INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To:	Interested Parties
Date:	October 1, 2014
From:	Matthew Stuckey, Chief Permits Branch Office of Air Quality
Source Name:	Hartford Bakery, Inc.
Permit Level:	Title V Operating Permit Renewal
Permit Number:	163-33433-00040
Source Location:	500 North Fulton Avenue, Evansville, Indiana
Type of Action Taken:	Permit Renewal

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 matter referenced above.

The final decision is available on the IDEM website at: http://www.in.gov/apps/idem/caats/
To view the document, select Search option 3, then enter permit 33433.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, 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.

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Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

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

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

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.: T163-33433-00040	
Issued by: Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 1, 2014 Expiration Date: October 1, 2019

TABLE OF CONTENTS

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)][326 IAC 2-8-16]

D.4.3 Record Keeping Requirements

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 (Bread and Other Bakery Products, Except Cookies and Crackers)
County Location:	Vanderburgh
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [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 5,520 pounds per hour each, 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 2,400 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.

(4) One (1) sifter, constructed in 2013, identified as Sifter #2, with a capacity of 6,600 pounds per hour, equipped with pressure relief bags.

(5) One (1) sifter, constructed in 2013, identified as Sifter #3, with a capacity of 7,200 pounds per hour, equipped with pressure relief bags.

(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 4,132 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 1,050 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.

(4) One (1) sifter, constructed in 2007, identified as Sifter #1, with a capacity of 6,600 pounds per hour, equipped with pressure relief bags.

(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 Specifically Regulated Insignificant Activities
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21) that have applicable requirements.

(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) 2.52 million British thermal units per hour (MMBtu/hr) natural gas fired boilers, constructed in 1974 and 1975.

(2) One (1) 1.3375 million British thermal units per hour (MMBtu/hr) natural gas fired boiler, constructed in 1951.

(3) Two (2) 0.40 million British thermal units per hour (MMBtu/hr) natural gas-fired Thermo Cycler heating units, constructed in 2007.

(4) Fifteen (15) natural gas fired space heaters with a combined heat input capacity of 3.67 million British thermal units per hour (MMBtu/hr), constructed in 1975.

(5) Three (3) natural gas fired water heaters with a combined heat input capacity of 1.33 million British thermal units per hour (MMBtu/hr), constructed in 1975.

(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) 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/inherent fabric bag filters for control of particulate matter emissions, exhausting to atmosphere.

(2) One (1) weigh hopper, identified as hopper 4, constructed in 1975, with a capacity of 4,132 pounds per hour, exhausting inside.

(3) Two (2) weigh hoppers, identified as hopper 5 and hopper 6, constructed in 1975, with capacities of 5,520 pounds per hour each, exhausting inside.

(4) One (1) weigh hopper, identified as hopper 7, constructed in 1980, with a capacity of 500 pounds per hour, exhausting inside.

(5) Two (2) weigh hoppers, identified as hopper 8 and hopper 9, constructed in 2013, with capacities of 6,600 pounds per hour each, exhausting inside.

(6) One (1) weigh hopper, identified as hopper 10, constructed in 2007, with a capacity of 7,200 pounds per hour, exhausting inside.

(7) One (1) Laramore Dusting System, identified as LDS1, constructed in 1998, with a capacity of 500 pounds per hour.

(h) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6.

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, T163-33433-00040, 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(35), 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(35).

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(35).

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(35).

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(35).

(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 or 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(35).

(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 T163-33433-00040 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 permit, all previous registrations and permits are superseded by this 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(35).

(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(42). 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(35).

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(35).

(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(37)) 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(35).

(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(35).

(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(35).

(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(35).

(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(35).

(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)]

For existing units:
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 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, 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(35).

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. The analog instrument shall be capable of measuring values outside of the normal range.

(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(35).

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(33) (“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(35).

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, where applicable:

(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, where applicable:

(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(35). 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

Emissions Unit Description:

(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(a), particulate matter emissions from Oven1 and Oven3 shall each not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.1.3 Preventive 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:

$$\sum_{m=1}^{12}\left(1.1x\left(\sum_{i=1}^{n}\frac{E_i * B_i}{2000lb/ton}\right)\right)_m$$ 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

Emissions Unit Description:

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) 2.52 million British thermal units per hour (MMBtu/hr) natural gas fired boilers, constructed in 1974 and 1975.

(2) One (1) 1.3375 million British thermal units per hour (MMBtu/hr) natural gas fired boiler, constructed in 1951.

(3) Two (2) 0.40 million British thermal units per hour (MMBtu/hr) natural gas-fired Thermo Cycler heating units, constructed in 2007.

(4) Fifteen (15) natural gas fired space heaters with a combined heat input capacity of 3.67 million British thermal units per hour (MMBtu/hr), constructed in 1975.

(5) Three (3) natural gas fired water heaters with a combined heat input capacity of 1.33 million British thermal units per hour (MMBtu/hr), constructed in 1975

(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]

(a) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from each of the Two (2) Thermo Cycler units, fifteen (15) space heaters, and three (3) water heaters shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf):

(b) Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from each of the two (2) 2.52 MMBtu/hr and one (1) 1.3375 MMBtu/hr natural gas-fired boilers shall not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).

D.2.2 Preventive 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

Emissions Unit Description:

(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 5,520 pounds per hour each, 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 2,400 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.

(4) One (1) sifter, constructed in 2013, identified as Sifter #2, with a capacity of 6,600 pounds per hour, equipped with pressure relief bags.

(5) One (1) sifter, constructed in 2013, identified as Sifter #3, with a capacity of 7,200 pounds per hour, equipped with pressure relief bags.

(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 4,132 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 1,050 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.

(4) One (1) sifter, constructed in 2007, identified as Sifter #1, with a capacity of 6,600 pounds per hour, equipped with pressure relief bags.

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) 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/inherent fabric bag filters for control of particulate matter emissions, exhausting to atmosphere.

(2) One (1) weigh hopper, identified as hopper 4, constructed in 1975, with a capacity of 4,132 pounds per hour, exhausting inside.

(3) Two (2) weigh hoppers, identified as hopper 5 and hopper 6, constructed in 1975, with capacities of 5,520 pounds per hour each, exhausting inside..

