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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Modification to a
Part 70 Operating Permit Renewal

for Holsum of Fort Wayne, Inc. in LaPorte County

Significant Source Modification No.: 091-40293-00106
Significant Permit Modification No.: 091-40524-00106

The Indiana Department of Environmental Management (IDEM) has received an application from Holsum Fort Wayne, Inc., located at 800 Boyd Boulevard, LaPorte, Indiana 46350, for a significant modification of its Part 70 Operating Permit Renewal issued on July 15, 2015. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Holsum of Fort Wayne, Inc. to make certain changes at its existing source. Holsum of Fort Wayne, Inc. has applied to modify work practice standards for the bread production line and to replace two mixers within the bread dough dry ingredient closed conveyance system.

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

IDEM is aware that the two mixers have been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft SSM and SPM 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:

LaPorte County Public Library
904 Indiana Avenue
LaPorte, IN 46350

and

IDEM Northwest Regional Office
330 W. US Highway 30, Suites E & F
Valparaiso, IN 46385

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

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM 091-40293-00106 and SPM091-40524-00106 in all correspondence.

Comments should be sent to:

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

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

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

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

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality

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Governor

Bruno L. Pigott
Commissioner

DRAFT

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

Re: 091-40524-00106
Significant Permit Modification

Dear Mr. Renock:

Holsum of Fort Wayne, Inc. was issued Part 70 Operating Permit Renewal No. T091-33988-00106 on July 15, 2015 for a stationary bakery plant located at 800 Boyd Boulevard, LaPorte, Indiana 46350. An application requesting changes to this permit was received on August 7, 2018. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachment(s). Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

Attachment A: 40 CFR 60, Subpart JJJJ, NSPS for Stationary Spark Ignition Internal Combustion Engines
Attachment B: 40 CFR 63, Subpart ZZZZ, NESHAP for Stationary Reciprocating Internal Combustion Engines

Previously issued approvals for this source containing these attachments are available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

Previously issued approvals for this source are also available via IDEM's Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the permit is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

DRAFT

If you have any questions regarding this matter, please contact Tamera Wessel, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-8530 or (800) 451-6027, and ask for Tamera Wessel.

Sincerely,

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document
cc: File - LaPorte County
LaPorte County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northwest Regional Office

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DRAFT

Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Holsum of Fort Wayne, Inc.
800 Boyd Boulevard
LaPorte, Indiana 46350

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T091-33988-00106 Master Agency Interest ID.: 30937	
Issued by: Original signed by: Jason R. Krawczyk, Section Chief Permits Branch, Office of Air Quality	Issuance Date: July 15, 2015 Expiration Date: July 15, 2020

First Significant Permit Modification No. 091-38010-00106, issued on May 11, 2017.

First Significant Permit Modification No.: 091-40524-00106	
Issued by: Heath Hartley, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: July 15, 2020

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Attachment A: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines [40 CFR 60, Subpart JJJJ]

Attachment B: National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary bakery plant.

Source Address:	800 Boyd Boulevard, LaPorte, Indiana 46350
General Source Phone Number:	812-425-4642
SIC Code:	2051 (Bread and Other Bakery Products, Except Cookies and Crackers)
County Location:	LaPorte
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

(a) One (1) bun production line, constructed in 1969, with a maximum production rate of 5,400 pounds per hour of bread and buns, consisting of the following:

(1) One (1) natural gas-fired oven, identified as BNO, approved in 2017 for construction, with a maximum heat input capacity of 5.18 MMBtu per hour, exhausting to Stacks 1 and 2.

(2) One (1) proof box, identified as BNP, constructed in 2005.

(b) One (1) bread production line with a maximum production rate of 15,862 pounds per hour of bread, consisting of the following:

(1) One (1) natural gas-fired oven, identified as BD2, constructed in 2005, with a maximum heat input capacity of 7.82 MMBtu per hour, exhausting to Stacks 3 and 4.

(2) One (1) proof box, identified as BDP, constructed in 1999.

(c) Six (6) flour silos, each having a capacity of 150,000 pounds, with integral/inherent fabric bag filters for equalizing pressure on top of each silo, exhausting inside the building.

(d) One (1) bun dough dry ingredient closed conveyance system, exhausting indoors, including: pneumatic conveyance process equipment and piping, use bins, weigh scale, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2014. The conveyance system includes the following emission units:

(1) Two (2) flour scale bins, identified as BNS1 and BNS2, each with a capacity of 3,600 pounds per hour, each equipped with sock filters for control of particulate matter emissions;

(2) One (1) bag breaker, identified as BNBB, with a capacity of 300 pounds per hour, equipped with sock filters for control of particulate matter emissions;

(3) One (1) mixer, constructed in 2013, identified as BNM, with a capacity of 6,000 pounds per hour, equipped with sock filters for control of particulate matter emissions;

(4) Two (2) manual weigh stations, identified as BNWS1 and BNWS2, each with a capacity of 1,800 pounds per hour;

(5) One (1) flour use bin, identified as BNFU, with a capacity of 3,600 pounds per hour, equipped with Torrit vacuum filters for control of particulate matter emissions;

(6) One (1) flour station, identified as BNF, with a capacity of 120 pounds per hour; equipped with sock filters for control of particulate matter emissions, and

(7) One (1) depanner, identified as BNDP, with a capacity of 4,657 pounds per hour, equipped with Torrit vacuum filters for control of particulate matter emissions.

(e) One (1) bread dough dry ingredient closed conveyance system, exhausting indoors, including: pneumatic conveyance process equipment and piping, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2014. The conveyance system includes the following emission units:

(1) Three (3) flour scale bins, installed in 2006, identified as BFC1, BFC2, and BFC3, each with a capacity of 4,500 pounds, equipped with a fabric bag filter for control of particulate matter emissions;

(2) Two (2) flour use bins, installed in 2000, identified as BDFU1 and BDFU2, each with a capacity of 4,500 pounds per hour, equipped with Torrit vacuum filters for control of particulate matter emissions;

(3) Two (2) manual weigh stations, installed in 2013, identified as BWS1 and BWS2, each with a capacity of 4,320 pounds per hour;

(4) One (1) bag breaker, identified as BB1A, with a capacity of 1,200 pounds per hour, equipped with sock filters for control of particulate matter emissions;

(5) Two (2) mixers, permitted in 2018, identified as BM1 and BM2, each with a capacity of 6,000 pounds, equipped with a fabric bag filter for control of particulate matter emissions;

(6) One (1) flour station, installed in 1969, identified as BFS1, with a capacity of 120 pounds per hour, equipped with sock filters for control of particulate matter emissions;

(7) One (1) depanner, identified as BDDP, with a capacity of 12,000 pounds per hour, equipped with Torrit vacuum filters for control of particulate matter emissions; and

(8) Two (2) sifters, identified as SF1 and SF2, each with a capacity of 14,000 pounds per hour and using Torrit vacuum filters as control.

