 | $1,558,880 | $280,700 |
| | Instrumentation | 0.10 A | included | included | included |
| | Sales Taxes | 0.07 A | $109,122 | $109,122 | $19,649 |
| | Freight | 0.05 A | included | included | included |
| Total Equipment Costs | | **B =** | **$1,668,002** | **$1,668,002** | **$300,349** |
| | | | | | |
| Direct Installation Cost | | | | | |
| | Foundation and Support | 0.08 B | $133,440 | $133,440 | $24,028 |
| | Handling and Erection | 0.14 B | $233,520 | $233,520 | $42,049 |
| | Piping | 0.02 B | $33,360 | $33,360 | $6,007 |
| | Insulation | 0.01 B | $16,680 | $16,680 | $3,003 |
| | Painting | 0.01 B | $16,680 | $16,680 | $3,003 |
| | Electrical | 0.04 B | $66,720 | $66,720 | $12,014 |
| | Site Preparation | contractor quote | $211,250 | $211,250 | $211,250 |
| | Other | | $0 | $0 | $0 |
| Total Direct Installation Costs | | | **$711,650** | **$711,650** | **$301,355** |
| | | | | | |
| **TOTAL Direct Investment (TDI) = (Total Equipment Cost + Total Direct Installation Cost)** | | **TDI =** | **$2,379,652** | **$2,379,652** | **$601,704** |
| | | | | | |
| **Indirect Installation Costs** | | | | | |
| | Engineering and Supervision | 0.10 B | $166,800 | $166,800 | $30,035 |
| | Construction and Field Expenses | 0.05 B | $83,400 | $83,400 | $15,017 |
| | Contractor Fees | 0.10 B | $166,800 | $166,800 | $30,035 |
| | Start-up | 0.02 B | $33,360 | $33,360 | $6,007 |
| | Performance Tests | 0.01 B | $16,680 | $16,680 | $3,003 |
| | Overall Contingencies | 0.03 B | $50,040 | $50,040 | $9,010 |
| | Working Capital | | $0 | $0 | $0 |
| **Total Indirect Installation Costs (TIC)** | | **TIC =** | **$517,080** | **$517,080** | **$93,108** |
| | | | | | |
| **TOTAL CAPITAL INVESTMENT (TCI) = (TDI +TIC)** | | **TCI =** | **$2,896,733** | **$2,896,733** | **$694,812** |
| | | | | | |
| **ANNUAL OPERATION & MAINTENANCE** | | | | | |
| Direct Operating Costs (DA) | | | | | |
| | Operating Labor - Operator (0.5 hr/shift) | $26.46/hr | $14,487 | $14,487 | $14,487 |
| | Operating Labor - Supervisor | 15% of operator | $2,173 | $2,173 | $2,173 |
| | | | | | |
| | Maintenance Labor (0.5 hr/shift) | $34.17/hr | $18,708 | $18,708 | $18,708 |
| | Maintenance Material | same as maintenance labor | $18,708 | $18,708 | $18,708 |
| | Replacement Parts | | | | |
| | Catalyst Replacement (see note) | | $25,000 | $25,000 | $25,000 |
| | Catalyst Cleaning | | $700 | $700 | $700 |
| | Catalyst Testing | $1000/test, 2 tests per year | $2,000 | $2,000 | $2,000 |
| | Natural Gas (0.282 MMBtu/hr) | $8.256/MMBtu | $20,105 | $20,105 | $20,105 |
| | Electricity (26.2 kWh) | $0.0742/kWh | $16,141 | $16,141 | $16,141 |
| Total Direct Operating Costs (DA) | | **DA =** | **$118,022** | **$118,022** | **$118,022** |
| | | | | | |
| Indirect Operating Costs (IC) | | | | | |
| | Overhead | 60% of total labor and materials | $49,066 | $49,066 | $49,066 |
| | Administrative Charges | 0.02 TCI | $57,935 | $57,935 | $13,896 |
| | Property Tax | 0.01 TCI | $28,967 | $28,967 | $6,948 |
| | Insurance | 0.01 TCI | $28,967 | $28,967 | $6,948 |
| | Capital Recovery Cost (Assumes 7% interest over 10 years) | 0.14238 x [ TCI - 1.08(Catalyst Costs) ] | $408,593 | $408,593 | $95,083 |
| Total Indirect Operating Costs (IA) | | **IA =** | **$164,935** | **$164,935** | **$76,858** |
| | Heat Recovery Credits | | $0 | $0 | $0 |
| **Total Operating Costs (DA + IA - Heat Recovery Credits)** | | **TOC =** | **$282,957** | **$282,957** | **$194,880** |
| | | | | | |
| **Total Annualized Cost (Capital Recovery Cost + TOC)** | | **TAC =** | **$691,550** | **$691,550** | **$289,963** |
| | | | | | |
| Proposed Permitted VOC Emissions (Tons) = | | | 46.79 | 4.25 | 42.54 |
| Tons VOC Removed @ 95.0% = | | | 44.45 | 4.04 | 40.41 |
| Cost per Ton VOC Removed (TAC / Tons VOC Removed) = | | | **$15,558** | **$171,282** | **$7,175** |