(4) One (1) weigh hopper, identified as hopper 7, constructed in 1980, with a capacity of 500 pounds per hour, exhausting inside.

(5) Two (2) weigh hoppers, identified as hopper 8 and hopper 9, constructed in 2013, with capacities of 6,600 pounds per hour each, exhausting inside.

(6) One (1) weigh hopper, identified as hopper 10, constructed in 2007, with a capacity of 7,200 pounds per hour, exhausting inside.

(7) One (1) Laramore Dusting System, identified as LDS1, constructed in 1998, with a capacity of 500 pounds per hour.

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

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

D.3.1 Minor Limits for PSD [326 IAC 2-2]

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 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, PM_{10}, and $PM_{2.5}$ emissions to less than 250 tons per twelve (12) consecutive month period, each, from the entire source. This shall render the requirements of 326 IAC 2-2 (PSD) 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 3, Silo 4, Silo 5, Sifter 1, Sifter 2, Sifter 3, Hopper 1A, Hopper 1B, Hopper 3, Hopper 4, Hopper 5, Hopper 6, Hopper 7, Hopper 8, Hopper 9, Hopper 10, LDS1, Breaker 1, Breaker 3, Mixer 1A, Mixer 1B, and Mixer 3.

D.3.3 Preventive 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.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

(h) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6.

(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.4.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements):

(a) The Permittee shall ensure the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.

(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.

(5) Provide a permanent, conspicuous label that lists the operating requirements in (a)(3), (a)(4), (a)(6), and (a)(7) of this condition.

(6) Store waste solvent only in closed containers.

(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) The Permittee shall ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) A refrigerated chiller.

(D) Carbon adsorption.

(E) An alternative system of demonstrated equivalent or better control as those outlined in (b)(1)(A) through (D) of this condition that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:

(A) must be a solid, fluid stream; and

(B) shall be applied at a pressure that does not cause excessive splashing.

D.4.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure than exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)][326 IAC 2-8-16]

D.4.3 Record Keeping Requirements

To document the compliance status with Condition D.4.2, on and after January 1, 2015, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

(a) The name and address of the solvent supplier.

(b) The date of purchase.

(c) The type of solvent purchased.

(d) The total volume of the solvent purchased.

(e) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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.: T163-33433-00040

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.: T163-33433-00040

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

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

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

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

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

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
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 Usage Report

(Submit Report Quarterly)

Source Name: Hartford Bakery, Inc.
Source Address: 500 N Fulton Avenue, Evansville, Indiana 47710
Part 70 Permit No.: T163-33433-00040
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:

$$\sum_{m=1}^{12}\left(1.1x\left(\sum_{i=1}^{n}\frac{E_i * B_i}{2000lb/ton}\right)\right)_m$$ 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
	VOC Emissions This Month	VOC Emissions Previous 11 Months	VOC Emissions 12 Month Total

☐ 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.: T163-33433-00040

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

Addendum to the Technical Support Document (ATSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	**Hartford Bakery, Inc.**
Source Location:	**500 N. Fulton Avenue, Evansville, IN 47710**
County:	**Vanderburgh**
SIC Code:	**2051 (Bread and Other Bakery Products, Except Cookies and Crackers)**
Permit Renewal No.:	**T 163-33433-00040**
Permit Reviewer:	**Tamera Wessel**

On August 6, 2014, the Office of Air Quality (OAQ) had a notice published in the Evansville Courier, Evansville, Indiana, stating that Hartford Bakery, Inc. had applied for a Part 70 Operating Permit Renewal to continue operations at their stationary wholesale bakery. The notice also stated that the OAQ proposed to issue a Part 70 Operating Permit Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

No comments were received during the public notice period.

Additional Changes

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

(a) Methodology footnotes were inadvertently cut-off the various combustion calculation worksheets, pages 8-11, of Appendix A: Emissions Calculations.

Methodology
...
CO2e (tons/yr) based on 11/29/2013 federal GWPs= CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential **Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).**

CO2e (tons/yr) based on 10/30/2009 federal GWPs = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential **Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).**

There are no changes being made to the permit.

IDEM Contact

(a) Questions regarding this proposed Part 70 Operating Permit Renewal can be directed to Tamera Wessel 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) 234-8530 or toll free at 1-800-451-6027 extension 4-8530.

(b) A copy of the permit 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 Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal and Minor Source Modification

Source Background and Description

Source Name:	Hartford Bakery, Inc.
Source Location:	500 N. Fulton Avenue, Evansville, IN 47710
County:	Vanderburgh
SIC Code:	2051 (Bread and Other Bakery Products, Except Cookies and Crackers)
Minor Source Modification No.:	163-34233-00040
Permit Renewal No.:	T163-33433-00040
Permit Reviewer:	Tamera Wessel

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Hartford Bakery, Inc. relating to the operation of a stationary wholesale bakery. On July 17, 2013, Hartford Bakery, Inc. submitted an application to the OAQ requesting to renew its operating permit and incorporate the following existing equipment: three (3) sifters, four (4) hoppers, and two (2) Thermo Cyclers, that have not been permitted previously. Hartford Bakery, Inc. was issued its second Part 70 Operating Permit Renewal T163-27317-00040 on April 17, 2009.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) bread dough closed 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 5,520 pounds per hour each, 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 2,400 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 closed 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 4,132 pounds per hour, 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 1,050 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.

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

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

(a) One (1) sifter, constructed in 2007, identified as Sifter #1, with a capacity of 6,600 pounds per hour, equipped with pressure relief bags.

(b) One (1) sifter, constructed in 2013, identified as Sifter #2, with a capacity of 6,600 pounds per hour, equipped with pressure relief bags.

(c) One (1) sifter, constructed in 2013, identified as Sifter #3, with a capacity of 7,200 pounds per hour, equipped with pressure relief bags.

(d) One (1) weigh hopper, identified as hopper 4, constructed in 1975, with a capacity of 4,132 pounds per hour, exhausting inside.

(e) Two (2) weigh hoppers, identified as hopper 5 and hopper 6, constructed in 1975, with capacities of 5,520 pounds per hour each, exhausting inside.

(f) One (1) weigh hopper, identified as hopper 7, constructed in 1980, with a capacity of 500 pounds per hour, exhausting inside.

