

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence Governor

Thomas W. Easterly

Commissioner

To: Interested Parties

Date: October 21, 2014

From: Matthew Stuckey, Chief

Permits Branch Office of Air Quality

Source Name: Maplehurst Bakeries, LLC

Permit Level: Title V Operating

Permit Number: 063-34014-00031

Source Location: 50 Maplehurst Dr

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 34014.

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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Commissioner

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

Maplehurst Bakeries, LLC 50 Maplehurst Drive Brownsburg, Indiana 46112

(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.: T063-34014-00031

Issued by:

Jason R. Krawczyk, Section Chief

Permits Branch Office of Air Quality Issuance Date: October 20,2014

Expiration Date: October 20,2019



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Permit Reviewer: Sarah Street / Charles Sullivan

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 commercial bakery operation.

Source Address: 50 Maplehurst Drive, Brownsburg, Indiana 46112

General Source Phone Number: (317) 858-9000

SIC Code: 2051 (Bread and Other Bakery Products, Except

Cookies and Crackers)

County Location: Hendricks

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) dry ingredient storage and conveyance system, including, but not limited to, pneumatic conveyance process equipment and piping, storage silos, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, installed in April 2002 and modified in 2012, with a maximum throughput of 20,130 pounds of dry ingredients per hour. The pneumatic conveyance system includes the following emission units:
 - (1) Two (2) flour storage silos, identified as emission units EU01 and EU02, installed in December 1995 and May 2001, respectively, each equipped with a baghouse for control of particulate matter emissions, exhausting outside.
 - One (1) flour storage silo, identified as emission unit EU03, installed in April 2002, tied to one (1) central dust collector unit for control of particulate matter emissions, exhausting outside.
 - One (1) sugar storage silo, identified as emission unit EU04, installed in April 2002, tied to one (1) central dust collector unit for control of particulate matter emissions, exhausting outside.
 - (4) One (1) dextrose storage silo, identified as emission unit EU05, installed in April 2002, tied to one (1) central dust collector unit for control of particulate matter emissions, exhausting outside.
 - (5) Five (5) use bins, identified as emission units EU06, EU07, EU10, EU11, and EU14, installed in 2002 and modified in 2012, each equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting inside.

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(6) Eight (8) use bins, identified as emission units EU08, EU9, EU12, EU13, and EU15 through EU18, installed in 2002, each tied to one (1) central dust collector unit for control of particulate matter emissions, exhausting inside.

- (7) Fifteen (15) dry ingredient scale hoppers, identified as emission units EU19 through EU33, installed in 2002, each equipped with one (1) filter unit for control of particulate matter emissions, exhausting inside.
- (8) Two (2) dry ingredient scale hoppers/mixers, identified as EU73 and EU74, installed in 2012, each equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting inside.
- (b) One (1) donut production line, identified as Moline I, installed in July 1993, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:
 - (1) One (1) proof box, identified as Proof1.
 - One (1) natural gas-fired fryer, identified as Fryer1, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 1.
- (c) One (1) donut production line, identified as Moline II, installed in December 1996, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:
 - (1) One (1) proof box, identified as Proof2.
 - One (1) natural gas-fired fryer, identified as Fryer2, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 2.
- (d) One (1) donut production line, identified as Moline III, installed in December 1998, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:
 - (1) One (1) proof box, identified as Proof3.
 - One (1) natural gas-fired fryer, identified as Fryer3, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 3.
- (e) One (1) donut production line, identified as Moline IV, installed in February 2001, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:
 - (1) One (1) proof box, identified as Proof4.
 - One (1) natural gas-fired fryer, identified as Fryer4, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 7.
- (f) One (1) donut production line, identified as Moline V, installed in February 2002, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:
 - (1) One (1) proof box, identified as Proof5.
 - One (1) natural gas-fired fryer, identified as Fryer5, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 5.

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(g) One (1) donut production line, identified as Moline VI, installed in February 2002, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:

- (1) One (1) proof box, identified as Proof6.
- One (1) natural gas-fired fryer, identified as Fryer6, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 4.
- (h) One (1) frozen donut production line, identified as Moline VII, installed in October 2008, with a maximum production rate of 3,000 pounds per hour of premix dough/cake batter and water, consisting of the following:
 - (1) One (1) natural gas-fired fryer, identified as Fryer7, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stacks 9 and 10.
 - (2) One (1) shock freezer spiral conveyor.
- (i) One (1) donut production line, identified as Moline VIII, installed in 2012, with a maximum production rate of 4,537 pounds of dough per hour, consisting of the following:
 - (1) One (1) proof box, identified as Proof8.
 - (2) One (1) electric fryer, identified as Fryer8, exhausting to Stack 11.

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

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

- (a) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
 - (1) One (1) natural gas-fired boiler, identified as Ajax, installed in September 2000, with a rated capacity of 6.3 MMBtu per hour, exhausting to Stack 6.
 - One (1) natural gas-fired boiler, identified as Ajax Boiler #2, installed in June 2003, with a rated capacity of 6.3 MMBtu per hour, exhausting to Stack 8.
 - (3) Five (5) natural gas-fired space heaters, identified as EU34, EU35, EU36, EU37 and EU40, with two (2) space heaters having a heat input capacity of 0.040 MMBtu per hour and three (3) space heaters having a heat input capacity of 0.030 MMBtu per hour, each installed in June 2005, except EU37 which was installed in October 1994.
 - (4) Two (2) natural gas-fired revert ovens, identified as EU38 and EU72, installed in June 2005, with heat input capacities of 0.170 MMBtu per hour and 0.177 MMBtu per hour, respectively.
 - (5) Two (2) natural gas-fired water heaters, identified as EU39 and EU48, installed in June 2005, with heat input capacities of 0.199 MMBtu per hour and 0.370 MMBtu per hour, respectively.
 - (6) Eight (8) natural gas-fired makeup air units, identified as EU41 through EU47 and EU49, each installed in June 2005, except EU47 which was installed in 2001,

with heat input capacities that range from 0.225 MMBtu per hour to 4.125 MMBtu per hour.

- (7) Twenty seven (27) natural gas-fired rooftop heating/air conditioning units, identified as EU50 through EU76, installed between March 1994 and February 2013, with heat input capacities that range from 0.199 MMBtu per hour to 0.370 MMBtu per hour.
- (b) Combustion source flame safety purging on startup.
- (c) Any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs, including two (2) degreasing operations.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
- (e) Stationary fire pump engines, including one (1) electric fire pump engine.
- (f) A laboratory, as defined in 326 IAC 2-7-1(21)(H).
- (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 PM₁₀, SO₂, 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) One (1) soy oil tank, with a capacity of 8,000 gallons.
 - (2) One (1) shortening tank, with a capacity of 10,000 gallons.
- (h) Paved roadways and parking lots.

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, T063-34014-00031, 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 July 1 of each year to:

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

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:
 - 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 within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,

Compliance and Enforcement Branch), or

Telephone Number: 317-233-0178 (ask for Office of Air Quality,

Compliance and Enforcement Branch) Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

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(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;
 - 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 T063-34014-00031 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).

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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

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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;

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(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:

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

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

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 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.4 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.5 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.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present. Maplehurst Bakeries, LLC Page 21 of 43 Brownsburg, Indiana T063-34014-00031

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

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. 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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

- (a) For new units:
 - Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) 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:

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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.11 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.12 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.13 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.14 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

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(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.15 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.16 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)(2), starting in 2005 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.17 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.18 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.

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(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.19 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:

- (a) One (1) dry ingredient storage and conveyance system, including, but not limited to, pneumatic conveyance process equipment and piping, storage silos, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, installed in April 2002 and modified in 2012, with a maximum throughput of 20,130 pounds of dry ingredients per hour. The pneumatic conveyance system includes the following emission units:
 - (1) Two (2) flour storage silos, identified as emission units EU01 and EU02, installed in December 1995 and May 2001, respectively, each equipped with a baghouse for control of particulate matter emissions, exhausting outside.
 - (2) One (1) flour storage silo, identified as emission unit EU03, installed in April 2002, tied to one (1) central dust collector unit for control of particulate matter emissions, exhausting outside.
 - One (1) sugar storage silo, identified as emission unit EU04, installed in April 2002, tied to one (1) central dust collector unit for control of particulate matter emissions, exhausting outside.
 - (4) One (1) dextrose storage silo, identified as emission unit EU05, installed in April 2002, tied to one (1) central dust collector unit for control of particulate matter emissions, exhausting outside.
 - (5) Five (5) use bins, identified as emission units EU06, EU07, EU10, EU11, and EU14, installed in 2002 and modified in 2012, each equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting inside.
 - (6) Eight (8) use bins, identified as emission units EU08, EU9, EU12, EU13, and EU15 through EU18, installed in 2002, each tied to one (1) central dust collector unit for control of particulate matter emissions, exhausting inside.
 - (7) Fifteen (15) dry ingredient scale hoppers, identified as emission units EU19 through EU33, installed in 2002, each equipped with one (1) filter unit for control of particulate matter emissions, exhausting inside.
 - (8) Two (2) dry ingredient scale hoppers/mixers, identified as EU73 and EU74, installed in 2012, each equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting inside.

(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 Avoidance Limits for PSD [326 IAC 2-2]

The PM emissions from the following operations shall not exceed the emission limits listed in the table below:

| Emission Unit | PM Limit (lb/hr) |
|--------------------------------|---------------------|
| Flour Silo (EU01) - Loading | 0.92 |
| Flour Silo (EU02) - Loading | 0.92 |
| Flour Silo (EU03) - Loading | 0.44 |
| Sugar Silo (EU04) - Loading | 0.44 |
| Dextrose Silo (EU05) - Loading | 0.44 |

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

D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from each of the dry ingredient storage and conveyance emission units shall not exceed the allowable PM emission rate as listed in the table below:

| Process / Emission Unit | Maximum Process Weight Rate (tons/hr) | 326 IAC 6-3-2 Allowable PM Emission Rate (lb/hr) |
|--|--|---|
| Flour Silos - Loading (EU01, EU02, EU03) | 25 (each) | 35.4 (each) |
| Minor Ingredient Silos - Loading (EU04, EU05) | 25 (each) | 35.4 (each) |
| Flour Silos - Conveying (EU01, EU02) | 2.937 (each) | 8.44 (each) |
| Flour Silo - Conveying (EU03) | 1.397 | 5.13 |
| Minor Ingredient Silos - Conveying (EU04, EU05) | 1.397 (each) | 5.13 (each) |
| Seventeen (17) Scale Hoppers (EU19-EU33, EU73, EU74) | 10.065 (each) | 19.3 (each) |

Each pound per hour limitation was calculated with the following equation:

Interpolation of the data in the table in 326 IAC 6-3-2(e)(2) for the process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

where E = rate of emission in pounds per hour, and

P = process weight rate in tons per hour

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

A Preventive Maintenance Plan (PMP) is required for these facilities and control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.4 Particulate Control

- (a) In order to comply with Condition D.1.1, particulate from the flour silos, EU01 and EU02, shall be controlled by a baghouse at all times that each flour silo is being loaded.
- (b) In order to comply with Condition D.1.1, particulate from the flour silo (EU03) and the minor ingredient silos (EU04 and EU05) shall be controlled by the central dust collector unit at all times that any of these units are being loaded.
- (c) In the event that bag failure is observed in a multi-compartment baghouse unit, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Compliance Monitoring Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.5 Visible Emissions Notations

- (a) Visible emission notations from the pressure release openings of the five (5) storage silos shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.6 Parametric Monitoring

(a) The Permittee shall monitor the pressure alarms to the 13-qty Use Bins and 17-qty Scale Hoppers continuously with the Control System over the Batching Area. When either the low pressure "No Convey Alarm" or high pressure "High Pressure Alarm Check Filters to Mixer XX" alarm is active during production, the Permittee shall take reasonable response steps. An active alarm during production is not a deviation from this permit. Section C – Response to Excursions and Exceedances contains the Permittee's

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obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) The instrument used for monitoring the pressure alarms shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.1.7 Broken or Failed Baghouse Detection

- (a) For a single compartment baghouse unit controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B Emergency Provisions).
- (b) Bag failure may be indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions, by an opacity violation, or by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows.

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

D.1.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain a daily record of visible emission notations required by that condition. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) Section C General Record Keeping Requirements contains the Permittee's obligation with regard to the record keeping required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) donut production line, identified as Moline I, installed in July 1993, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:
 - (1) One (1) proof box, identified as Proof1.
 - One (1) natural gas-fired fryer, identified as Fryer1, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 1.
- (c) One (1) donut production line, identified as Moline II, installed in December 1996, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:
 - (1) One (1) proof box, identified as Proof2.
 - One (1) natural gas-fired fryer, identified as Fryer2, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 2.
- (d) One (1) donut production line, identified as Moline III, installed in December 1998, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:
 - (1) One (1) proof box, identified as Proof3.
 - One (1) natural gas-fired fryer, identified as Fryer3, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 3.
- (e) One (1) donut production line, identified as Moline IV, installed in February 2001, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:
 - (1) One (1) proof box, identified as Proof4.
 - One (1) natural gas-fired fryer, identified as Fryer4, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 7.
- (f) One (1) donut production line, identified as Moline V, installed in February 2002, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:
 - (1) One (1) proof box, identified as Proof5.
 - One (1) natural gas-fired fryer, identified as Fryer5, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 5.
- (g) One (1) donut production line, identified as Moline VI, installed in February 2002, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:
 - (1) One (1) proof box, identified as Proof6.