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

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

(1) One (1) natural gas fired boiler, identified as B1, constructed in 2001, with a maximum heat capacity of 2.9 MMBtu per hour.

(2) One (1) natural gas fired boiler, identified as B2, constructed in 1980, with a maximum heat capacity of 5.4 MMBtu per hour.

(3) One (1) natural gas-fired water heater, constructed in 2009, rated at 0.40 MMBtu per hour.

(4) Thirteen (13) space heaters with a combined maximum heat capacity of 4.13 MMBtu per hour.

(b) Paved and unpaved roads and parking lots with public access.

(c) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs less than twelve thousand (12,000) gallons.

(d) Vessels storing lubricating oils.

(e) Noncontact cooling tower systems with forced and induced draft cooling tower systems not regulated under a NESHAP.

(f) Repair activities, including the following:

(1) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(2) Heat exchanger cleaning and repair.

(g) One (1) gasoline-fired emergency generator, rated at ten (10) horsepower, constructed in November 2008.

Under NSPS JJJJ, this unit is considered an affected facility.
Under NESHAP ZZZZ, this unit is considered an affected source

(h) One (1) natural gas-fired emergency generator, identified as EG1, rated at one hundred ninety (190) horsepower, constructed in 2017.

Under NSPS JJJJ, this unit is considered an affected facility.
Under NESHAP ZZZZ, this unit is considered an affected source.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, T091-33988-00106, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

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

B.4 Enforceability [326 IAC 2-7-7][IC 13-17-12]

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

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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

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

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northwest Regional Office phone: (219) 464-0233; fax: (219) 464-0553**.**

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T091-33988-00106 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or

anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(1) That this permit contains a material mistake.

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

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes

final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

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

Testing Requirements [326 IAC 2-7-6(1)]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

Indianapolis, Indiana 46204-2251

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(11)][40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]

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

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

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:

(1) starting in 2004 and every three (3) years thereafter, and

(2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.

(b) The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

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

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

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

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a

"responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

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

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) bun production line, constructed in 1969, with a maximum production rate of 5,400 pounds per hour of bread and buns, consisting of the following:

(1) One (1) natural gas-fired oven, identified as BNO, approved in 2017 for construction, with a maximum heat input capacity of 5.18 MMBtu per hour, exhausting to Stacks 1 and 2.

(2) One (1) proof box, identified as BNP, constructed in 2005.

(b) One (1) bread production line with a maximum production rate of 15,862 pounds per hour of bread, consisting of the following:

(1) One (1) natural gas-fired oven, identified as BD2, constructed in 2005, with a maximum heat input capacity of 7.82 MMBtu per hour, exhausting to Stacks 3 and 4.

(2) One (1) proof box, identified as BDP, constructed in 1999.

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

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

D.1.1 BACT Requirements (VOC) [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and SSM No. 091-34059-00106, BACT has been determined to be the following for the Bread Production Line:

(1) VOC emissions from the bread production line, consisting of the natural gas-fired oven, identified as BD2, and the proof box, identified as BDP, shall not exceed 70.0 tons per twelve (12) consecutive month period.

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

(3) In order to ensure proper operation and to minimize potential emissions, the source shall perform proof box cleaning operations for the proof box (BDP), on a tiered cleaning schedule and perform at a minimum, the following operations, or their equivalent, in accordance with their Sanitation Standard Operating Procedure:

(A) Daily Procedure:

(i) Inspect the proof box once per day of operation for waste dough and other materials. To the extent possible, without interrupting the proof box operational temperature and/or without contamination of product, remove the dough/other materials.
(ii) Document the daily inspection on a log sheet.

(B) Weekly Cleaning Procedure:

(i) Remove all bread pans.
(ii) Check and clean all areas over the food path.
(iii) Scrape dough from conveyor, grids, supports, roller, and bars. Wipe down walls as necessary to remove any debris.
(iv) Scrape all dough from floor and curbing.
(v) Sweep proof box floor. Put sweepings in covered bucket.
(vi) Wet entire floor and then rinse.
(vii) Scrape dough from bread pans and put into inedibles cart.

(C) Monthly Cleaning Procedure

(i) Remove all raw ingredients and product containers from the area.
(ii) Remove all bread pans.
(iii) Scrape dough from conveyor, grids, and supports.
(iv) Scrape all dough from floor.
(v) Sweep proof box floor. Put sweepings in bucket. Empty bucket into inedibles cart.
(vi) Wet entire floor and then rinse.
(vii) Scrape dough from bread pans and put into inedibles.
(viii) Vacuum. Move equipment and repeat procedure on remaining sides of proof box top.
(ix) Wash top with Lift Off.
(x) Put all equipment away in proper locations.
(xi) Rinse exterior of box with water.
(xii) Wash with Lift Off. Let stand 15 minutes and rinse with water.
(xiii) Wet mop floor.

(D) Twice Per Year (After Step (v) of Monthly Cleaning)

(i) Wash down the interior walls in small sections and rinse.
(ii) Continue with item (vi) in monthly Cleaning Procedure.

(b) Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and SSM No. 091-37989-00106, BACT has been determined to be the following for the Bun Baking Oven:

(1) VOC emissions from the bun baking oven, identified as BNO, shall not exceed 58.07 tons per twelve (12) consecutive month period.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.1.3 Volatile Organic Compounds

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

$$\text{VOC} = \sum_{m=1}^{12}\left(1.1x\left(\sum_{i=1}^{n} \frac{E_i * B_i}{2000lb/ton} \right) + 0.0154 \right)_m$$

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

Note: In the equation above, the monthly VOC emissions from the proof box (BDP) are assumed to be 10% of the VOC emissions from the oven (BD2); therefore the oven VOC emissions are multiplied by a factor of 1.1.

Note: In the equation above, the factor of 0.0154 tons/month represents the maximum monthly VOC emissions from combustion of natural gas in BD2 at the maximum heat input capacity of 7.82 MMBtu/hr and using the AP-42 emission factor of 5.5 lb/MMCF.

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

$E_i = 0.95Yi + 0.195ti - 0.51S - 0.86ts + 1.90$

Where:
E_i = The VOC emission factor for type i dough (lb of VOC/ton of dough);
Yi = Initial baker's percent of yeast;
ti = Total yeast action time in hours;
S = Final (spike) baker's percent of yeast; and
ts = Spiking time in hours.

D.1.4 Volatile Organic Compounds

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

$$\text{VOC} = \sum_{m=1}^{12}\left(\left(\sum_{i=1}^{n} \frac{E_i * B_i}{2000 lb/ton} \right) + 0.0102 \right)_m$$

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

Note: In the equation above, the factor of 0.0102 tons/month represents the maximum monthly VOC emissions from combustion of natural gas in BNO at the maximum heat input capacity of 5.18 MMBtu/hr and using the AP-42 emission factor of 5.5 lb/MMCF.

