



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and
Federally Enforceable State Operating Permit (FESOP)

for Inventure Foods in Wells County

FESOP No.: F179-37075-00045

The Indiana Department of Environmental Management (IDEM) has received an application from Inventure Foods, located at 705 West Dustman Road, Bluffton, IN 46714, for a new source construction and FESOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Inventure Foods to construct and operate a new stationary fried potato chip and similar snacks manufacturing plant.

The applicant intends to construct and operate new equipment that will emit air pollutants. The potential to emit regulated pollutants will be limited to less than the TV and/or PSD major threshold levels, respectively. 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.

IDEM is aware that the potato and similar snacks manufacturing plant has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft FESOP contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

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

Wells County Public Library
200 West Washington Street
Bluffton, IN 46714

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 F179-37075-00045 in all correspondence.

Comments should be sent to:

Dominic Williams
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-6555
Or dial directly: (317) 234-6555
Fax: (317) 232-6749 attn: Dominic Williams
E-mail: dwilliam2@idem.IN.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

What will happen after IDEM makes a decision?

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

If you have any questions, please contact Dominic Williams of my staff at the above address.



Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality



Indiana Department of Environmental Management

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Carol S. Comer
Commissioner

New Source Construction and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Inventure Foods
705 West Dustman Road
Bluffton, Indiana 46714**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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 FESOP under 326 IAC 2-8.

Operation Permit No. F179-37075-00045	
Issued by:	Issuance Date:
Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary fried potato chip and similar snacks manufacturing plant..

Source Address:	705 West Dustman Road, Bluffton, Indiana 46714
General Source Phone Number:	260-824-2800
SIC Code:	2096
County Location:	Wells
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) EU-01, constructed in 1985, consisting of:
 - (1) Three (3) natural gas-fired boilers, identified as B-1 through B-3, constructed in 1985, each with a maximum capacity of 0.636 MMBtu per hour, using no controls, and exhausting to stack SV-1 through SV-3.
- (b) EU-02, constructed in 1985, consisting of:
 - (1) Three (3) natural gas-fired heat exchangers, identified as CF-01 through CF-03, each with a maximum heat input capacity of 3.2 MMBtu per hour, venting to stacks SV-6 through SV-8.
 - (2) One (1) continuous deep fat fryer, identified as CF-01, with a maximum capacity of uncooked raw hummus, ancient grains, and rice and beans of 5,350 pounds per hour, a maximum capacity of finished product of 1,500 pounds per hour, using a standard mesh pad oil mist eliminator as control, and exhausting to stack SV-6.
 - (3) Two (2) continuous deep fat fryers, identified as CF-02 and CF-03, each with a maximum capacity of uncooked raw potatoes of 8670 pounds per hour, a maximum capacity of finished chips of 2,600 pounds per hour, each; each using a standard mesh pad oil mist eliminator as control, and exhausting to stacks SV-7 and SV-8.
- (c) EU-03, constructed in 2014, consisting of:
 - (1) Two (2) natural gas-fired dryers, identified as D-1 and D-2, each with a maximum heat input capacity of 1.5 MMBtu per hour, using no controls, and exhausting to stacks SV-9 and SV-10.

- (d) EU-04, constructed in 1985, consisting of:
 - (1) Two (2) natural gas-fired ovens, identified as O-1 and O-2, each with a maximum heat input capacity of 1.5 MMBtu per hour, using no controls, and exhausting to stacks SV-4 and SV-5.
- (e) EU-05, constructed in 1985, consisting of:
 - (1) Sixteen (16) natural gas-fired space heaters, each with a maximum heat input capacity of 0.25 MMBtu per hour, using no controls, and exhausting indoors.
- (f) EU-06, constructed in 2016, consisting of:
 - (1) Four (4) natural gas-fired process heaters, identified as BF-01 through BF-04, each with a maximum heat input capacity of 1.5 MMBtu per hour, venting to stacks SV-12 through SV-15.
 - (2) Four (4) batch fryers, identified as BF-01 through BF-04, each with a maximum capacity of uncooked raw potatoes of 300 pounds per hour, a maximum capacity of finished chips of 285 pounds per hour, each; each using a standard mesh pad oil mist eliminator as control, and exhausting to stacks SV-12 through SV-15.
- (g) Five (5) seasoners, identified as SEA-01 through SEA-05, each constructed in 1985, each with a maximum seasoning capacity of 0.845 pounds per hour of seasoning. Each seasoner applies seasoning at a rate of 9% of the maximum throughput of 1000 pounds per hour of fried chips, each using no controls and each exhausting indoors.
- (h) One (1) grain handling operation, identified as Grain Handling, constructed in 1985, with a maximum capacity of 493.15 pounds per hour, using no controls and exhausting indoors.
- (i) One (1) natural gas-fired boiler, constructed in 1985, identified as B-01, with a maximum heat input capacity of 0.50 MMBtu per hour, using no controls, exhausting to stack SV-11.
- (j) Paved roads.
- (k) Three (3) storage silos. These silos are no longer in use at this source.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

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

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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

B.2 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][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 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 described in the application or the permit. The emission units covered in this permit may continue operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as described.
- (b) If actual construction of the emission units differs from the construction described in the application, the source may not continue 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 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F179-37075-00045, 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 [326 IAC 2-8-6] [IC 13-17-12]

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

B.7 Severability [326 IAC 2-8-4(4)]

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 [326 IAC 2-8-4(5)(D)]

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

- (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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F179-37075-00045 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.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(1) That this permit contains a material mistake.

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

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.18 Permit Renewal [326 IAC 2-8-3(h)]

(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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][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 FESOP 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.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

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

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.

Testing Requirements [326 IAC 2-8-4(3)]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-4(1)][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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. Support information includes the following, where applicable:
 - (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the FESOP.Records of required monitoring information include the following, where applicable:

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

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

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

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) EU-01, constructed in 1985, consisting of:
 - (1) Three (3) natural gas-fired boilers, identified as B-1 through B-3, constructed in 1985, each with a maximum capacity of 0.636 MMBtu per hour, using no controls, and exhausting to stack SV-1 through SV-3.
- (b) EU-02, constructed in 1985, consisting of:
 - (1) Three (3) natural gas-fired heat exchangers, identified as CF-01 through CF-03, each with a maximum heat input capacity of 3.2 MMBtu per hour, venting to stacks SV-6 through SV-8.
 - (2) One (1) continuous deep fat fryer, identified as CF-01, with a maximum capacity of uncooked raw hummus, ancient grains, and rice and beans of 5,350 pounds per hour, a maximum capacity of finished product of 1,500 pounds per hour, using a standard mesh pad oil mist eliminator as control, and exhausting to stack SV-6.
 - (3) Two (2) continuous deep fat fryers, identified as CF-02 and CF-03, each with a maximum capacity of uncooked raw potatoes of 8670 pounds per hour, a maximum capacity of finished chips of 2,600 pounds per hour, each; each using a standard mesh pad oil mist eliminator as control, and exhausting to stacks SV-7 and SV-8.
- (f) EU-06, constructed in 2016, consisting of:
 - (1) Four (4) natural gas-fired process heaters, identified as BF-01 through BF-04, each with a maximum heat input capacity of 1.5 MMBtu per hour, venting to stacks SV-12 through SV-15.
 - (2) Four (4) batch fryers, identified as BF-01 through BF-04, each with a maximum capacity of uncooked raw potatoes of 300 pounds per hour, a maximum capacity of finished chips of 285 pounds per hour, each; each using a standard mesh pad oil mist eliminator as control, and exhausting to stacks SV-12 through SV-15.
- (i) One (1) natural gas-fired boiler, constructed in 1985, identified as B-01, with a maximum heat input capacity of 0.50 MMBtu per hour, using no controls, exhausting to stack SV-11.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP PM10 and PM2.5 Emission Limitations [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

- (1) PM10 emissions (after control) from the continuous deep fat fryer CF-01 shall not exceed 0.90 pounds per hour;

- (2) PM2.5 emissions (after control) from the continuous deep fat fryer CF-01 shall not exceed 0.90 pounds per hour;
- (3) PM10 emissions (after control) from the continuous deep fat fryers CF-02 and CF-03 shall each not exceed 3.10 pounds per hour;
- (4) PM2.5 emissions (after control) from the continuous deep fat fryers CF-02 and CF-03 shall each not exceed 3.10 pounds per hour;
- (5) PM10 emissions (after control) from the batch fryers BF-01 through BF-04 shall each not exceed 11.63 pounds per hour; and
- (6) PM2.5 emissions (after control) from the batch fryers BF-01 through BF-04 shall each not exceed 11.63 pounds per hour.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per 12 consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2, particulate matter (PM) from the continuous fryers and batch fryers shall not exceed the following pounds per hour limits when operating at the maximum process weights of raw, unprocessed potatoes (hummus, ancient grains, and rice and beans for CF-01) in tons per hour specified in the table below:

Emission Unit	Process Weight Rate (lbs/hr)	Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)
CF-01	5350	2.68	7.93
CF-02 and CF-03	17340	8.67	17.43
BF-01 through BF-04	1200	0.60	2.91

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

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

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

D.1.3 Particulate Emission Limitations for Sources of Indirect Heat [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heat), particulate matter emissions (Pt) from each of the following units shall not exceed the limits specified in the table below:

Unit ID	Construction Date	Maximum Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)
B-1	1985	0.636	18.008	0.51
B-2		0.636		
B-3		0.636		
B-01		0.5		
CF-01		3.2		
CF-02		3.2		
CF-03		3.2		
BF-01	2016	1.5	28.008	0.46
BF-02		1.5		
BF-03		1.5		
BF-04		1.5		

These limitations were based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

- Pt = Particulate Emission Limitation in pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
 Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.5 Particulate Control

- (a) In order to comply with Condition D.1.1, the standard mesh pad mist eliminators associated with the continuous fryers CF-01 through CF-03 (EU-02) shall be operated at all times that the continuous fryers CF-01 through CF-03 (EU-02) are in operation.
- (b) In order to comply with Conditions D.1.1 and D.1.2, the standard mesh pad mist eliminators associated with the batch fryers BF-01 through BF-04 (EU-06) shall be operated at all times that the batch fryers BF-01 through BF-04 (EU-06) are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]

D.1.6 Visible Emissions Notations

- (1) Visible emission notations of batch fryers BF-01 through BF-04 (EU-06) stack exhausts (SV-12 through SV-15) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (2) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (3) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (4) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (5) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response shall be considered a deviation from this permit.

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

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the batch fryers BF-01 through BF-04 (EU-06) stack exhausts (SV-12 through SV-15). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) Section C - General Record Keeping Requirements 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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Inventure Foods
Source Address: 705 West Dustman Road, Bluffton, Indiana 46714
FESOP Permit No.: F179-37075-00045

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Inventure Foods
Source Address: 705 West Dustman Road, Bluffton, Indiana 46714
FESOP Permit No.: F179-37075-00045

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12 |
|--|

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Inventure Foods
Source Address: 705 West Dustman Road, Bluffton, Indiana 46714
FESOP Permit No.: F179-37075-00045

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Inventure Foods
705 West Dustman Road
Bluffton, Indiana 46714

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 Inventure Foods 705 West Dustman Road, Bluffton, Indiana 46714, has constructed and will operate a fried potato chip and similar snacks manufacturing plant. on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on April 14, 2016 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F179-37075-00045, Plant ID No. 179-00045 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
Federally Enforceable State Operating Permit (FESOP)

Source Description and Location
--

Source Name:	Inventure Foods
Source Location:	705 West Dustman Road, Bluffton, IN 46714
County:	Wells
SIC Code:	2096 (Potato Chips, Corn Chips, and Similar Snacks)
Operation Permit No.:	F179-37075-00045
Permit Reviewer:	Dominic Williams

On April 14, 2016, the Office of Air Quality (OAQ) received an application from Inventure Foods related to the construction and operation of a new stationary fried potato chip and similar snacks manufacturing plant.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Wells County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Wells County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Wells County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (e) **Other Criteria Pollutants**
Wells County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) EU-01, constructed in 1985, consisting of:
 - (1) Three (3) natural gas-fired boilers, identified as B-1 through B-3, constructed in 1985, each with a maximum capacity of 0.636 MMBtu per hour, using no controls, and exhausting to stack SV-1 through SV-3.
- (b) EU-02, constructed in 1985, consisting of:
 - (1) Three (3) natural gas-fired heat exchangers, identified as CF-01 through CF-03, each with a maximum heat input capacity of 3.2 MMBtu per hour, venting to stacks SV-6 through SV-8.
 - (2) One (1) continuous deep fat fryer, identified as CF-01, with a maximum capacity of uncooked raw hummus, ancient grains, and rice and beans of 5,350 pounds per hour, a maximum capacity of finished product of 1,500 pounds per hour, using a standard mesh pad oil mist eliminator as control, and exhausting to stack SV-6.
 - (3) Two (2) continuous deep fat fryers, identified as CF-02 and CF-03, each with a maximum capacity of uncooked raw potatoes of 8670 pounds per hour, a maximum capacity of finished chips of 2,600 pounds per hour, each; each using a standard mesh pad oil mist eliminator as control, and exhausting to stacks SV-7 and SV-8.
- (c) EU-03, constructed in 2014, consisting of:
 - (1) Two (2) natural gas-fired dryers, identified as D-1 and D-2, each with a maximum heat input capacity of 1.5 MMBtu per hour, using no controls, and exhausting to stacks SV-9 and SV-10.
- (d) EU-04, constructed in 1985, consisting of:
 - (1) Two (2) natural gas-fired ovens, identified as O-1 and O-2, each with a maximum heat input capacity of 1.5 MMBtu per hour, using no controls, and exhausting to stacks SV-4 and SV-5.
- (e) EU-05, constructed in 1985, consisting of:
 - (1) Sixteen (16) natural gas-fired space heaters, each with a maximum heat input capacity of 0.25 MMBtu per hour, using no controls, and exhausting indoors.
- (f) EU-06, constructed in 2016, consisting of:
 - (1) Four (4) natural gas-fired process heaters, identified as BF-01 through BF-04, each with a maximum heat input capacity of 1.5 MMBtu per hour, venting to stacks SV-12 through SV-15.

