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

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and
Minor Source Operating Permit (MSOP)
for Perfection Bakeries, Inc. in Lake County

MSOP No.: M089-37029-00590

The Indiana Department of Environmental Management (IDEM) has received an application from Perfection Bakeries, Inc., located at 790 W. Commercial Avenue, Lowell, IN 46356, for a new source construction and MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Perfection Bakeries, Inc. to construct and operate a new baked good production facility.

The applicant intends to construct and operate new equipment that will emit air pollutants. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

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

Lowell Public Library
1505 E. Commercial Avenue
Lowell, IN 46356
and
IDEM Northwest Regional Office
330 W. US Highway 30, Suites E & F
Valparaiso, IN 46385

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 M089-37029-00590 in all correspondence.

Comments should be sent to:

Madhurima Moulik
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-0868
Or dial directly: (317) 233-0868
Fax: (317) 232-6749 attn: Madhurima Moulik
E-mail: mmoulik@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, at the IDEM Regional Office 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 Madhurima Moulik of my staff at the above address.

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

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Commissioner

DRAFT

New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

Perfection Bakeries, Inc.
790 W. Commercial Avenue
Lowell, Indiana 46356

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 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.: M089-37029-00590	
Issued by: Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary baked good production facility.

Source Address:	790 W. Commercial Avenue, Lowell, Indiana 46356
General Source Phone Number:	517-787-6720
SIC Code:	2051 (Bread and Other Bakery Products, Except Cookies and Crackers)
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other 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 baking line, identified as EU01, approved in 2016 for construction, with a maximum baking rate of 8,207 pounds of bread per hour, exhausting to Stack OS1, including:

(1) One (1) natural gas-fired bread baking oven, identified as EU02, with a maximum heat input capacity of 6.88 MMBtu/hr.

(2) One (1) proof box, identified as EU03, with a maximum capacity of 8,207 pounds of dough per hour.

(b) One (1) Raw Material Handling area, approved in 2016 for construction, including:

(1) Three (3) storage silos, identified as EU06-EU08, each with a maximum capacity of 5,615 pounds per hour, using a fabric filter CE01 as particulate control, exhausting to stacks FS01, FS02, and FS03.

(2) One (1) dry ingredient dump station, identified as EU09, with a maximum capacity of 2,500 pounds per hour, using a fabric filter as particulate control, exhausting indoors.

(3) One (1) use bin for granulated sugar storage, with a maximum capacity of 4,000 pounds, using no control, exhausting indoors.

(4) One (1) scaling station and two (2) mixers (identified as EU10 and EU11), each with a total maximum capacity of 8,115 pounds per hour, using a fabric filter as particulate control, exhausting outdoors.

(c) Natural gas fired combustion units, including:

(1) One (1) boiler, identified as EU04, with a maximum rated heat input capacity of 4.063 MMBtu/hr, exhausting to stack B01.

(2) One (1) boiler, identified as EU05, with a maximum rated heat input capacity of 4.063 MMBtu/hr, exhausting to stack B02.

(3) Twenty-two (22) heaters, identified as EU12 through EU33 with a maximum total rated heat input capacity of 5.035 MMBtu/hr, exhausting to stacks H01 through H22.

(d) Paved roads.

(e) Bulk liquid storage, including:

(1) Two (2) vegetable oil tanks, each with a maximum capacity of 3,700 gallons.

(2) Two (2) high fructose corn syrup (HFCS) tanks, each with a maximum capacity of 3,700 gallons.

SECTION B GENERAL CONDITIONS

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

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

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)][326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, M089-37029-00590, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

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

B.6 Enforceability

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

B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

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

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

B.10 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.11 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.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M089-37029-00590 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.13 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.14 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.15 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.16 Source Modification Requirement

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

B.17 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.18 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.19 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.20 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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and 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.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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 Continuous Compliance Plan [326 IAC 6.8-8-1] [326 IAC 6.8-8-8]

(a) Pursuant to 326 IAC 326 IAC 6.8-8-1, the Permittee shall submit to IDEM and maintain at source a copy of the Continuous Compliance Plan (CCP). The Permittee shall perform the inspections, monitoring and record keeping in accordance with the information in 326 IAC 6.8-8-5 through 326 IAC 6.8-8-7 or applicable procedures in the CCP.

(b) Pursuant to 326 IAC 6.8-8-8, the Permittee shall update the CCP, as needed, retain a copy of any changes and updates to the CCP at the source and make the updated CCP available for inspection by the department. The Permittee shall submit the updated CCP, if required to IDEM, OAQ within thirty (30) days of the update.

(c) Pursuant to 326 IAC 6.8-8, failure to submit a CCP, maintain all information required by the CCP at the source, or submit update to a CCP is a violation of 326 IAC 6.8-8.

C.12 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.13 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.14 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.15 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.16 Emission Statement [326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement by July 1 following a calendar year when the source emits oxides of nitrogen or volatile organic compounds into the ambient air equal to or greater than twenty-five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

The statement must be submitted to:

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

Indianapolis, Indiana 46204-2251

C.17 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.18 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 baking line, identified as EU01, approved in 2016 for construction, with a maximum baking rate of 8,207 pounds of bread per hour, exhausting to Stack OS1, including:

(1) One (1) natural gas-fired bread baking oven, identified as EU02, with a maximum heat input capacity of 6.88 MMBtu/hr.

(2) One (1) proof box, identified as EU03, with a maximum capacity of 8,207 pounds of dough 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.1.1 BACT Requirements (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), BACT has been determined to be the following for the bread baking line:

(a) VOC emissions from the bread baking line EU01, including the natural gas-fired oven EU02 and proof box EU03, shall not exceed 70.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The source shall operate the proof box EU03 in accordance with the manufacturer's design and operating specifications.

(c) In order to ensure proper operation and to minimize potential emissions, the source shall perform proof box cleaning operations for the proof box (EU03) on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedure (SSOP):

1. The following procedures to be conducted every week:

(A) Scraping of dough from racks and supports;
(B) Sweeping of the proof box floor;
(C) Removal of dough/product from inside the proof box.

2. The following procedures to be conducted every four (4) weeks:

(A) Wipe-off of interior proof box channel rails as needed;
(B) Removal of any dough or oil accumulations from channel rails and cross-over framework; and
(C) Washing or mopping of floor of the proof box, and removal of accumulated waste from the floor.

D.1.2 Preventive Maintenance Plan [326 IAC1-6-3]

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

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

D.1.3 Volatile Organic Compounds

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

$$VOC = \sum_{m=1}^{12}\left(1.1x\left(\sum_{i=1}^{n}\frac{E_i * B_i}{2000lb/ton}\right)+0.0135\right)_m$$

Where:

VOC	=	The VOC emissions from the bread baking line (tons per twelve (12) consecutive month period);
n	=	The number of different dough types used during month *m*.
B_i	=	The amount of dough of type i produced during month *m* (tons/month);
E_i	=	The VOC emission factor for type i dough (lb of VOC/ton of dough); and
m	=	Each calendar month within the twelve (12) consecutive month period;

Note: In the equation above, the monthly VOC emissions from the proof box are assumed to be 10% of the VOC emissions from the baking oven; therefore the oven VOC emissions are multiplied by a factor of 1.1.

Note: In the equation above, the factor of 0.0135 tons/month represents the maximum monthly VOC emissions from combustion of natural gas in EU02 at the maximum heat input capacity of 6.88 MMBtu/hr and using the AP-42 emission factor of 5.5 lb/MMCF.

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

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

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

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

D.1.4 Record Keeping Requirement

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

(1) The dates of the compliance period:

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

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

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

(B) The total yeast action time in hours;

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

(D) The spiking time in hours.

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

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

D.1.5 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted no later than thirty (30) days after the end of the quarter being reported using the reporting forms at the end of this permit or their equivalent. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) bread baking line, identified as EU01, approved in 2016 for construction, with a maximum baking rate of 8,207 pounds of bread per hour, exhausting to Stack OS1, including:

(1) One (1) natural gas-fired bread baking oven, identified as EU02, with a maximum heat input capacity of 6.88 MMBtu/hr.

(2) One (1) proof box, identified as EU03, with a maximum capacity of 8,207 pounds of dough per hour.

(b) One (1) Raw Material Handling area, approved in 2016 for construction, including:

(1) Three (3) storage silos, identified as EU06 through EU08, each with a maximum capacity of 5,615 pounds per hour, using a fabric filter CE01 as particulate control, exhausting to stacks FS01, FS02, and FS03.

(2) One (1) dry ingredient dump station, identified as EU09, with a maximum capacity of 2,500 pounds per hour, using a fabric filter as particulate control, exhausting indoors.

(3) One (1) use bin for granulated sugar storage, with a maximum capacity of 4,000 pounds, using no control, exhausting indoors.

(4) One (1) scaling station and two (2) mixers (identified as EU10 and EU11), each with a total maximum capacity of 8,115 pounds per hour, using a fabric filter as particulate control, exhausting outdoors.

(c) Natural gas fired combustion units, including:

(1) One (1) boiler, identified as EU04, with a maximum rated heat input capacity of 4.063 MMBtu/hr, exhausting to stack B01.

(2) One (1) boiler, identified as EU05, with a maximum rated heat input capacity of 4.063 MMBtu/hr, exhausting to stack B02.

(3) Twenty-two (22) heaters, identified as EU12 through EU33 with a maximum total rated heat input capacity of 5.035 MMBtu/hr, exhausting to stacks H01 through H22.

(d) Paved roads.

(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 6.8-1-2]

(a) Pursuant to 326 IAC 6.8-1-2(b)(3), the emissions of particulate matter from the natural gas-fired boilers EU04 and EU05 shall not exceed 0.01 grain per dry standard cubic foot.

(b) Pursuant to 326 IAC 6.8-1-2(a), the emissions of particulate matter from the baking oven, space heaters, each of the emission units comprising the raw material handling area, and paved roads shall not exceed 0.03 grain per dry standard cubic feet.

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.2.3 Particulate Matter

(a) In order to assure compliance with Condition D.2.1(b), the fabric filter CE01 for the storage silos EU06 through EU08, fabric filter for dry ingredient dump station EU09, and the fabric filter for the scaling operation and two (2) mixers EU10 and EU11 for particulate control, shall be in operation and control emissions at all times the associated units are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.2.4 Broken or Failed Filter Detection

(a) For a single compartment filter controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C- Response to Excursions or Exceedances).

(b) For a single compartment filter controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C- Response to Excursions or Exceedances).