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

$E_i = 0.95Yi + 0.195ti - 0.51S - 0.86ts + 1.90$

Where:
E_i = The VOC emission factor for type i dough (lb of VOC/ton of dough);
Yi = Initial baker's percent of yeast;
ti = Total yeast action time in hours;

S = Final (spike) baker's percent of yeast; and
ts = Spiking time in hours.

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

D.1.5 Record Keeping Requirements

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

(1) The dates of the compliance period:

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

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

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

(B) The total yeast action time in hours;

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

(D) The spiking time in hours.

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

(b) In order to assure compliance with Conditions D.1.1(a)(3), the Permittee shall maintain records of the dates and results of the inspections required under Condition D. 1.1(a)(3). The Permittee shall include in its daily record when waste dough is not removed and the reason for waste dough not being removed (e.g. waste dough not present or operations could not be disrupted).

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

D.1.6 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1(a) and D.1.1(b) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reports required by this condition. The reports submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(c) Six (6) flour silos, each having a capacity of 150,000 pounds, with integral/inherent fabric bag filters for equalizing pressure on top of each silo, exhausting inside the building.

(d) One (1) bun dough dry ingredient closed conveyance system, exhausting indoors, including: pneumatic conveyance process equipment and piping, use bins, weigh scale, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2014. The conveyance system includes the following emission units:

(1) Two (2) flour scale bins, identified as BNS1 and BNS2, each with a capacity of 3,600 pounds per hour, each equipped with sock filters for control of particulate matter emissions;

(2) One (1) bag breaker, identified as BNBB, with a capacity of 300 pounds per hour, equipped with sock filters for control of particulate matter emissions;

(3) One (1) mixer, constructed in 2013, identified as BNM, with a capacity of 6,000 pounds per hour, equipped with sock filters for control of particulate matter emissions;

(4) Two (2) manual weigh stations, identified as BNWS1 and BNWS2, each with a capacity of 1,800 pounds per hour;

(5) One (1) flour use bin, identified as BNFU, with a capacity of 3,600 pounds per hour, equipped with Torrit vacuum filters for control of particulate matter emissions;

(6) One (1) flour station, identified as BNF, with a capacity of 120 pounds per hour; equipped with sock filters for control of particulate matter emissions, and

(7) One (1) depanner, identified as BNDP, with a capacity of 4,657 pounds per hour, equipped with Torrit vacuum filters for control of particulate matter emissions.

(e) One (1) bread dough dry ingredient closed conveyance system, exhausting indoors, including: pneumatic conveyance process equipment and piping, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2014. The conveyance system includes the following emission units:

(1) Three (3) flour scale bins, installed in 2006, identified as BFC1, BFC2, and BFC3, each with a capacity of 4,500 pounds, equipped with a fabric bag filter for control of particulate matter emissions;

(2) Two (2) flour use bins, installed in 2000, identified as BDFU1 and BDFU2, each with a capacity of 4,500 pounds per hour, equipped with Torrit vacuum filters for control of particulate matter emissions;

(3) Two (2) manual weigh stations, installed in 2013, identified as BWS1 and BWS2, each with a capacity of 4,320 pounds per hour;

(4) One (1) bag breaker, identified as BB1A, with a capacity of 1,200 pounds per hour, equipped with sock filters for control of particulate matter emissions;

(5) Two (2) mixers, permitted in 2018, identified as BM1 and BM2, each with a capacity of 6,000 pounds, equipped with a fabric bag filter for control of particulate matter emissions;

(6) One (1) flour station, installed in 1969, identified as BFS1, with a capacity of 120 pounds per hour, equipped with sock filters for control of particulate matter emissions;

(7) One (1) depanner, identified as BDDP, with a capacity of 12,000 pounds per hour, equipped with Torrit vacuum filters for control of particulate matter emissions; and

(8) Two (2) sifters, identified as SF1 and SF2, each with a capacity of 14,000 pounds per hour and using Torrit vacuum filters as control.

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

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

D.2.1 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the PM, PM_{10}, and $PM_{2.5}$ emissions from the following operations shall not exceed the emission limits listed in the table below:

Emission Unit	Control Device	PM Limit (lbs/hr)	PM_{10} (lbs/hr)	$PM_{2.5}$ (lbs/hr)
Six (6) Flour Silos Loading	Fabric Bag Filters	1.41 (each)	0.50 (each)	0.50 (each)
Six (6) Flour Silos Conveyance	Fabric Bag Filters	4.40 (each)	1.54 (each)	1.54 (each)
Two (2) Flour Sifters SF1, SF2	Torrit Vacuum Filters	4.40 (each)	1.54 (each)	1.54 (each)
Bun Production Line				
Flour Scale Bin - BNS1	Sock Filter	1.13	0.40	0.40
Flour Use Bin - BNFU	Torrit Vacuum Filters	1.13	0.40	0.40
Flour Scale Bin - BNS2	Sock Filter	1.13	0.40	0.40
Mixer 1 - BNM	Sock Filter	0.34	0.09	0.09
Bread Production Line				
Flour Scale Bin - BFC1	Fabric Bag Filter	1.41	0.50	0.50
Flour Scale Bin - BFC2	Fabric Bag Filter	1.41	0.50	0.50
Flour Scale Bin - BFC3	Fabric Bag Filter	1.41	0.50	0.50
Flour Use Bin - BDFU1	Torrit Vacuum Filters	1.41	0.50	0.50
Flour Use Bin - BDFU2	Torrit Vacuum Filters	1.41	0.50	0.50
Mixer 1 - BM1	Fabric Bag Filter	0.34	0.09	0.09
Mixer 2 - BM2	Fabric Bag Filter	0.34	0.09	0.09

Compliance with these limits, combined with the potential to emit PM, PM_{10}, and $PM_{2.5}$ from all other emission units at the source, shall limit the PM, PM_{10}, and $PM_{2.5}$ emissions from the entire source to less than 250 tons per twelve (12) consecutive month period for PM, PM_{10}, and $PM_{2.5}$, each. This shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

D.2.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

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

Unit	Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)
Six (6) Flour Silos	7 (each)	15.10 (each)
Two (2) Flour Sifters SF1, SF2	7 (each)	15.10 (each)
Two (2) Flour Use Bins BDFU1, BDFU2	2.25 (each)	7.06 (each)
Three (3) Flour Scale Bins (BFC1, BFC2, BFC3)	2.25 (each)	7.06 (each)
One Flour Use Bin BNFU	1.8	6.08
Two (2) Flour Scale Bins BNS1, BNS2	1.8 (each)	6.08 (each)
Three (3) Mixers BNM, BM1, BM2	3.0 (each)	8.56 (each)

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

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

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

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

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

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

D.2.4 Particulate Control

(a) In order to assure compliance with Conditions D.2.1 and D.2.2, the particulate controls associated with each of the following units, including those integral to the process, shall be in operation and control emissions from the units at all times that the units are in operation:

Emission Unit	Control Device
Six (6) Flour Silos Loading	Fabric Bag Filters
Six (6) Flour Silos Conveyance	Fabric Bag Filters
Two (2) Flour Sifters SF1, SF2	Torrit Vacuum Filters
Flour Scale Bin - BNS1	Sock Filter
Flour Use Bin - BNFU	Torrit Vacuum Filters
Flour Scale Bin - BNS2	Sock Filter
Mixer 1 - BNM	Sock Filter
Flour Scale Bin - BFC1	Fabric Bag Filter
Flour Scale Bin - BFC2	Fabric Bag Filter
Flour Scale Bin - BFC3	Fabric Bag Filter
Flour Use Bin - BDFU1	Torrit Vacuum Filters
Flour Use Bin - BDFU2	Torrit Vacuum Filters
Mixer 1 - BM1	Fabric Bag Filter
Mixer 2 - BM2	Fabric Bag Filter

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

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

D.2.5 Filter Inspections

The Permittee shall perform quarterly inspections of the filters controlling particulate emissions from the dry ingredient storage and conveyance operation to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective filters shall be replaced.