(g) Two (2) weigh hoppers, identified as hopper 8 and hopper 9, constructed in 2013, with capacities of 6,600 pounds per hour each, exhausting inside.

(h) One (1) weigh hopper, identified as hopper 10, constructed in 2007, with a capacity of 7,200 pounds per hour, exhausting inside.

(i) One (1) Laramore Dusting System, identified as LDS1, constructed in 1998, with a capacity of 500 pounds per hour.

(j) Two (2) 0.40 million British thermal units per hour (MMBtu/hr) natural gas-fired Thermo Cycler heating units, constructed in 2007.

Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

(a) 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)]

Insignificant Activities

The source also consists of the following 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) 2.52 million British thermal units per hour (MMBtu/hr) natural gas fired boilers, constructed in 1974 and 1975.

(2) One (1) 1.3375 million British thermal units per hour (MMBtu/hr) natural gas fired boiler, constructed in 1951.

(3) Fifteen (15) natural gas fired space heaters with a combined heat input capacity of 3.67 million British thermal units per hour (MMBtu/hr), constructed in 1975.

(4) Three (3) natural gas fired water heaters with a combined heat input capacity of 1.33 million British thermal units per hour (MMBtu/hr), constructed in 1975.

(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) 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/inherent fabric bag filters for control of particulate matter emissions, exhausting to atmosphere.

(h) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6.

Existing Approvals

Since the issuance of the Part 70 Operating Permit Renewal No. T163-27317-00040 on April 17, 2009, the source has constructed or has been operating under the following additional approvals:

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

(b) Significant Source Modification No. 163-31953-00040, issued on August 21, 2012; and

(c) Significant Permit Modification No. 163-31955-00040, issued on September 7, 2012.

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

Air Pollution Control Justification as an Integral Part of the Process

Under Part 70 Operating Permit Renewal No. T163-17548-00040, issued on October 8, 2004, IDEM, OAQ made the determination that the fabric bag filters associated with the three (3) flour storage silos, identified as Silos 3, 4, and 5, should be considered as integral parts to the raw material storage system. This determination has been re-incorporated into this Part 70 Operating Renewal.

Enforcement Issue

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

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

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Attainment effective October 27, 2011, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

[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.

(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) $PM_{2.5}$
Vanderburgh County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Fugitive Emissions

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

Source Status - Existing Source

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** (ton/yr)
PM	107.03
PM_{10}	92.25
$PM_{2.5}$	92.25
SO_2	0.05
NO_X	8.01
VOC	165.32
CO	6.73
GHGs as CO_2e	9,669
Single HAP	4.95 Acetaldehyde
Total HAPs	5.10

(a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a PSD regulated pollutant, excluding GHGs, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) The source wide GHG emissions are less than one hundred thousand (<100,000) tons of CO_2 equivalent (CO_2e) emissions per year. GHG emissions do not affect the source PSD status.

(c) These emissions are based upon the Significant Permit Modification No. 163-31955-00040 issued September 7, 2012.

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).

Unrestricted Potential Emissions

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

After consideration of the integral controls associated with the silos, the source-wide potential to emit of PM10 and PM2.5 is less than 100 tons per year, each.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Hartford Bakery, Inc. on July 17, 2013, relating to an operating permit renewal and incorporation of three (3) sifters, four (4) hoppers, and two (2) Thermo Cyclers which were constructed and/or operated without a permit. The following is a list of the new emission units and pollution control devices requiring pre-construction approval and/or operating approval:

(a) One (1) sifter, constructed in 2007, identified as Sifter #1, with a capacity of 6,600 pounds per hour, equipped with pressure relief bags

(b) One (1) sifter, constructed in 2013, identified as Sifter #2, with a capacity of 6,600 pounds per hour, equipped with pressure relief bags.

(c) One (1) sifter, constructed in 2013, identified as Sifter #3, with a capacity of 7,200 pounds per hour, equipped with pressure relief bags.

(d) One (1) weigh hopper, identified as hopper 4, constructed in 1975, with a capacity of 4,132 pounds per hour, exhausting inside.

(e) Two (2) weigh hoppers, identified as hopper 5 and hopper 6, constructed in 1975, with capacities of 5,520 pounds per hour each, exhausting inside.

(f) One (1) weigh hopper, identified as hopper 7, constructed in 1980, with a capacity of 500 pounds per hour, exhausting inside.

(g) Two (2) weigh hoppers, identified as hopper 8 and hopper 9, constructed in 2013, with capacities of 6,600 pounds per hour each, exhausting inside.

(h) One (1) weigh hopper, identified as hopper 10, constructed in 2007, with a capacity of 7,200 pounds per hour, exhausting inside.

(i) One (1) Laramore Dusting System, identified as LDS1, constructed in 1998, with a capacity of 500 pounds per hour.

(j) Two (2) 0.40 million British thermal units per hour (MMBtu/hr) natural gas-fired Thermo Cycler heating units, constructed in 2007.

Permit Level Determination – Part 70 Modification to an Existing Source

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 table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects 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 Modification	
Pollutant	**Potential To Emit** (ton/yr)
PM	13.79
PM_{10}	3.47
$PM_{2.5}$	3.47
SO_2	negl.
NO_X	0.34
VOC	0.02
CO	0.29
GHGs as CO_2e	415
Single HAPs	<10
Total HAPs	<25

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

This source modification is subject to 326 IAC 2-7-10.5(e)(1)(A) which applies to modifications that have a potential to emit PM, PM_{10}, or direct $PM_{2.5}$ less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year. Additionally, the modification should have been incorporated into the Part 70 Operating Permit through a minor permit modification issued pursuant to 326 IAC 2-7-12(b)(1), because the changes do not require significant changes to the existing requirements of the Part 70 permit.

The Part 70 Operating Permit Renewal itself will grant the source the appropriate operating approval for the proposed modification. Therefore, a distinct minor permit modification will not be issued.