Filter failure can be indicated by a significant drop in the dust collector's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.5 Filter Inspection

An inspection shall be performed each calendar quarter of all filters controlling the silo bin vents, mixers and scales, and dump station. All defective filters shall be replaced.

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

D.2.6 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5.

(b) Section C - General Record Keeping Requirements of this permit 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

Quarterly Report

Source Name: Perfection Bakeries, Inc.
Source Address: 790 W. Commercial Avenue, Lowell, Indiana 46356
MSOP Permit No.: M089-37029-00590
Source: Bread Baking Line (including oven and proof box)
Pollutant: Volatile Organic Compounds (VOC)
Limit: VOC emissions from the bread baking line EU01, including the natural gas-fired oven EU02 and proof box EU03, shall not exceed 70.0 tons per twelve (12) consecutive month period.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions This Month	VOC Emissions Previous 11 Months	VOC Emissions 12 Month Total

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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:	Perfection Bakeries, Inc.
Address:	790 W. Commercial Avenue
City:	Lowell, Indiana 46356
Phone #:	517-787-6720
MSOP #:	M089-37029-00590

I hereby certify that Perfection Bakeries, Inc. is :

- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that Perfection Bakeries, Inc. is :

- ☐ in compliance with the requirements of MSOP M089-37029-00590.
- ☐ not in compliance with the requirements of MSOP M089-37029-00590.

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:

_____
_____

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

Perfection Bakeries, Inc.
790 W. Commercial Avenue
Lowell, Indiana 46356

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)

4. I hereby certify that Perfection Bakeries, Inc. 790 W. Commercial Avenue, Lowell, Indiana 46356, completed construction of the baked good production facility. on _____in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on April 1, 2016 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M089-37029-00590, Plant ID No. 089-00590 issued on _____.

5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature_____
Date_____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana

on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature_____
Name_____ (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit (MSOP)

Source Background and Description

Source Name:	**Perfection Bakeries, Inc.**
Source Location:	**790 W. Commercial Avenue, Lowell, IN 46356**
County:	**Lake**
SIC Code:	**2051 (Bread and Other Bakery Products, Except Cookies and Crackers)**
Permit Renewal No.:	**M089-37029-00590**
Permit Reviewer:	**Madhurima Moulik**

On April 1, 2016, the Office of Air Quality (OAQ) received an application from Perfection Bakeries, Inc. related to the construction and operation of a new baked good production facility.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Lake County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O_3	On June 11, 2012, the U.S. EPA designated Lake County nonattainment, for the 8-hour ozone standard. [1,2]
$PM_{2.5}$	Unclassifiable or attainment effective February 6, 2012, 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}	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

[1]The U. S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Lake County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3 for the 1-hour standard.
[2]The department has filed a legal challenge to U.S. EPA's designation in 77 FR 34228.

(a) Ozone Standards
U.S. EPA, in the Federal Register Notice 77 FR 112 dated June 11, 2012, has designated Lake County as nonattainment for ozone. On August 1, 2012, the air pollution control board issued an emergency rule adopting the U.S. EPA's designation. This rule became effective August 9, 2012. IDEM does not agree with U.S. EPA's designation of nonattainment. IDEM filed a suit against U.S. EPA in the U.S. Court of Appeals for the DC Circuit on July 19, 2012. However, in order to ensure that sources are not potentially

liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's designation. 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. Therefore, VOC and NO_x emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.

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

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

Fugitive Emissions

(a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

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

Greenhouse Gas Emissions

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.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Perfection Bakeries, Inc. on April 1, 2016, relating to the construction and operation of a new baked good production facility.

The source consists of the following emission units:

(a) One (1) bread baking line, identified as EU01, approved in 2016 for construction, with a maximum baking rate of 8,207 pounds of bread per hour, exhausting to Stack OS1, including:

(1) One (1) natural gas-fired bread baking oven, identified as EU02, with a maximum heat input capacity of 6.88 MMBtu/hr.

(2) One (1) proof box, identified as EU03, with a maximum capacity of 8,207 pounds of dough per hour.

(b) One (1) Raw Material Handling area, approved in 2016 for construction, including:

(1) Three (3) storage silos, identified as EU06-EU08, each with a maximum capacity of 5,615 pounds per hour, using a fabric filter CE01 as particulate control, exhausting to stacks FS01, FS02, and FS03.

(2) One (1) dry ingredient dump station, identified as EU09, with a maximum capacity of 2,500 pounds per hour, using a fabric filter as particulate control, exhausting indoors.

(3) One (1) use bin for granulated sugar storage, with a maximum capacity of 4,000 pounds, using no control, exhausting indoors.

(4) One (1) scaling station and two (2) mixers (identified as EU10 and EU11), each with a total maximum capacity of 8,115 pounds per hour, using a fabric filter as particulate control, exhausting outdoors.

(c) Natural gas fired combustion units, including:

(1) One (1) boiler, identified as EU04, with a maximum rated heat input capacity of 4.063 MMBtu/hr, exhausting to stack B01.

(2) One (1) boiler, identified as EU05, with a maximum rated heat input capacity of 4.063 MMBtu/hr, exhausting to stack B02.

(3) Twenty-two (22) heaters, identified as EU12 through EU33 with a maximum total rated heat input capacity of 5.035 MMBtu/hr, exhausting to stacks H01 through H22.

(d) Paved roads.

(e) Bulk liquid storage, including:

(1) Two (2) vegetable oil tanks, each with a maximum capacity of 3,700 gallons.

(2) Two (2) high fructose corn syrup (HFCS) tanks, each with a maximum capacity of 3,700 gallons.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Permit Level Determination - MSOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM[(1)]	141.17
PM_{10}	48.12
$PM_{2.5}$	48.01
SO_2	0.05
NO_x	8.61
VOC	88.86
CO	7.23
Single HAP	<10
Total HAP	<25

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM10, PM2.5, and VOC are each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.

(b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is 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.

Potential to Emit After Issuance of the MSOP

The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance (tons/year)								
	PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	Total HAPs	Worst Single HAP
EU01 Baking Line (fermentation)	--	--	--	--	--	70.00***	--	2.41	2.41 (Acet.)
EU02 (Baking Oven combustion)	0.06	0.23	0.23	0.02	2.95		2.48	0.05	0.06 (Hex.)
EU03 Proof Box	--	--	--	--	--		--	0.24	0.24 (Acet.)
Boiler 1 (EU04)	0.03	0.13	0.13	--	1.75	0.10	1.47	0.03	0.03 (Hex.)
Boiler 2 (EU05)	0.03	0.13	0.13	--	1.75	0.10	1.47	0.03	0.03 (Hex.)
EU06-EU08 (Storage Silos)	115.84	40.58	40.58	--	--	--	--	--	--
EU09 Bag Dump	0.03	0.02	0.02	--	--	--	--	--	--
Mixers, Scales (EU10-EU11)	24.44	6.73	6.73	--	--	--	--	--	--
Space Heaters (EU12)	0.04	0.16	0.16	0.01	2.16	0.12	1.82	0.04	0.04 (Hex.)
Total PTE of Entire Source (excluding fugitives)	**140.46**	**47.98**	**47.98**	**0.05**	**8.61**	**70.31**	**7.23**	**2.81**	**2.65 (Acet.)**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset Major Source Thresholds	NA	NA	NA	NA	100	100	NA	NA	NA

negl. = negligible, Hex. = Hexane, Acet. = Acetaldehyde
* 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 $PM_{2.5}$.
*** Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), VOC emissions from the bread baking line EU01, including the natural gas fired oven EU02 and proof box EU03, shall not exceed 70.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), BACT has been determined to be the following for the bread baking line:

(a) VOC emissions from the bread baking line EU01, including the natural gas-fired oven EU02 and proof box EU03, shall not exceed 70.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The source shall operate the proof box EU03 in accordance with the manufacturer's design and operating specifications.

(c) In order to ensure proper operation and to minimize potential emissions, the source shall perform proof box cleaning operations for the proof box (EU03) on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedure (SSOP):

1. The following procedures to be conducted every week:

   (A) Scraping of dough from racks and supports;
   (B) Sweeping of the proof box floor;
   (C) Removal of dough/product from inside the proof box.

2. The following procedures to be conducted every four (4) weeks:

   (A) Wipe-off of interior proof box channel rails as needed;
   (B) Removal of any dough or oil accumulations from channel rails and cross-over framework; and
   (C) Washing or mopping of floor of the proof box, and removal of accumulated waste from the floor.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit, since the boilers EU04 and EU05, each has a maximum heat input capacity of less than 10 MMBtu/hr, which is below the applicability threshold for this rule.

(b) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60, Subpart Kb (326 IAC 12), because the four (4) 3,700 gallon (14 cubic meters) storage vessels at this source, each has a capacity less than 75 cubic meters.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD, are not applicable to the boilers or heaters at this source, because this source is an area source for HAPs.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers: Area Sources, 40 CFR 63, Subpart JJJJJJ (326 IAC 20), are not included in the permit, since the proposed boilers at this source meet the definition of gas-fired boilers as defined in 40 CFR 63.11237. Pursuant to 40 CFR 63.11195(e), gas-fired boilers are not subject to this subpart.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Manufacturing of Nutritional Yeast, Subpart CCCC are not included in the permit. This source does not manufacture nutritional yeast.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
This new source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (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).

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

326 IAC 2-6 (Emission Reporting)
This source is subject to 326 IAC 2-6 (Emission Reporting) because it is located in Lake County and its emissions of VOC are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(1), annual reporting is required. An emission statement shall be submitted by July 1, 2017, and every year thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)
The source, located in Lake County, is not within the area regulated under 326 IAC 5-1-2(2). This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

Pursuant to 326 IAC 5-1-2:

(A) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period.

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

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

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
The emission units at this source are not subject to 326 IAC 326 IAC 7-1.1 because the SO_2 PTE for each unit are less than 25 tons/year or 10 pounds/hour.

State Rule Applicability – Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of each of the emission units at this source will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6.8-1-2 (PM Limitations for Lake County)
This source, located in Lake County, emits particulate matter greater than 10 tons per year, and is not subject to a more stringent limitation under 326 IAC 12. Therefore, the boilers, space heaters, storage silos, mixers and scalers, and bag dump, are subject to the requirements of 326 IAC 6.8-1-2.

Pursuant to 326 IAC 6.8-1-2(b), the emissions of particulate matter from the natural gas-fired boilers shall not exceed 0.01 grain per dry standard cubic foot.