D.2.6 Broken or Failed Bag Detection

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

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

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

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

D.2.7 Record Keeping Requirements

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

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

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

(1) One (1) natural gas fired boiler, identified as B1, constructed in 2001, with a maximum heat capacity of 2.9 MMBtu per hour.

(2) One (1) natural gas fired boiler, identified as B2, constructed in 1980, with a maximum heat capacity of 5.4 MMBtu per hour.

(3) One (1) natural gas-fired water heater, constructed in 2009, rated at 0.40 MMBtu per hour.

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

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

D.3.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e), the PM emissions from the 5.4 MMBtu per hour natural gas fired boiler (B2) shall be limited to six tenths (0.6) pounds per million Btu heat input.

D.3.2 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the 2.9 MMBtu per hour natural gas fired boiler (B1) and 0.40 MMBtu per hour natural gas-fired water heater shall each be limited to six tenths (0.6) pounds per million Btu heat input.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for each of the boilers, B1 and B2, and water heater and any associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

SECTION E.1 NSPS

Emissions Unit Description:

Insignificant Activities:

(g) One (1) gasoline-fired emergency generator, rated at ten (10) horsepower, constructed in November 2008.

Under NSPS JJJJ, this unit is considered an affected facility.
Under NESHAP ZZZZ, this unit is considered an affected source.

(h) One (1) natural gas-fired emergency generator, identified as EG1, rated at one hundred ninety (190) horsepower, constructed in 2017.

Under NSPS JJJJ, this unit is considered an affected facility.
Under NESHAP ZZZZ, this unit is considered an affected source.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR 60, Subpart A]

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 60, Subpart JJJJ.

(b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports 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

E.1.2 Standards of Performance for Stationary Spark Ignition Internal Combustion Engines NSPS [40 CFR 60, Subpart JJJJ]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart JJJJ (included as Attachment A to the operating permit) which are incorporated by reference as 326 IAC 12:

(a) Gasoline-fired emergency generator:

(1) 40 CFR 60.4230(a)(6) and (c)
(2) 40 CFR 60.4235
(3) 40 CFR 60.4236
(4) 40 CFR 60.4245
(5) 40 CFR 60.4246
(6) 40 CFR 60.4248
(7) Table 3

(b) Natural gas-fired emergency generator:

(1) 40 CFR 60.4230(a)(4)(iv)
(2) 40 CFR 60.4233(e)
(3) 40 CFR 60.4237(b)
(4) 40 CFR 60.4243(d)
(5) 40 CFR 60.4245(a), (b), and (c)
(6) 40 CFR 60.4246
(7) 40 CFR 60.4248
(8) Table 1
(9) Table 3

SECTION E.2 NESHAP

Emissions Unit Description:

Insignificant Activities:

(g) One (1) gasoline-fired emergency generator, rated at ten (10) horsepower, constructed in November 2008.

Under NSPS JJJJ, this unit is considered an affected facility.
Under NESHAP ZZZZ, this unit is considered an affected source.

(h) One (1) natural gas-fired emergency generator, identified as EG1, rated at one hundred ninety (190) horsepower, constructed in 2017.

Under NSPS JJJJ, this unit is considered an affected facility.
Under NESHAP ZZZZ, this unit is considered an affected source.

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

National Emissions Standards for Hazardous Air Pollutants (NESHAPs) Requirements [326 IAC 2-7-5(1)]

E.2.1 National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines NESHAP [326 IAC 20-82][40 CFR 63, Subpart ZZZZ]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment B of this permit), except as otherwise specified in 40 CFR Part 63, subpart ZZZZ:

(a) Gasoline-fired emergency generator:

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585
(3) 40 CFR 63.6590(a)(2)(iii) and (c)(1)
(4) 40 CFR 63.6595(a)(7)
(5) 40 CFR 63.6665
(6) 40 CFR 63.6670
(7) 40 CFR 63.6675

(b) Natural gas-fired emergency generator:

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585
(3) 40 CFR 63.6590(a)(2)(iii) and (c)(1)
(4) 40 CFR 63.6595(a)(7)
(5) 40 CFR 63.6665
(6) 40 CFR 63.6670
(7) 40 CFR 63.6675

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

Source Name: Holsum of Fort Wayne, Inc.
Source Address: 800 Boyd Boulevard, LaPorte, Indiana 46350
Part 70 Permit No.: T091-33988-00106

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

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

Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Holsum of Fort Wayne, Inc.
Source Address: 800 Boyd Boulevard, LaPorte, Indiana 46350
Part 70 Permit No.: T091-33988-00106

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

□ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) 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 2-7-16.

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

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

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

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Page 1 of 2

Source Name: Holsum of Fort Wayne, Inc.
Source Address: 800 Boyd Boulevard, LaPorte, Indiana 46350
Part 70 Permit No.: T091-33988-00106
Facility: Bun Production Line
Parameter: VOC
Limit: 58.07 tons per 12 consecutive month period with compliance determined at the end of each month

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

$$\text{VOC} = \sum_{m=1}^{12}\left(\left(\sum_{i=1}^{n} \frac{E_i * B_i}{2000 lb/ton} \right) + 0.0102 \right)_m$$

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

Note: In the equation above, the factor of 0.0102 tons/month represents the maximum monthly VOC emissions from combustion of natural gas in BNO at the maximum heat input capacity of 5.18 MMBtu/hr and using the AP-42 emission factor of 5.5 lb/MMCF.

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

$E_i = 0.95Yi + 0.195ti - 0.51S - 0.86ts + 1.90$

Where:
E_i = The VOC emission factor for type i dough (lb of VOC/ton of dough);
Yi = Initial baker's percent of yeast;
ti = Total yeast action time in hours;
S = Final (spike) baker's percent of yeast; and
ts = Spiking time in hours.

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

Part 70 Quarterly Report

QUARTER : YEAR:

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

□ No deviation occurred in this quarter.

□ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report

Page 1 of 2

Source Name: Holsum of Fort Wayne, Inc.
Source Address: 800 Boyd Boulevard, LaPorte, Indiana 46350
Part 70 Permit No.: T091-33988-00106
Facility: Bread Production Line
Parameter: VOC
Limit: 70 tons per 12 consecutive month period with compliance determined at the end of each month

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

$$\text{VOC} = \sum_{m=1}^{12}\left(1.1x\left(\sum_{i=1}^{n} \frac{E_i * B_i}{2000lb/ton} \right) + 0.0154 \right)_m$$

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

Note: In the equation above, the monthly VOC emissions from the proof box (BDP) are assumed to be 10% of the VOC emissions from the oven (BD2); therefore the oven VOC emissions are multiplied by a factor of 1.1.

Note: In the equation above, the factor of 0.0154 tons/month represents the maximum monthly VOC emissions from combustion of natural gas in BD2 at the maximum heat input capacity of 7.82 MMBtu/hr and using the AP-42 emission factor of 5.5 lb/MMCF.

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

$E_i = 0.95Yi + 0.195ti - 0.51S - 0.86ts + 1.90$

Where:
E_i = The VOC emission factor for type i dough (lb of VOC/ton of dough);
Yi = Initial baker's percent of yeast;
ti = Total yeast action time in hours;
S = Final (spike) baker's percent of yeast; and
ts = Spiking time in hours.

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

Part 70 Quarterly Report

QUARTER : YEAR:

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Holsum of Fort Wayne, Inc.
Source Address: 800 Boyd Boulevard, LaPorte, Indiana 46350
Part 70 Permit No.: T091-33988-00106

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source Modification and Significant Permit Modification

Source Description and Location

Source Name:	**Holsum of Fort Wayne, Inc.**
Source Location:	**800 Boyd Boulevard, LaPorte, Indiana 46350**
County:	**LaPorte**
SIC Code:	**2051 (Bread and Other Bakery Products, Except Cookies and Crackers)**
Operation Permit No.:	**T 091-33988-00106**
Operation Permit Issuance Date:	**July 15, 2015**
Significant Source Modification No.:	**091-40293-00106**
Significant Permit Modification No.:	**091-40524-00106**
Permit Reviewer:	**Tamera Wessel**

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T091-33988-00106 on July 15, 2015. The source has since received the following approvals:

(a) Significant Source Modification No.: 091-34059-00106, issued on June 26, 2015;
(b) Significant Source Modification No.: 091-37989-00106, issued on April 25, 2017; and
(c) Significant Permit Modification No.: 091-38010-00106, issued on May 11, 2017.

County Attainment Status

The source is located in LaPorte 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 November 15, 1990, for the 1-hour 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. LaPorte 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) $PM_{2.5}$
LaPorte County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
LaPorte County has been classified as attainment or unclassifiable in Indiana for all the 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 (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Greenhouse Gas (GHG) Emissions

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

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

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

	Source-Wide Emissions Before Modification (ton/year)								
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NO_X**	**VOC**	**CO**	**Single HAP[1]**	**Combined HAPs**
Total for Source	241.95	85.51	85.51	0.07	11.12	185.37	9.33	5.68	5.75
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--

[1]Single highest source-wide HAP = Acetaldehyde.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25)

tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

(c) These emissions are based on the TSD of Significant Permit Modification No.: 091-38010-00106, issued on May 11, 2017.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Holsum of Fort Wayne, Inc. on August 7, 2018, in response to an inspection summary and violation letter concerning a failure to correctly apply the daily cleaning procedures of the bread line proof box and failure to notify IDEM that two (2) mixers had been replaced within the bread line process. The source has proposed to modify work practice standards for the bread production line, which will require a reopening of the Best Available Control Technology (BACT), and to include the new mixers in this permit modification.

The following is a list of the new emission units:

(a) One (1) bread dough dry ingredient closed conveyance system, exhausting indoors, including: pneumatic conveyance process equipment and piping, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2014. The conveyance system includes the following emission units:

(1) Two (2) mixers, permitted in 2018, identified as BM1 and BM2, each with a capacity of 6,000 pounds, equipped with a fabric bag filter for control of particulate matter emissions;

Enforcement Issues

IDEM is aware that there is a pending enforcement action for failure to correctly apply daily cleaning procedures of the bread line proof box and the construction of two (2) mixers in use with the breadline without notifying IDEM. IDEM is reviewing this matter and will take the appropriate action.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5 and 326 IAC 2-7-11. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has

been determined to be integral, the table reflects the PTE after consideration of the integral control device.

	PTE Before Controls of the New Emission Units (ton/year)								
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NO_X**	**VOC**	**CO**	**Single HAP**	**Combined HAPs**
Mixer 1	7.52	2.05	2.05	-	-	-	-	-	-
Mixer 2	7.52	2.05	2.05	-	-	-	-	-	-
Total:	15.04	4.10	4.10	-	-	-	-	-	-

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

(a) Approval to Construct

Pursuant to 326 IAC 2-7-10.5(g)(2), a Significant Source Modification is required because this modification is subject to 326 IAC 8-1-6.

(b) Approval to Operate

Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification does not qualify as a Minor Permit Modification or as an Administrative Amendment.

Permit Level Determination – PSD

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

	Project Emissions (ton/year)						
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$[1]**	**SO_2**	**NO_X**	**VOC**	**CO**
Mixer 1	1.49	0.39	0.39	-	-	-	-
Mixer 2	1.49	0.39	0.39	-	-	-	-
Total for Modification	2.98	0.79	0.79	-	-	-	-
PSD Major Source Thresholds	250	250	250	250	250	250	250

[1]$PM_{2.5}$ listed is direct $PM_{2.5}$.

(a) This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant is less than the PSD major source threshold. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

		Source-Wide Emissions after Issuance (ton/year)						
Process / Emission Unit		**PM**	**PM_{10}**	**$PM_{2.5}$[1]**	**SO_2**	**NO_X**	**VOC**	**CO**
Silo Loading		37.05	13.14	13.14	0	0	0	0
Ingredient Storage & Handling		204.69	71.53	71.53	0	0	0	0
Bun Line	Proofing	0	0	0	0	0	4.64	0
	Fermentation	0	0	0	0	0	58.07	0
	Natural Gas Combustion	0.04	0.17	0.17	0.01	2.22		1.87
Bread Line	Fermentation	0	0	0	0	0	70.00	0
	Proofing	0	0	0	0	0		0
	Natural Gas Combustion	0.06	0.26	0.26	0.02	3.36		2.82
Insignificant Activities		0.11	0.42	0.42	0.03	5.54	0.34	4.64
Total for Source		241.95	85.51	85.51	0.07	11.12	185.37	9.33
PSD Major Source Thresholds		250	250	250	250	250	250	250

[1]$PM_{2.5}$ listed is direct $PM_{2.5}$.