Permit Level Determination – *PSD*

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 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential to Emit (ton/yr)							
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$***	**SO_2**	**NO_X**	**VOC**	**CO**	**GHGs**
(3) Sifters	13.40	3.22	3.22	-	-	-	-	-
(7) Weigh Hoppers	0.38	0.22	0.22	-	-	-	-	-
(1) LDS1	0.005	0.003	0.003	-	-	-	-	-
(2) ThermoCyclers	0.01	0.03	0.03	negl.	0.34	0.02	0.29	415
Total for Modification	13.79	3.47	3.47	0	0.34	0.02	0.29	415
Source-wide PTE After Issuance	68.96	43.98	43.98	0.07	10.94	165.48	9.19	13,206
PSD Major Source Thresholds	250	250	250	250	250	250	250	--

This modification to an existing minor PSD stationary source is not major because:

(a) The emissions increase of each PSD regulated pollutant, excluding GHGs, are less than the PSD major source thresholds; and

(b) The emissions increase of GHGs from this modification to an existing minor PSD source are less than one hundred thousand (100,000) tons of CO_2 equivalent (CO_2e) emissions per year

Therefore, pursuant to 326 IAC 2-2, the GHG emissions are not subject to regulation and the PSD requirements do not apply.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Silo Loading***	33.90	33.90	33.90	0	0	0	0	0	0	0
Dry Ingredient Conveyance	34.85	9.25	9.25	0	0	0	0	0	0	0
Bread Line (Line 1)	0.06	0.23	0.23	0.02	3.01	118.34	2.52	3,628	3.60	3.54 Acetaldehyde
Bun Line (Line 3)****	0.05	0.21	0.21	0.02	2.71	46.85	2.27	3,266	1.46	1.41 Acetaldehyde
Insignificant Activities	0.10	0.40	0.40	0.03	5.23	0.29	4.39	6,312	0.10	0
Total PTE of Entire Source	**68.96**	**43.98**	**43.98**	**0.07**	**10.94**	**165.48**	**9.19**	**13,206**	**5.16**	**4.95** Acetaldehyde
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO_2e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO_2e	NA	NA

negl. = negligible
* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.
***In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the PM, PM10, and PM2.5 emissions from Silos 3 through 6, shall each not exceed 2.58 lb/hr.
****Pursuant to 326 IAC 8-1-6 and SSM 163-31953-00040, VOC emissions attributable to proofing and fermentation from the bun production line, identified as Line 3 (consisting of the oven (Oven3) and proof box (Proof3)), shall not exceed 46.7 tons per twelve (12) consecutive month period. (Note: the additional 0.15 tons of VOC associated with Line3 in the table above are from natural gas combustion emissions)

Federal Rule Applicability

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.

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

NESHAP:

(g) The requirements of the National Emissions Standards for Hazardous Air Pollutants for Major Sources: Halogenated Solvent Cleaning, 40 CFR 63.460, Subpart T are not included in this permit because the source does not use halogenated solvents in their cleaning process.

(h) 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).

(i) 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.

(j) 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).

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

CAM:

(l) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each new or modified pollutant-specific emission unit that meets 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 3): PM	Bag Filter*	Y	112.85	1.13	100	N	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	N	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	N	N
Flour Silo (Silo 5): $PM_{10}/PM_{2.5}$	Bag Filter*	Y	39.53	---	100	N	---
Hopper (1A): PM	Bag Filter	Y	0.06	---	100	N	---
Hopper (1A): $PM_{10}/PM_{2.5}$	Bag Filter	Y	0.03	---	100	N	---
Breaker (1): PM	Bag Filter	Y	0.03	---	100	N	
Breaker (1): $PM_{10}/PM_{2.5}$	Bag Filter	Y	0.015	---	100	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 (1B): PM	Bag Filter	Y	0.06	---	100	N	---
Hopper (1B): $PM_{10}/PM_{2.5}$	Bag Filter	Y	0.03	---	100	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	---

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)
Hopper (3): PM	Bag Filter	Y	0.04	---	100	N	---
Hopper (3): $PM_{10}/PM_{2.5}$	Bag Filter	Y	0.03	---	100	N	
Breaker (3): PM	Bag Filter	Y	0.01	---	100	N	
Breaker (3): $PM_{10}/PM_{2.5}$	Bag Filter	Y	0.006	---	100	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	---
Sifter (1): PM	Bag Filter	Y	4.34	---	100	N	---
Sifter (1): PM_{10}, $PM_{2.5}$	Bag Filter	Y	1.04	---	100	N	---
Sifter (2): PM	Bag Filter	Y	4.34	---	100	N	---
Sifter (2): PM_{10}, $PM_{2.5}$	Bag Filter	Y	1.04	---	100	N	---
Sifter (3): PM	Bag Filter	Y	4.73	---	100	N	---
Sifter (3): PM_{10}, $PM_{2.5}$	Bag Filter	Y	1.14	---	100	N	---
Hopper (4): PM	Bag Filter	Y	0.04	---	100	N	---
Hopper (4): PM_{10}, $PM_{2.5}$	Bag Filter	Y	0.025	---	100	N	
Hopper (5): PM	Bag Filter	Y	0.06	---	100	N	---
Hopper (5): PM_{10}, $PM_{2.5}$	Bag Filter	Y	0.034	---	100	N	
Hopper (6): PM	Bag Filter	Y	0.06	---	100	N	---
Hopper (6): PM_{10}, $PM_{2.5}$	Bag Filter	Y	0.034	---	100	N	
Hopper (7): PM	Bag Filter	Y	0.01	---	100	N	---
Hopper (7): PM_{10}, $PM_{2.5}$	Bag Filter	Y	0.003	---	100	N	
Hopper (8): PM	Bag Filter	Y	0.07	---	100	N	---
Hopper (8): PM_{10}, $PM_{2.5}$	Bag Filter	Y	0.04	---	100	N	
Hopper (9): PM	Bag Filter	Y	0.07	---	100	N	---
Hopper (9): PM_{10}, $PM_{2.5}$	Bag Filter	Y	0.04	---	100	N	
Hopper (10): PM	Bag Filter	Y	0.08	---	100	N	---
Hopper (10): PM_{10}, $PM_{2.5}$	Bag Filter	Y	0.044	---	100	N	
LDS1: PM	Bag Filter	Y	0.01	---	100	N	---
LDS1: PM_{10}, $PM_{2.5}$	Bag Filter	Y	0.003	---	100	N	

*The fabric bag filters were determined to be necessary for the normal and proper operation of the silos to receive material from trucks via the pneumatic conveyance system. Therefore, the pressure equalization bags are inherent process equipment and not considered control devices. The requirements of 40 CFR Part 64.2, CAM are not applicable to the three (3) storage silos.