- (2) Four (4) batch fryers, identified as BF-01 through BF-04, each with a maximum capacity of uncooked raw potatoes of 300 pounds per hour, a maximum capacity of finished chips of 285 pounds per hour, each; each using a standard mesh pad oil mist eliminator as control, and exhausting to stacks SV-12 through SV-15.
- (g) Five (5) seasoners, identified as SEA-01 through SEA-05, each constructed in 1985, each with a maximum seasoning capacity of 0.845 pounds per hour of seasoning. Each seasoner applies seasoning at a rate of 9% of the maximum throughput of 1000 pounds per hour of fried chips, each using no controls and each exhausting indoors.
- (h) One (1) grain handling operation, identified as Grain Handling, constructed in 1985, with a maximum capacity of 493.15 pounds per hour, using no controls and exhausting indoors.
- (i) One (1) natural gas-fired boiler, constructed in 1985, identified as B-01, with a maximum heat input capacity of 0.50 MMBtu per hour, using no controls, exhausting to stack SV-11.
- (j) Paved roads.
- (k) Three (3) storage silos. These silos are no longer in use at this source.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction and operating permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP

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.

Pollutant	Potential To Emit (tons/year)
PM	68.89
PM10 ⁽¹⁾	115.22
PM2.5 ⁽¹⁾	115.19
SO ₂	0.07
NO _x	12.03
VOC	1.00
CO	10.10

(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".

HAPs	Potential To Emit (tons/year)
Hexane	0.22
TOTAL HAPs	0.23

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(30)) of PM10 and PM2.5 are each greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(30)) 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).

PTE of the Entire Source After Issuance of the FESOP

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Continuous Deep Fat Fryers (EU-02) (CF-1, CF-2, and CF-3)**	23.48	17.52	17.52	0.0	0.0	0.29	0.0	0.0	0.0
Batch Fryers (EU-06) (BF-1 through BF-4)**	44.94	50.93	50.93	0.0	0.0	0.05	0.0	0.0	0.0
Natural Gas Combustion Units (EU-01, EU-03, EU-04, EU-05, B-01)	0.23	0.91	0.91	0.07	12.03	0.66	10.10	0.23	0.22 Hexane
5 Seasoners (SEA-01 through SEA-05)	0.18	0.18	0.18	0.0	0.0	0.0	0.0	0.0	0.0
Grain Handling	0.07	0.04	0.01	0.0	0.0	0.0	0.0	0.0	0.0
Total PTE of Entire Source	68.89	69.59	69.56	0.07	12.03	1.00	10.10	0.23	0.22 Hexane
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
Paved Roads (Fugitive)	1.73	0.35	0.08	0.0	0.0	0.0	0.0	0.0	0.0
*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".									
**Limited PTE based upon annual PM10 and PM2.5 emissions limits to comply with 326 IAC 2-8 (FESOP), and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable. All remaining emissions listed in the above table are unrestricted PTE.									

- (a) **FESOP Status**
 This new source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this new source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

- (1) PM10 emissions (after control) from the continuous deep fat fryer CF-01 shall not exceed 0.90 pounds per hour;

- (2) PM2.5 emissions (after control) from the continuous deep fat fryer CF-01 shall not exceed 0.90 pounds per hour;
- (3) PM10 emissions (after control) from the continuous deep fat fryers CF-02 and CF-03 shall each not exceed 3.10 pounds per hour;
- (4) PM2.5 emissions (after control) from the continuous deep fat fryers CF-02 and CF-03 shall each not exceed 3.10 pounds per hour;
- (5) PM10 emissions (after control) from the batch fryers BF-01 through BF-04 shall each not exceed 11.63 pounds per hour; and
- (6) PM2.5 emissions (after control) from the batch fryers BF-01 through BF-04 shall each not exceed 11.63 pounds per hour.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per 12 consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

(b) PSD Minor Source

This new source is not a major stationary source, under PSD (326 IAC 2-2), because:

- (1) The potential to emit PM10 and PM2.5 is less than 250 tons per year,
- (2) The potential to emit all other PSD regulated pollutants are less than 250 tons per year,
- (3) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1), and

(c) GHGs

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 GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standards (NSPS) for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, 40 CFR 60, Subpart D, (326 IAC 12), are not included in the permit, because the four (4) natural gas-fired boilers, three (3) natural gas-fired heat exchangers, four (4) natural gas-fired process heaters, and twenty (20) natural gas-fired units each have a maximum heat input capacity of less than two hundred fifty (250) million British thermal units per hour and the twenty-seven (27) natural gas-fired units are each not boilers.