(a) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the emissions of each PSD regulated pollutant will continue to be less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the modification at this source, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

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

National Emission Standards for Hazardous Air Pollutants (NESHAP):

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

Compliance Assurance Monitoring (CAM):

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

(b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

(c) Pursuant to 40 CFR 64.2(b)(1)(iii), Acid Rain requirements pursuant to Sections 404, 405, 406, 407(a), 407(b), or 410 of the Clean Air Act are exempt emission limitations or standards. Therefore, CAM was not evaluated for emission limitations or standards for SO_2 and NO_X under the Acid Rain Program.

(d) Pursuant to 40 CFR 64.3(d), if a continuous emission monitoring system (CEMS) is required pursuant to other federal or state authority, the owner or operator shall use the CEMS to satisfy the requirements of CAM according to the criteria contained in 40 CFR 64.3(d).

Emission Unit	Pollutant	Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
BM1	PM*	FF	326 IAC 6-3-2 326 IAC 2-2	<100	<100	N [1,2]	
	PM10		326 IAC 2-2	<100	<100	N [1]	
	PM2.5		326 IAC 2-2	<100	<100	N [1]	
BM2	PM*	FF	326 IAC 6-3-2 326 IAC 2-2	<100	<100	N [1,2]	
	PM10		326 IAC 2-2	<100	<100	N [1]	
	PM2.5		326 IAC 2-2	<100	<100	N [1]	

Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for criteria pollutants (PM10, PM2.5, SO2, NOX, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy.
Under the Part 70 Permit program (40 CFR 70), PM is not a regulated pollutant.

PM* For limitations under 326 IAC 6-3-2, 326 IAC 6.5, and 326 IAC 6.8, IDEM OAQ uses PM as a surrogate for the regulated air pollutant PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of the regulated air pollutant PM10.

N [1] CAM does not apply for pollutant because the uncontrolled PTE of pollutant is less than the major source threshold.

N [2] Under 326 IAC 2-2, PM is not a surrogate for a regulated air pollutant. Therefore, CAM does not apply to these emission units for the 326 IAC 2-2 PM limitation.

Controls: FF = Fabric Bag Filter

Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to either of the new units as part of this modification.

State Rule Applicability Determination

Due to the modification at this source, state rule applicability has been reviewed as follows:

326 IAC 2-2 (PSD)
In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, PM, PM_{10}, and $PM_{2.5}$ emissions shall not exceed the limits listed below for the new bread line mixers:

Emission Unit	Control Device	PM Limit (lbs/hr)	PM_{10} (lbs/hr)	$PM_{2.5}$ (lbs/hr)
Bread Production Line				
Mixer 1 - BM1	Fabric Bag Filter	0.34	0.09	0.09
Mixer 2 - BM2	Fabric Bag Filter	0.34	0.09	0.09

Compliance with these limits, combined with the potential to emit PM, PM_{10}, and $PM_{2.5}$ from all other emission units at the source, shall limit the PM, PM_{10}, and $PM_{2.5}$ emissions from the entire source to

less than 250 tons per twelve (12) consecutive month period for PM, PM_{10}, and $PM_{2.5}$, each. This shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of the bread line mixers will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
Since this source is located in LaPorte County, and has a potential to emit VOC greater than or equal to twenty-five (25) tons per year, an emission statement covering the previous calendar year must be submitted by July 1 of each year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the bread line mixers, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c). Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the bread line mixers shall each not exceed 8.56 pounds per hour when operating at a process weight rate of 3.0 tons per hour. The pound per hour limitation was 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:

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

Based on potential to emit calculations, each of the mixers are able to comply with 326 IAC 6-3 without the use of a control device.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

(a) The Compliance Determination Requirements applicable to this modification are as follows:

Fabric bag filters on the mixers, BM1 and BM2, for particulate emissions control shall be in operation and control particulate emissions whenever any of the mixers, BM1 and BM2, are in operation.

(b) The Compliance Monitoring Requirements applicable to this proposed modification are as follows:

Emission Unit	Control Device	Operating Parameter	Frequency
Mixer 1 - BM1	Fabric Bag Filters	Filter Inspections	Quarterly
Mixer 2 - BM2	Fabric Bag Filters	Filter Inspections	Quarterly

These monitoring conditions are necessary because the fabric bag filters for the bread line mixers must operate properly to comply with emission limits to render 326 IAC 2-2 (PSD) not applicable.

Proposed Changes

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

(1) Sections A.2 and D.2 have been updated with the new mixer information.

(2) Condition D.1.1 has been updated to include the revised BACT requirements.

(3) Condition D.1.5 has been updated to include record keeping requirements for the daily cleaning inspections.

Additional Changes

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

(1) Condition D.2.5 Filter Inspections and Condition D.2.7(a) Record Keeping Requirements of the permit has been revised to clarify the compliance monitoring requirements for the filter control devices:

(2) On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions.

(3) D Sections - Language has been updated to match current IDEM, OAQ format and wording.

...

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

...

(e) One (1) bread dough dry ingredient closed conveyance system, exhausting indoors, including: pneumatic conveyance process equipment and piping, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2014. The conveyance system includes the following emission units:

...

(5) Two (2) mixers, ~~constructed in 2006,~~ **permitted in 2018,** identified as BM1 and BM2, each with a capacity of 6,000 pounds, equipped with a fabric bag filter for control of particulate matter emissions;

...

C.13 Risk Management Plan [326 IAC 2-7-5(~~12~~**11**)][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.

...

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

D.1.1 BACT Requirements (VOC) [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and SSM No. 091-34059-00106, BACT has been determined to be the following for the Bread Production Line:

(1) VOC emissions from the bread production line, consisting of the natural gas-fired oven, identified as BD2, and the proof box, identified as BDP, shall not exceed 70.0 tons per twelve (12) consecutive month period.

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

(3) In order to ensure proper operation and to minimize potential emissions, the source shall perform proof box cleaning operations for the proof box (BDP), on a tiered cleaning schedule and perform at a minimum, the following operations, or their equivalent, in accordance with their Sanitation Standard Operating Procedure:

(A) Daily ~~Cleaning~~ Procedure:

~~(i) All areas directly over food path must be checked and cleaned.~~
~~(ii) Remove product from floor of proof box;~~
~~(iii) Scrape any built-up dough on rollers or bars;~~
~~(iv) Check entrance and exit openings for any debris that may fall in product;~~
~~(v) Clean all curbing;~~
~~(vi) Scrape and sweep or squeegee flour area; and~~
(i) Inspect the proof box once per day of operation for waste dough and other materials. To the extent possible, without interrupting the proof box operational temperature and/or without contamination of product, remove the dough/other materials.
(ii) Document the daily inspection on a log sheet.