Pursuant to 326 IAC 6.8-1-2(a), the emissions of particulate matter from the baking oven, space heaters, each of the emissions units comprising the raw material handling area, and paved roads shall not exceed 0.03 grain per dry standard cubic feet.

326 IAC 6.8-2 (Lake County: PM10 Emission Requirements)
This facility is not a listed source regulated under 326 IAC 6.8-2-1(a); therefore, 326 IAC 6.8-2 does not apply.

326 IAC 6.8-8 (Lake County: Continuous Compliance Plan)
This new source, located in Lake County, has uncontrolled TSP (PM) emissions of greater than 100 tons per year based on 8760 hours of operation. Therefore, the requirements of 326 IAC 6.8-8 are applicable.

326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter Emissions)
This source does not have the potential to emit five (5) tons per year of fugitive particulate matter, is not specifically listed under 326 IAC 6.8-10(a)(2), and does not have total uncontrolled PM10 fugitive particulate matter equal to or greater than five (5) tons per year. Therefore, the requirements of 326 IAC 6.8-10 do not apply.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The boilers at this source are subject to limitations under 326 IAC 6.8-1 that are inconsistent with the limitations under 326 IAC 6-2-4. Pursuant to 326 IAC 6-2-1(e), the limitations in 326 IAC 6.8 prevail. Therefore the requirements of 326 IAC 6-2-4 are not applicable.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The emission units at this source with particulate matter emissions are subject to PM limitations under 326 IAC 6.8 which are more stringent than the limitations under 326 IAC 6-3-2. Therefore, pursuant to 326 6-3-1(c)(3), the requirements under 326 IAC 6-3-2 do not apply.

326 IAC 8-4-3 (VOC: Petroleum Liquid Storage Facilities)
The tanks at this source have capacities less than 39,000 gallons. Therefore, 326 IAC 8-4-3 does not apply.

326 IAC 8-5 (VOC: Miscellaneous Operations)
This baked good production source, construction of which will commence after 1980, is not a source of the type described under 326 IAC 8-5-2 or 326 IAC 8-3-3 through 326 IAC 8-3-5. Therefore, 326 IAC 8-5 does not apply.

326 IAC 8-6 (VOC: Organic Solvent Emissions Limitations)
This source, located in Lake County, is to be constructed after January 1, 1980, and does not have VOC potential emissions of greater than 100 tons per year. Therefore, 326 IAC 8-6 does not apply.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)
This baked good production source, located in Lake County, has potential VOC emissions greater than 25 tons per year; however, this plant does not include operations listed under 326 IAC 8-7-2(a)(1) through (3). Therefore, 326 IAC 8-7 does not apply.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The bread baking line, including the fermentation, baking oven and proof box, is scheduled to be installed after the date of January 1, 1980 and the potential VOC emissions are greater than twenty-five (25) tons per year. Therefore, the bread baking line is subject to 326 IAC 8-1-6 and the Permittee is required to control VOC emissions using the Best Available Control Technology (BACT).

IDEM, OAQ has determined that the following requirements represent BACT for the bread baking line:

(a) VOC emissions from the bread baking line EU01, including the natural gas-fired oven EU02 and proof box EU03, shall not exceed 70.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The source shall operate the proof box EU03 in accordance with the manufacturer's design and operating specifications.

(c) In order to ensure proper operation and to minimize potential emissions, the source shall perform proof box cleaning operations for the proof box (EU03) on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedure (SSOP):

1. The following procedures to be conducted every week:

   (A) Scraping of dough from racks and supports;
   (B) Sweeping of the proof box floor;
   (C) Removal of dough/product from inside the proof box.

2. The following procedures to be conducted every four (4) weeks:

   (A) Wipe-off of interior proof box channel rails as needed;
   (B) Removal of any dough or oil accumulations from channel rails and cross-over framework; and
   (C) Washing or mopping of floor of the proof box, and removal of accumulated waste from the floor.

Compliance Determination and Monitoring Requirements

The compliance determination and monitoring requirements applicable to this source are as follows:

1. In order to assure compliance with the PM emissions limitations under 326 IAC 6.8-1-2, the fabric filter CE01 for the storage silos EU06 through EU08, fabric filter for dry ingredient dump station EU09, and the fabric filter for the scaling operation and two (2) mixers EU10 and EU11 for particulate control, shall be in operation and control emissions at all times the associated units are in operation.

2. The monthly VOC emission from the baking oven and proof box shall be determined by the following:

$$\text{VOC} = \sum_{m=1}^{12}\left(1.1x\left(\sum_{i=1}^{n} \frac{E_i * B_i}{2000lb/ton} \right) + 0.0135 \right)_m$$

Where:

VOC	=	The VOC emissions from the bread baking line (tons per twelve (12) consecutive month period);
n	=	The number of different dough types used during month *m*.
B_i	=	The amount of dough of type i produced during month *m* (tons/month);
E_i	=	The VOC emission factor for type i dough (lb of VOC/ton of dough); and
m	=	Each calendar month within the twelve (12) consecutive month period;

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

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

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

Note: In the equation above, the monthly VOC emissions from the proof box are assumed to be 10% of the VOC emissions from the baking oven; therefore the oven VOC emissions are multiplied by a factor of 1.1.

Note: In the equation above, the factor of 0.0135 tons/month represents the maximum monthly VOC emissions from combustion of natural gas in EU02 at the maximum heat input capacity of 6.88 MMBtu/hr and using the AP-42 emission factor of 5.5 lb/MMCF.

These conditions are necessary to assure compliance with 326 IAC 8-1-6 (VOC BACT).

3. Broken or Failed Filter Detection

(a) For a single compartment filter controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C-Response to Excursions or Exceedances).

(b) For a single compartment filter controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the

completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C-Response to Excursions or Exceedances).

Filter failure can be indicated by a significant drop in the dust collector's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

4. Filter Inspections

Emission Unit/Control	Operating Parameters	Frequency
Fabric Filters (silo bins, mixers, scales, dump station)	Filter Inspections	Once per quarter

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 April 1, 2016.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. M089-37029-00590. The staff recommends to the Commissioner that this New Source Construction and MSOP be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Madhurima Moulik at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0868 or toll free at 1-800-451-6027 extension 3-0868.

(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
Source Summary

Source Name: Perfection Bakeries, Inc.
Source Address: 790 W. Commercial Avenue, Lowell, IN 46356
Permit No.: M089-37029-00590
Permit Reviewer: Madhurima Moulik

Emission Unit	Unrestricted Potential to Emit (ton/yr)									
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP	HAP
EU01 (Oven Fermentation)	--	--	--	--	--	80.35	--	2.41	2.41	Acetaldehyde
EU03 (Proofing)	--	--	--	--	--	8.03	--	0.24	0.24	Acetaldehyde
EU02 (Oven Natural Gas Combustion)	0.06	0.22	0.22	0.02	2.95	0.16	2.48	0.06	0.05	Hexane
EU06-08 (Flour Storage Silos)	115.84	40.58	40.58	--	--	--	--	--	--	--
EU04 (Boiler #1)	0.03	0.13	0.13	0.01	1.74	0.10	1.47	0.03	0.03	Hexane
EU05 (Boiler #2)	0.03	0.13	0.13	0.01	1.74	0.10	1.47	0.03	0.03	Hexane
EU09 (Bag Dump)	0.03	0.02	0.02	--	--	--	--	--	--	--
EU10-11 (Mixers and Scaling Station)	24.44	6.73	6.73	--	--	--	--	--	--	--
EU12 (Space Heaters)	0.04	0.16	0.16	0.01	2.16	0.12	1.82	0.04	0.04	Hexane
Paved Roads (Fugitive)	0.71	0.14	0.03	--	--	--	--	--	--	--
Total (excluding fugitives)	**140.46**	**47.98**	**47.98**	**0.05**	**8.61**	**88.86**	**7.23**	**2.81**	**2.65**	**Acetaldehyde**
Total (including fugitives):	141.17	48.12	48.01	0.05	8.61	88.86	7.23	2.81	2.65	Acetaldehyde

Emission Unit	Potential to Emit After Issuance (ton/yr)									
	PM	PM10	PM2.5	SO2	NOx	VOC*	CO	Total HAPs	Single HAP	HAP
EU01 (Oven Fermentation)	--	--	--	--	--	70.00	--	2.41	2.41	Acetaldehyde
EU03 (Proofing)	--	--	--	--	--		--	0.24	0.24	Acetaldehyde
EU02 (Oven Natural Gas Combustion)	0.06	0.22	0.22	0.02	2.95		2.48	0.06	0.05	Hexane
EU06-08 (Flour Storage Silos)	115.84	40.58	40.58	--	--	--	--	--	--	--
EU04 (Boiler #1)	0.03	0.13	0.13	0.01	1.74	0.10	1.47	0.03	0.03	Hexane
EU05 (Boiler #2)	0.03	0.13	0.13	0.01	1.74	0.10	1.47	0.03	0.03	Hexane
EU09 (Bag Dump)	0.03	0.02	0.02	--	--	--	--	--	--	--
EU10-11 (Mixers and Scaling Station)	24.44	6.73	6.73	--	--	--	--	--	--	--
EU12 (Space Heaters)	0.04	0.16	0.16	0.01	2.16	0.12	1.82	0.04	0.04	Hexane
Paved Roads (Fugitive)	0.71	0.14	0.03	--	--	--	--	--	--	--
Total (excluding fugitives)	**140.46**	**47.98**	**47.98**	**0.05**	**8.61**	**70.31**	**7.23**	**2.81**	**2.65**	**Acetaldehyde**
Total (including fugitives):	141.17	48.12	48.01	0.05	8.61	70.31	7.23	2.81	2.65	Acetaldehyde

* Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), VOC emissions from the bread baking line EU01, including the natural gas fired oven EU02 and proof box EU03, shall not exceed 70.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Appendix A: Emissions Calculations
Dry Ingredients Handling

Source Name: Perfection Bakeries, Inc.
Source Address: 790 W. Commercial Avenue, Lowell, IN 46356
Permit No.: M089-37029-00590
Permit Reviewer: Madhurima Moulik

Emission Unit		Maximum Capacity		Control Efficiency	Emission Factors			Uncontrolled Emissions			Controlled Emissions		
ID #	Description	(lb/hr)	(ton/hr)		PM (lb/ton)	PM_{10} (lb/ton)	$PM_{2.5}$ (lb/ton)	PM (ton/yr)	PM_{10} (ton/yr)	$PM_{2.5}$ (ton/yr)	PM (ton/yr)	PM_{10} (ton/yr)	$PM_{2.5}$ (ton/yr)
EU06-EU08	Flour Silos (3)*	16,845	8.423	99.0%	3.14	1.10	1.10	115.84	40.58	40.58	1.16	0.41	0.41
EU09	Bag Dump (1)	2,500	1.250	0.0%	0.0048	0.0028	0.0028	0.03	0.02	0.02	0.03	0.02	0.02
EU10-11	Scaling Station (1)	19,345	9.673	99.0%	0.0048	0.0028	0.0028	0.20	0.12	0.12	0.002	0.001	0.001
	Mixers (2)	19,345	9.673	99.0%	0.572	0.156	0.156	24.23	6.61	6.609	0.242	0.066	0.06609
							Emissions	**116.07**	**40.71**	**40.71**	**1.19**	**0.42**	**0.42**

Methodology:
Maximum Capacity (ton/hr) = Maximum Capacity (lb/hr) * (1 ton/2000 lb)
Uncontrolled Emissions (ton/yr) = Maximum Capacity (ton/hr) * Emission Factor (lb/ton) * (8760 hr/yr) * (1 ton/2000 lb)
Controlled Emissions (ton/yr) = Uncontrolled Emissions (ton/yr) * (1 - Control Efficiency)
* Each silo has a maximum capacity of 5,615 lb per hour.
The flour is delivered via hopper truck and the silos are filled pneumatically. Each silo and mixer is equipped with a breather bag to prevent the flour from being emitted into the atmosphere.