- (b) The requirements of the New Source Performance Standards (NSPS) for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, 40 CFR 60, Subpart Da, Standards of Performance (326 IAC 12), are not included in the permit, because the four (4) natural gas-fired boilers, three (3) natural gas-fired heat exchangers, four (4) natural gas-fired process heaters, and twenty (20) natural gas-fired units are each not an electric utility steam generating unit.
- (c) The requirements of the New Source Performance Standards (NSPS) for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db (326 IAC 12), are not included in the permit, because the four (4) natural gas-fired boilers, three (3) natural gas-fired heat exchangers, four (4) natural gas-fired process heaters, and twenty (20) natural gas-fired units each have a maximum heat input capacity of less than one-hundred (100) million British thermal units per hour.
- (d) The requirements of the New Source Performance Standards (NSPS) for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit, because the four (4) natural gas-fired boilers, three (3) natural gas-fired heat exchangers, four (4) natural gas-fired process heaters, and twenty (20) natural gas-fired units each have a maximum heat input capacity of less than ten (10) million British thermal units per hour.
- (e) The requirements of the New Source Performance Standards (NSPS) for Grain Elevators, 40 CFR 60, Subpart DD (326 IAC 12), are not included in this permit because the source does not include a grain terminal elevator with a permanent storage capacity of more than 2.5 million U.S. bushels or a grain storage elevator with a permanent grain storage capacity of 1 million bushels. The following definitions are included in 40 CFR 60.301:
 - (1) Grain elevator means any plant or installation at which grain is unloaded, handled, cleaned, dried, stored, or loaded.
 - (2) Grain terminal elevator means any grain elevator which has a permanent storage capacity of more than 88,100 m³ (ca. 2.5 million U.S. bushels), except those located at animal food manufacturers, pet food manufacturers, cereal manufacturers, breweries, and livestock feedlots.
 - (3) Grain storage elevator means any grain elevator located at any wheat flour mill, wet corn mill, dry corn mill (human consumption), rice mill, or soybean oil extraction plant which has a permanent grain storage capacity of 35,200 m³ (ca. 1 million bushels).
- (f) 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)

- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20-95), are not included in the permit for the four (4) natural gas-fired boilers, three (3) natural gas-fired heat exchangers, four (4) natural gas-fired process heaters, and twenty (20) natural gas-fired units, since this source is not a major source of HAPs as defined in §63.2.
- (h) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJ, are not included in the permit, since the four (4) natural gas-fired boilers (B-1 through B-3 and B-01) are each considered a gas-fired boiler, as defined by 40 CFR 63.11237, which is specifically exempted from this rule under 40 CFR 63.11195(e), and the three (3) natural gas-fired heat

exchangers, four (4) natural gas-fired process heaters, and twenty (20) natural gas-fired units are not considered boilers.

- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63, Subpart DDDDDDD, are not included in the permit, since this source does not own or operate a prepared feeds manufacturing facility that uses materials containing chromium or materials containing manganese.
- (j) 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)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-3 (Emission Offset)
Wells County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, this source is not subject to the requirements of 326 IAC 2-3 (Emission Offset).
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) 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.

- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
 Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
 The source-wide potential fugitive particulate emissions are less than 25 tons per year. Therefore, the requirements of 326 IAC 6-5 do not apply, and are not included in the permit.
- (i) 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.
- (j) 326 IAC 6.8 (PM Limitations for Lake County)
 This source is not subject to 326 IAC 6.8 because it is not located in Lake County.
- (k) 326 IAC 12 (New Source Performance Standards)
 See Federal Rule Applicability Section of this TSD.
- (l) 326 IAC 20 (Hazardous Air Pollutants)
 See Federal Rule Applicability Section of this TSD.

Continuous and Batch Fryers (EU-02) (CF-01 through CF-03) and (EU-06) (BF-01 through BF-04)

- (m) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are applicable to the continuous fryers (CF-01 through CF-03) and the batch fryers (BF-01 through BF-04), since these units each have potential particulate emissions greater than 0.551 pound per hour. Pursuant to 326 IAC 6-3-2, particulate matter (PM) from the continuous fryers and batch fryers shall not exceed the following pounds per hour limits when operating at the maximum process weights of raw, unprocessed potatoes (hummus, ancient grains, and rice and beans for CF-01) in tons per hour specified in the table below:

Emission Unit	Process Weight Rate (lbs/hr)	Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)
CF-01	5350	2.68	7.93
CF-02 and CF-03	17340	8.67	17.43
BF-01 through BF-04	1200	0.60	2.91

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

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

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

Based on calculations, the standard mesh pad oil mist eliminators are not needed for continuous fryers CF-01 through CF-03 to comply with the 326 IAC 6-3-2 allowable emission rates. The standard mesh pad oil mist eliminators shall be in operation and control emissions from the batch fryers BF-01 through BF-04 at all times when the associated batch fryer is in operation in order to comply with the 326 IAC 6-3-2 allowable emission rate.

- (n) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The provisions of 326 IAC 8-1-6 are applicable to new facilities as of January 1, 1980, that have potential emissions of twenty-five (25) tons per year or more of VOC, are located anywhere in the state, and are not otherwise regulated by another Article 8 rule, 326 IAC 20-48 (Emission Standards for Hazardous Air Pollutants for Boat Manufacturing), or 326 IAC 20-56 (Reinforced Plastic Composites Production). The potential VOC emissions from the continuous and batch fryers, identified as EU-02 and EU-06, are each less than twenty-five (25) tons per year. Therefore, 326 IAC 8-1-6 is not applicable to these facilities.

Natural Gas Combustion (EU-01, EU-02, EU-03, EU-04, EU-05, and EU-06)

- (o) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heat)
- (1) The particulate matter (PM) emissions from the twenty (20) natural gas-fired units (EU-03, EU-04, and EU-05) are each not subject to 326 IAC 6-2, because they are each not sources of indirect heating.
- (2) The three (3) 0.636 MMBtu per hour natural gas-fired boilers (B-1 through B-3), the one (1) 0.5 MMBtu per hour natural gas-fired boiler (B-01), the three (3) 3.2 MMBtu per hour natural gas-fired heat exchangers (CF-01 through CF-03), and the four (4) 1.5 MMBtu natural gas-fired process heaters (BF-01 through BF-04), were each constructed after September 21, 1983. Therefore, the requirements of 326 IAC 6-2-4 apply to each indirect-fired heating unit.

Particulate matter emissions (Pt) from each unit shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input; and

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated, or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heat), particulate matter emissions (Pt) from each of the following units shall not exceed the limits specified in the table below:

Unit ID	Construction Date	Maximum Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)
B-1	1985	0.636	18.008	0.51
B-2		0.636		
B-3		0.636		
B-01		0.5		
CF-01		3.2		
CF-02		3.2		
CF-03		3.2		
BF-01	2016	1.5	28.008	0.46
BF-02		1.5		
BF-03		1.5		
BF-04		1.5		

Based on Appendix A and AP-42, the potential to emit PM from the four (4) natural gas-fired boilers, three (3) natural gas-fired heat exchangers, four (4) natural gas-fired process heaters are calculated as follows:

$$1.90 \text{ lb PM/MMCF} \times 1 \text{ MMCF}/1,020 \text{ MMBtu} = 0.00186 \text{ lb PM/MMBtu}$$

Therefore the four (4) natural gas-fired boilers, three (3) natural gas-fired heat exchangers, four (4) natural gas-fired process heaters are each able to comply with this rule without the use of a control device.