State Rule Applicability - Entire Source

326 IAC 2-2 (PSD)
The source has the potential to emit greater than 250 tons per year of PM, PM_{10} and $PM_{2.5}$. Therefore, 326 IAC 2-2 would have applied to the source. However, the source has limited its PM, PM_{10} and $PM_{2.5}$ emissions below the major source threshold. 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, PM_{10} and $PM_{2.5}$ 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.

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 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

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 limited potential to emit of VOC and PM_{10} is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. 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, 2015, 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):

Sources or facilities of opacity located in the areas listed in section 1(c) of this rule shall meet the following limitations:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period.

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

326 IAC 6.5 (PM 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. The source has 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 3, Silo 4, Silo 5, Sifter 1, Sifter 2, Sifter 3, Hopper 1A, Breaker 1A, Mixer 1A, Hopper 1B, Breaker 1B, Mixer 1B, Hopper 3, Breaker 3, and Mixer 3, Hopper 4, Hopper 5, Hopper 6, Hopper 7, Hopper 8, Hopper 9, and Hopper 10, LDS1, Oven1 (Bread Oven), Oven3 (Bun Oven), Two (2) Thermo Cycler units, fifteen (15) space heaters, and three (3) water heaters

(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):

Two (2) 2.52 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.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The Silos, identified as Silos 3, 4, and 5, and the mixers, identified as mixers 1A, 1B and 3, would have been subject to 326 IAC 6-3 with a PM emission limitation of 16.80 pounds per hour. However, the facility is subject to the more stringent requirements of 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County). 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.

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) Significant Permit Modification No. 163-31955-00040, issued September 7, 2012, established a BACT limit of 46.7 tons per twelve (12) consecutive month period for the bun production line, identified as Line 3. IDEM, OAQ 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:

(1) 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.

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

(3) 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:

(A) Weekly Cleaning Procedure:

(i) Scrape any dough from the conveyor, grids, and supports;
(ii) Scrape any dough from the floor;
(iii) Sweep the proof box floor from the center out;
(iv) Wet the entire floor with cleaning solvent mixture and then rinse;
(v) Scrape any dough from the bun pans; and
(vi) Wash the pans, if necessary.

(B) Monthly Cleaning Procedure:

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

(C) Semi-Annually Cleaning Procedure:

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

(c) The degreasing operation is not subject to the requirements of 326 IAC 8-1-6, since it does not have the potential to emit 25 tons or more of VOC per year and because the degreasing operation is subject to 326 IAC 8-3-2.

326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements)
The cold cleaner degreaser operation is subject to the requirements of 326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements) because the source has the potential emissions of one hundred (100) tons or greater per year of VOC. The cold cleaner degreasing operation is subject to the following:

(a) The Permittee shall ensure the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.

(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.

(5) Provide a permanent, conspicuous label that lists the operating requirements in (a)(3), (a)(4), (a)(6), and (a)(7) of this condition.

(6) Store waste solvent only in closed containers.

(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) The Permittee shall ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) A refrigerated chiller.

(D) Carbon adsorption.

(E) An alternative system of demonstrated equivalent or better control as those outlined in (b)(1)(A) through (D) of this condition that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:

(A) must be a solid, fluid stream; and

(B) shall be applied at a pressure that does not cause excessive splashing.

326 IAC 8-3-8 (Material requirements for cold cleaner degreasers)

(a) Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(b) Pursuant to 326 IAC 8-3-8(c)(2), on and after January 1, 2015, the following records shall be maintained for each purchase of cold cleaner degreaser solvent:

(1) The name and address of the solvent supplier.

(2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).

(3) The type of solvent purchased.

(4) The total volume of the solvent purchased.

(5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(c) All records required by 326 IAC 8-3-8(c)(2) shall be:

(1) retained on-site or accessible electronically from the site for the most recent three (3) year period; and

(2) reasonably accessible for an additional two (2) year period.

This is a new requirement. This is a Title I change.

Compliance Determination and Monitoring 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 monitoring requirements applicable to this source are as follows:

(a) VOC Compliance Determination

Compliance with the VOC limit shall be determined by the following equation:

$$\sum_{m=1}^{12}\left(1.1x\left(\sum_{i=1}^{n}\frac{E_i * B_i}{2000lb/ton}\right)\right)_m$$ 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 bun 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.

(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 3 through 5) are in operation.

(2) Bag filters on the sifters for particulate emissions control shall be in operation and control particulate emissions whenever the sifters (Sifters 1 through 3) are in operation.

(3) 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.

(4) 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) not applicable.

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 163-34233-00040. The staff recommends to the Commissioner that this Part 70 Minor Source Modification be approved.

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal No. T163-33433-00040 be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant on July 17, 2013.

The operation of this stationary wholesale bakery shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T163-33433-00040.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Tamera Wessel 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) 234-8530 or toll free at 1-800-451-6027 extension 4-8530.

(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 Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

Appendix A: Emissions Calculations
Emissions Summary

Company Name: Hartford Bakery, Inc.
Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110
Minor Source Modification No.: 163-34233-00040
Part 70 Operating Permit Renewal No.: T163-33433-00040
Permit Reviewer: Tamera Wessel
Date: July 7, 2013

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*		338.54	118.60	118.60	0	0	0.00	0	0.00	0.00	0
Dry Ingredient Conveyance	Sifters	13.40	3.22	3.22	0	0	0.00	0	0.00	0.00	0
	Manual Weigh Station & LDS1	0.01	0.006	0.006	0	0	0.00	0	0.00	0.00	0
	Hoppers	0.54	0.31	0.31	0	0	0.00	0	0.00	0.00	0
	Breakers	0.04	0.021	0.021	0	0	0.00	0	0.00	0.00	0
	Mixers	20.87	5.69	5.69	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	3,628
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		0.10	0.40	0.40	0.03	5.23	0.29	4.39	0.00	0.10	6,312
PLANT-WIDE TOTAL		**373.60**	**128.68**	**128.68**	**0.07**	**10.94**	**165.57**	**9.19**	**4.95**	**5.16**	**13,206**

Note:

Under Part 70 Operating Permit Renewal No. T163-27317-00040, issued on April 17, 2009, IDEM, OAQ made the determination that the fabric bag filters associated with the three (3) flour storage silos, identified as Silos 3, 4, and 5, should be considered as integral parts to the raw material storage system. For purposes of Part 70 applicability, the PTE is after consideration of the integral controls. For Purposes of PSD applicability, the PTE is before consideration of any control devices. The PTE shown is before consideration of the integral silo controls.