Emission Factors:

The emission factors used for the Flour Silos was taken from AP-42, Ch. 11.12, Table 11.12-2 (February 2011 revisions) for cement supplement unloading (3-05-011-17). PM2.5 has been assumed to equal PM10.

The emission factors used for the Minor Ingredient Bag Dump and the Scaling Station were taken from AP-42, Ch. 11.12, Table 11.12-2 (February 2011 revisions) for Weigh hopper loading (3-05-011-08). PM2.5 has been assumed to equal PM10.

The emission factors used for the Mixers were derived from AP-42, Ch. 11.12 (February 2011 revisions) for Mixer loading (3-05-011-9).

Appendix A: Emissions Calculations
Fermentation

Source Name: Perfection Bakeries, Inc.
Source Address: 790 W. Commercial Avenue, Lowell, IN 46356
Permit No.: M089-37029-00590
Permit Reviewer: Madhurima Moulik

							Emission Factor	Potential Emissions	
Unit	Maximum Capacity (lb/hr)	Maximum Throughput (ton/yr)	Maximum Sponge % Yeast Yi	Fermentation Time (ti) (hr)	Dough % Yeast (S)	Spike Time ts (hr)	VOC (lb/ton)	VOC (ton/yr)	Acetaldehyde (ton/yr)
EU01 (Oven Fermentation)	8,207	35,946.66	3.00	4.30	0.00	1.30	4.47	80.35	2.41

Methodology:

Maximum Throughput (ton/yr) = Maximum Capacity (lb/hr) * (8760 hr/yr) * (1 ton/2000 lb)
Potential VOC Emissions (ton/yr) = Maximum Throughput (ton/yr) * Emission Factor (lb/ton) * (1 ton/2000 lb)
Potential Acetaldehyde Emissions (ton/yr) = Potential VOC Emissions x 0.03
The process VOC emission calculations for the dough fermentation are based upon the following EPA recommended bakery oven emissions:
AP-42 Section 9.9.6

VOC Emission Factor (lb/ton baked bread) = 0.95Yi + 0.195ti - 0.51S - 0.86ts + 1.90

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

VOCs emitted during fermentation (leavening) are assumed to be 97% ethanol and 3% acetaldehyde (VOC/HAP), based on the following document and supporting information:
1. "Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017. December 1992)
2. Henderson D.C., 1977 "Commercial Bakeries as a Major Source of Reactive Volatile Organic Gases", U.S. EPA, Region XI Surveillance and Analysis Division

Appendix A: Emissions Calculations
Proofing

Source Name: Perfection Bakeries, Inc.
Source Address: 790 W. Commercial Avenue, Lowell, IN 46356
Permit No.: M089-37029-00590
Permit Reviewer: Madhurima Moulik

Unit	Uncontrolled Potential VOC Emissions from Fermentation (ton/yr)	Proofing VOC Emission Factor (% of Fermentation VOC Emissions)	Uncontrolled Potential Emissions from Proofing	
			VOC (ton/yr)	Acetaldehyde (ton/yr)
EU03 (Proofing)	80.35	10%	8.03	0.24

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:
Potential VOC Emissions from Proofing (ton/yr) = 0.10 * Potential VOC Emissions from Fermentation (ton/yr)
Potential Acetaldehyde Emissions from Proofing (ton/yr) = 0.03 * Potential VOC Emissions from Proofing (ton/yr)

Appendix A: Emissions Calculations
Natural Gas Combustion (< 100 MMBtu/hr)

Source Name: Perfection Bakeries, Inc.
Source Address: 790 W. Commercial Avenue, Lowell, IN 46356
Permit No.: M089-37029-00590
Permit Reviewer: Madhurima Moulik

			Criteria Pollutants						
			PM*	PM10*	PM2.5*	SO2	NOx**	VOC	CO
Emission Factor in lb/MMCF			1.9	7.6	7.6	0.6	100.0	5.5	84.0
Emission Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)						
EU02 (oven NG Combustion)	6.9	59.087	0.056	0.225	0.225	0.018	2.954	0.162	2.482
EU04 (Boiler #1)	4.063	34.894	0.033	0.133	0.133	0.010	1.745	0.096	1.466
EU05 (Boiler #2)	4.063	34.894	0.033	0.133	0.133	0.010	1.745	0.096	1.466
EU12 (Space Heaters)	5.035	43.242	0.041	0.164	0.164	0.013	2.162	0.119	1.816
Total			**0.16**	**0.65**	**0.65**	**0.05**	**8.61**	**0.47**	**7.23**

Emission Factors are from AP-42, Tables 1.4-1 and 1.4-2.
*PM emission factor is filterable PM only. PM10 emission factor is filterable PM10 and condensable PM combined. PM2.5 emission factor is filterable PM2.5 and condensable PM combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

			HAPs - Organics					HAPs - Metals					Total HAPs
			Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMCF			2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Emission Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)										
EU02 (Oven NG Combustion)	6.9	59.087	6.2E-05	3.5E-05	2.2E-03	5.3E-02	1.0E-04	1.5E-05	3.2E-05	4.1E-05	1.1E-05	6.2E-05	5.6E-02
EU04 (Boiler #1)	4.063	34.894	3.7E-05	2.1E-05	1.3E-03	3.1E-02	5.9E-05	8.7E-06	1.9E-05	2.4E-05	6.6E-06	3.7E-05	3.3E-02
EU05 (Boiler #2)	4.063	34.894	3.7E-05	2.1E-05	1.3E-03	3.1E-02	5.9E-05	8.7E-06	1.9E-05	2.4E-05	6.6E-06	3.7E-05	3.3E-02
EU12 (Space Heaters)	5.035	43.242	4.5E-05	2.6E-05	1.6E-03	3.9E-02	7.4E-05	1.1E-05	2.4E-05	3.0E-05	8.2E-06	4.5E-05	4.1E-02
Total			1.8E-04	1.0E-04	6.5E-03	1.5E-01	2.9E-04	4.3E-05	9.5E-05	1.2E-04	3.3E-05	1.8E-04	**0.16**

Emission Factors are from AP-42, Tables 1.4-3 and 1.4-4.
The five highest organic and metal HAPs emission factors are provided above. The total HAPs is the sum of all HAPs listed in AP-42, Tables 1.4-3 and 1.4-4.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology

Heating Value of Natural Gas is assumed to be 1020 MMBtu/MMCF
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) * 8,760 hrs/yr * 1 MMCF/1,020 MMBtu
Potential Emission (tons/yr) = Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * (1 ton/2,000 lb)

Emission Calculations
Fugitive Dust Emissions - Paved Roads

Source Name: Perfection Bakeries, Inc.
Source Address: 790 W. Commercial Avenue, Lowell, IN 46356
Permit No.: M089-37029-00590
Permit Reviewer: Madhurima Moulik

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)
Truck (empty truck entering)	18	1	18.0	22	396.0	680	0.129	2.3	846.1
Truck (finished product exiting site)	18	1	18.0	22	396.0	680	0.129	2.3	846.1
Truck (bagged and/or boxed ingredients in)	2	1	2.0	30	60.0	1140	0.216	0.4	157.6
Truck (finished product exiting site)	2	1	2.0	30	60.0	1140	0.216	0.4	157.6
Semitrailer Truck (bulk ingredients in)	3	1	3.0	40	120.0	480	0.091	0.3	99.5
Semi trailer Truck (empty truck exiting site)	3	1	3.0	40	120.0	480	0.091	0.3	99.5
Truck (bagged and/or boxed ingredients in)	1	1	1.0	25	25.0	480	0.091	0.1	33.2
Truck (empty truck exiting site)	1	1	1.0	25	25.0	480	0.091	0.1	33.2
Truck (bagged and/or boxed ingredients in)	13	1	13.0	22	286.0	680	0.129	1.7	611.1
Truck (empty truck exiting site)	13	1	13.0	22	286.0	680	0.129	1.7	611.1
Semi trailer Truck (empty truck entering)	1	1	1.0	40	40.0	1140	0.216	0.2	78.8
Semitrailer Truck (product out)	1	1	1.0	40	40.0	1140	0.216	0.2	78.8
		Totals	**76.0**		**1854.0**			**10.0**	**3652.8**

Average Vehicle Weight Per Trip = 24.4 tons/trip
Average Miles Per Trip = 0.13 miles/trip

Unmitigated Emission Factor, Ef = [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 =	24.4	24.4	24.4	tons = average vehicle weight (provided by source)
sL =	1.4	1.4	1.4	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, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [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, Ef =	0.389	0.078	0.0191	lb/mile
Mitigated Emission Factor, Eext =	0.355	0.071	0.0174	lb/mile
Dust Control Efficiency* =	0%	0%	0%	

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)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Truck (empty truck entering)	0.16	0.03	0.01	0.15	0.03	0.01	0.15	0.03	0.01
Truck (finished product exiting site)	0.16	0.03	0.01	0.15	0.03	0.01	0.15	0.03	0.01
Truck (bagged and/or boxed ingredients in)	0.03	0.01	0.00	0.03	0.01	0.00	0.03	0.01	0.00
Truck (finished product exiting site)	0.03	0.01	0.00	0.03	0.01	0.00	0.03	0.01	0.00
Semitrailer Truck (bulk ingredients in)	0.02	0.00	0.00	0.02	0.00	0.00	0.02	0.00	0.00
Semi trailer Truck (empty truck exiting site)	0.02	0.00	0.00	0.02	0.00	0.00	0.02	0.00	0.00
Truck (bagged and/or boxed ingredients in)	0.01	0.00	0.00	0.01	0.00	0.00	0.01	0.00	0.00
Truck (empty truck exiting site)	0.01	0.00	0.00	0.01	0.00	0.00	0.01	0.00	0.00
Truck (bagged and/or boxed ingredients in)	0.12	0.02	0.01	0.11	0.02	0.01	0.11	0.02	0.01
Truck (empty truck exiting site)	0.12	0.02	0.01	0.11	0.02	0.01	0.11	0.02	0.01
Semi trailer Truck (empty truck entering)	0.02	0.00	0.00	0.01	0.00	0.00	0.01	0.00	0.00
Semitrailer Truck (product out)	0.02	0.00	0.00	0.01	0.00	0.00	0.01	0.00	0.00
Totals	0.71	0.14	0.03	**0.65**	**0.13**	**0.03**	0.65	0.13	0.03

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]
* Note: The source is not required to have a Fugitive Dust Control Plan. Therefore the control efficiency has been set equal to 0%.