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- One (1) natural gas-fired fryer, identified as Fryer6, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 4.
- (h) One (1) frozen donut production line, identified as Moline VII, installed in October 2008, with a maximum production rate of 3,000 pounds per hour of premix dough/cake batter and water, consisting of the following:
 - (1) One (1) natural gas-fired fryer, identified as Fryer7, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stacks 9 and 10.
 - (2) One (1) shock freezer spiral conveyor.
- (i) One (1) donut production line, identified as Moline VIII, installed in 2012, with a maximum production rate of 4,537 pounds of dough per hour, consisting of the following:
 - (1) One (1) proof box, identified as Proof8.
 - (2) One (1) electric fryer, identified as Fryer8, exhausting to Stack 11.

(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 Avoidance Limits for VOC BACT and PSD [326 IAC 8-1-6] [326 IAC 2-2]

In order to render the requirements of 326 IAC 8-1-6 and 326 IAC 2-2 not applicable, the VOC emissions attributable to proofing and fermentation for each donut production line (Moline I through Moline V) shall not exceed 24.4 tons per twelve (12) consecutive month period.

Compliance with these limits, combined with the potential VOC emissions from other emission units in each bakery line, shall limit the VOC emissions from each facility to less than 25 tons per twelve (12) consecutive month period for VOC and shall limit the VOC emissions from the entire source to less than 250 tons per twelve (12) consecutive month period for VOC. This shall render the requirements of 326 IAC 8-1-6 (BACT) not applicable for Moline I through Moline V. This shall also render the requirements of 326 IAC 2-2 (PSD) not applicable for the entire source.

D.2.2 BACT Requirements (VOC) [326 IAC 8-1-6]

- Pursuant to 326 IAC 8-1-6 and SSM 063-31357-00031, BACT has been determined to be the following for the donut production line identified as Moline VI:
 - (1) VOC emissions attributable to proofing and fermentation from donut production line Moline VI (consisting of the fryer (Fryer6) and the proof box (Proof6)) shall not exceed 40.1 tons per twelve (12) consecutive month period.
 - (2) The source shall operate the proof box (Proof6) 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 (Proof6), 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:

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- (i) Remove all raw ingredients and/or product containers from the seeder area:
- (ii) Scrape any dough from the racks and supports;
- (iii) Scrape and sweep the proof box floor; and
- (iv) Wet the entire floor with cleaning solvent mixture and then rinse.
- (B) Four Week Cleaning Procedure:
 - (i) Wipe off interior proof box channel rails where needed;
 - (ii) Remove any dough or oil accumulations from channel rails and cross over framework; and
 - (iii) Wash or mop the floor of the proof box. Remove accumulated waste from floor.
- (b) Pursuant to 326 IAC 8-1-6 and SSM 063-31357-00031, BACT has been determined to be the following for the donut production line identified as Moline VIII:
 - (1) VOC emissions attributable to proofing and fermentation from donut production line Moline VIII (consisting of the fryer (Fryer8) and the proof box (Proof8)) shall not exceed 60.7 tons per twelve (12) consecutive month period.
 - (2) The source shall operate the proof box (Proof8) 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 (Proof8), 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) Remove all raw ingredients and/or product containers from the seeder area:
 - (ii) Scrape any dough from the racks and supports;
 - (iii) Scrape and sweep the proof box floor; and
 - (iv) Wet the entire floor with cleaning solvent mixture and then rinse.
 - (B) Four Week Cleaning Procedure:
 - (i) Wipe off interior proof box channel rails where needed;
 - (ii) Remove any dough or oil accumulations from channel rails and cross over framework; and
 - (iii) Wash or mop the floor of the proof box. Remove accumulated waste from floor.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements

D.2.4 Volatile Organic Compounds

Compliance with the VOC limits in Conditions D.2.1 and D.2.2 shall be determined by the following equation:

$$VOC = \sum_{m=1}^{12} \left(1.1 * \left(\frac{Ei * Bi}{2000 lb / ton} \right) \right)_m$$

Where:

VOC = The VOC emissions per twelve (12) consecutive month period;

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 = Each calendar month within the twelve (12) consecutive month period.

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.2.5 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emissions limits established in Conditions D.2.1 and D.2.2.
 - (1) The dates of the compliance period.
 - (2) The number of production hours for each bakery line operated (Moline I through Moline VI and Moline VIII) during each compliance period.
 - (3) The total amount (in lbs) of yeast used for each bakery line operated during each compliance period.
 - (4) The total amount (in lbs) of dough produced for each bakery line operated during each compliance period.
 - (5) The following information necessary to calculate the VOC emission factor for each bakery line operated during each compliance period:
 - (A) The initial baker's percent of yeast;
 - (B) The total yeast action time in hours;

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- (C) The final (spike) baker's percent of yeast; and
- (D) The spiking time in hours.
- (b) To document the compliance status with Condition D.2.2(a)(3), the Permittee shall maintain records of the cleaning operations for the proof box (Proof6). The Permittee shall include in its record when a cleaning operation was not performed and the reason for the lack of cleaning operations.
- (c) To document the compliance status with Condition D.2.2(b)(3), the Permittee shall maintain records of the cleaning operations for the proof box (Proof8). The Permittee shall include in its record when a cleaning operation was not performed and the reason for the lack of cleaning operations.
- (d) Section C General Record Keeping Requirements contains the Permittee's obligation with regard to the record keeping required by this condition.

D.2.6 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.2.1 and D.2.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. 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 C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

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SECTION D.3 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) One (1) natural gas-fired boiler, identified as Ajax, installed in September 2000, with a rated capacity of 6.3 MMBtu per hour, exhausting to Stack 6.
 - One (1) natural gas-fired boiler, identified as Ajax Boiler #2, installed in June 2003, with a rated capacity of 6.3 MMBtu per hour, exhausting to Stack 8.
 - (5) Two (2) natural gas-fired water heaters, identified as EU39 and EU48, installed in June 2005, with heat input capacities of 0.199 MMBtu per hour and 0.370 MMBtu per hour, respectively.

(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 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from each of the indirect heating units shall not exceed the allowable PM emission rate as listed in the table below:

| Emission Unit | PM Limit (lb/MMBtu) |
|-------------------------|------------------------|
| Ajax Boiler | 0.60 |
| Ajax Boiler #2 | 0.56 |
| Hot Water Heater (EU39) | 0.56 |
| Hot Water Heater (EU48) | 0.56 |

The PM emissions for the boilers and water heaters are limited by the following equation:

$$Pt = 1.09 / (Q)^{0.26}$$

where

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input, and

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Maplehurst Bakeries, LLC Page 37 of 43 Brownsburg, Indiana T063-34014-00031

Permit Reviewer: Sarah Street / Charles Sullivan

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

Source Name: Maplehurst Bakeries, LLC

Source Address: 50 Maplehurst Drive, Brownsburg, Indiana 46112

Part 70 Permit No.: T063-34014-00031

| 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: |

Maplehurst Bakeries, LLC Page 38 of 43 Brownsburg, Indiana T063-34014-00031

Permit Reviewer: Sarah Street / Charles Sullivan

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: Maplehurst Bakeries, LLC

Source Address: 50 Maplehurst Drive, Brownsburg, Indiana 46112

Part 70 Permit No.: T063-34014-00031

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? Ν Type of Pollutants Emitted: TSP, PM-10, SO₂, 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:

Page 1 of 2

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

Part 70 Quarterly Report

Source Name: Maplehurst Bakeries, LLC

Source Address: 50 Maplehurst Drive, Brownsburg, Indiana 46112

Part 70 Permit No.: T063-34014-00031

Facility: Moline I, Moline II, Moline IV, Moline V, Moline VI, and Moline VIII

Parameter: Volatile Organic Compounds (VOC)

Limit: 24.4 tons per year each, for Moline I, Moline II, Moline III, Moline IV, and Moline V

40.1 tons per year, for Moline VI 60.7 tons per year, for Moline VIII

Compliance with these VOC limits shall be determined by the following equation:

VOC =
$$\sum_{m=1}^{12} \left(1.1 * \left(\frac{Ei * Bi}{2000lb/ton} \right) \right)_{m}$$

Where:

VOC = The VOC emissions per twelve (12) consecutive month period;

B_i = The amount of dough of type i produced during month m (tons/month);
 E_i = The VOC emission factor for type i bread (lb of VOC/ton of dough); and
 m = Each calendar month within the twelve (12) consecutive month period.

The emission factor for each type of dough 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 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.

Page 2 of 2

| QUARTER: | YEAR: | |
|----------|-------|--|
| | | |

| Month | Unit ID | Column 1 | Column 2 | Column 1 + Column 2 | | |
|---------|-------------|------------|--------------------|---------------------|--|--|
| | Office ID | This Month | Previous 11 Months | 12 Month Total | | |
| | Moline I | | | | | |
| | Moline II | | | | | |
| | Moline III | | | | | |
| Month 1 | Moline IV | | | | | |
| | Moline V | | | | | |
| | Moline VI | | | | | |
| | Moline VIII | | | | | |
| | Moline I | | | | | |
| | Moline II | | | | | |
| | Moline III | | | | | |
| Month 2 | Moline IV | | | | | |
| | Moline V | | | | | |
| | Moline VI | | | | | |
| | Moline VIII | | | | | |
| | Moline I | | | | | |
| | Moline II | | | | | |
| | Moline III | | | | | |
| Month 3 | Moline IV | | | | | |
| | Moline V | | | | | |
| | Moline VI | | | | | |
| | Moline VIII | | | | | |

| □ No deviation occurred in this quarter. |
|--|
| □ Deviation/s occurred in this quarter. Deviation has been reported on: |
| Submitted by: Title / Position: |
| Signature: |
| Date: |
| Phone: |

Response Steps Taken:

Permit Reviewer: Sarah Street / Charles Sullivan

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: Maplehurst Bakeries, LLC Source Address: 50 Maplehurst Drive, Brownsburg, Indiana 46112 Part 70 Permit No.: T063-34014-00031 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 #) **Duration of Deviation:** Date of Deviation: **Number of Deviations:** Probable Cause of Deviation:

Maplehurst Bakeries, LLC Brownsburg, Indiana Permit Reviewer: Sarah Street / Charles Sullivan

Page 2 of 2

| 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: Maplehurst Bakeries, LLC

Source Location: 50 Maplehurst Drive, Brownsburg, Indiana 46112

County: Hendricks

SIC Code: 2051 (Bread and Other Bakery Products, Except Cookies

and Crackers)

Operation Permit No.: T063-34014-00031

Permit Reviewer: C. Sullivan

On August 30, 2014, the Office of Air Quality (OAQ) had a notice published in the Hendricks County Flyer, in Plainfield, Indiana, stating that Maplehurst Bakeries, LLC had applied for a Part 70 Operating Permit Renewal to continue to operate an existing stationary commercial bakery operation. 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**.

1. IDEM, OAQ has corrected a typographical error contained in the Permittee's compliance determination requirements and Part 70 Quarterly Report Form.

. . . .

D.2.4 Volatile Organic Compounds

Compliance with the VOC limits in Conditions D.2.1 and D.2.2 shall be determined by the following equation:

$$VOC = \sum_{m=1}^{12} \left(1.1 * \left(\frac{Ei * Bi}{2000 lb / ton} \right) \right)_{m} \le 24.40 \text{ tons of VOC per twelve consecutive month period}$$

Where:

VOC = The VOC emissions per twelve (12) consecutive month period;

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 = Each calendar month within the twelve (12) consecutive month period.

. . . .

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

Part 70 Quarterly Report

Source Name: Maplehurst Bakeries, LLC

Source Address: 50 Maplehurst Drive, Brownsburg, Indiana 46112

Part 70 Permit No.: T063-34014-00031

Facility: Moline I, Moline II, Moline IV, Moline V, Moline VI, and Moline VIII

Parameter: Volatile Organic Compounds (VOC)

Limit: 24.4 tons per year each, for Moline I, Moline II, Moline IV, and Moline V

40.1 tons per year, for Moline VI 60.7 tons per year, for Moline VIII

Compliance with these VOC limits shall be determined by the following equation:

$$VOC = \sum_{m=1}^{12} \left(1.1 * \left(\frac{Ei * Bi}{2000 lb / ton} \right) \right)_{m} \le 24.40 \text{ tons of VOC per twelve consecutive month period}$$

Where:

VOC = The VOC emissions per twelve (12) consecutive month period;

B_i = The amount of dough of type i produced during month m (tons/month);
 E_i = The VOC emission factor for type i bread (lb of VOC/ton of dough); and
 m = Each calendar month within the twelve (12) consecutive month period.

