



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Minor Source Operating Permit (MSOP)
for Holsum of Fort Wayne, Inc. in Allen County

Significant Permit Revision No.: 003-35466-00259

The Indiana Department of Environmental Management (IDEM) has received an application from Holsum of Fort Wayne, Inc., located at 136 Murray Street, Fort Wayne, IN, 46803, for a significant revision of its MSOP issued on October 2, 2008. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Holsum of Fort Wayne, Inc. to make certain changes at its existing source. Holsum of Fort Wayne, Inc. has applied to permit an existing proof box and dry ingredient conveyance equipment.

The applicant has constructed and operates new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

IDEM is aware that the the proof box and bread dough dry ingredient conveyance equipment have been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft MSOP significant permit revision contains provisions to bring unpermitted equipment into compliance with operation permit rules.

A copy of the permit application and IDEM's preliminary findings are available at:

Allen County Public Library
900 Library Plaza
Fort Wayne, IN 46802

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 003-35466-00259 in all correspondence.

Comments should be sent to:

Tamera Wessel
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-8530
Or dial directly: (317) 234-8530
Fax: (317) 232-6749 attn: Tamera Wessel
E-mail: twessel@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Tamera Wessel or my staff at the above address.



Jason R. Krawczyk, Section Chief
Permits Branch
Office of Air Quality



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

DRAFT

Robert Renock
Holsum of Fort Wayne, Inc.
500 N. Fulton Avenue
Evansville, IN 47710

Re: 003-35466-00259
Significant Revision to
M003-24986-00259

Dear Mr. Renock

Holsum of Fort Wayne, Inc. was issued a Minor Source Operating Permit (MSOP) Renewal No. M003-24986-00259 on October 2, 2008 for a stationary bread bakery located at 136 Murray Street, Fort Wayne, IN 46803. On February 13, 2015, the Office of Air Quality (OAQ) received an application from the source requesting to permit an existing proof box and dry ingredient conveyance system. Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-6.1-6(i). Pursuant to the provisions of 326 IAC 2-6.1-6, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the significant permit revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire MSOP as revised.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. 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>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Tamera Wessel of my staff at 317-234-8530 or 1-800-451-6027, and ask for extension 4-8530.

Sincerely,

DRAFT

Jason R. Krawczyk, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

JK/tw

cc: File - Allen County
Allen County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

DRAFT

Thomas W. Easterly
Commissioner

Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Holsum of Fort Wayne, Inc.
136 Murray Street
Fort Wayne, Indiana 46803**

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

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

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

Operation Permit No.: M003-24986-00259	
Issued / Signed by: Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: October 2, 2008 Expiration Date: October 2, 2018

Significant Permit Revision No.: 003-35466-00259	
Issued by: Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: October 2, 2018

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2	Emission Units and Pollution Control Equipment Summary	
SECTION B	GENERAL CONDITIONS	7
B.1	Definitions [326 IAC 2-1.1-1]	
B.2	Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability	
B.5	Severability	
B.6	Property Rights or Exclusive Privilege	
B.7	Duty to Provide Information	
B.8	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.9	Preventive Maintenance Plan [326 IAC 1-6-3]	
B.10	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.11	Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.12	Permit Renewal [326 IAC 2-6.1-7]	
B.13	Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.14	Source Modification Requirement	
B.15	Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]	
B.16	Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.17	Annual Fee Payment [326 IAC 2-1.1-7]	
B.18	Credible Evidence [326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS.....	12
	Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)].....	12
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Permit Revocation [326 IAC 2-1.1-9]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1][IC 13-17-9]	
C.5	Incineration [326 IAC 4-2][326 IAC 9-1-2]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-6.1-5(a)(2)]	14
C.8	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	14
C.9	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)].....	14
C.10	Compliance Monitoring [326 IAC 2-1.1-11]	
C.11	Instrument Specifications [326 IAC 2-1.1-11]	
	Corrective Actions and Response Steps.....	15
C.12	Response to Excursions or Exceedances	
C.13	Actions Related to Noncompliance Demonstrated by a Stack Test	
	Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)].....	16
C.14	Malfunctions Report [326 IAC 1-6-2]	
C.15	General Record Keeping Requirements [326 IAC 2-6.1-5]	
C.16	General Reporting Requirements [326 IAC 2-1.1-11][326 IAC 2-6.1-2][IC 13-14-1-13]	

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS	18
Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)].....	18
D.1.1 Preventive Maintenance Plan [326 IAC 1-6-3]	
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS	19
Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)].....	19
D.2.1 Particulate Matter (PM) [326 IAC 6-2-3]	
D.2.2 Particulate Matter (PM) [326 IAC 6-2-4]	
D.2.3 Preventative Maintenance Plan [326 IAC 1-6-3]	
SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS	20
Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)].....	20
D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]	
D.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]	
Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]	21
D.3.3 Particulate Control	
Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)].....	21
D.3.4 Filter Inspections	
Record Keeping Requirements [326 IAC 2-6.1-5(a)(2)]	21
D.3.5 Record Keeping Requirements	
SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS	23
Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)].....	23
D.4.1 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]	
D.4.2 Preventive Maintenance Plan [326 IAC 1-6-3]	
Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)].....	23
D.4.3 Record Keeping Requirement	
ANNUAL NOTIFICATION	24
MALFUNCTION REPORT.....	25

SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary bread bakery.

Source Address:	136 Murray Street, Fort Wayne, Indiana 46803
General Source Phone Number:	(812) 425-4642
SIC Code:	2051 (Bread and Other Bakery Products, Except Cookies and Crackers)
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) bread production line with a maximum production rate of 7,500 pounds of bread per hour, consisting of the following:
 - (1) One (1) natural gas-fired baking oven, with a maximum heat input capacity of 3.742 million British thermal units (MMBtu) per hour, constructed in 1964, and exhausting to stacks #1, #2, and #3.
 - (2) One (1) proof box, identified as BDP, constructed in 1981.
- (b) Three (3) flour storage silos, each with a maximum capacity of 360,000 pounds and a maximum throughput rate of 7.5 tons of flour per hour, constructed in 1963, equipped with a pneumatic conveyance system, using filter bags as integral particulate controls, and venting into the building.
- (c) One (1) bread dough dry ingredient conveyance system, exhausting indoors, including: pneumatic conveyance process equipment and piping, use bin, sifter, weigh hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2015. The conveyance system includes the following emission units:
 - (1) One (1) flour use bin, identified as UB1, with a capacity of 6,000 pounds per hour, equipped with sock filters for control of particulate matter emissions;
 - (2) One (1) sifter, identified as SF1, with a capacity of 6,000 pounds per hour, equipped with sock filters for control of particulate matter emissions;
 - (3) One (1) weigh hopper, identified as WH1, with a capacity of 3,360 pounds per hour, equipped with sock filters for control of particulate matter emissions;

- (4) Two (2) weigh hoppers, identified as WH2 and WH3, each with a capacity of 1,440 pounds per hour, equipped with sock filters for control of particulate matter emissions;
- (5) One (1) dusting flour hopper, identified as DF1, with a capacity of 42 pounds per hour, equipped with sock filters for control of particulate matter emissions;
- (6) One (1) mixer, identified as M1, with a capacity of 7,200 pounds per hour;
- (7) Two (2) mixers, identified as M2 and M3, each with a capacity of 7,200 pounds per hour
- (8) One (1) fermentation room, identified as FR1;
- (9) One (1) depanner, identified as DP1, with a capacity of 7,200 pounds per hour, equipped with Torrit Vacuum filters for control of particulate matter emissions, and
- (10) Two (2) manual weigh stations, each with a capacity of 2,800 pounds per hour.
- (d) One (1) natural gas-fired boiler, identified as B1, with a maximum heat input capacity of 4.2 million British thermal units (MMBtu) per hour, constructed in 1959, and exhausting to stack #4.
- (e) One (1) natural gas-fired boiler, identified as B2, with a maximum heat input capacity of 5.2 million British thermal units (MMBtu) per hour, constructed in 2000, and exhausting to stack #5.
- (f) Four (4) natural gas-fired space heaters, including the following:
 - (1) One (1) space heater, identified as H1, with a maximum heat input capacity of 0.225 MMBtu/hr.
 - (2) Two (2) space heaters, identified as H5 and H6, each with a maximum heat input capacity of 0.23 MMBtu/hr.
 - (3) One (1) space heater, identified as H2, with a maximum heat input capacity of 0.175 MMBtu/hr.
- (g) Three (3) natural gas-fired tube heaters, including the following:
 - (1) One (1) tube heater, identified as H7, with a maximum heat input capacity of 0.32 MMBtu/hr.
 - (2) One (1) tube heaters, identified as H8, with a maximum heat input capacity of 0.200 MMBtu/hr.
 - (3) One (1) tube heater, identified as H9, with a maximum heat input capacity of 0.56 MMBtu/hr.
- (h) Four (4) natural gas-fired furnaces, including the following:
 - (1) One (1) residential type furnace, identified as H10, with a maximum heat input capacity of 0.113 MMBtu/hr.