(B) ~~Proof Box Floors~~**Weekly Cleaning Procedure**:

~~(i) Pick up all dough on floor;~~
~~(ii) Rinse floor of proof box to remove any hidden dough;~~
~~(iii) Spray all walls, under duct work, and on floor area.~~
~~(iv) Allow to sit 30 minutes;~~
~~(v) Begin rinsing with the power hose or washer, starting at one end and going in through all the side doors, and finishing at the drain area.~~
~~(vi) After box is rinsed down and is dried, go inside box and check~~

~~for areas that need to be manually scrubbed.~~

(i) Remove all bread pans.
(ii) Check and clean all areas over the food path.
(iii) Scrape dough from conveyor, grids, supports, roller, and bars. Wipe down walls as necessary to remove any debris.
(iv) Scrape all dough from floor and curbing.
(v) Sweep proof box floor. Put sweepings in covered bucket.
(vi) Wet entire floor and then rinse.
(vii) Scrape dough from bread pans and put into inedibles cart.

(C) Monthly Cleaning Procedure

(i) Remove all raw ingredients and product containers from the area.
(ii) Remove all bread pans.
(iii) Scrape dough from conveyor, grids, and supports.
(iv) Scrape all dough from floor.
(v) Sweep proof box floor. Put sweepings in bucket. Empty bucket into inedibles cart.
(vi) Wet entire floor and then rinse.
(vii) Scrape dough from bread pans and put into inedibles.
(viii) Vacuum. Move equipment and repeat procedure on remaining sides of proof box top.
(ix) Wash top with Lift Off.
(x) Put all equipment away in proper locations.
(xi) Rinse exterior of box with water.
(xii) Wash with Lift Off. Let stand 15 minutes and rinse with water.
(xiii) Wet mop floor.

(D) Twice Per Year (After Step (v) of Monthly Cleaning)

(i) Wash down the interior walls in small sections and rinse.
(ii) Continue with item (vi) in monthly Cleaning Procedure.

...

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(~~13~~**12**)]

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

...

D.1.5 Record Keeping Requirements

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

(b) In order to assure compliance with Conditions D.1.1(a)(3), the Permittee shall maintain records of the dates and results of the inspections required under Condition D. 1.1(a)(3). The Permittee shall include in its daily record when waste dough is not removed and the reason for waste dough not being removed (e.g. waste dough not present or operations could not be disrupted).

D.1.6 Reporting Requirements

~~Quarterly summaries~~**A quarterly summary** of the information to document the compliance status with Conditions D.1.1(a) and D.1.1(b) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the ~~reporting~~**reports** required by this condition. The report~~s~~ submitted by the Permittee do**es** require a certification that meets the requirements of 326 IAC 2-7-6**(1)** by ~~an "authorized individual"~~**a "responsible official"** as defined by ~~326 IAC 2-1.1-1(1).~~ **326 IAC 2-7-1(35).**

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:
...

(e) One (1) bread dough dry ingredient closed conveyance system, exhausting indoors, including: pneumatic conveyance process equipment and piping, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, permitted in 2014. The conveyance system includes the following emission units:
...

(5) Two (2) mixers, ~~constructed in 2006,~~ **permitted in 2018,** identified as BM1 and BM2, each with a capacity of 6,000 pounds, equipped with a fabric bag filter for control of particulate matter emissions;
...

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

...

D.2.1 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, ~~T~~**t**he PM, PM_{10}, and $PM_{2.5}$ emissions from the following operations shall not exceed the emission limits listed in the table below:
...

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(~~13~~**12**)]

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

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

D.2.4 Particulate Control

(a) In order to **assure compliance** ~~comply~~ with Conditions D.2.1 and D.2.2, the particulate controls associated with each of the following units, including those integral to the process, shall be in operation and control emissions from the units at all times that the units are in operation:
...

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

D.2.5 Filter Inspections

~~An inspection shall be performed each calendar quarter of all filters controlling the emission units comprising the dry ingredient storage and conveyance operation. All defective filters shall~~

~~be replaced.~~ **The Permittee shall perform quarterly inspections of the filters controlling particulate emissions from the dry ingredient storage and conveyance operation to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective filters shall be replaced.**

...

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

D.2.7 Record Keeping Requirements

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

...

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(~~13~~**12**)]

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

...

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 August 7, 2018.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 097-40293-00352. The operation of this proposed modification shall be subject to the conditions of the attached Significant Permit Modification.

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Significant Permit Modification be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Tamera Wessel, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-8530 or (800) 451-6027, and ask for Tamera Wessel.

(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 Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

Appendix A: Emissions Calculations
Emissions Summary

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 800 Boyd Boulevard, LaPorte, IN 46350
Significant Source Modification No.: 091-40293-00106
Significant Permit Modification No.: 091-40524-00106
Permit Reviewer: Tamera Wessel
Date: August 7, 2018

UNCONTROLLED POTENTIAL TO EMIT (tons/yr)

Emission Units		PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	Worst Single HAP		Total HAPs
Silo Loading		1.49	0.52	0.52	0	0	0	0	0		0
Ingredient Storage & Handling		1,022.04	356.37	356.37	0	0	0	0	0		0
Bun Line	Proofing	0	0	0	0	0	4.64	0	0.14	Acetaldehyde	0.14
	Fermentation	0	0	0	0	0	46.36	0	1.39	Acetaldehyde	1.39
	Natural Gas Combustion	0.04	0.17	0.17	0.01	2.22	0.12	1.87	0.04	Hexane	0.04
Bread Line	Fermentation	0	0	0	0	0	121.57	0	3.65	Acetaldehyde	3.65
	Proofing	0	0	0	0	0	12.16	0	0.36	Acetaldehyde	0.36
	Natural Gas Combustion	0.06	0.26	0.26	0.02	3.36	0.18	2.82	0.06	Hexane	0.06
Insignificant Activities		0.11	0.42	0.42	0.03	5.54	0.34	4.64	0.10	Hexane	0.10
PLANT-WIDE TOTAL		**1,023.74**	**357.73**	**357.73**	**0.07**	**11.12**	**185.37**	**9.33**	**5.54**	**Acetaldehyde**	**5.75**

CONTROLLED / UNLIMITED POTENTIAL TO EMIT (tons/yr)

Emission Units		PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	Worst Single HAP		Total HAPs
Silo Loading		1.49	0.52	0.52	0	0	0	0	0.00		0
Ingredient Storage & Handling		10.22	3.56	3.56	0	0	0	0	0.00		0
Bun Line	Proofing	0	0	0	0	0	4.64	0	0.14	Acetaldehyde	0.14
	Fermentation	0	0	0	0	0	46.36	0	1.39	Acetaldehyde	1.39
	Natural Gas Combustion	0.04	0.17	0.17	0.01	2.22	0.12	1.87	0.04	Hexane	0.04
Bread Line	Fermentation	0	0	0	0	0	121.57	0	3.65	Acetaldehyde	3.65
	Proofing	0	0	0	0	0	12.16	0	0.36	Acetaldehyde	0.36
	Natural Gas Combustion	0.06	0.26	0.26	0.02	3.36	0.18	2.82	0.06	Hexane	0.06
Insignificant Activities		0.11	0.42	0.42	0.03	5.54	0.34	4.64	0.10	Hexane	0.10
PLANT-WIDE TOTAL		**11.92**	**4.93**	**4.93**	**0.07**	**11.12**	**185.37**	**9.33**	**5.74**	**Acetaldehyde**	**5.75**