- (p) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
 - (1) Pursuant to 326 IAC 6-3(b)(1), twenty (20) natural gas-fired units (EU-03, EU-04, and EU-05), are each not subject to 326 IAC 6-3, because they are each not a manufacturing process.
 - (2) The three (3) 0.636 MMBtu per hour natural gas-fired boilers (B-1 through B-3)), the one (1) 0.5 MMBtu per hour natural gas-fired boiler (B-01), the three (3) 3.2 MMBtu per hour natural gas-fired heat exchangers (CF-01 through CF-03), and the four (4) 1.5 MMBtu natural gas-fired process heaters (BF-01 through BF-04) are each not subject to the requirements of 326 IAC 6-3 because each unit is subject to the requirements of 326 IAC 6-2.
- (q) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-1, the twenty (20) natural gas-fired units (EU-03, EU-04, and EU-05), the three (3) 0.636 MMBtu per hour natural gas-fired boilers (B-1 through B-3)), the one (1) 0.5 MMBtu per hour natural gas-fired boiler (B-01), the three (3) 3.2 MMBtu per hour natural gas-fired heat exchangers (CF-01 through CF-03), and the four (4) 1.5 MMBtu natural gas-fired process heaters (BF-01 through BF-04), are each not subject to the requirements of 326 IAC 7-1.1, since each has unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour, respectively.
- (r) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The provisions of 326 IAC 8-1-6 are applicable to new facilities as of January 1, 1980, that have potential emissions of twenty-five (25) tons per year or more of VOC, are located anywhere in the state, and are not otherwise regulated by another Article 8 rule, 326 IAC 20-48 (Emission Standards for Hazardous Air Pollutants for Boat Manufacturing), or 326 IAC 20-56 (Reinforced Plastic Composites Production). The twenty (20) natural gas-fired units (EU-03, EU-04, and EU-

05), the three (3) 0.636 MMBtu per hour natural gas-fired boilers (B-1 through B-3)), the one (1) 0.5 MMBtu per hour natural gas-fired boiler (B-01), the three (3) 3.2 MMBtu per hour natural gas-fired heat exchangers (CF-01 through CF-03), and the four (4) 1.5 MMBtu natural gas-fired process heaters (BF-01 through BF-04), are each not to the requirements of 326 IAC 8-1-6, since each has unlimited potential to emit VOC of less than 25 tons per year.

Seasoners (SEA-01 through SEA-05)

- (s) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are not applicable to the five (5) seasoners (SEA-01 through SEA-05), since they do not have potential particulate emissions greater than 0.551 pound per hour.

Grain Handling

- (t) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are not applicable to the one (1) grain handling operation, since it does not have potential particulate emissions greater than 0.551 pound per hour.

Compliance Determination, Monitoring and Testing Requirements

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

Emission Unit/Control	Operating Parameters	Frequency
EU-06 (Batch Fryers BF-01 through BF-04) Stacks SV-12 through SV-15	Visible Emissions Notation	Once per day

These compliance monitoring requirements are necessary to assure compliance with 326 IAC 6-3-2 particulate emission limits and the PM10 and PM2.5 FESOP limits.

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 14, 2016. Additional information was received on July 28, 2016.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. F179-37075-00045. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Dominic Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6555 or toll free at 1-800-451-6027 extension 4-6555.
- (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
Emission Summary**

Company Name: Inventure Foods
Source Address: 705 West Dustman Road, Bluffton, IN 46714
Permit Number: F179-37075-00045
Reviewer: Dominic Williams

Unlimited/Uncontrolled Potential to Emit (tons/yr)

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HAPs	Worst Single HAP	
Continuous Deep Fat Fryers (EU-02) (CF-1, CF-2, and CF-3)	23.48	29.20	29.20	-	-	0.29	-	-	-	-
Batch Fryers (EU-06) (BF-1 through BF-4)	44.94	84.88	84.88	-	-	0.05	-	-	-	-
Natural Gas Combustion Units (EU-01, B-01, EU-03, EU-04, EU-05)	0.23	0.91	0.91	0.07	12.03	0.66	10.10	0.23	0.22	Hexane
5 Seasoners (SEA-01 through SEA-05)	0.18	0.18	0.18	-	-	-	-	-	-	-
Grain Handling	0.07	0.04	0.01	-	-	-	-	-	-	-
Total PTE (Non-Fugitive)	68.89	115.22	115.19	0.07	12.03	1.00	10.10	0.23	0.22	Hexane
Paved Roads (Fugitive)	1.73	0.35	0.08	-	-	-	-	-	-	-

Limited Potential to Emit (tons/yr)

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HAPs	Worst Single HAP	
Continuous Deep Fat Fryers (EU-02) (CF-1, CF-2, and CF-3)	23.48	17.52	17.52	-	-	0.29	-	-	-	-
Batch Fryers (EU-06) (BF-1 through BF-4)	44.94	50.93	50.93	-	-	0.05	-	-	-	-
Natural Gas Combustion Units (EU-01, B-01, EU-03, EU-04, EU-05)	0.23	0.91	0.91	0.07	12.03	0.66	10.10	0.23	0.22	Hexane
5 Seasoners (SEA-01 through SEA-05)	0.18	0.18	0.18	-	-	-	-	-	-	-
Grain Handling	0.07	0.04	0.01	-	-	-	-	-	-	-
Total PTE (Non-Fugitive)	68.89	69.59	69.56	0.07	12.03	1.00	10.10	0.23	0.22	Hexane
Paved Roads (Fugitive)	1.73	0.35	0.08	-	-	-	-	-	-	-

Controlled Potential to Emit (tons/yr)

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HAPs	Worst Single HAP	
Continuous Deep Fat Fryers (EU-02) (CF-1, CF-2, and CF-3)	10.27	14.38	14.38	-	-	0.29	-	-	-	-
Batch Fryers (EU-06) (BF-1 through BF-4)	11.23	21.22	21.22	-	-	0.05	-	-	-	-
Natural Gas Combustion Units (EU-01, B-01, EU-03, EU-04, EU-05)	0.23	0.91	0.91	0.07	12.03	0.66	10.10	0.23	0.22	Hexane
5 Seasoners (SEA-01 through SEA-05)	0.18	0.18	0.18	-	-	-	-	-	-	-
Grain Handling	0.07	0.04	0.01	-	-	-	-	-	-	-
Total PTE (Non-Fugitive)	21.99	36.74	36.71	0.07	12.03	1.00	10.10	0.23	0.22	Hexane
Paved Roads (Fugitive)	1.73	0.35	0.08	-	-	-	-	-	-	-

Appendix A: Emissions Calculations
Continuous Fryers
CF-01, CF-02, CF-03

Company Name: Inventure Foods
 Source Address: 705 West Dustman Road, Bluffton, IN 46714
 Permit Number: F179-37075-00045
 Reviewer: Dominic Williams