- (2) One (1) residential type furnace, identified as H11, with a maximum heat input capacity of 0.09 MMBtu/hr.
- (3) Two (2) furnaces, identified as H3 and H4, with a maximum heat input capacity of 0.20 MMBtu/hr.
- (i) Two (2) closed top cold degreasers, each constructed before 1980, one located in the vehicle maintenance shop and one located in the basement.
- (j) One (1) glycol storage tank, identified as GT1, with a maximum capacity of 350 gallons, constructed in 1940.
- (k) One (1) pan oil tank, identified as POT, with a maximum capacity of 5,145 gallons.
- (l) Two (2) soy oil storage tanks, identified as TK1 and TK2, each with a maximum capacity of 9,146 gallons.

- ## B.7 Duty to Provide Information

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

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 003-35466-00259 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

B.14 Source Modification Requirement

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

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

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

C.4 Open Burning [326 IAC 4-1][IC 13-17-9]

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

- (f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

C.12 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-1.1-11][326 IAC 2-6.1-2][IC 13-14-1-13]

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

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

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

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

- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) bread production line with a maximum production rate of 7,500 pounds of bread per hour, consisting of the following:
 - (1) One (1) natural gas-fired baking oven, with a maximum heat input capacity of 3.742 million British thermal units (MMBtu) per hour, constructed in 1964, and exhausting to stacks #1, #2, and #3.
 - (2) One (1) proof box, identified as BDP, constructed in 1981.

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

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

D.1.1 Preventive Maintenance Plan [326 IAC 1-6-3]

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) One (1) natural gas-fired boiler, identified as B1, with a maximum heat input capacity of 4.2 million British thermal units (MMBtu) per hour, constructed in 1959, and exhausting to stack #4.
- (e) One (1) natural gas-fired boiler, identified as B2, with a maximum heat input capacity of 5.2 million British thermal units (MMBtu) per hour, constructed in 2000, and exhausting to stack #5.

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

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

D.2.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(d), particulate emissions from the 4.2 MMBtu/hr boiler, which was existing and in operation before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.

D.2.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, particulate emissions from the 5.2 MMBtu/hr boiler, which was constructed after September 12, 1983, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input.

D.2.3 Preventative Maintenance Plan [326 IAC 1-6-3]

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

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) Three (3) flour storage silos, each with a maximum capacity of 360,000 pounds and a maximum throughput rate of 7.5 tons of flour per hour, constructed in 1963, equipped with a pneumatic conveyance system, using filter bags as integral particulate controls, and venting into the building.
- (c) One (1) bread dough dry ingredient conveyance system, exhausting indoors, including: pneumatic conveyance process equipment and piping, use bin, sifter, weigh hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2015. The conveyance system includes the following emission units:
 - (1) One (1) flour use bin, identified as UB1, with a capacity of 6,000 pounds per hour, equipped with sock filters for control of particulate matter emissions;
 - (2) One (1) sifter, identified as SF1, with a capacity of 6,000 pounds per hour, equipped with sock filters for control of particulate matter emissions;
 - (3) One (1) weigh hopper, identified as WH1, with a capacity of 3,360 pounds per hour, equipped with sock filters for control of particulate matter emissions;
 - (4) Two (2) weigh hoppers, identified as WH2 and WH3, each with a capacity of 1,440 pounds per hour, equipped with sock filters for control of particulate matter emissions;
 - (5) One (1) dusting flour hopper, identified as DF1, with a capacity of 42 pounds per hour, equipped with sock filters for control of particulate matter emissions;
 - (6) One (1) mixer, identified as M1, with a capacity of 7,200 pounds per hour;
 - (7) Two (2) mixers, identified as M2 and M3, each with a capacity of 7,200 pounds per hour
 - (8) One (1) fermentation room, identified as FR1;
 - (9) One (1) depanner, identified as DP1, with a capacity of 7,200 pounds per hour, equipped with Torrit Vacuum filters for control of particulate matter emissions, and
 - (10) Two (2) manual weigh stations, each with a capacity of 2,800 pounds per hour.

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

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

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the following emission units shall not exceed the allowable emission rates as listed in the table below:

Unit	Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)
Three (3) Flour Silos (S1, S2, S3)	7.5 (each)	15.8 (each)
Sifter (SF1)	3	8.56
Flour Use Bin (UB1)	3	8.56
Three (3) Mixers (M1, M2, M3)	3.6 (each)	9.67 (each)

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

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

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

where: E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour

D.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.3.3 Particulate Control

- (a) Pursuant to operating permit no. 003-6247-00259, issued on August 4, 1997 and in order to comply with Condition D.3.1, the fabric bag filters used to control PM emissions from the silos shall be in operation at all times when these storage silos are in operation.
- (b) In order to ensure compliance with Condition D.3.1, the sock filters used to control PM emissions from the Sifter (SF1) and Flour Use Bin (UB1) shall be in operation at all times when the Sifter or Flour Use Bin are in operation.
- (c) In the event that bag failure is observed in a multi-compartment baghouse, if operation 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 2-6.1-5(a)(2)]

D.3.4 Filter Inspections

An inspection shall be performed each calendar quarter of all filters controlling the three (3) flour storage silos (S1, S2, S3), sifter (S1) and flour use bin (UB1). All defective filters shall be replaced.

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

D.3.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.3.4, the Permittee shall maintain records of the results of the inspections required under Condition D.3.4.

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

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (i) Two (2) closed top cold degreasers, each constructed before 1980, one located in the vehicle maintenance shop and one located in the basement.

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

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

D.4.1 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

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

D.4.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this facility and its associated control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.4.3 Record Keeping Requirement

- (a) To document the compliance status with Condition D.4.1, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Holsum of Fort Wayne, Inc.
Address:	136 Murray Street
City:	Fort Wayne, Indiana 46803
Phone #:	(812) 425-4642
MSOP #:	003-35466-00259

I hereby certify that Holsum of Fort Wayne, Inc. is :

☐ still in operation.

☐ no longer in operation.

I hereby certify that Holsum of Fort Wayne, Inc. is :

☐ in compliance with the requirements of
MSOP 003-35466-00259.

☐ not in compliance with the requirements of
MSOP 003-35466-00259.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

COMPANY: _____ PHONE NO. () _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

**Technical Support Document (TSD) for a Significant Permit Revision to a
Minor Source Operating Permit (MSOP) Renewal**

Source Description and Location
--

Source Name: Source Location: County: SIC Code: Operation Permit No.: Operation Permit Issuance Date: Significant Permit Revision No.: Permit Reviewer:	Holsum of Fort Wayne, Inc. 136 Murray Street, Fort Wayne, IN 46803 Allen 2051(Bread and Other Bakery Products, Except Cookies and Crackers) M003-24986-00259 October 2, 2008 003-35466-00259 Tamera Wessel
--	---

On February 13, 2015, the Office of Air Quality (OAQ) received an application from Holsum of Fort Wayne, Inc. related to a modification to an existing bread bakery.

Existing Approvals

The source was issued MSOP Renewal No. M003-24986-00259 on October 2, 2008. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Allen 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}	Unclassifiable or attainment effective April 5, 2005, 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. Allen 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.

- [illegible]

- | Status of the Existing Source | |
|-------------------------------|-----|
| 1 | 2 |
| 3 | 4 |
| 5 | 6 |
| 7 | 8 |
| 9 | 10 |
| 11 | 12 |
| 13 | 14 |
| 15 | 16 |
| 17 | 18 |
| 19 | 20 |
| 21 | 22 |
| 23 | 24 |
| 25 | 26 |
| 27 | 28 |
| 29 | 30 |
| 31 | 32 |
| 33 | 34 |
| 35 | 36 |
| 37 | 38 |
| 39 | 40 |
| 41 | 42 |
| 43 | 44 |
| 45 | 46 |
| 47 | 48 |
| 49 | 50 |
| 51 | 52 |
| 53 | 54 |
| 55 | 56 |
| 57 | 58 |
| 59 | 60 |
| 61 | 62 |
| 63 | 64 |
| 65 | 66 |
| 67 | 68 |
| 69 | 70 |
| 71 | 72 |
| 73 | 74 |
| 75 | 76 |
| 77 | 78 |
| 79 | 80 |
| 81 | 82 |
| 83 | 84 |
| 85 | 86 |
| 87 | 88 |
| 89 | 90 |
| 91 | 92 |
| 93 | 94 |
| 95 | 96 |
| 97 | 98 |
| 99 | 100 |

This PTE table is from Appendix A of M003-24986-00259, issued on October 2, 2008.