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		33.90	33.90	33.90	0	0	0	0	0	0	0
Dry Ingredient Conveyance	Sifters	13.40	3.22	3.22	0	0	0	0	0	0	0
	Manual Weigh Station & LDS1	0.01	0.006	0.006	0	0	0	0	0	0	0
	Hoppers	0.54	0.31	0.31	0	0	0	0	0	0	0
	Breakers	0.04	0.02	0.02	0	0	0	0	0	0	0
	Mixers	20.87	5.69	5.69	0	0	0	0	0	0	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	3,628
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		0.10	0.40	0.40	0.03	5.23	0.29	4.39	0.00	0.10	6,312
PLANT-WIDE TOTAL		**68.96**	**43.98**	**43.98**	**0.07**	**10.94**	**165.48**	**9.19**	**4.95**	**5.16**	**13,206**

Appendix A: Emissions Calculations
Emissions Summary of Modification

Company Name: Hartford Bakery, Inc.
Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110
Minor Source Modification No.: 163-34233-00040
Part 70 Operating Permit Renewal No.: T163-33433-00040
Permit Reviewer: Tamera Wessel
Date: July 7, 2013

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)
Dry Ingredient Conveyance	Sifters	13.40	3.22	3.22	0	0	0.00	0	0.00	0.00	0
	LDS1	0.005	0.003	0.003	0	0	0.00	0	0.00	0.00	0
	Hoppers (4 - 10)	0.38	0.22	0.22	0	0	0.00	0	0.00	0.00	0
	Natural Gas Combustion	0.01	0.03	0.03	2.06E-03	0.34	0.02	0.29	0.01	0.01	415
PLANT-WIDE TOTAL		**13.79**	**3.47**	**3.47**	**2.06E-03**	**0.34**	**0.02**	**0.29**	**0.01**	**0.01**	**415**

Appendix A: Emissions Calculations
Particulate Emissions from Silo Loading

Company Name: Hartford Bakery, Inc.
Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110
Minor Source Modification No.: 163-34233-00040
Part 70 Operating Permit Renewal No.: T163-33433-00040
Permit Reviewer: Tamera Wessel
Date: July 7, 2013

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

Control Device Efficiency: 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 3	Flour Silo Loading	16,410	8.205	3.14	1.10	1.10	112.85	39.53	39.53	1.13	0.40	0.40	11.30	2.58	11.30	2.58	11.30	2.58
Silo 4	Flour Silo Loading	16,410	8.205	3.14	1.10	1.10	112.85	39.53	39.53	1.13	0.40	0.40	11.30	2.58	11.30	2.58	11.30	2.58
Silo 5	Flour Silo Loading	16,410	8.205	3.14	1.10	1.10	112.85	39.53	39.53	1.13	0.40	0.40	11.30	2.58	11.30	2.58	11.30	2.58
						Total Emissions	**338.54**	**118.60**	**118.60**	**3.39**	**1.19**	**1.19**	**33.90**	**7.74**	**33.90**	**7.74**	**33.90**	**7.74**

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 2-2.
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/ton
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)

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

Company Name: Hartford Bakery, Inc.
Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110
Minor Source Modification No.: 163-34233-00040
Part 70 Operating Permit Renewal No.: T163-33433-00040
Permit Reviewer: Tamera Wessel
Date: July 7, 2013

The following calculations determine the source-wide emissions from the pneumatic conveyance of the flour to various emission units.

Control Device Efficiency: 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
Sifter 1	Flour Sifter	6,600	3.300	0.30	0.072	0.072	4.34	1.04	1.04	0.04	0.01	0.01
Sifter 2	Flour Sifter	6,600	3.300	0.30	0.072	0.072	4.34	1.04	1.04	0.04	0.01	0.01
Sifter 3	Flour Sifter	7,200	3.600	0.30	0.072	0.072	4.73	1.14	1.14	0.05	0.01	0.01
Manual Weigh Station	Additives	500	0.250	0.0048	0.0028	0.0028	0.0053	0.0031	0.0031	0.0053	0.0031	0.0031
Hopper 1A	Weigh Hopper	5,520	2.760	0.0048	0.0028	0.0028	0.06	0.03	0.03	0.0006	0.0003	0.0003
Hopper 1B	Weigh Hopper	5,520	2.760	0.0048	0.0028	0.0028	0.06	0.03	0.03	0.0006	0.0003	0.0003
Breaker 1	Bag Breaker	2,400	1.200	0.0048	0.0028	0.0028	0.03	0.015	0.015	0.0003	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	4,132	2.066	0.0048	0.0028	0.0028	0.04	0.03	0.03	0.0004	0.0003	0.0003
Breaker 3	Bag Breaker	1,050	0.525	0.0048	0.0028	0.0028	0.01	0.006	0.006	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
Hopper 4	Blend Tank Hopper	4,132	2.066	0.0048	0.0028	0.0028	0.04	0.025	0.025	0.0004	0.0003	0.0003
Hopper 5	Blend Tank Hopper	5,520	2.760	0.0048	0.0028	0.0028	0.06	0.034	0.034	0.0006	0.0003	0.0003
Hopper 6	Blend Tank Hopper	5,520	2.760	0.0048	0.0028	0.0028	0.06	0.034	0.034	0.0006	0.0003	0.0003
Hopper 7	Flouring Dough Balls	500	0.250	0.0048	0.0028	0.0028	0.01	0.003	0.003	0.0001	0.0000	0.0000
Hopper 8	White Flour Hopper	6,600	3.300	0.0048	0.0028	0.0028	0.07	0.040	0.040	0.0007	0.0004	0.0004
Hopper 9	Wheat Flour Hopper	6,600	3.300	0.0048	0.0028	0.0028	0.07	0.040	0.040	0.0007	0.0004	0.0004
Hopper 10	White Flour (Prater Unit) Hopper	7,200	3.600	0.0048	0.0028	0.0028	0.08	0.044	0.044	0.0008	0.0004	0.0004
LDS1	Laramore Dusting Sys.	500	0.250	0.0048	0.0028	0.0028	0.005	0.003	0.003	0.0001	0.0000	0.0000
						Total Emissions	**34.85**	**9.25**	**9.25**	**0.35**	**0.10**	**0.10**