The emission factor for each type of dough 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 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.

...

IDEM Contact

- (a) Questions regarding this proposed Part 70 Operating Renewal can be directed to Charles Sullivan 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) 232-8422 or toll free at 1-800-451-6027 extension 2-8422.
- (b) A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

Maplehurst Bakeries, LLC Brownsburg, Indiana Permit Reviewer: C. Sullivan Page 3 of 3 ATSD for Part 70 Operating Renewal No. T063-34014-00031

(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

Source Background and Description

Source Name: Maplehurst Bakeries, LLC

Source Location: 50 Maplehurst Drive, Brownsburg, Indiana 46112

County: Hendricks

SIC Code: 2051 (Bread and Other Bakery Products, Except

Cookies and Crackers)

Permit Renewal No.: T063-34014-00031

Permit Reviewer: Sarah Street / Charles Sullivan

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Maplehurst Bakeries, LLC relating to the operation of a stationary commercial bakery operation. On December 19, 2013, Maplehurst Bakeries, LLC submitted an application to the OAQ requesting to renew its operating permit. Maplehurst Bakeries, LLC was issued a Part 70 Operating Permit T063-28023-00031 on October 9, 2009.

Note that with this Renewal, the source name is changing from Maplehurst Bakeries, Inc. to Maplehurst Bakeries, LLC.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) dry ingredient storage and conveyance system, including, but not limited to, pneumatic conveyance process equipment and piping, storage silos, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, installed in April 2002 and modified in 2012, with a maximum throughput of 20,130 pounds of dry ingredients per hour. The pneumatic conveyance system includes the following emission units:
 - (1) Two (2) flour storage silos, identified as emission units EU01 and EU02, installed in December 1995 and May 2001, respectively, each equipped with a baghouse for control of particulate matter emissions, exhausting outside.
 - (2) One (1) flour storage silo, identified as emission unit EU03, installed in April 2002, tied to one (1) central dust collector unit for control of particulate matter emissions, exhausting outside.
 - One (1) sugar storage silo, identified as emission unit EU04, installed in April 2002, tied to one (1) central dust collector unit for control of particulate matter emissions, exhausting outside.
 - (4) One (1) dextrose storage silo, identified as emission unit EU05, installed in April 2002, tied to one (1) central dust collector unit for control of particulate matter emissions, exhausting outside.
 - (5) Five (5) use bins, identified as emission units EU06, EU07, EU10, EU11, and EU14, installed in 2002 and modified in 2012, each equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting inside.

- (6) Eight (8) use bins, identified as emission units EU08, EU9, EU12, EU13, and EU15 through EU18, installed in 2002, each tied to one (1) central dust collector unit for control of particulate matter emissions, exhausting inside.
- (7) Fifteen (15) dry ingredient scale hoppers, identified as emission units EU19 through EU33, installed in 2002, each equipped with one (1) filter unit for control of particulate matter emissions, exhausting inside.
- (8) Two (2) dry ingredient scale hoppers/mixers, identified as EU73 and EU74, installed in 2012, each equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting inside.
- (b) One (1) donut production line, identified as Moline I, installed in July 1993, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:
 - (1) One (1) proof box, identified as Proof1.
 - One (1) natural gas-fired fryer, identified as Fryer1, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 1.
- (c) One (1) donut production line, identified as Moline II, installed in December 1996, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:
 - (1) One (1) proof box, identified as Proof2.
 - (2) One (1) natural gas-fired fryer, identified as Fryer2, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 2.
- (d) One (1) donut production line, identified as Moline III, installed in December 1998, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:
 - (1) One (1) proof box, identified as Proof3.
 - One (1) natural gas-fired fryer, identified as Fryer3, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 3.
- (e) One (1) donut production line, identified as Moline IV, installed in February 2001, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:
 - (1) One (1) proof box, identified as Proof4.
 - One (1) natural gas-fired fryer, identified as Fryer4, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 7.
- (f) One (1) donut production line, identified as Moline V, installed in February 2002, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:
 - (1) One (1) proof box, identified as Proof5.
 - One (1) natural gas-fired fryer, identified as Fryer5, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 5.
- (g) One (1) donut production line, identified as Moline VI, installed in February 2002, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:

Permit Reviewer: Sarah Street / Charles Sullivan

- (1) One (1) proof box, identified as Proof6.
- One (1) natural gas-fired fryer, identified as Fryer6, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 4.
- (h) One (1) frozen donut production line, identified as Moline VII, installed in October 2008, with a maximum production rate of 3,000 pounds per hour of premix dough/cake batter and water, consisting of the following:
 - (1) One (1) natural gas-fired fryer, identified as Fryer7, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stacks 9 and 10.
 - (2) One (1) shock freezer spiral conveyor.
- (i) One (1) donut production line, identified as Moline VIII, installed in 2012, with a maximum production rate of 4,537 pounds of dough per hour, consisting of the following:
 - (1) One (1) proof box, identified as Proof8.
 - (2) One (1) electric fryer, identified as Fryer8, exhausting to Stack 11.

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

The source consists of no emission units that were constructed and/or are operating without a permit.

Emission Units and Pollution Control Equipment Removed From the Source

The source is not removing any emission units with this Renewal.

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) One (1) natural gas-fired boiler, identified as Ajax, installed in September 2000, with a rated capacity of 6.3 MMBtu per hour, exhausting to Stack 6.
 - One (1) natural gas-fired boiler, identified as Ajax Boiler #2, installed in June 2003, with a rated capacity of 6.3 MMBtu per hour, exhausting to Stack 8.
 - (3) Five (5) natural gas-fired space heaters, identified as EU34, EU35, EU36, EU37 and EU40, with two (2) space heaters having a heat input capacity of 0.040 MMBtu per hour and three (3) space heaters having a heat input capacity of 0.030 MMBtu per hour, each installed in June 2005, except EU37 which was installed in October 1994.
 - (4) Two (2) natural gas-fired revert ovens, identified as EU38 and EU72, installed in June 2005, with heat input capacities of 0.170 MMBtu per hour and 0.177 MMBtu per hour, respectively.
 - (5) Two (2) natural gas-fired water heaters, identified as EU39 and EU48, installed in June 2005, with heat input capacities of 0.199 MMBtu per hour and 0.370 MMBtu per hour, respectively.

- (6) Eight (8) natural gas-fired makeup air units, identified as EU41 through EU47 and EU49, each installed in June 2005, except EU47 which was installed in 2001, with heat input capacities that range from 0.225 MMBtu per hour to 4.125 MMBtu per hour.
- (7) Twenty seven (27) natural gas-fired rooftop heating/air conditioning units, identified as EU50 through EU76, installed between March 1994 and February 2013, with heat input capacities that range from 0.199 MMBtu per hour to 0.370 MMBtu per hour.
- (b) Combustion source flame safety purging on startup.
- (c) Any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs, including two (2) degreasing operations.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
- (e) Stationary fire pump engines, including one (1) electric fire pump engine.
- (f) A laboratory, as defined in 326 IAC 2-7-1(21)(H).
- (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 PM₁₀, SO₂, 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) One (1) soy oil tank, with a capacity of 8,000 gallons.
 - (2) One (1) shortening tank, with a capacity of 10,000 gallons.
- (h) Paved roadways and parking lots.

Existing Approvals

Since the issuance of the Part 70 Operating Permit T063-28023-00031 on October 2, 2009, the source has constructed or has been operating under the following additional approvals:

- (a) Significant Source Modification No. 063-31357-00031 issued on May 25, 2012; and
- (b) Significant Permit Modification No. 063-31381-00031 issued on June 11, 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.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Hendricks 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 July 11, 2013, 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 Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which 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. Hendricks 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) $PM_{2.5}$

Hendricks 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

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

Fugitive Emissions

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

| Unrestricted Potential Emissions | | | | | |
|----------------------------------|---------------------------------|--|--|--|--|
| Pollutant | Tons/year | | | | |
| PM | Greater than 250 | | | | |
| PM ₁₀ | Greater than 100, Less than 250 | | | | |
| PM _{2.5} | Greater than 100, Less than 250 | | | | |
| SO ₂ | Less than 100 | | | | |
| NO _x | Less than 100 | | | | |
| VOC | Greater than 250 | | | | |
| СО | Less than 100 | | | | |
| GHGs as CO₂e | Less than 100,000 | | | | |
| Single HAP | Less than 10 | | | | |
| Total HAP | Less than 25 | | | | |

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 PM10, PM2.5, and 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.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO2 equivalent emissions (CO2e) per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

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.

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.

| | Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) | | | | | | | | | |
|------------------------------------|--|--------------------|----------------------|-----------------|-----------------|------------------------|-------|------------------------------|---------------|---------------------------------------|
| Process/ Emission Unit | PM | PM ₁₀ * | PM _{2.5} ** | SO ₂ | NO _x | VOC | СО | GHGs | Total HAPs | Worst Single HAP (Acetaldehyde) |
| Silo Receiving | 13.84 ⁽¹⁾ | 48.49 | 48.49 | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 |
| Dry Ingredient Conveyance | 163.85 | 55.49 | 55.49 | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 |
| Moline I | 1.46 | 1.75 | 1.75 | 0.003 | 0.56 | <25.00 ⁽²⁾ | 0.47 | 674 | 1.28 | 1.27 |
| Moline II | 1.46 | 1.75 | 1.75 | 0.003 | 0.56 | <25.00 ⁽²⁾ | 0.47 | 674 | 1.21 | 1.20 |
| Moline III | 1.46 | 1.75 | 1.75 | 0.003 | 0.56 | <25.00 ⁽²⁾ | 0.47 | 674 | 1.24 | 1.22 |
| Moline IV | 1.46 | 1.75 | 1.75 | 0.003 | 0.56 | <25.00 ⁽²⁾ | 0.47 | 674 | 1.17 | 1.16 |
| Moline V | 1.46 | 1.75 | 1.75 | 0.003 | 0.56 | <25.00 ⁽²⁾ | 0.47 | 674 | 1.19 | 1.18 |
| Moline VI | 1.46 | 1.75 | 1.75 | 0.003 | 0.56 | < 40.69 ⁽³⁾ | 0.47 | 674 | 1.21 | 1.20 |
| Moline VII | 1.46 | 1.75 | 1.75 | 0.003 | 0.56 | 0.56 | 0.47 | 674 | 0.01 | 0.00 |
| Moline VIII | 2.19 | 2.58 | 2.58 | 0 | 0 | < 61.54 ⁽³⁾ | 0 | 0 | 1.82 | 1.82 |
| Insignificant Activities | 0.28 | 1.11 | 1.11 | 0.09 | 14.57 | 0.80 | 12.24 | 17,588 | 0.27 | 0.00 |
| Total PTE of Entire Source | 190.35 | 119.93 | 119.93 | 0.11 | 18.48 | 228.57 | 15.52 | 22,305 | 9.42 | 9.07 |
| Title V Major Source Thresholds | NA | 100 | 100 | 100 | 100 | 100 | 100 | 100,000 CO ₂ e | 25 | 10 |
| PSD Major Source Thresholds | 250 | 250 | 250 | 250 | 250 | 250 | 250 | NA | NA | NA |

^{*} 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".

PSD Minor Limits: PM

The source has the potential to emit greater than 250 tons per year of PM. Therefore, 326 IAC 2-2 would have applied to the source. However, the source has decided to limit their PM emissions below the major source threshold as follows:

| Emission Unit | PM Limit (lb/hr) |
|--------------------------------|------------------|
| Flour Silo (EU01) - Loading | 0.92 |
| Flour Silo (EU02) - Loading | 0.92 |
| Flour Silo (EU03) - Loading | 0.44 |
| Sugar Silo (EU04) - Loading | 0.44 |
| Dextrose Silo (EU05) - Loading | 0.44 |

Compliance with the above limits, combined with the potential to emit PM from other emission units at the source, shall limit the PM emissions from the entire source to less than 250 tons per twelve (12) consecutive month period for PM. This shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

^{**}PM_{2.5} listed is direct PM_{2.5}.

⁽¹⁾ PM emissions limited in order to render the requirements of 326 IAC 2-2 not applicable.

⁽²⁾ VOC emissions attributable to proofing and fermentation for each donut production line (Moline I through Moline V) are limited in order to render the requirements of 326 IAC 2-2 and 326 IAC 8-1-6 not applicable.

⁽³⁾ Subject to 326 IAC 8-1-6 (BACT).

Fugitive emissions are not included in this table.