[illegible]

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source Prior to Revision (tons/year)							
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} . ***The flour storage silos were determined to have integral controls in Operating Permit OP-003-6247-00259, issued August 4, 1997. Therefore, emission values shown are after control.								

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

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

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Holsum of Fort Wayne, Inc. on February 13, 2015, relating to the permitting of the existing proof box and dry ingredient conveyance equipment.

Emissions of VOC from the proofing operation were not previously accounted for as part of the baking line.

The following is a list of the existing unpermitted emission units and pollution control devices:

- (a) One (1) proof box, identified as BDP, constructed in 1981.
- (b) One (1) bread dough dry ingredient conveyance system, exhausting indoors, including: pneumatic conveyance process equipment and piping, use bin, sifter, weigh hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2015. The conveyance system includes the following emission units:
 - (1) One (1) flour use bin, identified as UB1, constructed in 1960, with a capacity of 6,000 pounds per hour, equipped with sock filters for control of particulate matter emissions;

- (2) One (1) sifter, identified as SF1, constructed in 1997, with a capacity of 6,000 pounds per hour, equipped with sock filters for control of particulate matter emissions;
- (3) One (1) weigh hopper, identified as WH1, constructed in 1960, with a capacity of 3,360 pounds per hour, equipped with sock filters for control of particulate matter emissions;
- (4) Two (2) weigh hoppers, identified as WH2 and WH3, each constructed in 1960, each with a capacity of 1,440 pounds per hour, equipped with sock filters for control of particulate matter emissions;
- (5) One (1) dusting flour hopper, identified as DF1, constructed in 1998, with a capacity of 42 pounds per hour, equipped with sock filters for control of particulate matter emissions;
- (6) One (1) mixer, identified as M1, constructed in 1971, with a capacity of 7,200 pounds per hour;
- (7) One (1) mixer, identified as M2, constructed in 2008, with a capacity of 7,200 pounds per hour;
- (8) One (1) mixer, identified as M3, constructed in 1970, with a capacity of 7,200 pounds per hour;
- (9) One (1) fermentation room, identified as FR1, constructed in 1940;
- (10) One (1) depanner, identified as DP1, constructed in 1982, with a capacity of 7,200 pounds per hour, equipped with Torrit Vacuum filters for control of particulate matter emissions, and
- (11) Two (2) manual weigh stations, constructed in 2013, each with a capacity of 2,800 pounds per hour.

The following is a list of existing emission units to be included with this minor permit revision:

- (a) One (1) closed top cold degreaser, constructed before 1980, and located in the basement.
- (b) One (1) glycol storage tank, identified as GT1, with a maximum capacity of 350 gallons, constructed in 1940.
- (c) One (1) pan oil tank, identified as POT, constructed in 1984, with a maximum capacity of 5,145 gallons.
- (d) Two (2) soy oil storage tanks, identified as TK1 and TK2, each with a maximum capacity of 9,146 gallons.

“Integral Part of the Process” Determination

- (a) As part of Operation Permit No. OP-003-6247-00259, issued August 4, 1997, IDEM, OAQ previously determined that the filters associated with the three (3) flour silos (S1, S2, S3) should be considered as integral parts to the storage and conveyance process.

IDEM, OAQ is not reevaluating the integral justification at this time. Therefore, the potential particulate emissions from the silos will continue to be calculated after consideration of the filters for determining permitting level and 326 IAC 6-3-2.
- (b) On February 13, 2015, the Permittee submitted the following information to justify why the filters

for:

- 1) Flour Use Bin (UB1)
- 2) Sifter (SF1)
- 3) Three (3) Weigh Hoppers (WH1, WH2, WH3)
- 4) Dusting Flour Hopper (DF1)
- 5) Three (3) Mixers (M1, M2, M3)

should be considered integral parts of the bread dough dry ingredient conveyance process:

- (1) The pneumatic flour handling system cannot be operated without the release of pressure. The product would not move through the system without the equalization of the pressure.
- (2) The primary purpose of the bags is to contain the flour product at the pressure relief points and to prevent contamination of the flour product, which would occur if the pressure relief points were open to the atmosphere.
- (3) The bags retain both the product and the integrity of the product by preventing loss of product and the contamination of the product. If not in place the economic impact of product loss and contaminated product would be substantial. Based on a material cost of \$0.21 per pound of white flour and \$0.19 per pound of wheat flour, the two-year average annual cost of lost material is \$10,498. The two-year average replacement cost of the sock filters is approximately \$322 total for the units being evaluated for integral control. The two-year average annual cost benefit savings is therefore \$10,176. Unit specific lost material costs are shown in the table below:

Emission Unit	Emission Factor (lb/ton)	2-Year Average Processing Rate (lbs/yr)	Annual Cost of Lost Material (\$)	Operating Cost (\$/yr)	Savings Benefit (\$/yr)
SF1	3.14	14,920,658	4,819	35.75	4,783.18
UB1	3.14	14,920,658	4,819	35.75	4,783.18
WH1	0.0048	2,200,157	1.08	35.75	-34.67
M1	0.572	2,200,157	129.26	35.75	93.51
WH2	0.0048	10,097,233	4.98	35.75	-30.77
M2	0.572	10,097,233	593.91	35.75	558.16
WH3	0.0048	2,200,157	1.08	35.75	-34.67
M3	0.572	2,200,157	129.26	35.75	93.51
DF1	0.0048	345,264	0.17	35.75	-35.58

IDEM, OAQ has evaluated the information submitted and has determined that the filters for:

- 1) Sifter (SF1)
- 2) Flour Use Bin (UB1)
- 3) Three (3) Weigh Hoppers (WH1, WH2, WH3)
- 4) Three (3) Mixers (M1, M2, M3)
- 5) Dusting Flour Hopper (DF1)

will not be considered an integral part of the bread dough dry ingredient conveyance process. This determination is based on the fact that each of the devices can be operated without the use of their respective filters, and although the installation of the filters provides a mechanism for material recovery, the maximum overall product throughput that could be captured and recovered by the filters is approximately 0.16% of total throughput. The filters in use with the three (3) weigh hoppers (WH1, WH2, WH3) and the dusting flour hopper (DF1) provide no economic incentive to

operate them while their respective units are in operation. The operation of each of the other filters provide a positive net economic benefit, however, the devices do not provide a significant economic benefit. Therefore, the permitting level will be determined using the potential to emit prior to the filters. This determination is similar to the IDEM, OAQ determinations made for similar facilities within the bakery industry (see Administrative Amendment No. 167-32365-00151 for Keebler Company, issued on November 16, 2011).

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the section entitled "Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit". IDEM, OAQ is reviewing this matter and will take the appropriate action. This proposed permit is intended to satisfy the requirements of the construction and operating permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Ingredient Storage & Handling	109.78	36.40	36.40	0	0	0	0	0	0
Proofing	0	0	0	0	0	5.30	0	0.16	0.16 Acetaldehyde
Storage Tanks	0	0	0	0	0	negl.	0	0	0
Degreaser	0	0	0	0	0	0.33	0	0	0
Total PTE of Proposed Revision	109.78	36.40	36.40	0	0	5.63	0	0.16	0.16 Acetaldehyde
negl. = negligible									

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Pursuant to 326 IAC 2-6.1-6(i)(1)(E), this MSOP is revised through a Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit Revision and the proposed revision involves the initial permitting of existing unpermitted emission units with a potential to emit greater than or equal to twenty-five (25) tons per year of PM, PM10, and direct PM2.5.