**NOTES:**
Equipment total for Option 1 includes $1,278,180 for the clean room and $280,700 for one oxidizer
Equipment total for Option 2 includes $1,278,180 for the clean room and $280,700 for one oxidizer
Equipment total for Option 3 includes $280,700 for one oxidizer.
Due to the presence of silicone, replacement of the catalyst is expected within a minimum of eight (8) years, with every five (5) years likely

# 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: Robert M. Renock
Hartford Bakery, Inc.
500 N. Fulton Avenue
Evansville, IN 47710

DATE: September 7, 2012

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

SUBJECT: Final Decision
Significant Permit Modification
163-31955-00040

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:
Henry F. Lincoln – Vice President
Pamela Block – Air Quality Services, LLC
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**
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Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
**www.idem.IN.gov**

September 7, 2012

TO: Evansville Vanderburgh Public Library

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

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

**Applicant Name: Hartford Bakery, Inc.**
**Permit Number: 163-31955-00040**

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

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

Enclosures
Final Library.dot 11/30/07

# Mail Code 61-53

| IDEM Staff | GHOTOPP 9/7/2012<br>Hartford Bakery, Inc. 163-31955-00040 final | | | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING |
|---|---|---|---|---|
| Name and address of Sender | ▶ | Indiana Department of Environmental Management<br>Office of Air Quality – Permits Branch<br>100 N. Senate<br>Indianapolis, IN 46204 | Type of Mail:<br>**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<br>Remarks |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | | Robert M. Renock Hartford Bakery, Inc. 500 N. Fulton Avenue Evansville IN 47710 (Source CAATS) via confirmed delivery | | | | | | | | | |
| 2 | | Henry F. Lincoln Vice President & General Mgr Hartford Bakery, Inc. 500 N. Fulton Avenue Evansville IN 47710 *(RO CAATS)* | | | | | | | | | |
| 3 | | Evansville City Council and Mayors Office 1NW MLK Blvd, Rm 302 Evansville IN 47708 *(Local Official)* | | | | | | | | | |
| 4 | | Vanderburgh County Commissioners 1 NW MLK Blvd, Rm 305 Evansville IN 47708 *(Local Official)* | | | | | | | | | |
| 5 | | Evansville Vanderburg Public Library 200 SE Martin Luther King Jr. Blvd Evansville IN 47708-1694 *(Library)* | | | | | | | | | |
| 6 | | Mr. Wendell Hibdon Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 *(Affected Party)* | | | | | | | | | |
| 7 | | Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 *(Affected Party)* | | | | | | | | | |
| 8 | | Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 *(Health Department)* | | | | | | | | | |
| 9 | | Ms. Pamela Block Air Quality Services, LLC 425 Main Street Evansville IN 47708 *(Consultant)* | | | | | | | | | |
| 10 | | Kim Sherman 3355 Woodview Drive Newburgh IN 47630 *(Affected Party)* | | | | | | | | | |
| 11 | | Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 *(Affected Party)* | | | | | | | | | |
| 12 | | Mr. John Blair 800 Adams Ave Evansville IN 47713 *(Affected Party)* | | | | | | | | | |
| 13 | | Evansville EPA 100 E. Walnut St. Suite 100, Newsome Center Evansville IN 47713 (Local Official) | | | | | | | | | |
| 14 | | David Boggs 216 Western Hills Dr Mt Vernon IN 47620 *(Affected Party)* | | | | | | | | | |
| 15 | | | | | | | | | | | |

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