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

Indiana Department of Environmental Management
Office of Air Quality

Appendix B
Best Available Control Technology (BACT) Analysis Determination

Source Background and Description

Source Name:	Perfection Bakeries, Inc.
Source Location:	790 W. Commercial Avenue, Lowell, IN 46356
County:	Lake
SIC Code:	2051 (Bread and Other Bakery Products)
Operating Permit No.:	M089-37029-00590
Permit Reviewer:	Madhurima Moulik

Background Information

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) has performed the following Best Available Control Technology (BACT) review for a new stationary baked good production plant, owned and operated by Perfection Bakeries, Inc. located at 790 W. Commercial Avenue, Lowell, IN 46356. The following new units will be constructed after January 1, 1980, and have VOC potential emissions of greater than twenty-five (25) tons per year, and are not regulated by any other rule in 326 IAC 8. Pursuant to the provisions of 326 IAC 8-1-6, a VOC BACT (Best Available Control Technology) analysis was performed for these units:

(a) One (1) bread baking line, identified as EU01, approved in 2016 for construction, and a maximum baking rate of 8,207 pounds of bread per hour, exhausting to Stack OS1, including:

(1) One (1) natural gas-fired bread baking oven, identified as EU02, with a maximum heat input capacity of 6.88 MMBtu/hr.

(2) One (1) proof box, identified as EU03, with a maximum capacity of 8,207 pounds of dough per hour.

IDEM, OAQ conducts BACT analyses in accordance with the *"Top-Down" Best Available Control Technology Guidance Document* outlined in the 1990 draft U.S. EPA *New Source Review Workshop Manual*, which outlines the steps for conducting a top-down BACT analysis. Those steps are listed below.

(1) Identify all potentially available control options;

(2) Eliminate technically infeasible control options;

(3) Rank remaining control technologies;

(4) Evaluate the most effective controls and document the results; and

(5) Select BACT.

Also in accordance with the *"Top-Down" Best Available Control Technology Guidance Document* outlined in the 1990 draft U.S. EPA *New Source Review Workshop Manual*, BACT analyses take into account the energy, environmental, and economic impacts of the control options. Emission reductions may be determined through the application of available control techniques, process design, and/or operational

limitations. Such reductions are necessary to demonstrate that the emissions remaining after application of BACT will not cause adverse environmental effects to public health and the environment.

VOC BACT Determination

Step One: Identify All Potentially Available Control Technologies

Based on the information reviewed for this BACT determination, the following potentially available control technologies were identified for controlling VOC emissions, which are primarily emitted in the form of ethanol, from the baking line:

(a) Catalytic Oxidizer:

Catalytic oxidation is the process of oxidizing organic contaminants in a waste gas stream within a heated chamber containing a catalyst bed in the presence of oxygen for sufficient time to completely oxidize the organic contaminants to carbon dioxide and water. The catalyst is used to lower the activation energy of the oxidation reaction. The residence time, temperature, flow velocity and mixing, the oxygen concentration, and type of catalyst used in the combustion chamber affect the oxidation rate and destruction efficiency. Catalytic oxidizers typically require combustion of an auxiliary fuel (e.g., natural gas) to maintain combustion chamber temperature high enough to completely oxidize the contaminant gases. Catalytic oxidizers operate at lower temperatures and require less fuel than thermal oxidizers, they have a smaller footprint, and they need little or no insulation. Catalytic oxidizers are typically designed to have a residence time of 0.5 seconds or less and combustion chamber temperatures between 600 and 1,200°F. The types of catalysts used include platinum, platinum alloys, copper chromate, copper oxide, chromium, manganese, and nickel. These catalysts are deposited in thin layers on an inert substrate, usually a honeycomb shaped ceramic.

The two types of catalytic oxidation systems include recuperative and regenerative catalytic oxidizers, which are differentiated by the type of heat recovery equipment used. In a recuperative catalytic oxidizer, the waste gas stream is preheated using the heat content of the treated gas stream, resulting in improved oxidizer efficiency and significant fuel cost savings. In a regenerative thermal oxidizer, a high-density media such as a packed ceramic bed, which was heated in a previous cycle, is used to preheat the incoming waste gas stream, resulting in improved oxidizer efficiency and significant fuel cost savings. VOC destruction efficiencies greater than 98% are achievable under certain operating conditions (EPA-453/R-92-017). However, based on the information reviewed for this BACT determination, a VOC destruction efficiency of 95% or a VOC outlet concentration of 10 ppmv or less is achievable on a consistent basis under normal operational conditions for a typical bread baking operation.

(b) Thermal Oxidizer:

Thermal oxidation is the process of oxidizing organic contaminants in a waste gas stream by raising the temperature above the auto-ignition point in the presence of oxygen for sufficient time to completely oxidize the organic contaminants to carbon dioxide and water. The residence time, temperature, flow velocity and mixing, and the oxygen concentration in the combustion chamber affect the oxidation rate and destruction efficiency. Thermal oxidizers typically require combustion of an auxiliary fuel (e.g., natural gas) to maintain combustion chamber temperature high enough to completely oxidize the contaminant gases. Thermal oxidizers are typically designed to have a residence time of one second or less and combustion chamber temperatures between 1,200 and 2,000°F.

The three types of thermal oxidation systems include direct flame, recuperative, and regenerative thermal oxidizers, which are differentiated by the type of heat recovery equipment used. A direct flame thermal oxidizer consists of only a combustion chamber with no heat recovery equipment.

In a recuperative thermal oxidizer, the waste gas stream is preheated using the heat content of the treated gas stream, resulting in improved oxidizer efficiency and significant fuel cost savings. In a regenerative thermal oxidizer, a high-density media such as a packed ceramic bed, which was heated in a previous cycle, is used to preheat the incoming waste gas stream, resulting in improved oxidizer efficiency and significant fuel cost savings. In general, thermal oxidizers are less efficient at treating waste gas streams with highly variable flow rates since the variable flow rate results in varying residence times, combustion chamber temperature, and poor mixing. VOC destruction efficiencies greater than 98% are achievable under certain operating conditions (EPA-453/R-92-017). However, a VOC destruction efficiency of 95% is achievable on a consistent basis under normal operational conditions for a typical bakery operation.

(c) Wet Packed Bed Scrubber:

A wet packed bed scrubber is an absorption system in which a waste gas stream is interacted with a scrubbing liquid inside a contact chamber containing a bed of packing media in order to strip contaminant gases from the waste gas stream through the process of dissolution. Water is the most commonly used scrubbing liquid. Other solvents may be used depending on the components of the waste gas stream. Based on information reviewed for this BACT determination, a VOC destruction efficiency of 81% is achievable on a consistent basis under normal operational conditions for a typical bakery operation.

(d) Biofiltration:

Biofiltration is a process in which a waste gas stream is passed through a bed of peat, compost, bark, soil, gravel, or other inorganic media in order to strip organic contaminant gases from the waste gas stream through the process of dissolution in the bed moisture and adsorption to the bed media. Under aerobic conditions, microorganisms naturally present in the bed oxidize the organic contaminant gases within the bed to carbon dioxide, water, and additional biomass through metabolic processes. If the temperature of the waste gas stream is too high, the gas stream must be cooled to an optimum temperature before it can be treated in the biofilter in order to maintain the viability of the microorganisms. In addition, the bed must be monitored and maintained at an optimum moisture content and pH in order to prevent cracking of the bed media and to maintain the viability of the microorganisms.

(e) Carbon Adsorption Unit:

Carbon adsorption is a process by which VOC is retained on a granular carbon surface, which is highly porous and has a very large surface-to-volume ratio. Carbon adsorption systems can operate in two phases: adsorption and desorption. Adsorption is rapid and removes most of the VOCs in the stream. Eventually, the adsorbent becomes saturated with the vapors and the system's efficiency drops. The adsorbent must be regenerated or replaced soon after efficiency begins to decline. In regenerative systems, the adsorbent is reactivated with steam or hot air in order to desorb the absorbate (VOC vapors) from the adsorbent, and the adsorbate and regenerated absorbent can be recovered for reuse or disposal. Non-regenerative systems require the removal of the spent adsorbent and replacement with fresh adsorbent.

(f) Condensation Unit:

Condensation is the process by which the temperature of the waste gas stream is lowered to below the dew points of the contaminants gases in waste gas. A refrigeration condenser normally provides VOC control efficiency greater than 90%.

Step Two: Eliminate Technically Infeasible Control Options

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of carbon adsorption, condensation, and biofiltration systems are not technically feasible options for the bread baking line fermentation, oven and proof box for the following reasons:

(a) Based on the information reviewed for this BACT determination, the use of a biofiltration system is infeasible because the high temperature exhaust stream from the baking oven would inhibit microbiological activities. The outlet temperature of the ovens would exceed those in the required temperature range for mesophilic bacteria (nominally less than 106° F) and would kill off the microbes. Additionally, during the periods that the oven is shut-down for normal cleaning operations, the biofiltration system would have to be artificially fed in order to maintain system acclimation. Therefore, this technology is not technically feasible, and no further evaluation will be made.