Emissions Unit	Total Maximum Capacity (lbs/hr)*	Total Maximum Capacity (tons/year)*	Pollutant	Emission Factor Before Controls (lb/ton)**	Potential Emissions Before Controls (lbs/hr)	Potential Emissions Before Controls (tons/yr)	Emission Factor After Controls (lb/ton)**	Potential Emissions After Controls (lbs/hr)	Potential Emissions After Controls (tons/yr)	Limited Potential Emissions*** (lbs/hr)	Limited Potential Emissions*** (tons/yr)
Continuous Deep Fat Fryer (EU-02) (CF-01)	1,500	6,570	PM	1.60	1.20	5.26	0.7	0.53	2.30	0.72	3.15
	1,500	6,570	PM10/PM2.5	1.99	1.49	6.54	0.98	0.74	3.22	0.90	3.92
	1,500	6,570	VOC	0.02	0.02	0.07	0.02	0.02	0.07	0.02	0.07
Continuous Deep Fat Fryers (EU-02) (CF-02, and CF-03)	5,200	22,776	PM	1.60	4.16	18.22	0.7	1.82	7.97	2.50	10.93
	5,200	22,776	PM10/PM2.5	1.99	5.17	22.66	0.98	2.55	11.16	3.10	13.60
	5,200	22,776	VOC	0.02	0.05	0.23	0.02	0.05	0.23	0.05	0.23

Total PM=	5.36	23.48		2.35	10.27	3.22	14.09
Total PM10/PM2.5=	6.67	29.20		3.28	14.38	4.00	17.52
Total VOC=	0.07	0.29		0.07	0.29	0.07	0.29

*Maximum Capacity = weight of finished product. Each of the Continuous Deep Fat Fryers (EU-02) (CF-02, and CF-03) has a maximum capacity of 2,600 lbs/hr of finished chips.

**PM/PM10 emission factors are from AP-42 9.13.3, SCC 3-02-036-01. PM10 assumed to be filterable and condensable PM combined. There are no PM2.5 emission factors for fryers in AP-42. Therefore, PM2.5 is assumed to be equal to PM10. All emission factors in lb/ton of finished product.

***Limited Potential Emissions have been conservatively estimated using a PM/PM10/PM2.5 control efficiency of 40%.

Methodology

Total Maximum Capacity (tons/year) = Total Maximum Capacity (lbs/hr) * (ton/2000 lbs)
 Potential Emissions Before Controls (lbs/hr) = Total Maximum Capacity (lbs/hr) x Emission Factor Before Controls (lb/ton) * (ton/2000 lbs)
 Potential Emissions Before Controls (tons/yr) = Potential Emissions Before Controls (lbs/hr) * (8760 hours/yr) * (ton/2000 lbs)
 Potential Emissions After Controls (lbs/hr) = Total Maximum Capacity (lbs/hr) x Emission Factor After Controls (lb/ton) * (ton/2000 lbs)
 Potential Emissions After Controls (tons/yr) = Potential Emissions After Controls (lbs/hr) * (8760 hours/yr) * (ton/2000 lbs)

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

Emission Unit	PTE PM before controls (lbs/hr)	Subject to 326 IAC 6-3-2?	Process Weight Rate (lbs/hr)*	Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable PM Limit (lbs/hr)	PTE PM after controls (lbs/hr)	Able to Comply with 326 IAC 6-3-2?
Continuous Deep Fat Fryer (EU-02) (CF-01)	1.20	Yes, 0.551 lbs/hr	5350	2.68	7.93	0.53	Yes
Continuous Deep Fat Fryers (EU-02) (CF-02, and CF-03)	4.16	Yes, 0.551 lbs/hr	17340	8.67	17.43	1.82	Yes

Methodology

*Pursuant to 326 IAC 1-2-59, "Process weight" is defined as the total weight of all materials introduced into any source operation. For this source the materials introduced to the operation consist of raw unprocessed potatoes for CF-02 and CF-03; and hummus, ancient grains, and rice and beans for CF-01. Process Weight Rates were provided by the source.

Process Weight Rate (tons/hr) = Process Weight Rate (lbs/hr) * (ton/2000 lbs)

326 IAC 6-3-2 Allowable PM Limit (lbs/hr)

When the process weight rate is less than one hundred (100) pounds per hour, the allowable rate of emission is five hundred fifty-one thousandths (0.551) pound per hour. Emission limitations for process weight rates up to sixty thousand pounds per hour shall be calculated with the following equation:

$$E \text{ (lb/hr)} = 4.10 P^{0.67}$$

Emission limitations for process weight rates greater than sixty thousand pounds per hour shall be calculated with the following equation:

$$E \text{ (lb/hr)} = 55.0 P^{0.11} - 40$$

Where: E = Rate of emission in pounds per hour
 P = Process Weight Rate in tons per hour

**Appendix A: Emissions Calculations
Batch Fryers
BF-01 through BF-04**

Company Name: Inventure Foods
Source Address: 705 West Dustman Road, Bluffton, IN 46714
Permit Number: F179-37075-00045
Reviewer: Dominic Williams

Emission Factor Development

Emissions Unit	Pollutant	AP 42 Controlled Emission Factor (lb/ton)*	Efficiency of AP 42 Control Device**	AP 42 Uncontrolled Emission Factor (lb/ton)*
Batch Fryers (EU-06) (BF-01 through BF-04)	PM	1.8	90%	18
	PM10/PM2.5	3.4	90%	34

Methodology

*PM/PM10 emission factors are from AP-42 9.13.3, SCC 3-02-036-01. The AP-42 factor for Batch Fryers is for controlled emissions using a hood scrubber as a control device. PM10 assumed to be filterable and condensable PM combined. There are no PM2.5 emission factors for fryers in AP-42. Therefore, PM2.5 is assumed to be equal to PM10. All emission factors in lb/ton of chips produced.