PTE of the Entire Source After Issuance of the MSOP Revision

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit		Uncontrolled/Unlimited Potential To Emit of the Entire Source After Issuance of the Revision (tons/year)							
		PM	PM10*	PM2.5**	SO ₂	NOx	VOC	CO	Total HAPs Worst Single HAP
Silo Loading***		0.10 1.03	0.03 0.36	0.03 0.36	0	0	0	0	0
Ingredient Storage & Handling		109.78	36.4	36.4	0	0	0	0	0
Bread Line	Fermentation	0	0	0	0	0	66.7 53.03	0	2.00 1.59 Acetaldehyde
	Proofing	0	0	0	0	0	5.30	0	0.16 Acetaldehyde
	Natural Gas Combustion (Oven)	0.03	0.12	0.12	0.00 0.01	0.10 1.61	0.04 0.09	0.16 1.35	0.07 0.03 0.04 Hexane
Natural Gas Combustion (except bake oven)		0.08 0.10	0.37 0.39	0.37 0.39	0.02 0.03	4.87 5.13	0.27 0.28	4.09 4.31	0.21 0.10 0.12 0.09 Hexane
Degreasers		0	0	0	0	0	0.66	0	0
Storage Tanks		0	0	0	0	0	negl.	0	0
Total PTE of Entire Source Excluding Fugitives		110.94	37.28	37.28	0.04	6.74	59.36	5.66	1.75 Acetaldehyde
Title V Major Source Thresholds		-	100	100	100	100	100	100	25 10
Fugitive Emissions		negl.	negl.	negl.	0	0	0	0	0
Total PTE of Entire Source Including Fugitives		110.94	37.28	37.28	0.04	6.74	59.36	5.66	1.75 Acetaldehyde
MSOP Threshold		25	25	25	25	25	25	-	-
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". ** PM _{2.5} listed is direct PM _{2.5} . ***The flour storage silos were determined to have integral control in Operating Permit OP-003-6247-00259, issued August 4, 1997. Therefore, emission values shown are after control.									

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source after issuance of this revision. The table below was generated from the above table, with bold text un-bolded and strikethrough text deleted.

Process/ Emission Unit		Uncontrolled/Unlimited Potential To Emit of the Entire Source After Issuance of the Revision (tons/year)							
		PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs Worst Single HAP
Silo Loading***		1.03	0.36	0.36	0	0	0	0	0
Ingredient Storage & Handling		109.78	36.40	36.40	0	0	0	0	0
Bread Line	Fermentation	0	0	0	0	0	53.03	0	1.59 Acetaldehyde
	Proofing	0	0	0	0	0	5.30	0	0.16 Acetaldehyde
	Natural Gas Combustion (Oven)	0.03	0.12	0.12	0.01	1.61	0.09	1.35	0.03 Hexane
Natural Gas Combustion (except bake oven)		0.10	0.39	0.39	0.03	5.13	0.28	4.31	0.10 Hexane
Degreasers		0	0	0	0	0	0.66	0	0
Storage Tanks		0	0	0	0	0	negl.	0	0
Total PTE of Entire Source Excluding Fugitives		110.94	37.28	37.28	0.04	6.74	59.36	5.66	1.88 1.75 Acetaldehyde
Title V Major Source Thresholds		-	100	100	100	100	100	100	25 10
Fugitive Emissions		negl.	negl.	negl.	0	0	0	0	0
Total PTE of Entire Source Including Fugitives		110.94	37.28	37.28	0.04	6.74	59.36	5.66	1.88 1.75 Acetaldehyde
MSOP Threshold		25	25	25	25	25	25	-	-

negl. = negligible
 *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 ** PM_{2.5} listed is direct PM_{2.5}.
 ***The flour storage silos were determined to have integral control in Operating Permit OP-003-6247-00259, issued August 4, 1997. Therefore, emission values shown are after control.

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

MSOP Status

(1) Criteria Pollutants

This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the

entire source will still be less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).

(2) HAPs

This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Permit Level Determination – PSD

(a) PSD Minor Source - PM

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

(b) PSD Minor Source – Other Regulated Pollutants

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the uncontrolled/unlimited potential to emit of all PSD regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Revision section above.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) *40 CFR 60, Subpart DD*

The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60, Subpart DD, are not included in the permit because this source does not perform any grain handling processes.

(b) *40 CFR 60, Subpart Kb*

The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60.110b, Subpart Kb, are not included for the storage tanks because each tank has a volume less than 75 m³ (19,813 gallons).

(c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(d) There are no National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed revision.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
See the Permit Level Determination - PSD section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
See PTE of the Entire Source After Issuance of the MSOP Revision Section above.

Ingredient Storage and Handling

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the following emission units shall not exceed the allowable emission rates as listed in the table below:

Unit	Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)
Sifter (SF1)	3	8.56
Flour Use Bin (UB1)	3	8.56
Two (2) Manual Weigh Stations (MW1, MW2)	1.4 (each)	exempt per 326 IAC 6-3-1(b)(14) (Potential PM emissions < 0.551)
One (1) Weigh Hopper (WH1)	1.68	exempt per 326 IAC 6-3-1(b)(14) (Potential PM emissions < 0.551)
Two (2) Weigh Hoppers (WH2, WH3)	0.72 (each)	exempt per 326 IAC 6-3-1(b)(14) (Potential PM emissions < 0.551)
Three (3) Mixers (M1, M2, M3)	3.6 (each)	9.67 (each)
Dusting Flour Station	0.021	exempt per 326 IAC 6-3-1(b)(14) (Potential PM emissions < 0.551)
Depanning	3.6	exempt per 326 IAC 6-3-1(b)(14) (Potential PM emissions < 0.551)

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

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

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

Where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The sock filters shall be in operation at all times the sifter and flour use bin (SF1 and UB1) are in operation, in order to comply with this limit.

The three (3) mixers (M1, M2, and M3) are able to comply with this limit without the use of control.

Bread Production Line

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

Pursuant to 326 IAC 8-1-6, the bread baking line is exempt from the requirements of 326 IAC 8-1-6 for the following reasons:

- (a) The bread baking oven is exempt from 326 IAC 8-1-6 because the oven was installed in 1965, which is prior to the regulated date of January 1, 1980.
- (b) The proof box for the bread oven, identified as BDP, was installed in 1981, which is after the regulated date of January 1, 1980. However, the potential VOC emissions from the bread proof box are less than twenty-five (25) tons per year.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The bread baking oven is not considered a source of indirect heating. Therefore, the requirements of 326 IAC 6-2 do not apply.

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

Pursuant to 326 IAC 6-3-1(b)(14), the bread baking line is exempt from the requirements of 326 IAC 6-3, because the line has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Degreasers

326 IAC 8-3 (Organic Solvent Degreasing Operation)

The degreasers are not subject to the requirements of 326 IAC 8-3-2, because the degreasers were constructed before 1980 and are not located in Clark, Elkhart, Floyd, Lake, Marion, Porter, or St. Joseph County.

326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)

Pursuant to 326 IAC 8-3-8, material requirements for the cold cleaner degreasers are as follows:

- (a) No person shall operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) All persons subject to the requirements of subsection 326 IAC 8-3-8(b)(2) shall maintain each of the following records for each purchase:
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.

- (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (c) All required records shall be:
 - (1) Retained on-site or accessible electronically from the site for the most recent three (3) year period; and
 - (2) Reasonably accessible for an additional two (2) year period.

Storage Tanks

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The three (3) glycol storage tanks, the pan oil storage tank, and the soy oil tank are not subject to the requirements of 326 IAC 8-9, because the source is not located in Clark, Floyd, Lake or Porter County.

Compliance Determination, Monitoring and Testing Requirements

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

Emission Unit	Control	Operating Parameters	Frequency
Flour Sifter - SF1	Sock Filters	Filter Inspections	Quarterly
Flour Use Bin - UB1	Sock Filters		

These monitoring conditions are necessary because the sock filters for SF1 and UB1 must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes).

Proposed Changes

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

- Revision 1: The Emission Unit descriptions have been updated throughout the permit to reflect the new units.
- Revision 2: Additional requirements have been included due to the addition of previously unpermitted emission units.
- Revision 3: Cold cleaner degreaser solvent requirements have been added pursuant to 326 IAC 8-3-8(c)(2).

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) **One (1) bread production line with a maximum production rate of 7,500 pounds of bread per hour, consisting of the following:**
 - (1) One (1) natural gas-fired baking oven, with a maximum heat input capacity of 3.742 million British thermal units (MMBtu) per hour ~~and maximum baking rate of 7,500 pounds of bread per hour~~, constructed in 1964, and exhausting to stacks #1, #2, and #3.