Notes:
The emission factors are from AP-42, Ch. 11.12, Table 11.12-2 (February 2011 revisions) for hopper loading (SCC# 3-05-011-08), and mixer loading (SCC# 3-05-011-09) and Ch. 11.19.2 , Table 11.19.2-2 for fines screening (SCC# 3-05-020-21)
$PM_{2.5}$ 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/ton
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) * (1 - Actual Control Efficiency)

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

Company Name: Hartford Bakery, Inc.
Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110
Minor Source Modification No.: 163-34233-00040
Part 70 Operating Permit Renewal No.: T163-33433-00040
Permit Reviewer: Tamera Wessel
Date: July 7, 2013

The following calculations determine the emissions from the pneumatic conveyance of the flour to various emission units affected by Minor Source Modification No. 163-34233-00040.

Control Device Efficiency: 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
Sifter 1	Flour Sifter	6,600	3.300	0.30	0.072	0.072	4.34	1.04	1.04	0.04	0.01	0.01
Sifter 2	Flour Sifter	6,600	3.300	0.30	0.072	0.072	4.34	1.04	1.04	0.04	0.01	0.01
Sifter 3	Flour Sifter	7,200	3.600	0.30	0.072	0.072	4.73	1.14	1.14	0.05	0.01	0.01
Hopper 4	Blend Tank Hopper	4,132	2.066	0.0048	0.0028	0.0028	0.04	0.025	0.025	0.0004	0.0003	0.0003
Hopper 5	Blend Tank Hopper	5,520	2.760	0.0048	0.0028	0.0028	0.06	0.034	0.034	0.0006	0.0003	0.0003
Hopper 6	Blend Tank Hopper	5,520	2.760	0.0048	0.0028	0.0028	0.06	0.034	0.034	0.0006	0.0003	0.0003
Hopper 7	Flouring Dough Balls	500	0.250	0.0048	0.0028	0.0028	0.01	0.003	0.003	0.0001	0.0000	0.0000
Hopper 8	White Flour Hopper	6,600	3.300	0.0048	0.0028	0.0028	0.07	0.040	0.040	0.0007	0.0004	0.0004
Hopper 9	Wheat Flour Hopper	6,600	3.300	0.0048	0.0028	0.0028	0.07	0.040	0.040	0.0007	0.0004	0.0004
Hopper 10	White Flour (Prater Unit) Hopper	7,200	3.600	0.0048	0.0028	0.0028	0.08	0.044	0.044	0.0008	0.0004	0.0004
LDS1	Laramore Dusting Sys.	500	0.250	0.0048	0.0028	0.0028	0.005	0.003	0.003	0.0001	0.0000	0.0000
						Total Emissions	**13.79**	**3.44**	**3.44**	**0.14**	**0.03**	**0.03**

Notes:
The emission factors are from AP-42, Ch. 11.12, Table 11.12-2 (February 2011 revisions) for hopper loading (SCC# 3-05-011-08), and mixer loading (SCC# 3-05-011-09) and Ch. 11.19.2 , Table 11.19.2-2 for fines screening (SCC# 3-05-020-21)
$PM_{2.5}$ 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/ton
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) * (1 - Actual Control Efficiency)

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

Company Name: Hartford Bakery, Inc.
Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110
Minor Source Modification No.: 163-34233-00040
Part 70 Operating Permit Renewal No.: T163-33433-00040
Permit Reviewer: Tamera Wessel
Date: July 7, 2013

				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: Hartford Bakery, Inc.
Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110
Minor Source Modification No.: 163-34233-00040
Part 70 Operating Permit Renewal No.: T163-33433-00040
Permit Reviewer: Tamera Wessel
Date: July 7, 2013

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
MM BTU/HR <100
Bread Oven (Line 1)

Company Name: Hartford Bakery, Inc.
Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110
Minor Source Modification No.: 163-34233-00040
Part 70 Operating Permit Renewal No.: T163-33433-00040
Permit Reviewer: Tamera Wessel
Date: July 7, 2013

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
7.0	1020	60.1

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/	0.06	0.23	0.23	0.02	3.01	0.17	2.52

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMc	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/	6.312E-05	3.607E-05	2.254E-03	5.411E-02	1.022E-04	**5.656E-02**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMc	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/	1.503E-05	3.306E-05	4.208E-05	1.142E-05	6.312E-05	**1.647E-04**
					Total HAPs	**0.06**
					Worst HAP	**0.05**

Methodology is the same as above.

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

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMc	120,000	2.3	2.2
Potential Emission in tons/	3,607	0.07	0.07
Summed Potential Emissions in tons/yr	3,607		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	3,628		
CO2e Total in tons/yr based on 10/30/2009 federal GWPs	3,629		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) based on 11/29/2013 federal GWPs= CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).
CO2e (tons/yr) based on 10/30/2009 federal GWPs = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Bun Oven (Line 3)

Company Name: Hartford Bakery, Inc.
Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110
Minor Source Modification No.: 163-34233-00040
Part 70 Operating Permit Renewal No.: T163-33433-00040
Permit Reviewer: Tamera Wessel
Date: July 7, 2013

Heat Input Capacity MMBtu/hr	HHV mmBtu/mmscf	Potential Throughput MMCF/yr
6.3	1020	54.1

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.05	0.21	0.21	0.02	2.71	0.15	2.27

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	5.681E-05	3.246E-05	2.029E-03	4.870E-02	9.198E-05	**5.091E-02**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.353E-05	2.976E-05	3.787E-05	1.028E-05	5.681E-05	**1.483E-04**
					Total HAPs	**0.05**
					Worst HAP	**0.05**

Methodology is the same as above.