PSD Minor Limits: VOC

The source has the potential to emit greater than 250 tons per year of VOC. Therefore, 326 IAC 2-2 would have applied to the source. However, the source has decided to limit their VOC emissions below the major source threshold as follows:

In order to render the requirements of 326 IAC 8-1-6 and 326 IAC 2-2 not applicable, the VOC emissions attributable to proofing and fermentation for each donut production line (Moline I through Moline V) shall not exceed 24.4 tons per twelve (12) consecutive month period.

Compliance with these limits, combined with the potential VOC emissions from other emission units in each bakery line, shall limit the VOC emissions from each facility to less than 25 tons per twelve (12) consecutive month period for VOC and shall limit the VOC emissions from the entire source to less than 250 tons per twelve (12) consecutive month period for VOC. This shall render the requirements of 326 IAC 8-1-6 (BACT) not applicable for Moline I through Moline V. This shall also render the requirements of 326 IAC 2-2 (PSD) not applicable for the entire source.

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the 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 emission units do not utilize a control device, and therefore CAM is not applicable to these units:

| Emission Units Not Subject to CAM | | | | | |
|---|--|--|--|--|--|
| Moline I (donut production line) | | | | | |
| Moline II (donut production line) | | | | | |
| Moline III (donut production line) | | | | | |
| Moline IV (donut production line) | | | | | |
| Moline V (donut production line) | | | | | |
| Moline VI (donut production line) | | | | | |
| Moline VII (frozen donut production line) | | | | | |
| Moline VIII (donut production line) | | | | | |
| Insignificant Activities | | | | | |

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

| Emission Unit | Pollutant | Control Device Used | Emission Limitation (Y/N) | Uncontrolled PTE (tons/year) | Controlled PTE (tons/year) | Major Source Threshold (tons/year) | CAM Applicable (Y/N) | Large Unit (Y/N) | | | |
|-------------------|-----------|---------------------------|---------------------------------|---|---|---|----------------------------|------------------------|--|--|--|
| Flour Silo (FU01) | РМ | Doghouse | Y (326 IAC 2-2) | Less than 100 | Less than 100 | 100 | N | n/a | | | |
| Flour Silo (EU01) | PM10 | Baghouse | N | CAM is not ap | plicable becaus | e this unit is not | subject to an e | mission | | | |
| | PM2.5 | | N | | limitation or standard for these pollutants | | | | | | |
| Flour Silo (FU02) | РМ | Dogbouse | Y (326 IAC 2-2) | Less than 100 | Less than 100 | 100 | N | n/a | | | |
| Flour Silo (EU02) | PM10 | Baghouse | N | CAM is not ap | CAM is not applicable because this unit is not subject to an emission | | | | | | |
| 1 | PM2.5 | | N | | limitation or star | ndard for these p | oollutants | | | | |
| | PM | Dust | Y (326 IAC 2-2) | Less than 100 | Less than 100 | Less than 100 | | n/a | | | |
| | PM10 | collector | N | CAM is not applicable because this unit is not subject to an emission | | | | | | | |
| | PM2.5 | | N | | limitation or standard for these pollutants | | | | | | |
| Sugar Silo | PM | Dust | Y (326 IAC 2-2) | Less than 100 | Less than 100 | 100 | N | n/a | | | |
| (EU04) | PM10 | collector | N | CAM is not applicable because this unit is not subject to an emission | | | | | | | |
| | PM2.5 | | N | limitation or standard for these pollutants | | | | | | | |
| Dextrose Silo | РМ | Dust | Y (326 IAC 2-2) | Less than 100 | Less than 100 | 100 | N | n/a | | | |
| (EU05) | PM10 | collector | N | CAM is not ap | plicable becaus | e this unit is not | subject to an e | mission | | | |
| | PM2.5 | | N | limitation or standard for these pollutants | | | | | | | |
| Has Dies | PM | Dust | Y (326 IAC 6-3) | Less than 100 | Less than 100 | 100 | N | n/a | | | |
| Use Bins | PM10 | collector | N | CAM is not ap | CAM is not applicable because this unit is not subject to an emi- | | | | | | |
| | PM2.5 | | N | | limitation or star | ndard for these p | oollutants | | | | |
| 0 1 11 | РМ | Dust | Y (326 IAC 6-3) | Less than 100 | Less than 100 | 100 | N | n/a | | | |
| Scale Hoppers | PM10 | collector | N | CAM is not ap | plicable becaus | e this unit is not | subject to an e | mission | | | |
| | PM2.5 | | N | | | ndard for these p | | | | | |

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the emission units as part of this Renewal.

New Source Performance Standards (NSPS)

- (b) The storage tanks at this source have individual capacities less than 75 cubic meters (19,813 gallons). Therefore, the New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (326 IAC 12, 40 CFR 60.110b, Subpart Kb) are not included in this permit renewal.
- (c) This source is not subject to the requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60.300, Subpart DD because this source does not contain any grain terminal elevators or grain storage elevators. This source contains dry ingredient storage silos that are not equipped with grain elevators.
- (d) The requirements of the following NSPS under 40 CFR Part 60 are not included in the permit:
 - (1) New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60.4200, Subpart IIII); and
 - (2) New Source Performance Standard for Spark Ignition Internal Combustion Engines, 40 CFR 60.4230, Subpart JJJJ).

These NSPS apply only to internal combustion engines. Since the stationary fire pump engine is electric, it does not have an internal combustion engine; therefore, Maplehurst Bakeries, LLC is not subject to these NSPS.

Appendix A: Emissions Calculations **Emissions Summary**

Company Name: Maplehurst Bakeries, LLC Address City IN Zip: 50 Maplehurst Drive, Brownsburg, Indiana 46112 Part 70 Renewal No.: T063-34014-00031 Permit Reviewer: Sarah Street / Charles Sullivan

| | | | UN | CONTROLL | ED POTENT | IAL TO EMI | T (tons/yr) | | | | |
|---------------|------------------------|--------|------------------|-------------------|-----------------|-----------------|-------------|-------|-------------------|------------|---------------------------|
| Em | nission Units | PM | PM ₁₀ | PM _{2.5} | SO ₂ | NO _x | voc | со | GHGs (as CO₂e) | Total HAPs | Single HAP (Acetaldehyde) |
| 5 | Silo Loading | 138.42 | 48.49 | 48.49 | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 |
| Dry Ingre | edient Conveyance | 163.85 | 55.49 | 55.49 | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 |
| | Proofing | 0 | 0 | 0 | 0 | 0 | 3.84 | 0 | 0 | 0.12 | 0.12 |
| Moline I | Fermentation | 0 | 0 | 0 | 0 | 0 | 38.36 | 0 | 0 | 1.15 | 1.15 |
| Wollife | Frying | 1.45 | 1.71 | 1.71 | 0 | 0 | 0.56 | 0 | 0 | 0.00 | 0.00 |
| | Natural Gas Combustion | 0.01 | 0.04 | 0.04 | 0.00 | 0.56 | 0.03 | 0.47 | 674 | 0.01 | 0.00 |
| | Proofing | 0 | 0 | 0 | 0 | 0 | 3.65 | 0 | 0 | 0.11 | 0.11 |
| Moline II | Fermentation | 0 | 0 | 0 | 0 | 0 | 36.49 | 0 | 0 | 1.09 | 1.09 |
| Moline II | Frying | 1.45 | 1.71 | 1.71 | 0 | 0 | 0.56 | 0 | 0 | 0.00 | 0.00 |
| | Natural Gas Combustion | 0.01 | 0.04 | 0.04 | 0.00 | 0.56 | 0.03 | 0.47 | 674 | 0.01 | 0.00 |
| | Proofing | 0 | 0 | 0 | 0 | 0 | 3.71 | 0 | 0 | 0.11 | 0.11 |
| Moline III | Fermentation | 0 | 0 | 0 | 0 | 0 | 37.11 | 0 | 0 | 1.11 | 1.11 |
| Wollrie III | Frying | 1.45 | 1.71 | 1.71 | 0 | 0 | 0.56 | 0 | 0 | 0.00 | 0.00 |
| | Natural Gas Combustion | 0.01 | 0.04 | 0.04 | 0.00 | 0.56 | 0.03 | 0.47 | 674 | 0.01 | 0.00 |
| | Proofing | 0 | 0 | 0 | 0 | 0 | 3.52 | 0 | 0 | 0.11 | 0.11 |
| Moline IV | Fermentation | 0 | 0 | 0 | 0 | 0 | 35.24 | 0 | 0 | 1.06 | 1.06 |
| Wolline IV | Frying | 1.45 | 1.71 | 1.71 | 0 | 0 | 0.56 | 0 | 0 | 0.00 | 0.00 |
| | Natural Gas Combustion | 0.01 | 0.04 | 0.04 | 0.00 | 0.56 | 0.03 | 0.47 | 674 | 0.01 | 0.00 |
| | Proofing | 0 | 0 | 0 | 0 | 0 | 3.59 | 0 | 0 | 0.11 | 0.11 |
| Moline V | Fermentation | 0 | 0 | 0 | 0 | 0 | 35.87 | 0 | 0 | 1.08 | 1.08 |
| Wolline v | Frying | 1.45 | 1.71 | 1.71 | 0 | 0 | 0.56 | 0 | 0 | 0.00 | 0.00 |
| | Natural Gas Combustion | 0.01 | 0.04 | 0.04 | 0.00 | 0.56 | 0.03 | 0.47 | 674 | 0.01 | 0.00 |
| | Proofing | 0 | 0 | 0 | 0 | 0 | 3.65 | 0 | 0 | 0.11 | 0.11 |
| Moline VI | Fermentation | 0 | 0 | 0 | 0 | 0 | 36.49 | 0 | 0 | 1.09 | 1.09 |
| Moline VI | Frying | 1.45 | 1.71 | 1.71 | 0 | 0 | 0.56 | 0 | 0 | 0.00 | 0.00 |
| | Natural Gas Combustion | 0.01 | 0.04 | 0.04 | 0.00 | 0.56 | 0.03 | 0.47 | 674 | 0.01 | 0.00 |
| Moline VII* | Frying | 1.45 | 1.71 | 1.71 | 0 | 0 | 0.56 | 0 | 0 | 0.00 | 0.00 |
| Wolline VII | Natural Gas Combustion | 0.01 | 0.04 | 0.04 | 0.00 | 0.56 | 0.03 | 0.47 | 674 | 0.01 | 0.00 |
| | Proofing | 0 | 0 | 0 | 0 | 0 | 5.52 | 0 | 0 | 0.17 | 0.17 |
| Moline VIII** | Fermentation | 0 | 0 | 0 | 0 | 0 | 55.18 | 0 | 0 | 1.66 | 1.66 |
| | Frying | 2.19 | 2.58 | 2.58 | 0 | 0 | 0.84 | 0 | 0 | 0.00 | 0.00 |
| Insigr | nificant Activities | 0.28 | 1.11 | 1.11 | 0.09 | 14.57 | 0.80 | 12.24 | 17,588 | 0.27 | 0.00 |
| PLAN | IT-WIDE TOTAL | 314.93 | 119.93 | 119.93 | 0.11 | 18.48 | 307.99 | 15.52 | 22,305 | 9.42 | 9.07 |
| Fugi | itive Emissions | 11.59 | 2.32 | 0.57 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total with | n Fugitive Emissions | 326.51 | 122.25 | 120.50 | 0.11 | 18.48 | 307.99 | 15.52 | 22,305 | 9.42 | 9.07 |