- (2) **One (1) proof box, identified as BDP, constructed in 1981.**
- (db) Three (3) flour storage silos, each with a maximum capacity of 360,000 pounds and a maximum throughput rate of 7.5 tons of flour per hour, constructed in 1963, equipped with a pneumatic conveyance system, using filter bags ~~for~~ **as integral particulate controls**, and venting into the building.
- (c) **One (1) bread dough dry ingredient conveyance system, exhausting indoors, including: pneumatic conveyance process equipment and piping, use bin, sifter, weigh hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2015. The conveyance system includes the following emission units:**
- (1) **One (1) flour use bin, identified as UB1, with a capacity of 6,000 pounds per hour, equipped with sock filters for control of particulate matter emissions;**
 - (2) **One (1) sifter, identified as SF1, with a capacity of 6,000 pounds per hour, equipped with sock filters for control of particulate matter emissions;**
 - (3) **One (1) weigh hopper, identified as WH1, with a capacity of 3,360 pounds per hour, equipped with sock filters for control of particulate matter emissions;**
 - (4) **Two (2) weigh hoppers, identified as WH2 and WH3, each with a capacity of 1,440 pounds per hour, equipped with sock filters for control of particulate matter emissions;**
 - (5) **One (1) dusting flour hopper, identified as DF1, with a capacity of 42 pounds per hour, equipped with sock filters for control of particulate matter emissions;**
 - (6) **One (1) mixer, identified as M1, with a capacity of 7,200 pounds per hour;**
 - (7) **Two (2) mixers, identified as M2 and M3, each with a capacity of 7,200 pounds per hour**
 - (8) **One (1) fermentation room, identified as FR1;**
 - (9) **One (1) depanner, identified as DP1, with a capacity of 7,200 pounds per hour, equipped with Torrit Vacuum filters for control of particulate matter emissions, and**
 - (10) **Two (2) manual weigh stations, each with a capacity of 2,800 pounds per hour.**
- (bd) One (1) natural gas-fired boiler, **identified as B1**, with a maximum heat input capacity of 4.2 million British thermal units (MMBtu) per hour, constructed in 1959, and exhausting to stack #4.
- (ee) One (1) natural gas-fired boiler, **identified as B2**, with a maximum heat input capacity of 5.2 million British thermal units (MMBtu) per hour, constructed in 2000, and exhausting to stack #5.
- (ef) ~~Six~~**Four (64)** natural gas-fired space heaters, including the following:

- (1) One (1) space heater, **identified as H1**, with a maximum heat input capacity of 0.225 MMBtu/hr.
 - (2) ~~Four~~**Two (42)** space heaters, **identified as H5 and H6**, each with a maximum heat input capacity of 0.4523 MMBtu/hr.
 - (3) One (1) space heater, **identified as H2**, with a maximum heat input capacity of ~~0.090~~**0.175** MMBtu/hr.
- (fg) Three (3) natural gas-fired tube heaters, including the following:
- (1) One (1) tube heater, **identified as H7**, with a maximum heat input capacity of 0.2532 MMBtu/hr.
 - (2) ~~Two~~**One (21)** tube heaters, **identified as H8**, each with a maximum heat input capacity of ~~0.420~~**0.200** MMBtu/hr.
 - (3) **One (1) tube heater, identified as H9, with a maximum heat input capacity of 0.56 MMBtu/hr.**
- (gh) ~~Three~~**Four (34)** natural gas-fired furnaces, including the following:
- (1) One (1) residential type furnace, **identified as H10**, with a maximum heat input capacity of 0.113 MMBtu/hr.
 - (2) One (1) residential type furnace, **identified as H11**, with a maximum heat input capacity of 0.09 MMBtu/hr.
 - (3) ~~One (1) furnace, located in the old office building, with a maximum heat input capacity of 0.1 MMBtu/hr.~~**Two (2) furnaces, identified as H3 and H4, with a maximum heat input capacity of 0.20 MMBtu/hr.**
- (hi) ~~One~~**Two (42)** closed top cold degreasers, **each** constructed before 1980, ~~and one~~ located in the vehicle maintenance shop **and one located in the basement.**
- (j) **One (1) glycol storage tank, identified as GT1, with a maximum capacity of 350 gallons, constructed in 1940.**
- (k) **One (1) pan oil tank, identified as POT, with a maximum capacity of 5,145 gallons.**
- (l) **Two (2) soy oil storage tanks, identified as TK1 and TK2, each with a maximum capacity of 9,146 gallons.**

...

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) **One (1) bread production line with a maximum production rate of 7,500 pounds of bread per hour, consisting of the following:**

(1) One (1) natural gas-fired baking oven, with a maximum heat input capacity of 3.742 million British thermal units (MMBtu) per hour ~~and maximum baking rate of 7,500 pounds of bread per hour~~, constructed in 1964, and exhausting to stacks #1, #2, and #3.

(2) **One (1) proof box, identified as BDP, constructed in 1981.**

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

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

D.1.1 Preventative Maintenance Plan [326 IAC 1-6-3]

~~A Preventative Maintenance Plan, in accordance with~~ **is required for these facilities and their control devices.** ~~Section CB - Preventative Maintenance Plan, of this permit, is required for this facility.~~ **contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(bd) One (1) natural gas-fired boiler, **identified as B1**, with a maximum heat input capacity of 4.2 million British thermal units (MMBtu) per hour, constructed in 1959, and exhausting to stack #4.

(ee) One (1) natural gas-fired boiler, **identified as B2**, with a maximum heat input capacity of 5.2 million British thermal units (MMBtu) per hour, constructed in 2000, and exhausting to stack #5.

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

...

D.2.3 Preventative Maintenance Plan [326 IAC 1-6-3]

~~A Preventative Maintenance Plan, in accordance with~~ **is required for these facilities and their control devices.** ~~Section B - Preventative Maintenance Plan, of this permit, is required for these facilities.~~ **contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

....

SECTION D.3

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (db) Three (3) flour storage silos, each with a maximum capacity of 360,000 pounds and a maximum throughput rate of 7.5 tons of flour per hour, constructed in 1963, equipped with a pneumatic conveyance system, using filter bags ~~for~~ **as integral particulate** controls, and venting into the building.
- (c) **One (1) bread dough dry ingredient conveyance system, exhausting indoors, including: pneumatic conveyance process equipment and piping, use bin, sifter, weigh hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2015. The conveyance system includes the following emission units:**
 - (1) **One (1) flour use bin, identified as UB1, with a capacity of 6,000 pounds per hour, equipped with sock filters for control of particulate matter emissions;**
 - (2) **One (1) sifter, identified as SF1, with a capacity of 6,000 pounds per hour, equipped with sock filters for control of particulate matter emissions;**
 - (3) **One (1) weigh hopper, identified as WH1, with a capacity of 3,360 pounds per hour, equipped with sock filters for control of particulate matter emissions;**
 - (4) **Two (2) weigh hoppers, identified as WH2 and WH3, each with a capacity of 1,440 pounds per hour, equipped with sock filters for control of particulate matter emissions;**
 - (5) **One (1) dusting flour hopper, identified as DF1, with a capacity of 42 pounds per hour, equipped with sock filters for control of particulate matter emissions;**
 - (6) **One (1) mixer, identified as M1, with a capacity of 7,200 pounds per hour;**
 - (7) **Two (2) mixers, identified as M2 and M3, each with a capacity of 7,200 pounds per hour**
 - (8) **One (1) fermentation room, identified as FR1;**
 - (9) **One (1) depanner, identified as DP1, with a capacity of 7,200 pounds per hour, equipped with Torrit Vacuum filters for control of particulate matter emissions, and**
 - (10) **Two (2) manual weigh stations, each with a capacity of 2,800 pounds per hour.**

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

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

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), ~~the allowable PM emission rate from each storage silo shall not exceed 15.8 pounds per hour when operating at a process weight rate of 15,000 pounds per hour.~~ **the particulate matter (PM) emissions from the following emission units shall not exceed the allowable emission rates as listed in the table below:**

Unit	Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)
Three (3) Flour Silos (S1, S2, S3)	7.5 (each)	15.8 (each)
Sifter (SF1)	3	8.56
Flour Use Bin (UB1)	3	8.56
Three (3) Mixers (M1, M2, M3)	3.6 (each)	9.67 (each)

The pounds per hour limitations ~~was~~**were** calculated using the following equation:

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

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

where: E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour

D.3.2 Preventative Maintenance Plan [326 IAC 1-6-3]

A Preventative Maintenance Plan, ~~in accordance with~~ **is required for these facilities and their control devices.** Section B - Preventative Maintenance Plan, ~~of this permit, is required for these facilities.~~ **contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

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

D.3.3 Particulate Control

- (a) Pursuant to operating permit no. 003-6247-00259, issued on August 4, 1997 and in order to comply with Condition D.3.1, **the fabric bag** filters used to control PM emissions from the silos shall be in operation at all times when these storage silos are in operation.
- (b) **In order to ensure compliance with Condition D.3.1, the sock filters used to control PM emissions from the Sifter (SF1) and Flour Use Bin (UB1) shall be in operation at all times when the Sifter or Flour Use Bin are in operation.**
- (c) **In the event that bag failure is observed in a multi-compartment baghouse, if operation 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 2-6.1-5(a)(2)]

D.3.4 Filter Inspections

An inspection shall be performed each calendar quarter of all filters controlling the three (3) flour storage silos (S1, S2, S3), sifter (S1) and flour use bin (UB1). All defective filters shall be replaced.