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

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	3,246	0.06	0.06
Summed Potential Emissions in tons/yr	3,246		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	3,266		
CO2e Total in tons/yr based on 10/30/2009 federal GWPs	3,266		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) based on 11/29/2013 federal GWPs= CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).
CO2e (tons/yr) based on 10/30/2009 federal GWPs = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emissions Calculations
Natural Gas Combustion Only
Source-wide Insignificant Activities

Company Name: Hartford Bakery, Inc.
Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110
Minor Source Modification No.: 163-34233-00040
Part 70 Operating Permit Renewal No.: T163-33433-00040
Permit Reviewer: Tamera Wessel
Date: July 7, 2013

Heat Input Capacity*** MMBtu/hr	Emission Units	HHV mmBtu/mmscf	Potential Throughput MMCF/yr
5.04	2 - NG Boilers		
1.3375	1 - NG Boiler		
3.67	15 - NG Space Heaters		
1.33	3 - NG Water Heaters		
0.8	2 - NG ThermoCyclers		
12.2		1020	104.6

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.10	0.40	0.40	0.03	5.23	0.29	4.39

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

***Heat Input Capacity value is the sum of the heat input capacities of various units as follows: Boiler #1 = 2.52 MMBtu/hr, Boiler #2 = 2.52 MMBtu/hr, Boiler #3 = 1.338 MMBtu/hr, 7-Modine Units = 0.30 MMBtu/hr (each), Reznor Unit #2 = 0.20 MMBtu/hr, Dayton Unit #3 = 0.10 MMBtu/hr, 3-Dayton Units = 0.20 MMBtu/hr (each), Reznor Unit #12 = 0.25 MMBtu/hr, 2-Carrier Units = 0.18 MMBtu/hr (each), Vanguard Unit #16 = 0.036 MMBtu/hr, Enterprise Unit 17 = 0.04 MMBtu/hr, 2-Thermocycler Units = 0.40 MMBtu/hr (each), and Lochinvar Unit #20 = 1.26 MMBtu/hr

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.098E-04	6.275E-05	3.922E-03	9.412E-02	1.778E-04	**9.840E-02**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.615E-05	5.752E-05	7.321E-05	1.987E-05	1.098E-04	**2.866E-04**
					Total HAPs	**0.10**
					Worst HAP	**0.09**

Methodology is the same as above.

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

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	6,275	0.12	0.12
Summed Potential Emissions in tons/yr	6,275		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	6,312		
CO2e Total in tons/yr based on 10/30/2009 federal GWPs	6,313		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) based on 11/29/2013 federal GWPs= CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).
CO2e (tons/yr) based on 10/30/2009 federal GWPs = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emissions Calculations
Natural Gas Combustion
Insignificant Activities added through Minor Source Modification No. 163-34233-00040

Company Name: Hartford Bakery, Inc.
Address City IN Zip: 500 N. Fulton Avenue, Evansville, Indiana 47110
Minor Source Modification No.: 163-34233-00040
Part 70 Operating Permit Renewal No.: T163-33433-00040
Permit Reviewer: Tamera Wessel
Date: July 7, 2013

Heat Input Capacity*** MMBtu/hr	Emission Units	HHV mmBtu/mmscf	Potential Throughput MMCF/yr
0.8	2 - NG ThermoCyclers		
0.8		1020	6.9

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.01	0.03	0.03	0.00	0.34	0.02	0.29

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

***Heat Input Capacity value is the sum of the heat input capacities of various units as follows: Boiler #1 = 2.52 MMBtu/hr, Boiler #2 = 2.52 MMBtu/hr, Boiler #3 = 1.338 MMBtu/hr, 7-Modine Units = 0.30 MMBtu/hr (each), Reznor Unit #2 = 0.20 MMBtu/hr, Dayton Unit #3 = 0.10 MMBtu/hr, 3-Dayton Units = 0.20 MMBtu/hr (each), Reznor Unit #12 = 0.25 MMBtu/hr, 2-Carrier Units = 0.18 MMBtu/hr (each), Vanguard Unit #16 = 0.036 MMBtu/hr, Enterprise Unit 17 = 0.04 MMBtu/hr, 2-Thermocycler Units = 0.40 MMBtu/hr (each), and Lochinvar Unit #20 = 1.26 MMBtu/hr

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	7.214E-06	4.122E-06	2.576E-04	6.184E-03	1.168E-05	**6.464E-03**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.718E-06	3.779E-06	4.809E-06	1.305E-06	7.214E-06	**1.883E-05**

Total HAPs	**0.01**
Worst HAP	**0.01**

Methodology is the same as above.

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

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	412	0.01	0.01
Summed Potential Emissions in tons/yr	412		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	415		
CO2e Total in tons/yr based on 10/30/2009 federal GWPs	415		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) based on 11/29/2013 federal GWPs= CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).
CO2e (tons/yr) based on 10/30/2009 federal GWPs = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Robert Renock
Hartford Bakery Incorporated
500 N. Fulton Avenue
Evansville, IN 47710

DATE: October 1, 2014

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

SUBJECT: Final Decision
Title V Operating Permit Renewal
163-33433-00040

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 Lincoln, VP/Mgr
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.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

October 1, 2014

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: 163-33433-00040

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 6/13/2013

Mail Code 61-53

IDEM Staff	VHAUN 10/1/2014 Hartford Bakery Incorporated 163-33433-00040 FINAL		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

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1		Robert Renock Hartford Bakery Incorporated 500 N Fulton Avenue Evansville IN 47710 (Source CAATS) CONFIRMED DELIVERY									
2		Henry Lincoln VP/Mgr Hartford Bakery Incorporated 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. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 *(Affected Party)*									
7		Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 *(Health Department)*									
8		Ms. Pamela Block Air Quality Services, LLC 425 Main Street Evansville IN 47708 *(Consultant)*									
9		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 *(Affected Party)*									
10		Evansville EPA 100 E. Walnut St. Suite 100, Newsome Center Evansville IN 47713 *(Local Official)*									
11		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 *(Affected Party)*									
12		John Blair 800 Adams Ave Evansville IN 47713 *(Affected Party)*									
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