| LIMITED POTENTIAL TO EMIT (tons/yr) | | | | | | | | | | | | |
|-------------------------------------|------------------------|----------------|------------------|-------------------|-----------------|-----------------|--------|-------|-------------------|------------|---------------------------|--|
| Em | nission Units | PM | PM ₁₀ | PM _{2.5} | SO ₂ | NO _x | voc | со | GHGs (as CO₂e) | Total HAPs | Single HAP (Acetaldehyde) | |
| Ş | Silo Loading | 13.84 | 48.49 | 48.49 | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | |
| Dry Ingr | edient Conveyance | 163.85 | 55.49 | 55.49 | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0.00 | |
| | Proofing | 0 | 0 | 0 | 0 | 0 | 24.4 | 0 | 0 | 0.12 | 0.12 | |
| Moline I | Fermentation | 0 | 0 | 0 | 0 | 0 | 24.4 | 0 | 0 | 1.15 | 1.15 | |
| Wollie | Frying | 1.45 | 1.71 | 1.71 | 0 | 0 | 0.56 | 0 | 0 | 0.00 | 0.00 | |
| | Natural Gas Combustion | 0.01 | 0.04 | 0.04 | 0.003 | 0.56 | 0.03 | 0.47 | 674 | 0.01 | 0.00 | |
| | Proofing | 0 | 0 | 0 | 0 | 0 | 24.4 | 0 | 0 | 0.11 | 0.11 | |
| Moline II | Fermentation | 0 | 0 | 0 | 0 | 0 | 24.4 | 0 | 0 | 1.09 | 1.09 | |
| Moline II | Frying | 1.45 | 1.71 | 1.71 | 0 | 0 | 0.56 | 0 | 0 | 0.00 | 0.00 | |
| | Natural Gas Combustion | 0.01 | 0.04 | 0.04 | 0.003 | 0.56 | 0.03 | 0.47 | 674 | 0.01 | 0.00 | |
| | Proofing | 0 | 0 | 0 | 0 | 0 | 24.4 | 0 | 0 | 0.11 | 0.11 | |
| M - P 101 | Fermentation | 0 | 0 | 0 | 0 | 0 | 24.4 | 0 | 0 | 1.11 | 1.11 | |
| Moline III | Frying | 1.45 | 1.71 | 1.71 | 0 | 0 | 0.56 | 0 | 0 | 0.00 | 0.00 | |
| | Natural Gas Combustion | 0.01 | 0.04 | 0.04 | 0.003 | 0.56 | 0.03 | 0.47 | 674 | 0.01 | 0.00 | |
| | Proofing | 0 | 0 | 0 | 0 | 0 | 24.4 | 0 | 0 | 0.11 | 0.11 | |
| Moline IV | Fermentation | 0 | 0 | 0 | 0 | 0 | 24.4 | 0 | 0 | 1.06 | 1.06 | |
| Moline IV | Frying | 1.45 | 1.71 | 1.71 | 0 | 0 | 0.56 | 0 | 0 | 0.00 | 0.00 | |
| | Natural Gas Combustion | 0.01 | 0.04 | 0.04 | 0.003 | 0.56 | 0.03 | 0.47 | 674 | 0.011 | 0.00 | |
| | Proofing | 0 | 0 | 0 | 0 | 0 | 24.4 | 0 | 0 | 0.11 | 0.11 | |
| Moline V | Fermentation | 0 | 0 | 0 | 0 | 0 | 24.4 | 0 | 0 | 1.08 | 1.08 | |
| wollne v | Frying | 1.45 | 1.71 | 1.71 | 0 | 0 | 0.56 | 0 | 0 | 0.00 | 0.00 | |
| | Natural Gas Combustion | 0.01 | 0.04 | 0.04 | 0.003 | 0.56 | 0.03 | 0.47 | 674 | 0.01 | 0.00 | |
| | Proofing | 0 | 0 | 0 | 0 | 0 | 40.4 | 0 | 0 | 0.11 | 0.11 | |
| Malian M | Fermentation | 0 | 0 | 0 | 0 | 0 | 40.1 | 0 | 0 | 1.09 | 1.09 | |
| Moline VI | Frying | 1.45 | 1.71 | 1.71 | 0 | 0 | 0.56 | 0 | 0 | 0.00 | 0.00 | |
| | Natural Gas Combustion | 0.01 | 0.04 | 0.04 | 0.003 | 0.56 | 0.03 | 0.47 | 674 | 0.01 | 0.00 | |
| M - P 1/11# | Frying | 1.45 | 1.71 | 1.71 | 0 | 0 | 0.56 | 0 | 0 | 0.00 | 0.00 | |
| Moline VII* | Natural Gas Combustion | 0.01 | 0.04 | 0.04 | 0.003 | 0.56 | 0.03 | 0.47 | 674 | 0.01 | 0.00 | |
| | Proofing | 0 | 0 | 0 | 0 | 0 | 00.7 | 0 | 0 | 0.17 | 0.17 | |
| Moline VIII** | Fermentation | 0 | 0 | 0 | 0 | 0 | 60.7 | 0 | 0 | 1.66 | 1.66 | |
| | Frying | 2.19 | 2.58 | 2.58 | 0 | 0 | 0.84 | 0 | 0 | 0.00 | 0.00 | |
| Insia | nificant Activities | 0.28 | 1.11 | 1.11 | 0.09 | 14.57 | 0.80 | 12.24 | 17,588 | 0.27 | 0.00 | |
| | IT-WIDE TOTAL | 190.35 | 119.93 | 119.93 | 0.11 | 18.48 | 228.57 | 15.52 | 22,305 | 9.42 | 9.07 | |
| | Fugitive Emissions | | 1.20 | 0.29 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| Total with Fugitive Emissions | | 5.98 196.33 | 121.13 | 120.22 | 0.11 | 18.48 | 228.57 | 15.52 | 22,305 | 9.42 | 9.07 | |

^{*} Moline VII produces either (1) unfried yeast donuts which are frozen without proofing, or (2) chemically leavened fried cake donuts which are then frozen. Moline VII does not produce emissions due to proofing and/or fermentation.

** The fryer for Moline VIII is electric and does not produce emissions due to natural gas combustion.

Appendix A: Emissions Calculations Particulate Emissions from Silo Loading

Company Name: Maplehurst Bakeries, LLC

Address City IN Zip: 50 Maplehurst Drive, Brownsburg, Indiana 46112

Part 70 Renewal No.: T063-34014-00031

Permit Reviewer: Sarah Street / Charles Sullivan

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

Control Device Efficiency: 99%

| | | Maxii | mum | Emission Factors | | Uncontrolled PTE | | Limited PM PTE** | | Controlled PTE | | Έ | | |
|----------|------------------------|---------|----------|------------------|------------------|--------------------|---------|------------------|-------------------|----------------|---------|---------|------------------|-------------------|
| Emission | Emission Unit Capacity | | acity | PM | PM ₁₀ | PM _{2.5*} | PM | PM ₁₀ | PM _{2.5} | PM | PM | PM | PM ₁₀ | PM _{2.5} |
| ID# | Description | lb/hr | tons/hr | lb/ton | lb/ton | lb/ton | tons/yr | tons/yr | tons/yr | lb/hr | tons/yr | tons/yr | tons/yr | tons/yr |
| EU01 | Flour Silo | 5,873 | 2.937 | 3.14 | 1.10 | 1.10 | 40.39 | 14.15 | 14.15 | 0.92 | 4.03 | 0.40 | 0.14 | 0.14 |
| EU02 | Flour Silo | 5,873 | 2.937 | 3.14 | 1.10 | 1.10 | 40.39 | 14.15 | 14.15 | 0.92 | 4.03 | 0.40 | 0.14 | 0.14 |
| EU03 | Flour Silo | 2,794.5 | 1.397 | 3.14 | 1.10 | 1.10 | 19.22 | 6.73 | 6.73 | 0.44 | 1.93 | 0.19 | 0.07 | 0.07 |
| EU04 | Minor Ingredient Silo | 2,794.5 | 1.397 | 3.14 | 1.10 | 1.10 | 19.22 | 6.73 | 6.73 | 0.44 | 1.93 | 0.19 | 0.07 | 0.07 |
| EU05 | Minor Ingredient Silo | 2,794.5 | 1.397 | 3.14 | 1.10 | 1.10 | 19.22 | 6.73 | 6.73 | 0.44 | 1.93 | 0.19 | 0.07 | 0.07 |
| | Total | 20,130 | <u> </u> | | Tota | Emissions: | 138.42 | 48.49 | 48.49 | 3.16 | 13.84 | | | |

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

| Silos: | P= 25 tons/hr limit = 4.1 x (2 | 5 ^0.67) = | 35.4 lb/hr | (allowable) |
|---|---|----------------------|------------|------------------------|
| with uncontrolled potential (flour silos EU01/EU0 40.39 tons/yr x | 02): 2000 lb/ton / | 8760 hr/yr = hr/yr = | 9.22 lb/hr | (capable of complying) |
| with uncontrolled potential (flour silo EU03 and r 19.22 tons/vr x | minor ingredient silos): 2000 lb/ton / | 8760 hr/vr = hr/vr = | 4.39 lb/hr | (capable of complying) |

Notes:

Each silo can be filled pneumatically by tanker trucks at a rate of 25 tons per hour. This is the process weight rate of the silo for purposes of determining compliance with 326 IAC 6-3-2. 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).

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 Emissions (tons/yr) = PSD Minor Limit (lb/hr) * 8760 hr/yr ÷ 2000 lb/ton
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) * (1 - Actual Control Efficiency)

^{*}PM_{2.5} has been assumed to be equal to PM₁₀.

^{**}The silos only have PSD Minor limits for PM. PM10 and PM2.5 are unlimited.

Appendix A: Emissions Calculations Particulate Emissions from Dry Ingredient Conveyance

Company Name: Maplehurst Bakeries, LLC

Address City IN Zip: 50 Maplehurst Drive, Brownsburg, Indiana 46112

Part 70 Renewal No.: T063-34014-00031

Permit Reviewer: Sarah Street / Charles Sullivan

The following calculations determine the emissions from the pneumatic conveyance of the dry ingredients from the silos to the mixers.

Control Device Efficiency: 99%

| | | Maximum | | Emission Factors | | | Uncontrolled | | | Controlled | | |
|---|-----------------------|---------|----------|------------------|------------------|-------------------|--------------|------------------|-------------------|------------|------------------|-------------------|
| Emission | Emission Unit | | Capacity | | 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 |
| EU01 | Flour Silo | 5,873 | 2.937 | 3.14 | 1.10 | 1.10 | 40.39 | 14.15 | 14.15 | 0.40 | 0.14 | 0.14 |
| EU02 | Flour Silo | 5,873 | 2.937 | 3.14 | 1.10 | 1.10 | 40.39 | 14.15 | 14.15 | 0.40 | 0.14 | 0.14 |
| EU03 | Flour Silo | 2,794.5 | 1.397 | 3.14 | 1.10 | 1.10 | 19.22 | 6.73 | 6.73 | 0.19 | 0.07 | 0.07 |
| EU04 | Minor Ingredient Silo | 2,794.5 | 1.397 | 3.14 | 1.10 | 1.10 | 19.22 | 6.73 | 6.73 | 0.19 | 0.07 | 0.07 |
| EU05 | Minor Ingredient Silo | 2,794.5 | 1.397 | 3.14 | 1.10 | 1.10 | 19.22 | 6.73 | 6.73 | 0.19 | 0.07 | 0.07 |
| EU06-EU18 | Use Bins (13) | 20,130 | 10.065 | 0.0048 | 0.0028 | 0.0028 | 0.21 | 0.12 | 0.12 | 0.002 | 0.001 | 0.001 |
| EU19-EU33, EU73, EU74 Scale Hoppers/Mixers (17) | | 20,130 | 10.065 | 0.572 | 0.156 | 0.156 | 25.22 | 6.88 | 6.88 | 0.25 | 0.07 | 0.07 |
| · | _ | | | Emi | ssions Total | 163.85 | 55.49 | 55.49 | | | | |

Allowable Emissions:

The use bins are exempt from 326 IAC 6-3-2 because, pursuant to 326 IAC 6-3-1(b)(14), each bin has potential particulate emissions less than 0.551 lb/hr.

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

| Flour Silos (EU01, EU02): | P: limit : | | r 2.937 ^0.67) | = | 8.44 lb/hr | lb/hr | (allowable) |
|--|---------------------------|-----------------|---------------------|---------|------------|-------|------------------------|
| with uncontrolled potential 19.22 ton | ns/yr x 200 | 0 lb/ton / | 8760 hr/yr = | hr/yr = | 4.39 lb/hr | lb/hr | (capable of complying) |
| Flour Silo (EU03) & Minor Ing | redient Silos: Pellimit : | | r 1.397 ^0.67) | = | 5.13 lb/hr | lb/hr | (allowable) |
| with uncontrolled potential 19.22 ton | ns/yr x 200 | 0 lb/ton / | 8760 hr/yr = | hr/yr = | 4.39 lb/hr | lb/hr | (capable of complying) |
| Scale Hoppers/Mixers: | P: limit : | 101000 10110/11 | r 10.065 ^0.67) | = | 19.3 lb/hr | lb/hr | (allowable) |
| with uncontrolled potential 25.22 ton | ns/yr x 200 | 0 lb/ton / | 8760 hr/yr = | hr/yr = | 5.76 lb/hr | lb/hr | (capable of complying) |

Notes:

Each silo is bottlenecked by the amount of dry ingredient that can be conveyed pneumatically from the silo. This is the maximum capacity used for purposes of determining compliance with 326 IAC 2-2. The emission factors are from AP-42, Ch. 11.12, Table 11.12-2 (February 2011 revisions) for cement unloading (SCC# 3-05-011-17), hopper loading (SCC# 3-05-011-08), and mixer loading (SCC# 3-05-011-09). PM_{2.5} has been assumed to be equal to PM₁₀.