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

D.3.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.3.4, the Permittee shall maintain records of the results of the inspections required under Condition D.3.4.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (i) Two (2) closed top cold degreasers, each constructed before 1980, one located in the vehicle maintenance shop and one located in the basement.

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

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

D.4.1 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

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

D.4.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this facility and its associated control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.4.3 Record Keeping Requirement

- (a) To document the compliance status with Condition D.4.1, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

Additional Changes

IDEM, OAQ made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

- (1) The source status in section A.1 General Information has been corrected to list the source as not 1 of 28 Source Categories.
- (2) IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.
- (3) IDEM, OAQ has determined that rather than having a Certification condition and various references throughout the permit as to whether a particular report, notice, or correspondence needs to include a certification, the specific conditions that require an affirmation of truth and completeness shall state so. The certification condition has been removed. All statements to whether a certification, pursuant to the former Section B - Certification, is needed or not have been removed. Section B - Credible Evidence and Section C - Asbestos Abatement Projects still require certification as the underlying rules also require certifications.
- (4) IDEM, OAQ has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore all timeline have been revised to "no later than" or "not later than."
- (5) IDEM, OAQ has decided to clarify Section B - Preventive Maintenance Plan.
- (6) IDEM, OAQ has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.
- (7) IDEM, OAQ has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.
- (8) IDEM, OAQ has revised Section C - Incineration to more closely reflect the two underlying rules.
- (9) IDEM, OAQ has removed the first paragraph of Section C - Performance Testing as due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.
- (10) IDEM has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.

- (11) IDEM has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test". There was confusion if the "receipt" was by IDEM, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.
- (12) The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.
- (13) IDEM clarified the Instrument Specifications condition to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.

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

The Permittee owns and operates a stationary bread bakery.

Source Address:	136 Murray Street, Fort Wayne, Indiana 46803
Mailing Address:	P.O. Box 11468, Fort Wayne, IN 46858
...	
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. ~~The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-4(1).~~ Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

~~B.8 Certification~~

- ~~(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.~~
- ~~(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.~~
- ~~(c) An "authorized individual" is defined at 326 IAC 2-1.1-4(1).~~

B.98 Annual Notification [326 IAC 2-6.1-5(a)(5)]

...

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

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

...

B.409 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall **prepare and maintain and implement Preventive Maintenance Plans (PMPs) no later than ninety (9) 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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) **no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later**, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. ~~or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.4410 Prior Permits Superseded [326 IAC 2-1.1-9.5]

...

B.4211 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ~~ninety (90)~~ **one hundred twenty (120)** days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.4312 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
~~Permits Branch~~ **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 ~~ninety (90)~~ **one hundred twenty (120)** days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, **pursuant to 326 IAC 2-6.1-4(b)**, in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.4413 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

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

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

~~Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

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

B.4514 Source Modification Requirement

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

B.4615 Inspection and Entry

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

...

B.4716 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

...

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

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

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

...

B.4817 Annual Fee Payment [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~~ **due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.**

...

B.4918 Credible Evidence [326 IAC 1-1-6]

...

C.3 Opacity [326 IAC 5-1]

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

...

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

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

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

...

- (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
~~Asbestos Section~~**Compliance and Enforcement Branch**, Office of Air Quality
100 North Senate Avenue
MC 61-523 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. ~~The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

...

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

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

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 Data Section~~**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 certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. ~~The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

...

~~C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]~~

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

~~C.4211 Instrument Specifications [326 IAC 2-1.1-11]~~

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

...

~~C.4312 Response to Excursions or Exceedances~~

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

- (a) ~~Upon detecting an excursion or exceedance, the~~ The Permittee shall **take reasonable response steps** to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing **excess** emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. ~~and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions~~ **The response** may include, but ~~are~~ is not limited to, the following:
- (1) initial inspection and evaluation;
 - (2) recording that operations returned **or are returning** to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to ~~within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.~~ **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 maintain the following records:~~ **the reasonable response steps taken.**

- (1) ~~monitoring data;~~
- (2) ~~monitor performance data, if applicable; and~~
- (3) ~~corrective actions taken.~~

C.4413 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall ~~take appropriate response actions. The Permittee shall submit a description of its these response actions to IDEM, OAQ, within no later than thirty (30) days of receipt of the test results~~ **seventy-five (75) days after the date of the test..** The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed ~~within no later than one hundred eighty (180) twenty (120) days of receipt of the original test results~~ **days after the date of the test..** Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred **eighty (180) twenty (120)** 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 the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

C.4514 Malfunctions Report [326 IAC 1-6-2]

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

...

C.4615 General Record Keeping Requirements [326 IAC 2-6.1-5]

...

- (b) Unless otherwise specified in this permit, **for** all record keeping requirements not already legally required, **the Permittee shall be allowed up to** ~~shall be implemented within~~ 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.4716 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

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

- (c) ~~Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end~~ **The first report shall cover the period commencing on the date of issuance of this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end or the date of initial start-up, whichever is later, and ending on the last day of the reporting period.** ~~All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- (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.
- ...

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on February 13, 2015. Additional information was received on June 9, 2015.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Significant Permit Revision No. 003-35466-00259. The staff recommends to the Commissioner that this MSOP Significant Permit Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Tamera Wessel at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-8530 or toll free at 1-800-451-6027 extension 4-8530.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations
Emissions Summary**

Page 1 of 10 TSD App A

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
Permit No.: 003-35466-00259
Permit Reviewer: Tamera Wessel
Date: February 13, 2015

UNCONTROLLED POTENTIAL TO EMIT (tons/yr)

Emission Units		PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Worst Single HAP		Total HAPs
Silo Loading*		103.15	36.14	36.14	0	0	0	0	0		0
Ingredient Storage & Handling		109.78	36.40	36.40	0	0	0	0	0		0
Bread Line	Fermentation	0	0	0	0	0	53.03	0	1.59	Acetaldehyde	1.59
	Proofing	0	0	0	0	0	5.30	0	0.16	Acetaldehyde	0.16
	Natural Gas Combustion	0.03	0.12	0.12	0.01	1.61	0.09	1.35	0.03	Hexane	0.03
Natural Gas Combustion (except bake oven)		0.10	0.39	0.39	0.03	5.13	0.28	4.31	0.09	Hexane	0.10
Degreasers		0	0	0	0	0	0.66	0	0		0
Storage Tanks		0	0	0	0	0	negl.	0	0		0
Total PTE Excluding Fugitives		213.05	73.05	73.05	0.04	6.74	59.36	5.66	1.75	Acetaldehyde	1.88
Fugitive Emissions - Paved Roads		3.98E-03	7.97E-04	1.96E-04	0	0	0	0	0		0
PLANT-WIDE TOTAL		213.06	73.05	73.05	0.04	6.74	59.36	5.66	1.75	Acetaldehyde	1.88

*Under Operating Permit No. OP003-6247-00259, issued on August 4, 1997, IDEM, OAQ made the determination that the filters associated with the three (3) flour storage silos, identified as Silos S1, S2, and S3, should be considered as integral parts to the raw material storage system. For purposes of Part 70 applicability, the PTE is after consideration of the integral controls. For Purposes of PSD applicability, the PTE is before consideration of any control devices. The PTE shown is before consideration of the integral silo controls.