**Control efficiency of Batch Fryer hood scrubbers was assumed to be 90%

AP-42 Uncontrolled Emission Factor (lb/ton) = AP-42 Controlled Emission Factor (lb/ton) / (1 - Control Efficiency)

Potential to Emit

Emissions Unit	Total Maximum Capacity (lbs/hr)**	Total Maximum Capacity (tons/year)**	Pollutant	AP 42 Uncontrolled Emission Factor (lb/ton)*	Uncontrolled Potential Emissions (lbs/hr)	Uncontrolled Potential Emissions (tons/yr)	Control Efficiency Provided by the Source***	Controlled Potential Emissions (lbs/hr)	Controlled Potential Emissions (tons/yr)	Limited Potential Emissions*** (lbs/hr)	Limited Potential Emissions*** (tons/yr)
Batch Fryers (EU-06) (BF-01 through BF-04)	1,140	4,993	PM	18	10.26	44.94	75%	2.57	11.23	6.16	26.96
	1,140	4,993	PM10/PM2.5	34	19.38	84.88	75%	4.85	21.22	11.63	50.93
	1,140	4,993	VOC	0.02	0.01	0.05	0%	0.01	0.05	0.01	0.05
				Total PM=	10.26	44.94		2.57	11.23	6.16	26.96
				Total PM10/PM2.5=	19.38	84.88		4.85	21.22	11.63	50.93
				Total VOC=	0.01	0.05		0.01	0.05	0.01	0.05

*PM/PM10 emission factors are from AP-42 9.13.3, SCC 3-02-036-01. PM10 assumed to be filterable and condensable PM combined. There are no PM2.5 emission factors for fryers in AP-42. Therefore, PM2.5 is assumed to be equal to PM10. All emission factors in lb/ton of finished product.

**Total Maximum Capacity = weight of finished product. Each of the four (4) batch fryers (BF-01 through BF-04) has a maximum capacity of 285 lbs/hr of finished chips.

***Batch fryers use a standard mesh pad oil mist eliminator, with control efficiency for PM/PM10/PM2.5 of 75%.

****Limited Potential Emissions have been conservatively estimated using a PM/PM10/PM2.5 control efficiency of 40%.

Methodology

Total Maximum Capacity (tons/year) = Total Maximum Capacity (lbs/hr) * (ton/2000 lbs)

Potential Emissions Before Controls (lbs/hr) = Total Maximum Capacity (lbs/hr) x Emission Factor Before Controls (lb/ton) * (ton/2000 lbs)

Potential Emissions Before Controls (tons/yr) = Potential Emissions Before Controls (lbs/hr) * (8760 hours/yr) * (ton/2000 lbs)

Potential Emissions After Controls (lbs/hr) = Potential Emissions Before Controls (lbs/hr) * (1 - Control Efficiency)

Potential Emissions After Controls (tons/yr) = Potential Emissions After Controls (lbs/hr) * (8760 hours/yr) * (ton/2000 lbs)

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

Emission Unit	PTE PM before controls (lbs/hr)	Subject to 326 IAC 6-3-2?	Process Weight Rate (lbs/hr)	Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable PM Limit (lbs/hr)	PTE PM after controls (lbs/hr)	Able to Comply with 326 IAC 6-3-2?
Batch Fryers (EU-06) (BF-01 through BF-04)	10.26	Yes, 0.551 lbs/hr	1200	0.60	2.91	2.57	Yes, with control

Methodology

Process Weight Rate, provided by the source, include the weight of raw, unprocessed potatoes.

Process Weight Rate (tons/hr) = Process Weight Rate (lbs/hr) * (ton/2000 lbs)

326 IAC 6-3-2 Allowable PM Limit (lbs/hr)

When the process weight rate is less than one hundred (100) pounds per hour, the allowable rate of emission is five hundred fifty-one thousandths (0.551) pound per hour.

Emission limitations for process weight rates up to sixty thousand pounds per hour shall be calculated with the following equation:

$$E \text{ (lb/hr)} = 4.10 P^{0.67}$$

Emission limitations for process weight rates greater than sixty thousand pounds per hour shall be calculated with the following equation:

$$E \text{ (lb/hr)} = 55.0 P^{0.11} - 40$$

Where: E = Rate of emission in pounds per hour
P = Process Weight Rate in tons per hour

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

Company Name: Inventure Foods
Source Address: 705 West Dustman Road, Bluffton, IN 46714
Permit Number: F179-37075-00045
Reviewer: Dominic Williams

Unit ID	Number of Units	Maximum Capacity (Each) MMBtu/hr	Maximum Capacity (Total) MMBtu/hr	Maximum Capacity (Total) MMBtu/hr
Boilers B-1 through B-3 (EU-01)	3	0.636	1.908	1.908
Boiler (B-01)	1	0.5	0.5	0.5
Continuous Fryers CF-01 through CF-03 (EU-02)	3	3.2	9.6	9.6
Batch Fryers BF-01 through BF-04 (EU-06)	4	1.5	6	6
Twenty (20) Dryers D-1 and D-2 (EU-03)	2	1.5	3	10
Natural Gas-Fired Units Ovens O-1 and O-2 (EU-04)	2	1.5	3	
16 Space Heaters (EU-05)	16	0.25	4	
Total:			28.008	

Total Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
28.01	1020	240.5

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Potential Emission in tons/yr	1.9	7.6	7.6	0.6	100 **see below	5.5	84
	0.23	0.91	0.91	0.07	12.03	0.66	10.10

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

Methodology

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

Hazardous Air Pollutants (HAPs)

Emission Factor in lb/MMCF	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Potential Emission in tons/yr	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	0.23
	2.5E-04	1.4E-04	9.0E-03	0.22	4.1E-04	

Emission Factor in lb/MMCF	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Potential Emission in tons/yr	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	6.6E-04
	6.0E-05	1.3E-04	1.7E-04	4.6E-05	2.5E-04	

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

Total HAPs	0.23
Worst HAP	0.22

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

**Appendix A: Emissions Calculations
Seasoners and Grain Handling
(SEA-01 through SEA-05)**

Company Name: Inventure Foods
Source Address: 705 West Dustman Road, Bluffton, IN 46714
Permit Number: F179-37075-00045
Reviewer: Dominic Williams

Seasoners

Emission Unit	Maximum Seasoning Capacity per Seasoner (lbs/hr)*	Maximum Seasoning Capacity per Seasoner (tons/yr)	Process Weight Rate (lbs/hr)	Emission Factor**	Uncontrolled PM/PM10/PM2.5 Emissions (lb/hr)	Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr)
Each Seasoner	0.845	3.700	0.84	1.00%	0.01	0.04
5 Seasoners (SEA-01 through SEA-05)	4.224	18.500			0.04	0.18

Methodology

Maximum Seasoning Capacity per Seasoner (tons/yr) = Maximum Seasoning Capacity per Seasoner (lbs/hr) * (ton/2000 lbs) * (8760 hours/yr)

PM/PM10/PM2.5 Uncontrolled Emissions (lb/hr) = Maximum Seasoning Capacity per Seasoner (lbs/hr) x Emission Factor (%)

Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr) = Uncontrolled PM/PM10/PM2.5 Emissions (lbs/hr) * (8760 hours/yr) * (ton/2000 lbs)

Maximum Seasoning Capacity of 5 Seasoners = 5 * Maximum Seasoning Capacity per Seasoner

PM/PM10/PM2.5 Uncontrolled Emissions of 5 Seasoners = 5 * PM/PM10/PM2.5 Uncontrolled Emissions of Each Seasoner

PM/PM10 emissions for seasoners submitted by source.