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 Fryer)

Company Name: Maplehurst Bakeries, LLC

Address City IN Zip: 50 Maplehurst Drive, Brownsburg, Indiana 46112

Part 70 Renewal No.: T063-34014-00031

Permit Reviewer: Sarah Street / Charles Sullivan

| | | | | | | | | Emission | | ential |
|-------------|--------------------|----------|------------|---------|-------|---------|-------|----------|-----------|--------------|
| | | | | | | | | Factor | Emi | ssions |
| | | Maximum | Maximum | Average | Ferm | | Spike | | | |
| Bakery | | Capacity | Throughput | Sponge | Time | Dough | Time | VOC | VOC | Acetaldehyde |
| Line | Product | (lb/hr) | (tons/yr) | % Yeast | Hours | % Yeast | Hours | (lb/ton) | (tons/yr) | (tons/yr) |
| Moline I | yeast product | 3,000 | 13,140.00 | 3.9 | 1.2 | 0.0 | 0.0 | 5.84 | 38.36 | 1.15 |
| Moline II | yeast product | 3,000 | 13,140.00 | 3.6 | 1.2 | 0.0 | 0.0 | 5.55 | 36.49 | 1.09 |
| Moline III | yeast product | 3,000 | 13,140.00 | 3.7 | 1.2 | 0.0 | 0.0 | 5.65 | 37.11 | 1.11 |
| Moline IV | yeast product | 3,000 | 13,140.00 | 3.4 | 1.2 | 0.0 | 0.0 | 5.36 | 35.24 | 1.06 |
| Moline V | yeast product | 3,000 | 13,140.00 | 3.5 | 1.2 | 0.0 | 0.0 | 5.46 | 35.87 | 1.08 |
| Moline VI | yeast product | 3,000 | 13,140.00 | 3.6 | 1.2 | 0.0 | 0.0 | 5.55 | 36.49 | 1.09 |
| Moline VII | yeast/cake product | 3,000 | 13,140.00 | 0.0 | 0.0 | 0.0 | 0.0 | see note | 0.00 | 0.00 |
| Moline VIII | yeast product | 4,537 | 19,872.06 | 3.6 | 1.2 | 0.0 | 0.0 | 5.55 | 55.18 | 1.66 |

Notes:

Moline VII produces either (1) unfried yeast donuts which are frozen without proofing, or (2) chemically leavened fried cake donuts which are then frozen. Moline VII does not produce emissions due to proofing and/or fermentation.

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

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

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Appendix A: Emissions Calculations VOC and HAP Emissions Proof Boxes

Company Name: Maplehurst Bakeries, LLC

Address City IN Zip: 50 Maplehurst Drive, Brownsburg, Indiana 46112

Part 70 Renewal No.: T063-34014-00031

Permit Reviewer: Sarah Street / Charles Sullivan

| | | Uncontrolled | Uncontrolled | Uncontrolled | Limited |
|-------------|--------------------|-------------------|---------------|---------------|-------------------|
| | | Potential | Potential | Potential | VOC Emissions |
| | | VOC | VOC | Acetaldehyde | from Fermentation |
| | | from Fermentation | from Proofing | from Proofing | and Proofing |
| Fryer | Product | (tons/year) | (tons/year) | (tons/year) | (tons/year) |
| Moline I | yeast product | 38.36 | 3.84 | 0.12 | 24.4 |
| Moline II | yeast product | 36.49 | 3.65 | 0.11 | 24.4 |
| Moline III | yeast product | 37.11 | 3.71 | 0.11 | 24.4 |
| Moline IV | yeast product | 35.24 | 3.52 | 0.11 | 24.4 |
| Moline V | yeast product | 35.87 | 3.59 | 0.11 | 24.4 |
| Moline VI | yeast product | 36.49 | 3.65 | 0.11 | 40.1 |
| Moline VII | yeast/cake product | 0.00 | 0.00 | 0.00 | n/a |
| Moline VIII | yeast product | 55.18 | 5.52 | 0.17 | 60.7 |

Notes:

Moline VII produces either (1) unfried yeast donuts which are frozen without proofing, or (2) chemically leavened fried cake donuts which are then frozen. Moline VII does not produce emissions due to proofing and/or fermentation.

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 Particulate and VOC Emissions Frying

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Company Name: Maplehurst Bakeries, LLC

Address City IN Zip: 50 Maplehurst Drive, Brownsburg, Indiana 46112

Part 70 Renewal No.: T063-34014-00031

Permit Reviewer: Sarah Street / Charles Sullivan

| | | Maximum | Maximum | | Emissior | Factors | | | Potential | Emissions | |
|-------------|---------------|----------|------------|--------|------------------|-------------------|--------|---------|------------------|-------------------|---------|
| | | Capacity | Throughput | PM | PM ₁₀ | PM _{2.5} | VOC | PM | PM ₁₀ | PM _{2.5} | VOC |
| Fryer | Product | lb/hr | tons/yr | lb/ton | lb/ton | lb/ton | lb/ton | tons/yr | tons/yr | tons/yr | tons/yr |
| Moline I | yeast product | 3,000 | 13,140.00 | 0.22 | 0.26 | 0.26 | 0.085 | 1.45 | 1.71 | 1.71 | 0.56 |
| Moline II | yeast product | 3,000 | 13,140.00 | 0.22 | 0.26 | 0.26 | 0.085 | 1.45 | 1.71 | 1.71 | 0.56 |
| Moline III | yeast product | 3,000 | 13,140.00 | 0.22 | 0.26 | 0.26 | 0.085 | 1.45 | 1.71 | 1.71 | 0.56 |
| Moline IV | yeast product | 3,000 | 13,140.00 | 0.22 | 0.26 | 0.26 | 0.085 | 1.45 | 1.71 | 1.71 | 0.56 |
| Moline V | yeast product | 3,000 | 13,140.00 | 0.22 | 0.26 | 0.26 | 0.085 | 1.45 | 1.71 | 1.71 | 0.56 |
| Moline VI | yeast product | 3,000 | 13,140.00 | 0.22 | 0.26 | 0.26 | 0.085 | 1.45 | 1.71 | 1.71 | 0.56 |
| Moline VII | cake product | 3,000 | 13,140.00 | 0.22 | 0.26 | 0.26 | 0.085 | 1.45 | 1.71 | 1.71 | 0.56 |
| Moline VIII | yeast product | 4,537 | 19,872.06 | 0.22 | 0.26 | 0.26 | 0.085 | 2.19 | 2.58 | 2.58 | 0.84 |

Allowable Emissions:

The fryers are exempt from 326 IAC 6-3-2 because, pursuant to 326 IAC 6-3-1(b)(14), each fryer has potential particulate emissions less than 0.551 lb/hr.

Notes:

Emission factors are based on AP-42, Ch. 9.13, Tables 9.13.3-2 and 9.13.3-3 for snack chip deep frying with standard mesh pad mist eliminator. $PM_{2.5}$ has been assumed to be equal to PM_{10} .

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

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

Fryers
Company Name: Maplehurst Bakeries, LLC

Address City IN Zip: 50 Maplehurst Drive, Brownsburg, Indiana 46112

Part 70 Renewal No.: T063-34014-00031

Permit Reviewer: Sarah Street / Charles Sullivan

Production Line Fryer ID MMBtu/hr Moline I Fryer1 1.3 Moline II Fryer2 1.3 Moline III 1.3 Fryer3 Moline IV Fryer4 1.3 Moline V Fryer5 1.3

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TSD - Appendix A

Heat Input Capacity HHV Potential Throughput Moline VI Fryer6 1.3 MMBtu/hr MmBtu MMCF/yr Moline VII Fryer7 1.3

mmscf

1.3 1020 11.2

| | | Pollutant | | | | | | | | | | |
|-------------------------------|------------|--------------|----------------------|------------|---------------------------|------------|----------|--|--|--|--|--|
| Emission Factor in lb/MMCF | PM* 1.9 | PM10* 7.6 | direct PM2.5* 7.6 | SO2 0.6 | NOx 100 **see below | VOC 5.5 | CO 84 | | | | | |
| Potential Emission in tons/yr | 0.01 | 0.04 | 0.04 | 0.00 | 0.56 | 0.03 | 0.47 | | | | | |

^{*}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

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 | | | | | | | | | | |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|------------------|--|--|--|--|--|--|
| Emission Factor in lb/MMcf | Benzene 2.1E-03 | Dichlorobenzene 1.2E-03 | Formaldehyde 7.5E-02 | Hexane 1.8E+00 | Toluene 3.4E-03 | Total - Organics | | | | | | |
| Potential Emission in tons/yr | 1.172E-05 | 6.699E-06 | 4.187E-04 | 1.005E-02 | 1.898E-05 | 1.050E-02 | | | | | | |

| | | HAPs - Metals | | | | | | | | | | | |
|-----------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|----------------|--|--|--|--|--|--|--|
| Emission Factor in lb/MMcf | Lead 5.0E-04 | Cadmium 1.1E-03 | Chromium 1.4E-03 | Manganese 3.8E-04 | Nickel 2.1E-03 | Total - Metals | | | | | | | |
| Potential Emission in tons/yr | 2.791E-06 | 6.141E-06 | 7.815E-06 | 2.121E-06 | 1.172E-05 | 3.059E-05 | | | | | | | |
| | | | | | Total HAPs | 1.053E-02 | | | | | | | |
| Methodology is the same as above. | | | | | Worst HAP | 1.005E-02 | | | | | | | |

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 | |
|---------------------------------------|----------------|----------------|------------|
| Emission Factor in lb/MMcf | CO2 120,000 | CH4 2.3 | N2O 2.2 |
| Potential Emission in tons/yr | 670 | 0.0 | 0.0 |
| Summed Potential Emissions in tons/yı | | 670 | |
| CO2e Total in tons/yr | | 674 | |

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) = 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).

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

Appendix A: Emissions Calculations Natural Gas Combustion Only MM BTU/HR <100 Insignificant Activities Company Name: Maplehurst Bakeries, LLC

Address City IN Zip: 50 Maplehurst Drive, Brownsburg, Indiana 46112 Part 70 Renewal No.: T063-34014-00031

| Permit | Reviewer: | Sarah Str | eet / Charles | Sullivan |
|--------|-----------|-----------|---------------|----------|
| | | | | |

| | MMBtu/hr | Unit ID |
|---|----------|---------|
| Ajax Boiler | 6.3 | n/a |
| Ajax Boiler #2 | 6.3 | n/a |
| Air Compressor Rm Gas Unit Space Htr #1 | 0.04 | EU34 |
| Air Compressor Rm Gas Unit Space Htr #2 | 0.03 | EU35 |
| Fire Pumphouse Gas Unit Space Htr | 0.03 | EU36 |
| Hogfeed Room Gas Unit Space Htr | 0.04 | EU37 |
| Maintenance Shop Gas Unit Space Htr | 0.03 | EU40 |
| Lab Revent Oven | 0.17 | EU38 |
| Tech Center Revent Oven | 0.177 | EU72 |
| Maintenance Hot Water Htr | 0.199 | EU39 |
| Moline 2 Hot Water Htr | 0.37 | EU48 |
| MAU 10 | 4.125 | EU41 |
| MAU 2 | 0.833118 | EU42 |
| MAU 3 | 0.833118 | EU43 |
| MAU 4 | 0.25 | EU44 |
| MAU 5 | 0.3 | EU45 |
| MAU 6 | 0.225 | EU46 |
| MAU 9 | 4.05 | EU47 |
| MAU 1 | 0.225 | EU49 |

| | MMBtu/hr | Unit |
|---------------|----------|------|
| RTU 1 | 0.855 | EU50 |
| RTU 11 | 0.1615 | EU51 |
| RTU 12 | 0.25 | EU52 |
| RTU 13 | 0.4 | EU53 |
| RTU 15 | 0.135 | EU54 |
| RTU 16 | 0.4 | EU55 |
| RTU 17 | 0.4 | EU56 |
| RTU 18 | 0.4 | EU57 |
| RTU 19 | 0.10 | EU58 |
| RTU 20 | 0.855 | EU59 |
| RTU 21 | 0.10 | EU60 |
| RTU 22 | 0.25 | EU61 |
| RTU 23 | 0.25 | EU62 |
| RTU 25 | 0.04 | EU63 |
| RTU 26 | 0.06 | EU64 |
| RTU 27 | 0.08 | EU65 |
| RTU 28 | 0.15 | EU66 |
| RTU 3 | 0.855 | EU67 |
| RTU 4 | 0.4368 | EU68 |
| RTU 5 | 0.56 | EU69 |
| RTU 7 | 0.855 | EU70 |
| RTU 8 | 0.56 | EU71 |
| RTU 29 | 0.25 | EU72 |
| RTU 30 | 0.25 | EU73 |
| RTU 31 | 0.25 | EU74 |
| RTU 32 | 0.25 | EU75 |
| RTU 33 | 0.25 | EU76 |
| | | |

Heat Input Capacity MMRtu/hr

HHV Potential Throughput mmBtu MMCF/yr

| | IIIIIISCI | |
|--------|-----------|-------|
| 33.931 | 1020 | 291.4 |
| | | |
| | | |
| | | |

| | | Pollutant | | | | | | | | |
|-------------------------------|------------|--------------|----------------------|------------|---------------------------|------------|----------|--|--|--|
| Emission Factor in lb/MMCF | PM* 1.9 | PM10* 7.6 | direct PM2.5* 7.6 | SO2 0.6 | NOx 100 **see below | VOC 5.5 | CO 84 | | | |
| Potential Emission in tons/yr | 0.28 | 1.11 | 1.11 | 0.09 | 14.57 | 0.80 | 12.24 | | | |