UNCONTROLLED POTENTIAL TO EMIT WITH CONSIDERATION OF INTEGRAL CONTROL (tons/yr)

Emission Units		PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Worst Single HAP		Total HAPs
Silo Loading		1.03	0.36	0.36	0	0	0	0	0		0
Ingredient Storage & Handling		109.78	36.40	36.40	0	0	0	0	0		0
Bread Line	Fermentation	0	0	0	0	0	53.03	0	1.59	Acetaldehyde	1.59
	Proofing	0	0	0	0	0	5.30	0	0.16	Acetaldehyde	0.16
	Natural Gas Combustion	0.03	0.12	0.12	0.01	1.61	0.09	1.35	0.03	Hexane	0.03
Natural Gas Combustion (except bake oven)		0.10	0.39	0.39	0.03	5.13	0.28	4.31	0.09	Hexane	0.10
Degreasers		0	0	0	0	0	0.66	0	0		0
Storage Tanks		0	0	0	0	0	negl.	0	0		0
Total PTE Excluding Fugitives		110.94	37.28	37.28	0.04	6.74	59.36	5.66	1.75	Acetaldehyde	1.88
Fugitive Emissions - Paved Roads		3.98E-03	7.97E-04	1.96E-04	0	0	0	0	0		0
PLANT-WIDE TOTAL		110.94	37.28	37.28	0.04	6.74	59.36	5.66	1.75	Acetaldehyde	1.88

**Appendix A: Emissions Calculations
Emissions Summary of Modifications**

Page 2 of 10 TSD App A

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
Permit No.: 003-35466-00259
Permit Reviewer: Tamera Wessel
Date: February 13, 2015

UNCONTROLLED / UNLIMITED POTENTIAL TO EMIT (tons/yr)

Emission Units		PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Worst Single HAP		Total HAPs
Ingredient Storage & Handling		109.78	36.40	36.40	0	0	0	0	0		0
Bread Line	Proofing	0	0	0	0	0	5.30	0	0.16	Acetaldehyde	0.16
Storage Tanks		0	0	0	0	0	negl.	0	0		0
Degreaser		0	0	0	0	0	0.33	0	0		0
PLANT-WIDE TOTAL		109.78	36.40	36.40	0.00	0.00	5.63	0.00	0.16	Acetaldehyde	0.16

CONTROLLED / UNLIMITED POTENTIAL TO EMIT (tons/yr)

Emission Units		PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Worst Single HAP		Total HAPs
Ingredient Storage & Handling		1.10	0.36	0.36	0	0	0	0	0.00		0
Bread Line	Proofing	0	0	0	0	0	5.30	0	0.16	Acetaldehyde	0.16
Storage Tanks		0	0	0	0	0	negl.	0	0		0.00
Degreaser		0	0	0	0	0	0.33	0	0		0
PLANT-WIDE TOTAL		1.10	0.36	0.36	0.00	0.00	5.63	0.00	0.16	Acetaldehyde	0.16

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

**Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
Permit No.: 003-35466-00259
Permit Reviewer: Tamera Wessel
Date: February 13, 2015**

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

Actual Control Device Efficiency: 99%

Emission Unit		Maximum Capacity*		Emission Factors			PTE Prior to Consideration of Integral Controls			PTE After Consideration of Integral Controls**		
				PM lb/ton	PM ₁₀ lb/ton	PM _{2.5} lb/ton	PM tons/yr	PM ₁₀ tons/yr	PM _{2.5} tons/yr	PM tons/yr	PM ₁₀ tons/yr	PM _{2.5} tons/yr
ID #	Description	lb/hr	tons/hr									
Silo 1	White Flour Silo	5,000	2.500	3.14	1.10	1.10	34.38	12.05	12.05	0.34	0.12	0.12
Silo 2	White Flour Silo	5,000	2.500	3.14	1.10	1.10	34.38	12.05	12.05	0.34	0.12	0.12
Silo 3	White Flour Silo	5,000	2.500	3.14	1.10	1.10	34.38	12.05	12.05	0.34	0.12	0.12
Total Emissions							103.15	36.14	36.14	1.03	0.36	0.36

Notes:

*Each silo is bottlenecked by the amount of dry ingredient that can be conveyed pneumatically out of the silo. This is the maximum capacity of the silo for purposes of determining applicability of 326 IAC 2-2.

The emission factors are from AP-42, Ch. 11.12, Table 11.12-2 for cement supplement unloading (SCC# 3-05-011-17).

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

**Under Operating Permit No. OP003-6247-00259, issued on August 4, 1997, IDEM, OAQ made the determination that the filters associated with the three (3) flour storage silos, identified as Silos S1, S2, and S3, should be considered as integral parts to the raw material storage system. For purposes of Part 70 applicability, the PTE is after consideration of the integral controls. For Purposes of PSD applicability, the PTE is before consideration of any control devices. The PTE shown is before consideration of the integral silo controls.

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 - Control Efficiency)

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

Page 4 of 10 TSD App A

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
Permit No.: 003-35466-00259
Permit Reviewer: Tamera Wessel
Date: February 13, 2015

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

Control Device Efficiency: 99%

Emission Unit		Maximum Capacity		Emission Factors			Uncontrolled			Controlled		
				PM	PM ₁₀	PM _{2.5}	PM	PM ₁₀	PM _{2.5}	PM	PM ₁₀	PM _{2.5}
Description	ID #	lb/hr	tons/hr	lb/ton	lb/ton	lb/ton	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
Sifter	SF1	6,000	3.000	3.14	1.10	1.10	41.26	14.45	14.45	0.41	0.14	0.14
Flour Use Bin	UB1	6,000	3.000	3.14	1.10	1.10	41.26	14.45	14.45	0.41	0.14	0.14
Manual Weigh Station	MW1	2,800	1.400	0.0048	0.0028	0.0028	0.03	0.02	0.02	2.94E-04	1.72E-04	1.72E-04
Manual Weigh Station	MW2	2,800	1.400	0.0048	0.0028	0.0028	0.03	0.02	0.02	2.94E-04	1.72E-04	1.72E-04
Weigh Hopper	WH1	3,360	1.680	0.0048	0.0028	0.0028	0.04	0.02	0.02	3.53E-04	2.06E-04	2.06E-04
Weigh Hopper	WH2	1,440	0.720	0.0048	0.0028	0.0028	0.02	0.01	0.01	1.51E-04	8.83E-05	8.83E-05
Weigh Hopper	WH3	1,440	0.720	0.0048	0.0028	0.0028	0.02	0.009	0.009	1.51E-04	8.83E-05	8.83E-05
Mixer 1	M1	7,200	3.600	0.572	0.1560	0.1560	9.02	2.46	2.46	0.09	0.02	0.02
Mixer 2	M2	7,200	3.600	0.572	0.1560	0.1560	9.02	2.46	2.46	0.09	0.02	0.02
Mixer 3	M3	7,200	3.600	0.572	0.1560	0.1560	9.02	2.46	2.46	0.09	0.02	0.02
Dusting Flour Station	DF1	42	0.021	0.0048	0.0028	0.0028	0.0004	0.0003	0.0003	4.42E-06	2.58E-06	2.58E-06
Depanning*	DP1	7,200	3.600	0.0048	0.0028	0.0028	0.08	0.04	0.04	7.57E-04	4.42E-04	4.42E-04
Total Emissions							109.78	36.40	36.40	1.10	0.36	0.36

Notes:

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) and Ch. 11.19.2, Table 11.19.2-2 for fines screening (SCC# 3-05-020-21)

PM_{2.5} has been assumed to be equal to 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 Oven)**

Page 5 of 10 TSD App A

**Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
Permit No.: 003-35466-00259
Permit Reviewer: Tamera Wessel
Date: February 13, 2015**

Production Line	Product	Maximum Capacity (lb/hr)	Maximum Throughput (tons/yr)	AP-42, Section 9.9.6 Equation Values				Emission Factor	Potential Emissions	
				Initial Baker's % Yeast	Yeast Action Time (hours)	Final (Spike) Baker's % Yeast	Spike Time (hours)	VOC (lb/ton)	VOC (tons/yr)	Acetaldehyde (tons/yr)
Bread Line	bread	7,200	31,536.00	2.0	4.8	0.5	1.3	3.36	53.03	1.59
Bread Line	353	5,625	24,637.50	2.0	4.8	0.5	1.3	3.36	41.43	1.24
Bread Line	20	8,625	37,777.50	2.0	4.8	6.0	1.3	0.56	10.54	0.32
Bread Line	100	8,625	37,777.50	2.0	4.8	3.0	1.3	2.09	39.44	1.18
Worst Case									53.03	1.59

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

$$\text{VOC} = 0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.90$$

where:

Y_i = initial baker's percent of yeast to the nearest tenth

t_i = total yeast action time in hours to the nearest tenth

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

t_s = spiking time in hours to the nearest tenth

The equation values for both production lines have been rounded to the nearest tenth.

The equation values for the bread production line are from the Technical Support Document (TSD) for Operating Permit Renewal No. T091-27352-00106.

The equation values for the bun production line are for the production of its highest-emitting product, as supplied by the source.