(b) Based on the information reviewed for this BACT determination, the use of carbon adsorption is infeasible because fats and oils in the baking oven exhaust would clog carbon pores. In addition, the ethanol in the exhaust is difficult to strip from the carbon. Therefore, this technology is not technically feasible, and no further evaluation will be made.

(c) Based on the information reviewed for this BACT determination, the condensation method is infeasible because of the low VOC concentrations and high air flows, temperatures, and moisture content in the baking oven exhaust. In addition, the fats and oils contained in the exhaust can reduce the control efficiency and create sanitation concerns. Therefore, this technology is not technically feasible, and no further evaluation will be made.

The following table summarizes other BACT determinations at similar sources or for similar processes that were identified in the EPA's RACT/BACT/LAER Clearinghouse (RBLC) under Process Type Code 70.550 (Bakeries and Snack Food), as well as IDEM, OAQ permits issued to date. The BACT determinations are arranged in descending order in terms of issuance date.

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
Proposed BACT Perfection Bakeries, Inc., Lowell, IN	Proposed	Bakery Oven EU01 and Proof Box EU03	None	VOC emissions from the bread baking line, including the oven EU1 and proof box EU3, shall not exceed 70.0 tons per twelve (12) consecutive month period. The source shall operate the proof box EU3 in accordance with the manufacturer's design and operating specifications. The source shall perform proof box cleaning operations for the proof box EU3 on a weekly cleaning schedule in accordance with the Sanitation Standard Operating Procedure (SSOP).	New Source Construction and Minor Source Operating Permit (Pending): M089-37029-00590

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
KBI, Inc.	2015	Bun Line (Line 1)	None	VOC emissions from the bun line, identified as Line 1 (consisting of the oven (OVEN) and the proof box (Line 1 Proof Box)), shall not exceed 109.8 tons per twelve (12) consecutive month period. The source shall operate the proof box in accordance with the manufacturer's design and operating specifications. In order to ensure proper operation and to minimize potential emissions, the source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP): Weekly cleaning shall include: Scraping of dough from racks and supports; Sweeping of the proof box floor; Removal of dough/product from inside proof box. Monthly cleaning shall include: Wiping off interior proof box channel rails; Removal of dough and oil accumulations from channel rails and cross over framework; Washing or mopping of the floor of the proof box; Removal of accumulated waste from floor.	RBLC ID IN-0237 Indiana Part 70 Significant Source Modification No. 145-35383-00037

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
Holsum of Fort Wayne, Inc.	2015	Bread Production Line	None	VOC emissions from the bread production line, consisting of the natural gas-fired oven, identified as BD2, and the proof box, identified as BDP, shall not exceed 70.0 tons per twelve (12) consecutive month period. The source shall operate the proof box (BDP) in accordance with the manufacturer's design and operating specifications. In order to ensure proper operation and to minimize potential emissions, the source shall perform proof box cleaning operations for the proof box (BDP), on a tiered cleaning schedule and perform at a minimum, the following operations, or their equivalent, in accordance with their Sanitation Standard Operating Procedure.	RBLC ID: IN-0216 Indiana Part 70 Significant Source Modification: 091-34059-00106

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
Harlan Bakeries	2015	Bagel Baking Line	Catalytic Oxidizer	The VOC emissions from the bagel Oven 2 shall be controlled by a catalytic oxidizer (CO-1). The overall VOC control efficiency for the catalytic oxidizer (including the capture efficiency and destruction efficiency) shall be at least 95%, or the VOC outlet concentration shall not exceed 10 ppmv. The VOC emissions from the catalytic oxidizer CO-1 stack exhaust (S-1) shall not exceed 0.36 pounds per hour. In order to ensure proper operation and to minimize potential emissions, the source shall operate the Ancillary Baking Equipment, including Proofer 2 and Proofer 10, in accordance with the following. The Permittee shall operate Proofer 2 and Proofer 10 in accordance with the manufacturer's design and operating specifications. The Permittee shall perform cleaning operations on a tiered cleaning schedule and perform at a minimum, the following operations, or their equivalent. Weekly cleaning shall include: Scraping of dough from racks and supports. Sweeping of the proof box floor; Removal of dough/product from inside proof box. Monthly cleaning shall include: Wiping off interior proof box channel rails; Removal of dough and oil accumulations from channel rails and cross over framework Washing or mopping of the floor of the proof box; Removal of accumulated waste from floor.	RBLC ID: IN-0214 FESOP No. F063-33421-00059

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
New Horizons Baking Company Fremont, IN	2013	Muffin Line B Muffin Line H	None	VOC emissions from the muffin line, identified as Line B (consisting of the muffin griddle (Unit B) and the proof box (Line B Proof Box)), shall not exceed 35.16 tons per twelve (12) consecutive month period. The source shall operate Line B (consisting of the muffin griddle (Unit B) and proof box (Line B Proof Box)) in accordance the manufacturer's design and operating specifications. The source shall perform proof box cleaning operations for the proof box (Line B Proof Box) on a weekly cleaning schedule in accordance with their Sanitation Standard Operating Procedure (SSOP). VOC emissions from the muffin line, identified as Line H (consisting of the muffin griddle (Unit H) and the proof box (Line H Proof Box)), shall not exceed 31.65 tons per twelve (12) consecutive month period. The source shall operate Line H (consisting of the muffin griddle (Unit H) and proof box (Line H Proof Box)) in accordance the manufacturer's design and operating specifications. The source shall perform proof box cleaning operations for the proof box (Line H Proof Box) on a weekly cleaning schedule in accordance with their Sanitation Standard Operating Procedure (SSOP)	RBLC ID: IN-0161 Indiana Part 70 Significant Source Modification 161-32848-00060

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
Hartford Bakery, Inc. Evansville, IN	2012	Bun Production Line (Line 3)	None	VOC emission shall be limited to 46.7 tons per twelve (12) consecutive month period. The source shall operate the proof box in accordance with manufacturer's and operating specifications. The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP).	RBLC ID: IN 0148 Indiana Part 70 Significant Source Modification 163-31953-00040
Maplehurst Bakeries, Inc. Brownsburg, IN	2012	Donut Production Line - Moline VI Donut Production Line - Moline VIII	None	VOC emissions attributable to proofing and fermentation from donut production line Moline VI (consisting of the fryer (Fryer6) and the proof box (Proof6)) shall not exceed 40.1 tons per twelve (12) consecutive month period. The source shall operate the proof box (Proof6) in accordance with manufacturer's design and operating specifications. The source shall perform proof box cleaning operations for the proof box (Proof6) on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP). VOC emissions attributable to proofing and fermentation from donut production line Moline VIII (consisting of fryer (Fryer8) and the proof box (Proof6)) shall not exceed 60.7 tons per twelve (12) consecutive month period. The source shall operate the proof box (Proof8) in accordance with manufacturer's design and operating specifications. The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP).	RBLC ID: IN-0134 Indiana Part 70 Significant Source Modification 063-31357-00031

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
Allen Foods, Inc. Elkhart, IN	2013	Bakery Ovens (Bread Line 028) (Bun Line 048)	Catalytic Oxidizer	The VOC emissions from the baking oven 028 and baking oven 048 shall be controlled by a single catalytic oxidizer (029). The overall VOC control efficiency for the catalytic oxidizer (including capture efficiency and destruction efficiency) shall be at least 95%, or the VOC outlet concentration shall not exceed 10 ppmv. The combined VOC emissions from baking oven 028 and the bun line baking oven (048), jointly controlled by catalytic oxidizer 029 and exhausting through vent S17, shall not exceed 4.30 lbs/hr. The Permittee shall operate bread line (Line 028) (consisting of the baking oven and proof box) in accordance with the manufacturer's design and operating specifications. The Permittee shall operate the bun line (Line 048) (consisting of the baking oven and proof box) in accordance with the manufacturer's design and operating specifications. The source shall perform proof box cleaning operations for the proof box associated with Bread Line 028 on a weekly cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP). The source shall perform proof box cleaning operations for the proof box associated with Bun Line 048 on a weekly cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP).	RBLC ID: IN-0155 Indiana Federally Enforceable State Operating Permit Significant Permit Revision 039-32174-00643

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
Hartford Bakery, Inc. Evansville, IN	2012	Bun Production Line (Line 3)	None	VOC emission shall be limited to 46.7 tons per twelve (12) consecutive month period. The source shall operate the proof box in accordance with manufacturer's and operating specifications. The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP).	RBLC ID: IN 0148 Indiana Part 70 Significant Source Modification 163-31953-00040
Allen Foods, Inc. Elkhart, IN	2012	Bakery Oven (Bread Line 028)	Catalytic Oxidizer	VOC emissions from the bread oven shall be controlled by a catalytic oxidizer. Overall VOC efficiency of the catalytic oxidizer shall be 95%, or the VOC outlet concentration shall not exceed 10 ppmv. VOC emissions shall not exceed 2.29 lbs/hr. The source shall operate the proof box in accordance with manufacturer's and operating specifications. The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP).	RBLC ID: IN-0124 Indiana Federally Enforceable State Operating Permit 039-29392-00643

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
The Kroger Company - Indianapolis Bakery Indianapolis, IN	2012	Bakery Oven (Bun Line BU4)	Catalytic Oxidizer	VOC emissions from the bun oven shall be controlled by a catalytic oxidizer. Overall VOC efficiency of the catalytic oxidizer shall be 95%, or the VOC outlet concentration shall not exceed 10 ppmv. VOC emissions from the bun oven shall not exceed 2.75 pounds per hour. The source shall operate the proof box in accordance with manufacturer's and operating specifications. The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP).	Indiana Federally Enforceable State Operating Permit Significant Permit Revision F097-29287-00161
White Castle Systems, Inc. Rensselaer, IN	2011	Bakery Oven/ Proof Box	Catalytic Oxidizer	VOC emission from the bread baking oven shall be controlled by a catalytic oxidizer. Overall VOC efficiency of the catalytic oxidizer shall be 95%, or the VOC outlet concentration shall not exceed 10 ppmv. VOC emissions from the bread oven shall not exceed 0.54 lbs/hr The source shall operate the proof box in accordance with manufacturer's and operating specifications. The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP).	RBLC ID: IN-0128 Indiana Minor Source Operating Permit M073-29819-00039