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

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 | | | | | | | | | |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|------------------|--|--|--|--|--|
| Emission Factor in lb/MMcf | Benzene 2.1E-03 | Dichlorobenzene 1.2E-03 | Formaldehyde 7.5E-02 | Hexane 1.8E+00 | Toluene 3.4E-03 | Total - Organics | | | | | |
| Potential Emission in tons/yr | 3.060E-04 | 1.748E-04 | 1.093E-02 | 2.623E-01 | 4.954E-04 | 2.742E-01 | | | | | |

| | | HAPs - Metals | | | | | | | | | |
|-----------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|----------------|--|--|--|--|--|
| Emission Factor in lb/MMcf | Lead 5.0E-04 | Cadmium 1.1E-03 | Chromium 1.4E-03 | Manganese 3.8E-04 | Nickel 2.1E-03 | Total - Metals | | | | | |
| Potential Emission in tons/yr | 7.285E-05 | 1.603E-04 | 2.040E-04 | 5.537E-05 | 3.060E-04 | 7.984E-04 | | | | | |
| | | | | | Total HAPs | 0.27 | | | | | |
| Methodology is the same as above. | | | | | Worst HAP | 0.26 | | | | | |

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 | | |
|---------------------------------------|----------------|----------------|------------|--|
| Emission Factor in lb/MMcf | CO2 120,000 | CH4 2.3 | N2O 2.2 | |
| Potential Emission in tons/yr | 17,484 | 0.3 | 0.3 | |
| Summed Potential Emissions in tons/yr | 17,485 | | | |
| CO2e Total in tons/yr | | 17,588 | | |

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 (Ib/MMCF)/2,000 Ib/ton

CO2e (tons/yr) = 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).

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

Appendix A: Emission Calculations Fugitive Dust Emissions - Paved Roads

Company Name: Maplehurst Bakeries, LLC

Address City IN Zip: 50 Maplehurst Drive, Brownsburg, Indiana 46112

Part 70 Renewal No.: T063-34014-00031 Permit Reviewer: Sarah Street / Charles Sullivan

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Informtation (provided by source)

| tomero micro (promoto a) | | | | | | | | | |
|---|-----------|---------------|---------------|-------------|----------------|-------------|--------------|--------------|--------------|
| | Maximum | Number of | | Maximum | | Maximum | | | |
| | number of | one-way trips | Maximum trips | Weight | Total Weight | one-way | Maximum one | Maximum one- | Maximum one- |
| | vehicles | per day per | per day | Loaded | driven per day | distance | way distance | way miles | way miles |
| Type | per day | vehicle | (trip/day) | (tons/trip) | (ton/day) | (feet/trip) | (mi/trip) | (miles/day) | (miles/yr) |
| Truck (bagged and/or boxed ingredients in) | 4 | 4 | 16.0 | 40.25 | 644.0 | 533 | 0.101 | 1.6 | 589.5 |
| Truck (bagged and/or boxed ingredients exiting site | 4 | 4 | 16.0 | 40.25 | 644.0 | 1271 | 0.241 | 3.9 | 1405.8 |
| Semitrailer Truck (bulk ingredients in) | 5 | 5 | 25.0 | 64 | 1600.0 | 1588 | 0.301 | 7.5 | 2744.4 |
| Semi trailer Truck (empty truck exiting site) | 5 | 5 | 25.0 | 40 | 1000.0 | 1271 | 0.241 | 6.0 | 2196.6 |
| Semi trailer Truck (empty truck entering) | 15 | 15 | 225.0 | 40 | 9000.0 | 533 | 0.101 | 22.7 | 8290.3 |
| Semitrailer Truck (product out) | 15 | 15 | 225.0 | 40 | 9000.0 | 1271 | 0.241 | 54.2 | 19769.1 |
| | | Totals | 532.0 | | 21888.0 | | | 95.9 | 34995 7 |

Average Vehicle Weight Per Trip = 41.1 tons/trip Average Miles Per Trip = miles/trip

Unmitigated Emission Factor, Ef = [k * (sL)^0.91 * (W)^1.02] (Equation 1 from AP-42 13.2.1)

where k = 0.011 0.0022 0.00054 lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1) tons = average vehicle weight (provided by source) / g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3) W = 41.1 41.1 41.1 sL=

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]

where p = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)

PM PM10 PM2.5 Unmitigated Emission Factor, Ef = 0.132 0.662 0.0325 Mitigated Emission Factor, Eext = Dust Control Efficiency* = 0.0297 lb/mile 0% 0%

| | | | | | | Mitigated | | | |
|---|-------------|-------------|--------------|-----------|---------------|-----------|------------|----------------|----------------|
| | Unmitigated | Unmitigated | Unmitigated | Mitigated | Mitigated PTE | PTE of | Controlled | Controlled PTE | Controlled PTE |
| | PTE of PM | PTE of PM10 | PTE of PM2.5 | PTE of PM | of PM10 | PM2.5 | PTE of PM | of PM10 | of PM2.5 |
| Process | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) |
| Truck (bagged and/or boxed ingredients in) | 0.20 | 0.04 | 0.01 | 0.18 | 0.04 | 0.01 | 0.18 | 0.04 | 0.01 |
| Truck (bagged and/or boxed ingredients exiting site | 0.47 | 0.09 | 0.02 | 0.43 | 0.09 | 0.02 | 0.43 | 0.09 | 0.02 |
| Semitrailer Truck (bulk ingredients in) | 0.91 | 0.18 | 0.04 | 0.83 | 0.17 | 0.04 | 0.83 | 0.17 | 0.04 |
| Semi trailer Truck (empty truck exiting site) | 0.73 | 0.15 | 0.04 | 0.66 | 0.13 | 0.03 | 0.66 | 0.13 | 0.03 |
| Semi trailer Truck (empty truck entering) | 2.74 | 0.55 | 0.13 | 2.51 | 0.50 | 0.12 | 2.51 | 0.50 | 0.12 |
| Semitrailer Truck (product out) | 6.54 | 1.31 | 0.32 | 5.98 | 1.20 | 0.29 | 5.98 | 1.20 | 0.29 |
| Tetala | 44 E0 | 2 22 | 0 F7 | 10 FO | 2 4 2 | 0.52 | 40 E0 | 2 42 | 0.52 |

Methodology

Total Weight driven per day (ton/day) Maximum one-way distance (mi/trip) Maximum one-way miles (miles/day) Average Vehicle Weight Per Trip (ton/trip) Average Miles Per Trip (miles/trip) Unmitigated PTE (tons/yr) Mitigated PTE (tons/yr) Controlled PTE (tons/yr)

- = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
- = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
- = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)] = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)] = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]

Abbreviations

PM = Particulate Matter PM10 = Particulate Matter (<10 um) PM2.5 = Particle Matter (<2.5 um) PTE = Potential to Emit

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (f) The requirements of the National Emission Standards for Halogenated Solvent Cleaning (40 CFR 63, Subpart T) are not included in this permit for the two(2) insignificant degreasing operations, since each of these degreasering operations does not use any of the halogenated HAPs contained in 40 CFR 63.460(a).
- (g) The requirements of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63.6580, Subpart ZZZZ, are not included in this permit because the stationary fire pump engine is electric and does not have an internal combustion engine.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (63.7480 through 63.7575) (326 IAC 20-95), are not included in this permit, because this source is not a major source of HAPs.
- (i) The natural gas-fired boilers (Ajax Boiler and Ajax Boiler #2) are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (63.11193 through 63.11237), because these gas-fired boilers, as defined by 40 CFR 63.11237, are specifically exempted under 40 CFR 63.11195(e).
 - The natural gas-fired water heaters (EU39 and EU48) are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (63.11193 through 63.11237), because these hot water heaters, as defined by 40 CFR 63.11237, are specifically exempted under 40 CFR 63.11195(f).
- (j) There are still no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit for this source.

State Rule Applicability - Entire Source

The following state rules are applicable to the source:

(a) 326 IAC 2-2 (PSD)

This source is an existing PSD Minor source. See Potential to Emit After Issuance section above for PSD Minor limits for PM and VOC.

PSD Permitting History:

- (1) According to Part 70 Operating Permit No. T063-28023-00031, issued on October 2, 2009, the potential to emit of all attainment regulated pollutants was less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) were not applicable to the source.
- (2) 2012 Modification

According to Significant Source Modification No. 063-31357-00031, issued on May 25, 2012, the source has the potential to emit greater than 250 tons per year of PM. Therefore, 326 IAC 2-2 would have applied to the source. However, the source has

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

According to Significant Source Modification No. 063-31357-00031, issued on May 25, 2012, the source has the potential to emit greater than 250 tons per year of VOC. Therefore, 326 IAC 2-2 would have applied to the source. However, the source has decided to limit their VOC emissions below the major source threshold. Compliance with these limits, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC emissions from the entire source to less than 250 tons per twelve (12) consecutive month period for VOC. This shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

- (b) 326 IAC 2-3 (Emission Offset) and 326 IAC 2-1.1-5 (Nonattainment NSR) The existing emission limits for PM_{2.5} pursuant to 326 IAC 2-1.1-5 (Nonattainment NSR) are being removed with this Renewal. Hendricks County has been classified as attainment for PM_{2.5} (See County Attatinment Status section above). Therefore, direct PM_{2.5}, SO₂, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. The source has the potential to emit less than 250 tons per year of PM_{2.5}, SO₂, and NOx. 326 IAC 2-3 (Emission Offset) is not applicable to this source.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
 The operation of the source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.
- (d) 326 IAC 2-6 (Emission Reporting)
 This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70).
 The potential to emit of VOC and PM10 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 by July 1, 2005 and every three (3) years thereafter. The next statement shall be submitted by July 1, 2017. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.
- (e) 326 IAC 5-1 (Opacity Limitations)
 Pursuant to 326 IAC 5-1-2, except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in the permit:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

(g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The potential emissions from fugitive dust sources (paved roads) at this source have been recalculated with this Renewal, to use the current emission factors from AP-42. The paved roads have potential fugitive particulate emissions less than 25 tons per year (see Appendix A).
Therefore, this source is not subject to 326 IAC 6-5. The Fugitive Dust Control Plan is no longer applicable and will be removed from the permit.

State Rule Applicability - Individual Facilities

The following state rules are applicable to the individual facilities:

- (a) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
 - (1) The natural gas-fired fryers (identified as Fryer1 through Fryer7), revent ovens, space heaters, heating and air conditioning (HVAC) units and makeup air (MUA) units are not subject to 326 IAC 6-2 as they are not sources of indirect heating.
 - (2) The electric fryer for Moline VIII, identified as Fryer8, is not subject to 326 IAC 6-2 as it is not a source of indirect heating.
 - (3) The natural gas-fired boilers and water heaters are subject to the requirements of 326 IAC 6-2-4, since each of the units are sources of indirect heating, were constructed after September 21, 1983, and are located in Hendricks County.

The PM emissions for the boilers and water heaters are limited by the following equation:

$$Pt = 1.09 / (Q)^{0.26}$$

where Pt = Pounds of particulate matter emitted per million Btu

(lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

The table below summarizes the limits under 326 IAC 6-2 for each of these units:

| Emission Unit | Date of Construction | Maximum Heat Input Capacity (MMBtu/hr) of Individual Unit | Q: Total Source Maximum Heat Input Capacity | 326 IAC 6-2 PM Limit (lb/MMBtu) | Potential PM Emissions (lb/MMBtu) |
|----------------------------|-------------------------|---|---|---------------------------------------|--|
| Ajax Boiler | September 2000 | 6.3 | 6.3 | 0.60 | 0.0019 |
| Ajax Boiler #2 | June 2003 | 6.3 | 12.6 (= 6.3 + 6.3) | 0.56 | 0.0019 |
| Hot Water Heater (EU39) | June 2005 | 0.199 | 12.799 (= 12.6 + 0.199) | 0.56 | 0.0019 |
| Hot Water Heater (EU48) | June 2005 | 0.37 | 13.169 (= 12.799 + 0.37) | 0.56 | 0.0019 |

(A) Limit for Ajax Boiler:

$$Pt = 1.09 / (6.3)^{0.26} = 0.67 \text{ lb/MMBtu}$$

However, 326 IAC 6-2-4 states that for boilers constructed after September 21, 1983 and having Q less than 10 MMBtu/hr, Pt shall not exceed 0.60 lb/MMBtu. Hence the particulate limit for Ajax Boiler is 0.60 lb/MMBtu.

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The potential PM emissions from the Ajax Boiler are less than this limit, therefore, it is ably to comply with this rule.