VOCs emitted during fermentation (leavening) are assumed to be 97% ethanol and 3% acetaldehyde (VOC/HAP), based on the following document and supporting information:

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

Appendix A: Emissions Calculations
VOC and HAP Emissions
Proof Box

Page 6 of 10 TSD App A

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
Permit No.: 003-35466-00259
Permit Reviewer: Tamera Wessel
Date: February 13, 2015

Production Line	Product	Emission Unit	Uncontrolled Potential VOC from Fermentation (tons/year)	Uncontrolled Potential VOC from Proofing (tons/year)	Uncontrolled Potential Acetaldehyde from Proofing (tons/year)
Bread Line	bread	BDP	53.03	5.30	0.16
TOTAL				5.30	0.16

Notes:

VOC emissions from proofing shall be assumed to be 10% of the emissions calculated for fermentation based on the following document:

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

VOCs emitted during fermentation (leavening) are assumed to be 97% ethanol and 3% acetaldehyde (VOC/HAP), based on the following document and supporting information:

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

Methodology:

VOC Emissions from Proofing (tons/yr) = 0.10 * Fermentation Emissions (tons/yr)

Acetaldehyde Emissions from Proofing (tons/yr) = 0.03 * VOC Emissions from Proofing (tons/yr)

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Bread Oven (BD2)

Page 7 of 10 TSD App A

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
Permit Number: 003-35466-00259
Reviewer: Tamera Wessel
Date: February 13, 2015

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
3.742	1020	32.1

	Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/	0.03	0.12	0.12	0.01	1.61	0.09	1.35

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

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

HAPS Calculations

	HAPs - Organics					
Emission Factor in lb/MMc	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
	2.1E-03	1.2E-03	0.075	1.80	3.4E-03	
Potential Emission in tons/	3.374E-05	1.928E-05	1.205E-03	0.029	5.463E-05	0.030

	HAPs - Metals					
Emission Factor in lb/MMc	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/	8.034E-06	1.768E-05	2.250E-05	6.106E-06	3.374E-05	8.806E-05
	Total HAPs					0.03
	Worst HAP					0.03

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Hexane

Appendix A: Emissions Calculations

Page 8 of 10 TSD App A

Natural Gas Combustion Only

MM BTU/HR <100

Insignificant Activities

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
Permit Number: 003-35466-00259
Reviewer: Tamera Wessel
Date: February 13, 2015

Unit	Maximum Heat Input Capacity (MMBtu/hr)	High Heat Value (MMBtu/MMscf)	Potential Throughput (MMcf/yr)
Boiler 1 - (B1)	4.200	1020	36.071
Boiler 2 - (B2)	5.200		44.659
Space Heater - (H1)	0.225		1.932
Space Heater - (H2)	0.175		1.503
2 Space heaters @ 0.23 MMBTU/hr each - (H5, H6)	0.46		3.951
2 Furnaces @ 0.20 MMBTU/hr each - (H3, H4)	0.40		3.435
Furnace - (H10)	0.113		0.970
Furnace - (H11)	0.09		0.773
Tube heater - (H7)	0.32		2.748
Tube heater - (H8)	0.20		1.718
Tube heater - (H9)	0.56		4.809
Totals	11.943		102.57

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.10	0.39	0.39	0.03	5.13	0.28	4.31

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

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

HAPS Calculations

Emission Factor in lb/MMcf	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
	2.1E-03	1.2E-03	0.075	1.80	3.4E-03	
Potential Emission in tons/yr	1.077E-04	6.154E-05	3.846E-03	0.09	1.744E-04	0.10

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.564E-05	5.641E-05	7.180E-05	1.949E-05	1.077E-04	2.810E-04

Total HAPs	0.10
Worst HAP	0.09

Hexane

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Degreasers**

Page 9 of 10 TSD App A

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
Permit Number: 003-35466-00259
Reviewer: Tamara Wessel

Calculations submitted by source and approved by IDEM.

Emission Point ID	VOC Emission Factor	Number of Units	VOC Emissions		Controlled Emission Reduction	Controlled VOC Emissions	
	tons/yr/unit		tons/yr	lb/hr	%	tons/yr	lb/hr
Degreasers	0.33	2	0.66	0.15	28%	0.48	0.11

Emissions calculated using the methodology in AP-42, Section 4.6, Table 4.6-2

Emission Reduction from AP-42, Section 4.6, Table 4.6-3

Methodology

VOC Emissions (tons/yr) = VOC Emission Factor (tons/yr/unit) * Number of Units

VOC Emissions (lb/hr) = VOC Emission Factor (tons/yr/unit) * Number of Units * 2000 lbs/1 ton * 1 yr/8760 hours

Controlled VOC Emissions (tons/yr) = VOC Emissions (tons/yr) * (1-Controlled Emission Reduction)

Controlled VOC Emissions (lbs/hr) = VOC Emissions (lbs/hr) * (1-Controlled Emission Reduction)

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

Page 10 of 10 TSD App A

Company Name: Holsum of Fort Wayne, Inc.
Source Address: 136 Murray Street, Fort Wayne, IN 46803
Permit Number: 003-35466-00259
Reviewer: Tamera Wessel
Date: February 13, 2015

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 Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Tankers	1.0	1.0	1.0	25.0	25.0	25	0.005	4.73E-03	1.73
Tractor Trailers	3.0	1.0	3.0	10.0	30.0	25	0.005	0.01	5.18
Totals			4.0		55.0			0.02	6.91

Vehicle Weight Per Trip = 13.8 tons/trip
Average Miles Per Trip = 0.00 miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	13.8	13.8	13.8	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

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

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	1.260	0.252	0.0619	lb/mile
Mitigated Emission Factor, $E_{ext} =$	1.152	0.230	0.0566	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Tankers	1.09E-03	2.18E-04	5.35E-05	9.96E-04	1.99E-04	4.89E-05
Tractor Trailers	3.27E-03	6.53E-04	1.60E-04	2.99E-03	5.97E-04	1.47E-04
Totals	4.36E-03	8.71E-04	2.14E-04	3.98E-03	7.97E-04	1.96E-04

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Notice of Public Comment

June 10, 2015

Hoslum of Fort Wayne, Inc.

003-35466-00259

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 6/13/13





INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

July 10, 2015

Mr. Robert Renock
Hoslum of Fort Wayne, Inc.
500 N Fulton Avenue
Evansville, IN 47710

Re: Public Notice
Hoslum of Fort Wayne, Inc.
Permit Level: Significant Permit Revision
Permit Number: 003-35466-00259

Dear Mr. Renock:

Enclosed is a copy of your draft Significant Permit Revision, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Journal Gazette in Fort Wayne, Indiana publish the abbreviated version of the public notice no later than July 14, 2015. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Allen County Public Library 900 Library Plaza in Fort Wayne, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Tamera Wessel, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-8530 or dial (317) 234-8530.

Sincerely,

Greg Hotopp

Greg Hotopp
Permits Branch
Office of Air Quality

Enclosures

PN Applicant Cover letter-2014. Dot4/10/14



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

July 10, 2015

To: Allen County Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Hoslum of Fort Wayne, Inc.
Permit Number: 003-35466-00259

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 6/13/2013



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

July 10, 2015

Journal Gazette
600 W. Main Street
PO Box 100
Fort Wayne, IN 46801

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Hoslum of Fort Wayne, Inc., Allen County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than July 14, 2015.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Greg Hotopp at 800-451-6027 and ask for extension 4-3493 or dial 317-234-3493.

Sincerely,

Greg Hotopp


Greg Hotopp
Permit Branch
Office of Air Quality

Permit Level: Significant Permit Revision
Permit Number: 003-35466-00259

Enclosure

PN Newspaper.dot 6/13/2013

Mail Code 61-53

IDEM Staff	GHOTOPP 7/10/2015 Holsum of Fort Wayne, Inc 003-35466-00259 Draft		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Robert Renock Holsum of Fort Wayne, Inc 500 N Fulton Avenue Evansville IN 47710 (Source CAATS)									
2		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)									
3		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)									
4		Allen County Public Library 900 Library Plaza, P.O. Box 2270 Fort Wayne IN 46802 (Library)									
5		Fort Wayne City Council and Mayors Office 200 E Berry Street Ste 120 Fort Wayne IN 46802 (Local Official)									
6		Mr. Jeff Coburn Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party)									
7		Ms. Pamela Block Air Quality Services, LLC 425 Main Street Evansville IN 47708 (Consultant)									
8		Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 (Local Official)									
9		Fort Wayne-Allen County Health Department 200 E Berry St Suite 360 Fort Wayne IN 46802 (Health Department)									
10		Ms. Leslie J. Sams c/o Air quality Services, LLC, 425 Main Street Evansville IN 47708 (Affected Party)									
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
10			