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
Alpha Baking Co., Inc. LaPorte, IN	2011	Bakery Ovens Proof Boxes	Catalytic Oxidizer	VOC emission from the baking ovens shall be controlled by a catalytic oxidizer. Overall VOC efficiency of the catalytic oxidizer shall be 95%, or the VOC outlet concentration shall not exceed 10 ppmv. The source shall operate the proof boxes in accordance with manufacturer's and operating specifications. The source shall perform proof box cleaning operations for the proof boxes on tiered cleaning schedules in accordance with their Sanitation Standard Operating Procedures (SSOP).	RBLC ID: IN-0132 Indiana Federally Enforceable State Operating Permit F091-28222-00135
Harlan Bakeries, Inc. Avon, IN	2008	Bakery Oven	Catalytic Oxidizer	VOC emissions from the bagel oven shall be controlled by a catalytic oxidizer. Overall VOC efficiency of the catalytic oxidizer shall be 95%, or the VOC outlet concentration shall not exceed 10 ppmv. VOC emissions shall not exceed 0.36 lbs/hr.	Indiana Minor Source Operating Permit M063-24103-00059
Allen Foods, Inc. Elkhart, IN	2006	Bakery Oven	Catalytic Oxidizer	VOC emissions from the bread oven shall be controlled by a catalytic oxidizer. Overall VOC efficiency of the catalytic oxidizer shall be 95%, or the VOC outlet concentration shall not exceed 10 ppmv. VOC emissions shall not exceed 2.29 lbs/hr.	RBLC ID: IN-0120 Indiana Federally Enforceable State Operating Permit F039-22633-00643
Holsum of Fort Wayne, Inc. Fort Wayne, IN	2005	Bakery Oven	None	VOC emission shall be limited to 60 tons per twelve (12) consecutive month period	Indiana Part 70 Significant Source Modification SSM 091-27352-00106
The Kroger Company - Indianapolis Bakery Indianapolis, IN	2003	Bakery Oven and Chain Lubricant (Bread Line BD1)	None	VOC emissions shall not exceed 49.0 tons per thirteen (13) consecutive twenty-eight (28) day period.	Indiana Federally Enforceable State Operating Permit Significant Permit Revision F097-16909-00161

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
Maple Leaf Bakery CA	1998	Bakery Oven	Catalytic Oxidizer	92 % Destruction Removal Efficiency Minimal 600°F Operating Temperature	RBLC ID: CA-0854 Permit No.: 0473-170
Freund Baking Company CA	1997	Bakery Oven	Catalytic Oxidizer	95.4 % Destruction Removal Efficiency	RBLC ID: CA-0859 Permit No.: 328570
Interstate Brands Corporation Indianapolis, IN	1997	Combined Bakery Ovens and Chain Lubricant	None	VOC emissions shall not exceed 95 tons per thirteen (13) consecutive twenty-eight (28) day period.	Indiana Federally Enforceable State Operating Permit F097-7413-00171
KBI, Inc. Morristown, IN	1996	Dough Mixing, Fermentation, and Baking Area	None	VOC emissions shall not exceed a total of 99.9 tons per twelve (12) consecutive month period	Indiana Federally Enforceable State Operating Permit F145-15375-00037
Holsum Bakery, Inc. AZ	1996	Bakery Oven	Quencher / Scrubber	81 % Control Efficiency 49.9 tons per year	RBLC ID: AZ-0029 Permit No.:95-0432

Step Three: Rank Remaining Control Technologies by Control Effectiveness

The remaining technically feasible options for controlling VOC emissions from the bread production line are as follows (listed in descending order of most technically feasible):

Options for VOC Control	Control Efficiency (%)
Catalytic Oxidizer	95%
Thermal Oxidizer	95%
Wet Packed Bed Scrubber	81%

IDEM, OAQ is aware that the above control technologies may be able to periodically achieve control efficiencies that exceed 95% under certain operating conditions. However, BACT must be achievable on a consistent basis under normal operational conditions. BACT limitations do not necessarily reflect the highest possible control efficiency achievable by the technology on which the emission limitation is based. The permitting authority has the discretion to base the emission limitation on a control efficiency that is somewhat lower than the optimal level. There are several reasons why the permitting authority might choose to do this. One reason is that the control efficiency achievable through the use of the technology may fluctuate so that it would not always achieve its optimal control efficiency. In that case, setting the emission limitation to reflect the highest control efficiency would make violations of the permit unavoidable. To account for this possibility, a permitting authority must be allowed a certain degree of discretion to set the emission limitation at a level that does not necessarily reflect the highest possible control efficiency, but will allow the Permittee to achieve compliance consistently. While we recognize that greater than 95% may be achievable as an average during testing, IDEM, OAQ allows for sources to include a safety factor, or margin of error, to allow for minor variations in the operation of the emission units and the control device.

Step 4 – Evaluate Top Control Alternatives

Further evaluation including economic, energy and environmental impacts are required for controlling VOC emissions from the bread production line consisting of baking oven EU01 and proof box EU03. Annualized costs were determined in accordance with the EPA guidance (EPA's Office of Air Quality Planning and Standards Control Cost Manual), with other relevant information provided by the respective equipment vendors, inputs from plant personnel, and engineering judgment.

Perfection Bakeries, Inc. provided IDEM, OAQ with a thorough economic analysis of the technically feasible control options. The analysis estimated the cost of the VOC control equipment, including the initial capital cost of the various components intrinsic to the complete system, and the estimated annual operating costs. The estimated total capital cost was calculated with the use of a factoring method of determining direct and indirect installation costs. The basic equipment costs were obtained from vendor's quoted prices. Annualized costs were developed based on information from the vendors and a literature review. The analysis assumed an interest rate of 7% and an equipment life of 10 years. The basis of cost effectiveness, used to evaluate the control options, is the ratio of the annualized cost to the amount of VOC (tons) removed per year. The applicant evaluated three possibilities for controlling potential VOC emissions from the entire bread production line (natural gas fire oven and the proof box):

1. Option 1: Control VOC emissions from the entire bread production line (oven and proof box) using a catalytic oxidizer. This includes the installation of a clean room surrounding the proof box as well as the conveyor system between the proof box and oven, the addition of air handlers to direct airflow to the catalytic oxidizer, sanitizing of the ductwork from the clean room to the production line exhaust to prevent mold and bacterial growth, and humidification of the air in the clean room.

2. Option 2: Control the VOC emissions from the baking oven only.

3. Option 3: Control the VOC emissions from the proof box only. This option would include the installation of a clean room surrounding the proof box as well as the conveyor system between the proof box and oven, and the addition of an air handler to direct air to the catalytic oxidizer.

The cost analysis for installing a thermal oxidizer for the bread baking line was not performed because the associated costs are considerably higher than that for a catalytic oxidizer, and both control technologies achieve the same level of control. The costs associated for a wet packed bed scrubber, which achieves a lower level of control, is also considerably higher than that for a catalytic or thermal oxidizer. A cost analysis has not been performed for a packed bed scrubber.

A summary of the cost figures determined in the cost analysis (for a catalytic oxidizer) is provided in the table below. A complete breakdown of the costs associated with a catalytic oxidizer is included in Appendix C.

Option	Control Efficiency (%)	Total Annualized Costs ($/yr)	Limited Potential VOC (tons/year)	Potential VOC removal (tons/year)	Cost Effectiveness ($/ton VOC removed)
Catalytic Oxidizer for Oven + Proof Box	95.0	1,169,550	70.0	66.5	17,587
Catalytic Oxidizer for Oven only	95.0	646,438	70.0	63.0	10,801
Catalytic Oxidizer for Proof Box Only	95.0	1,038,351	70.0	6.65	156,143

Perfection Bakeries, Inc. has provided IDEM, OAQ, with energy impact analysis as follows:

The additional energy requirement for the operation of a clean room, air handling, and the catalytic oxidizer would be 8.59 MMBtu per hour for the oxidizer, and 112 Kw-hr for the air handlers. The additional energy cost has been estimated to be $372,152 per year.

Based on the high costs associated with the installation and operation of a catalytic oxidizer for the bread production line, and the additional energy requirement for the operation of the control device, as identified in the table above, the IDEM, OAQ has determined that a catalytic oxidizer is not a cost effective control technology for the bread baking line at this facility.

The Permittee has proposed the following as BACT for the proposed bread baking line, including the bread line fermentation and oven at EU01 and proof box EU03:

(a) VOC emissions from the bread baking line, including the natural gas-fired oven EU01 and proof box EU03, shall not exceed 70.0 tons per twelve (12) consecutive month period.

(b) The source shall operate the proof box EU03 in accordance with the manufacturer's design and operating specifications.

(c) The source shall perform proof box cleaning operations for the proof box EU03 on a weekly cleaning schedule in accordance with the Sanitation Standard Operating Procedure (SSOP).

The proposed VOC emissions BACT limit of 70.0 tons per twelve (12) consecutive month period falls within the average range for existing VOC BACT limitations for other similar sized bakery production operations.

Step 5 – Select BACT

IDEM, OAQ has determined that the following requirements represent BACT for the proposed bread baking line EU01, including the bread line fermentation and fuel combustion at EU02 and proof box EU03:

(a) VOC emissions from the bread baking line EU01, including the natural gas-fired oven EU02 and proof box EU03, shall not exceed 70.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The source shall operate the proof box EU03 in accordance with the manufacturer's design and operating specifications.

(c) In order to ensure proper operation and to minimize potential emissions, the source shall perform proof box cleaning operations for the proof box (EU03) on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedure (SSOP):

1. The following procedures to be conducted every week:

   (A) Scraping of dough from racks and supports;
   (B) Sweeping of the proof box floor;
   (C) Removal of dough/product from inside the proof box.

2. The following procedures to be conducted every four (4) weeks:

   (A) Wipe-off of interior proof box channel rails as needed;
   (B) Removal of any dough or oil accumulations from channel rails and cross-over framework; and

(C) Washing or mopping of floor of the proof box, and removal of accumulated waste from the floor.