(B) Limit for Ajax Boiler #2: Pt = $1.09 / (12.6)^{0.26} = 0.56 \text{ lb/MMBtu}$

Pursuant to 326 IAC 6-2-4, as each new indirect heating facility is added to a plant, Q will increase. Hence Q for the Ajax Boiler #2 becomes 12.6 MMBtu/hr and the particulate limit for the Ajax Boiler #2 is 0.56 lb/MMBtu.

The potential PM emissions from the Ajax Boiler #2 are less than this limit, therefore, it is ably to comply with this rule.

(C) Limit for first water heater, EU39 Pt = $1.09 / (12.799)^{0.26} = 0.56$ lb/MMBtu

Pursuant to 326 IAC 6-2-4, as each new indirect heating facility is added to a plant, Q will increase. Hence Q for the first water heater EU39 becomes 12.799 MMBtu/hr and the particulate limit for EU39 is 0.56 lb/MMBtu.

The potential PM emissions from the water heater EU39 are less than this limit, therefore, it is ably to comply with this rule.

(D) Limit for second water heater, EU48 Pt = $1.09 / (13.169)^{0.26} = 0.56$ lb/MMBtu

Pursuant to 326 IAC 6-2-4, as each new indirect heating facility is added to a plant, Q will increase. Hence Q for the second water heater EU48 becomes 13.169 MMBtu/hr and the particulate limit for EU48 is 0.56 lb/MMBtu.

The potential PM emissions from the water heater EU48 are less than this limit, therefore, it is ably to comply with this rule.

- (b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 - (1) Proofing & Fermentation

The proofing and fermentation processes from Moline 1 through Moline VI and Moline VIII do not generate PM emissions. Therefore, 326 IAC 6-3-2 does not apply to these processes.

Note: Moline VII does not produce emissions due to proofing and/or fermentation.

- (2) Fryers
 - (A) Process Emissions

Pursuant to 326 IAC 6-3-1(b)(14), the fryers (Fryer1 through Fryer8) are exempt from 326 IAC 6-3-2 because each fryer has potential particulate emissions less than 0.551 lb/hr.

- (B) Combustion Emissions
 - (i) The natural gas combustion units (Fryer1 through Fryer7) are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-

59, liquid and gaseous fuels and combustion air are not considered as part of the process weight rate.

(ii) There are no PM emissions from the electric fryer, identified as Fryer8.

(3) Use Bins

Pursuant to 326 IAC 6-3-1(b)(14), the use bins (EU06-EU18) are exempt from the requirements of 326 IAC 6-3-2 because each emission unit has potential particulate emissions less than 0.551 lb/hr.

(4) Silos (Loading & Conveying) and Scale Hoppers

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the silos and scale hoppers shall not exceed the allowable PM emission rates as listed in the table below:

| Process / Emission Unit | Maximum Process Weight Rate (tons/hr) | 326 IAC 6-3-2 Allowable PM Emission Rate (lb/hr) | | | |
|--|--|---|--|--|--|
| Flour Silos - Loading (EU01, EU02, EU03) | 25 (each) * | 35.4 (each) | | | |
| Minor Ingredient Silos - Loading (EU04, EU05) | 25 (each) * | 35.4 (each) | | | |
| Flour Silos - Conveying (EU01, EU02) | 2.937 (each) | 8.44 (each) | | | |
| Flour Silo - Conveying (EU03) | 1.397 | 5.13 | | | |
| Minor Ingredient Silos - Conveying (EU04, EU05) | 1.397 (each) | 5.13 (each) | | | |
| Seventeen (17) Scale Hoppers (EU19-EU33, EU73, EU74) | 10.065 (each) | 19.3 (each) | | | |

^{*} Each silo can be filled pneumatically by tanker trucks at a rate of 25 tons per hour. This is the process weight rate of the silo for purposes of determining compliance with 326 IAC 6-3-2. However, 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. See Appendix A for detailed calculations.

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

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

Based upon the calculations in Appendix A, each of the emission units is capable of complying with the corresponding 326 IAC 6-3-2 limit without the use of controls.

(c) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

(1) Moline I through Moline V

The following donut production lines have individual potential emissions of VOC greater than 25 tons per year: Moline I, Moline II, Moline III, Moline IV, and Moline V (see Appendix A for detailed emissions calculations). Therefore, 326 IAC 8-1-6 would have

applied to each facility. However, the source will continue to limit their VOC emissions below the applicability level as follows:

In order to render the requirements of 326 IAC 8-1-6 and 326 IAC 2-2 not applicable, the VOC emissions attributable to proofing and fermentation for each donut production line (Moline I through Moline V) shall not exceed 24.4 tons per twelve (12) consecutive month period.

Compliance with these limits, combined with the potential VOC emissions from other emission units in each bakery line, shall limit the VOC emissions from each facility to less than 25 tons per twelve (12) consecutive month period for VOC and shall limit the VOC emissions from the entire source to less than 250 tons per twelve (12) consecutive month period for VOC. This shall render the requirements of 326 IAC 8-1-6 (BACT) not applicable for Moline I through Moline V. This shall also render the requirements of 326 IAC 2-2 (PSD) not applicable for the entire source.

(2) Moline VI

The donut production line identified as Moline VI is subject to 326 IAC 8-1-6 because it exceeded the 326 IAC 8-1-6 avoidance limit of 24.4 tons per twelve (12) consecutive month period, which was made federally enforceable pursuant to Part 70 Operating Permit No. T063-28023-00031, issued on October 2, 2009.

Pursuant to 326 IAC 8-1-6 and SSM 063-31357-00031, BACT has been determined to be the following for the donut production line identified as Moline VI:

- (A) VOC emissions attributable to proofing and fermentation from donut production line Moline VI (consisting of the fryer (Fryer6) and the proof box (Proof6)) shall not exceed 40.1 tons per twelve (12) consecutive month period.
- (B) The source shall operate the proof box (Proof6) 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 (Proof6), on a tiered cleaning schedule and perform at a minimum, the following operations, or their equivalent, in accordance with their Sanitation Standard Operating Procedure:
 - (i) Weekly Cleaning Procedure:
 - (a) Remove all raw ingredients and/or product containers from the seeder area:
 - (b) Scrape any dough from the racks and supports;
 - (c) Scrape and sweep the proof box floor; and
 - (d) Wet the entire floor with cleaning solvent mixture and then rinse.
 - (ii) Four Week Cleaning Procedure:
 - (a) Wipe off interior proof box channel rails where needed;
 - (b) Remove any dough or oil accumulations from channel rails and cross over framework; and
 - (c) Wash or mop the floor of the proof box. Remove accumulated waste from floor.

(3) Moline VII

The donut production line identified as Moline VII is not subject to 326 IAC 8-1-6 because it has potential emissions of VOC less than 25 tons per year. See Appendix A for detailed emissions calculations.

Any change or modification which may increase the potential to emit VOC from Moline VII to 25 tons per year or more shall require prior approval by the IDEM, OAQ before such changes may take place.

(4) Moline VIII

The donut production line identified as Moline VIII is subject to 326 IAC 8-1-6 because it was after January 1, 1980 and has potential to emit VOC greater than 25 tons per year. See Appendix A for detailed emissions calculations.

Pursuant to 326 IAC 8-1-6 and SSM 063-31357-00031, BACT has been determined to be the following for the donut production line identified as Moline VIII:

- (A) VOC emissions attributable to proofing and fermentation from donut production line Moline VIII (consisting of the fryer (Fryer8) and the proof box (Proof8)) shall not exceed 60.7 tons per twelve (12) consecutive month period.
- (B) The source shall operate the proof box (Proof8) 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 (Proof8), on a tiered cleaning schedule and perform at a minimum, the following operations, or their equivalent, in accordance with their Sanitation Standard Operating Procedure:
 - (i) Weekly Cleaning Procedure:
 - (a) Remove all raw ingredients and/or product containers from the seeder area:
 - (b) Scrape any dough from the racks and supports;
 - (c) Scrape and sweep the proof box floor; and
 - (d) Wet the entire floor with cleaning solvent mixture and then rinse.
 - (ii) Four Week Cleaning Procedure:
 - (a) Wipe off interior proof box channel rails where needed;
 - (b) Remove any dough or oil accumulations from channel rails and cross over framework; and
 - (c) Wash or mop the floor of the proof box. Remove accumulated waste from floor.

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

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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.

- (a) The compliance determination requirements applicable to this source are as follows:
 - (1) VOC Compliance Determination

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

$$VOC = \sum_{m=1}^{12} \left(1.1* \left(\frac{Ei*Bi}{2000lb/ton} \right) \right)_m \le 24.40 \text{ tons of VOC per 12 consecutive month period}$$

Where:

VOC = The VOC emissions per twelve (12) consecutive month period;

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 = Each calendar month within the twelve (12) consecutive month period.

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.

VOC emissions from proofing shall be assumed to be 10% of the emissions calculated for fermentation based on the "Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017, December 1992).

- (2) Emission Controls Operation
 - (A) A baghouse for particulate emissions control shall be in operation and control particulate emissions whenever flour silo EU01 is being loaded.
 - (B) A baghouse for particulate emissions control shall be in operation and control particulate emissions whenever flour silo EU02 is being loaded.
 - (C) The central dust collector for particulate emissions control shall be in operation and control particulate emissions whenever any of the following emission units are being loaded: flour silo EU03, sugar silo EU04, and dextrose silo EU05.

These requirements are necessary to ensure compliance with 326 IAC 8-1-6 (VOC BACT) and to render the requirements of 326 IAC 2-2 (PSD) not applicable.

- (b) The compliance monitoring requirements applicable to this source are as follows:
 - (1) Visible emission notations from the pressure release openings of the five (5) storage silos shall be performed once per day during normal daylight operations when exhausting to the atmosphere.
 - (2) The Permittee shall monitor the pressure alarms to the Scale Hoppers continuously with the Control System over the Batching Area. When either the low pressure "No Convey Alarm" or high pressure "High Pressure Alarm Check Filters to Mixer XX" alarm is active during production, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances.

These requirements are necessary to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and to render the requirements of 326 IAC 2-2 (PSD) not applicable.

(c) There are no testing requirements applicable to this source.

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on December 19, 2013.

Conclusion

The operation of this stationary commercial bakery operation shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T063-34014-00031.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Charles Sullivan 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) 232-8422 or toll free at 1-800-451-6027 extension 2-8422.
- (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.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence Governor

Thomas W. Easterly

Commissioner

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

TO: Jim Pietsch

Maplehurst Bakeries LLC

40 Maplehurst Dr

Brownsburg, IN 46112

DATE: October 21, 2014

FROM: Matt Stuckey, Branch Chief

Permits Branch Office of Air Quality

SUBJECT: Final Decision

Title V

063-34014-00031

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: 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 ibrush@idem.IN.gov.

Final Applicant Cover letter.dot 6/13/2013







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Michael R. Pence Governor

Thomas W. Easterly

Commissioner

October 21, 2014

TO: Brownsburg Public Library

From: Matthew Stuckey, Branch Chief

Permits Branch
Office of Air Quality

Subject: Important Information for Display Regarding a Final Determination

Applicant Name: Maplehurst Bakeries LLC

Permit Number: 063-34014-00031

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 | CDENNY 10/21/ | 2014 | | |
|------------|-----------------|--|----------------|-------------|
| | Maplehurst Bake | ries LLC 063-34014-00031 (final) | AFFIX STAMP | |
| Name and | | Indiana Department of Environmental | Type of Mail: | HERE IF |
| address of | | Management | | USED AS |
| Sender | | Office of Air Quality – Permits Branch | CERTIFICATE OF | CERTIFICATE |
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| | | | | | | | | | | | Remarks |
| 1 | | Jim Pietsch Maplehurst Bakeries LLC 40 Maplehurst Dr Brownsburg IN 46112 (Source | e CAATS) | | | | | | | | |
| 2 | | Brownsburg Brown and Lincoln Twp Library 450 S Jefferson St Brownsburg IN 46112-1310 (Library) | | | | | | | | | |
| 3 | | V.P., Board of County Commissioners 355 S. Washington Street Room 204 Danville IN 46122 (Affected Party) | | | | | | | | | |
| 4 | | Larry and Becky Bischoff 10979 North Smokey Row Road Mooresville IN 46158 (Affected Party) | | | | | | | | | |
| 5 | | Hendricks County Commissioners 355 S Washington Danville IN 46122 (Local Official) | | | | | | | | | |
| 6 | | Betty Bartley P.O. Box 149 Danville IN 46122 (Affected Party) | | | | | | | | | |
| 7 | | Brownsburg Town Council and Town Manager 61 North Green Street Brownsburg IN 46112 (Local Official) | | | | | | | | | |
| 8 | | Hendricks County Health Department 355 S Washington Street, Suite 210 Danville IN 46122-1759 (Health Department) | | | | | | | | | |
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