PM2.5 is assumed to be equal to PM10.

*Maximum Seasoning Capacity provided by the source. Based on 9% seasoning rate for maximum chip throughput of 1000 lbs/hr.

**Assumes a 1% seasoning emission rate based on total estimated seasoning used (50% of product seasoned at 9% of total weight)

Grain Handling

Emission Unit	Maximum Capacity (lbs/hr)	Maximum Capacity (tons/year)	PM Emission Factor (lb/ton)	PM10 Emission Factor (lb/ton)	PM2.5 Emission Factor (lb/ton)	Uncontrolled PM Emissions (tons/year)	Uncontrolled PM10 Emissions (tons/year)	Uncontrolled PM2.5 Emissions (tons/year)
Grain Handling	493.15	2160.00	0.061	0.034	0.0058	0.066	0.037	0.006

PM/PM10/PM2.5 emission factors are from AP-42 9.9.1-1, SCC 3-02-005-30.

Methodology

Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr) = Maximum Capacity (tons/year) * PM/PM10/PM2.5 Emission Factor (lbs/ton) * (ton/2000 lbs)

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

Company Name: Inventure Foods
Source Address: 705 West Dustman Road, Bluffton, IN 46714
Permit Number: F179-37075-00045
Reviewer: Dominic Williams

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)
Vehicle (entering plant) (one-way trip)	30.0	1.0	30.0	10.0	300.0	1000	0.189	5.7	2073.9
Vehicle (leaving plant) (one-way trip)	30.0	1.0	30.0	10.0	300.0	1000	0.189	5.7	2073.9
Totals			60.0		600.0			11.4	4147.7

Average Vehicle Weight Per Trip =

10.0	tons/trip
------	-----------

Average Miles Per Trip =

0.19	miles/trip
------	------------

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	10.0	10.0	10.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

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

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
where p =

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

N =

365	days per year
-----	---------------

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	0.911	0.182	0.0447	lb/mile
Mitigated Emission Factor, $E_{ext} =$	0.833	0.167	0.0409	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.94	0.19	0.05	0.86	0.17	0.04
Vehicle (leaving plant) (one-way trip)	0.94	0.19	0.05	0.86	0.17	0.04
Totals	1.89	0.38	0.09	1.73	0.35	0.08

Methodology

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

Abbreviations

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



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 23, 2016

Mr. Steve Petty
Maintenance Manager
Inventure Foods
705 West Dustman Road
Bluffton, Indiana 46714

Re: Public Notice
Inventure Foods
Permit Level: FESOP – New Source
Permit Number: 179-37075-00045

Dear Mr. Petty:

Enclosed is a copy of your draft FESOP – New Source, 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 Bluffton News Banner in Bluffton, Indiana publish the abbreviated version of the public notice no later than August 25, 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 Wells County Public Library, 200 West Washington Street in Bluffton, Indiana 46714. 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 Dominic Williams, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-6555 or dial (317) 234-6555.

Sincerely,

Vicki Biddle

Vicki Biddle
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 23, 2016

Bluffton News Banner
P. O. Box 436
Bluffton, Indiana 46714

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Inventure Foods, Wells 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 Thursday, August 25, 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 Vicki Biddle at 800-451-6027 and ask for extension 3-6867 or dial 317-233-6867.

Sincerely,

Vicki Biddle

Vicki Biddle
Permit Branch
Office of Air Quality

Permit Level: FESOP – New Source
Permit Number: 179-37075-00045

Enclosure

PN Newspaper.dot 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 23, 2016

To: Well County Public Library

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

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

Applicant Name: Inventure Foods
Permit Number: 179-37075-00045

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



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

August 23, 2016
Inventure Foods
179-37075-00045

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	VBIDDLE 8/23/2016 Inventure Foods 179-37075-00045 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		Steve Petty Inventure Foods 705 W Dustman Rd Bluffton IN 46714 (Source CAATS)										
2		Adam Johnson Plant Director Inventure Foods 705 W Dustman Rd Bluffton IN 46714 (RO CAATS)										
3		Wells County Health Department 223 W. Washington St Bluffton IN 46714-1955 (Health Department)										
4		Wells County Public Library 200 W. Washington St Bluffton IN 46714-1999 (Library)										
5		Ms. Joy Haney 5285 East 400 South Columbia City IN 46725 (Affected Party)										
6		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 (Affected Party)										
7		Mrs. Tera Fredrickson 4860 W 900 S--90 Montpelier IN 47359-9559 (Affected Party)										
8		Mr. Christina Furnish 7539 W 1100 S--90 Montpelier IN 47359 (Affected Party)										
9		Dr. James Rybarczyk 9815 N. CR. 300 E. Muncie IN 47303 (Affected Party)										
10		Mr. Kevin E. Jackson 7858 South 450 West Poneto IN 46781 (Affected Party)										
11		Mr. Neil Potter Southern Wells Community Schools 9120 S 300 W Poneto IN 46781 (Affected Party)										
12		Mrs. Donna Runkle 7327 W 1000 S--90 Warren IN 46792 (Affected Party)										
13		Wells County Board of Commissioners 105 W Market Street, Suite 205, Courthouse Bluffton IN 46714 (Local Official)										
14		Mr. Jason Morrison SevenGen 604 West Wayne Street Fort Wayne IN 46802 (Consultant)										
15		Mr. Ted Smith Bluffton City Executive 223 W. Washington St. (Courthouse Annex) Bluffton IN 46714 (Local Agency)										

Total number of pieces Listed by Sender 15	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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Mail Code 61-53

IDEM Staff	VBIDDLE 8/23/2016 Inventure Foods		179-37075-00045	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		Ted Mayor City of Bluffton 128 E. Market St. Bluffton IN 46714 (Local Official)										
2		Paul J & Lula Reiff 2545 SE State Road 116 Bluffton IN 46714 (Affected Party)										
3		Mr. Seth Fiechter 525 W. Dustman Road Bluffton IN 46714 (Affected Party)										
4		Keith W. & Bev Ellerbrock 511 W. Dustman Road Bluffton IN 46714 (Affected Party)										
5		Trinity Properties 2450 E. Terrance Drive Bluffton IN 46714 (Affected Party)										
6		Ms. Marjorie A. King 609 W. Dustman Road Bluffton IN 46714 (Affected Party)										
7												
8												
9												
10												
11												
12												
13												
14												
15												

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