TSD Appendix C
Cost Analysis

Source Name: Perfection Bakeries, Inc.
Source Address: 790 W. Commercial Avenue, Lowell, IN 46356
Permit No.: M089-37029-00590
Permit Reviewer: Madhurima Moulik

Economic Analysis for Baking Line
Catalytic Oxidizer Control

Cost Item	Basis		Option 1 Entire Line	Option 2 Oven Only	Option 3 Proofer Only
Direct Costs					
Catalytic Oxidizer + Clean Room + Air Handling (A)			$ 2,006,700.00	$ 425,000.00	$ 1,610,000.00
Instrumentation	A x 0.1		$ 200,670.00	$ 42,500.00	$ 161,000.00
Taxes	A x 0.07		$ 140,469.00	$ 29,750.00	$ 112,700.00
Freight	A x 0.05		$ 100,335.00	$ 21,250.00	$ 80,500.00
	Purchased equipment cost (B):		$2,448,174.00	$518,500.00	$1,964,200.00
Direct Installation Costs					
Foundation & supports	B x 0.08		$195,853.92	$41,480.00	$157,136.00
Auxiliaries - Ductwork/Fittings			$250,000.00	$250,000.00	$250,000.00
Handling & erection	B x 0.14		$342,744.36	$72,590.00	$274,988.00
Electrical	B x 0.04		$97,926.96	$20,740.00	$78,568.00
Piping	B x 0.02				
Insulation	B x 0.01				
Painting	B x 0.01				
	Direct installation costs (DIC):		$886,525.24	$384,810.00	$760,692.00
	Total Direct Costs (DC):		$3,334,699.24	$903,310.00	$2,724,892.00
Indirect Costs (Installation)					
Engineering	B x 0.05		$122,408.70	$25,925.00	$98,210.00
Construction and field e	B x 0.1		$244,817.40	$51,850.00	$196,420.00
Contractor fees	B x 0.1		$244,817.40	$51,850.00	$196,420.00
Start-up	B x 0.02		$48,963.48	$10,370.00	$39,284.00
Performance Test	B x 0.01		$24,481.74	$5,185.00	$19,642.00
Contingencies	B x 0.03		$73,445.22	$15,555.00	$58,926.00
	Total Indirect Costs (IC):		$758,933.94	$160,735.00	$608,902.00
Total Capital Investment (DC+ IC)			**$4,093,633.18**	**$1,064,045.00**	**$3,333,794.00**
Direct Annual Costs					
Operating labor					
	Operator	1000 hr/yr @ $28/hr	$28,000.00	$28,000.00	$28,000.00
	Sanitation (2 people)	2080 hr/yr @ $28/hr	$116,480.00	$116,480.00	$116,480.00
	Supervisor	15% of operator	$4,200.00	$4,200.00	$4,200.00
Maintenance					
	Labor	same as operating labor	$28,000.00	$28,000.00	$28,000.00
	Material	100% of maintenance labor	$28,000.00	$28,000.00	$28,000.00
Natural Gas	8.59 MMBtu/hr @2.06 $/MMBtu		$155,011.70	$155,011.70	$155,011.70
Electricity	112 kWh @0.0127 $/kWh		$12,460.22	$12,460.22	$12,460.22
Catalyst Replacement	$20,000/yr		$20,000.00	$20,000.00	$20,000.00
	Total Direct Annual Costs (DAC):		$392,151.93	$392,151.93	$392,151.93
Indirect Annual Costs					
Overhead	Total Labor and Materials x 0.8		$70,560.00	$70,560.00	$70,560.00
Administrative charges	Total Capital Investment x 0.02		$81,872.66	$21,280.90	$66,675.88
Property tax	Total Capital Investment x 0.01		$40,936.33	$10,640.45	$33,337.94
Insurance	Total Capital Investment x 0.01		$40,936.33	$10,640.45	$33,337.94
Capital recovery	Total Capital Investment x 0.133		$543,093.18	$141,164.48	$442,287.01
	Total Indirect Annual Costs (IAC):		$234,305.33	$113,121.80	$203,911.76
Total Annual Cost			**$1,169,550.44**	**$646,438.20**	**$1,038,350.70**
Limited VOC emissions (tons per year) =			70.0	63.0	7.0
Tons VOC Removed @ 95.0% =			66.50	59.85	6.65
Cost per Ton VOC Removed ($/ton)			**$17,587.22**	**$10,800.97**	**$156,142.96**

Notes:
Equipment total for Option 1 includes $676,700 for the oxidizer; $1,305,000 for the clean room and $25,000 for air handling.
Equipment total for Option 2 includes $425,000 for the oxidizer.
Equipment total for Option 3 includes $425,000 for the oxidizer; $1,160,000 for the clean room and $25,000 for air handling.
Capital Recovery Factor based on the lowest interest rate from U.S. EPA Air Pollution Control Cost Manual of 5.5% for 10 years.

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
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Michael R. Pence
Governor

Carol S. Comer
Commissioner

May 25, 2016

Mr. David Kent
Perfection Bakeries, Inc.
2100 Enterprise Street
Jackson, MI 49203-3410

Re: Public Notice
Perfection Bakeries, Inc.
Permit Level: New Source Construction and Minor Source Operating Permit (MSOP)
Permit Number: 089-37029-00590

Dear Mr. Kent:

Enclosed is a copy of your draft New Source Construction and Minor Source Operating Permit (MSOP), 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 Post Tribune in Merrillville, Indiana and The Times in Munster, Indiana publish the abbreviated version of the public notice no later than May 27, 2016. 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 Lowell Public Library, 1505 East Commercial Avenue in Lowell, 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 Madhurima Moulik, 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 3-0868 or dial (317) 233-0868.

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016

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

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

May 24, 2016

The Post Tribune
1433 E. 83rd Avenue
Merrillville, IN 46410

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Perfection Bakeries, Inc., Lake 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 May 27, 2016.

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 Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

Vivian Haun

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: New Source Construction and Minor Source Operating Permit (MSOP)
Permit Number: 089-37029-00590

Enclosure
PN Newspaper.dot 8/27/2015

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

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

May 24, 2016

The Times
601 West 45th Avenue
Munster, IN 46321

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Perfection Bakeries, Inc., Lake 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 May 27, 2016.

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.

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Sincerely,

Vivian Haun

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: New Source Construction and Minor Source Operating Permit (MSOP)
Permit Number: 089-37029-00590

Enclosure
PN Newspaper.dot 8/27/2015

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

May 25, 2016

To: Lowell 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: Perfection Bakeries, Inc.
Permit Number: 089-37029-00590

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 2/16/2016

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

Carol S. Comer
Commissioner

Notice of Public Comment

May 25, 2016
Perfection Bakeries, Inc.
089-37029-00590

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 2/17/2016

Mail Code 61-53

IDEM Staff	VHAUN 5/25/2016 Perfection Bakeries Inc 089-37029-00590 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	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		David Kent Perfection Bakeries Inc 2100 Enterprise St Jackson MI 49203-3410 (Source CAATS)									
2		Mark Porter VP Perfection Bakeries Inc 2100 Enterprise St Jackson MI 49203-3410 *(RO CAATS)*									
3		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 *(Local Official)*									
4		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 *(Health Department)*									
5		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 *(Affected Party)*									
6		Lowell Public Library 1505 East Commercial Lowell IN 46356 *(Library)*									
7		Lowell Town Council and Town Manager PO Box 157, 501 East Main Street Lowell IN 46356 *(Local Official)*									
8		Shawn Sobocinski 1814 Laporte Street Portage IN 46368-1217 *(Affected Party)*									
9		Mark Coleman 8 Turret Rd. Portage IN 46368-1072 *(Affected Party)*									
10		Mr. Dennis Hahney Pipefitters Association, Local Union 597 1461 East Summit St Crown Point IN 46307 *(Affected Party)*									
11		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 *(Affected Party)*									
12		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 *(Local Official)*									
13		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)									
14		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 *(Affected Party)*									
15		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 *(Affected Party)*									

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.
15			

FACSIMILIE OF PS Form 3877

Mail Code 61-53

IDEM Staff	VHAUN 5/25/2016 Perfection Bakeries Inc 089-37029-00590 DRAFT		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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1		Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)									
2		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 *(Affected Party)*									
3		Mr. Alic Bent August Mack Environmental, Inc. 1302 N Meridian St, Suite 300 Indianapolis IN 46202 *(Consultant)*									
4		Gary City Council 401 Broadway # 209 Gary IN 46402 *(Local Official)*									
5		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 *(Affected Party)*									
6		Ryan Dave 939 Cornwallis Munster IN 46321 *(Affected Party)*									
7		Henry Jones 797 W. Commercial Ave. Lowell IN 46356 *(Affected State)*									
8		Lisa & Stephen Holm 9066 State #17 Road Plymouth IN 46356 *(Affected Party)*									
9		Caseys Marketing Co. 888 W. Commercial Ave. Lowell IN 46356 *(Affected Party)*									
10		White Graphics Systems 270 West Meadow Place Lowell IN 46356 *(Affected Party)*									
11		Valerie Sucich 765 Tonto Court Lowell IN 46356 *(Affected Party)*									
12		Roper Real Estate 700 W. Commercial Ave Lowell IN 46356 *(Affected Party)*									
13		Aaron Malone 300 Langen St. Lowell IN 46356 (Affected Party)									
14		Lisa Griffith 767 Mohawk Dr Lowell IN 46356 *(Affected Party)*									
15		Gerald & Marianne Hoffman 763 Mohawk Dr Lowell IN 46356 *(Affected Party)*									

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.
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1		David Souther 759 Mohawk Dr Lowell IN 46356 (Affected Party)									
2		Theodore & Carolyn Vintila 753 Mohawk Dr Lowell IN 46356 *(Affected Party)*									
3		Jeff Blandford 747 Mohawk Dr Lowell IN 46356 *(Affected Party)*									
4		Monica Lacy 741 Mohawk Dr Lowell IN 46356 *(Affected Party)*									
5		Stanley & Kathleen Bafia 735 Mohawk Dr Lowell IN 46356 *(Affected Party)*									
6		Lara Coleman 731 Mohawk Dr Lowell IN 46356 *(Affected Party)*									
7		Michele Carey 780 Aztec Ct. Lowell IN 46356 *(Affected Party)*									
8		Carol Rizzo 785 Aztec Ct. Lowell IN 46356 *(Affected Party)*									
9		Tim Hoots 779 Aztec Ct. Lowell IN 46356 *(Affected Party)*									
10		Brandee Wilson 760 Tonto Ct. Lowell IN 46356 *(Affected Party)*									
11		Tim & Kim Malenius 759 Tonto Ct. Lowell IN 46356 *(Affected Party)*									
12		Stephen & Renata Litteral 744 Hiawatha Ct. Lowell IN 46356 *(Affected Party)*									
13		Robert & Mary Basso 745 Hiawatha Ct. Lowell IN 46356 (Affected Party)									
14		Michael & Cindy Jackson 741 Hiawatha Ct. Lowell IN 46356 *(Affected Party)*									
15		Michael & Emely Powers 728 Shawnee Ct. Lowell IN 46356 *(Affected Party)*									

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1		John & Susan Gray 725 Shawnee Ct. Lowell IN 46356 (Affected Party)									
2		Douglas Curtis 723 Shawnee Ct. Lowell IN 46356 *(Affected Party)*									
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13											
14											
15											

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