LIMITED POTENTIAL TO EMIT OF THE ENTIRE SOURCE AFTER ISSUANCE (tons/yr)

Emission Units		PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	Worst Single HAP		Total HAPs
Silo Loading		37.05	13.14	13.14	0	0	0	0	0.00		0
Ingredient Storage & Handling		204.69	71.53	71.53	0	0	0	0	0.00		0
Bun Line	Proofing	0	0	0	0	0	4.64	0	0.14	Acetaldehyde	0.14
	Fermentation*	0	0	0	0	0	58.07	0	1.39	Acetaldehyde	1.39
	Natural Gas Combustion*	0.04	0.17	0.17	0.01	2.22		1.87	0.04	Hexane	0.04
Bread Line**	Fermentation	0	0	0	0	0	70.00	0	3.65	Acetaldehyde	3.65
	Proofing	0	0	0	0	0		0	0.36	Acetaldehyde	0.36
	Natural Gas Combustion	0.06	0.26	0.26	0.02	3.36		2.82	0.00	Hexane	0.06
Insignificant Activities		0.11	0.42	0.42	0.03	5.54	0.34	4.64	0.10	Hexane	0.10
PLANT-WIDE TOTAL		**241.95**	**85.51**	**85.51**	**0.07**	**11.12**	**133.05**	**9.33**	**5.68**	**Acetaldehyde**	**5.75**

* VOC emissions limited pursuant to 326 IAC 8-1-6 BACT determination in SSM No. 091-37989-00106
** VOC emissions limited pursuant to 326 IAC 8-1-6 BACT determination in SSM No. 091-34059-00106

Appendix A: Emissions Calculations
Emissions Summary of Modifications

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 800 Boyd Boulevard, LaPorte, IN 46350
Significant Source Modification No.: 091-40293-00106
Significant Permit Modification No.: 091-40524-00106
Permit Reviewer: Tamera Wessel
Date: August 7, 2018

UNCONTROLLED POTENTIAL TO EMIT (tons/yr)

Emission Units		PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	Worst Single HAP		Total HAPs
Bread Line	Mixer 1 (BM1)	7.52	2.05	2.05	0	0	0	0	0		0
	Mixer 2 (BM2)	7.52	2.05	2.05	0	0	0	0	0		0
MODIFICATION TOTAL		**15.03**	**4.10**	**4.10**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**0.00**

CONTROLLED / UNLIMITED POTENTIAL TO EMIT (tons/yr)

Emission Units		PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	Worst Single HAP		Total HAPs
Bread Line	Mixer 1 (BM1)	0.08	0.02	0.02	0	0	0	0	0		0
	Mixer 2 (BM2)	0.08	0.02	0.02	0	0	0	0	0		0
MODIFICATION TOTAL		**0.15**	**0.04**	**0.04**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**0.00**

LIMITED POTENTIAL TO EMIT OF THE MODIFICATION AFTER ISSUANCE (tons/yr)

Emission Units		PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	Worst Single HAP		Total HAPs
Bread Line	Mixer 1 (BM1)	1.49	0.39	0.39	0	0	0	0	0		0
	Mixer 2 (BM2)	1.49	0.39	0.39	0	0	0	0	0		0
MODIFICATION TOTAL		**2.98**	**0.79**	**0.79**	**0**	**0**	**0**	**0**	**0**		**0**

Appendix A: Emissions Calculations
Particulate Emissions from Silo Loading

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 800 Boyd Boulevard, LaPorte, IN 46350
Significant Source Modification No.: 091-40293-00106
Significant Permit Modification No.: 091-40524-00106
Permit Reviewer: Tamera Wessel
Date: August 7, 2018

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

Control Device Efficiency: 99%

Emission Unit		Maximum Capacity		Emission Factors			Uncontrolled			Controlled			Limited					
				PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM	PM_{10}	PM_{10}	$PM_{2.5}$	$PM_{2.5}$
ID #	Description	lb/hr	tons/hr	lb/ton	lb/ton	lb/ton	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr
Silo 1	White Flour Silo	3,600	1.800	3.14	1.10	1.10	24.76	8.67	8.67	0.25	0.09	0.09	6.18	1.41	2.19	0.50	2.19	0.50
Silo 2	White Flour Silo	3,600	1.800	3.14	1.10	1.10	24.76	8.67	8.67	0.25	0.09	0.09	6.18	1.41	2.19	0.50	2.19	0.50
Silo 3	White Flour Silo	3,600	1.800	3.14	1.10	1.10	24.76	8.67	8.67	0.25	0.09	0.09	6.18	1.41	2.19	0.50	2.19	0.50
Silo 4	White Flour Silo	3,600	1.800	3.14	1.10	1.10	24.76	8.67	8.67	0.25	0.09	0.09	6.18	1.41	2.19	0.50	2.19	0.50
Silo 5	Wheat Flour Silo	3,600	1.800	3.14	1.10	1.10	24.76	8.67	8.67	0.25	0.09	0.09	6.18	1.41	2.19	0.50	2.19	0.50
Silo 6	Wheat Flour Silo	3,600	1.800	3.14	1.10	1.10	24.76	8.67	8.67	0.25	0.09	0.09	6.18	1.41	2.19	0.50	2.19	0.50
						Total Emissions	**148.53**	**52.03**	**52.03**	**1.49**	**0.52**	**0.52**	**37.05**	**8.46**	**13.14**	**3.00**	**13.14**	**3.00**

Notes:
Each silo is bottlenecked by the amount of dry ingredient that can be conveyed pneumatically out of the silo. This is the maximum capacity of the silo for purposes of determining compliance with 326 IAC 2-2.
The emission factors are from AP-42, Ch. 11.12, Table 11.12-2 for cement unloading (SCC# 3-05-011-17).
$PM_{2.5}$ has been assumed to be equal to PM_{10}.

Methodology:
Maximum Capacity (tons/hr) = Maximum Capacity (lb/hr) ÷ 2000 lb/ton
Uncontrolled Emissions (tons/yr) = Maximum Capacity (tons/hr) * Emission Factor (lb/ton) * 8760 hr/yr ÷ 2000 lb/ton
Limited PM/PM10/$PM_{2.5}$ Emissions (tons/yr) = Limited PM/PM10/PM2.5 Emissions (lb/hr) * 8,760 hrs/yr * 1 ton / 2,000 lbs
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) * (1 - Control Efficiency)

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

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 800 Boyd Boulevard, LaPorte, IN 46350
Significant Source Modification No.: 091-40293-00106
Significant Permit Modification No.: 091-40524-00106
Permit Reviewer: Tamera Wessel
Date: August 7, 2018

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

Control Device Efficiency: 99%

Emission Unit		Maximum Capacity		Emission Factors			Uncontrolled			Controlled			Limited					
				PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM		PM_{10}		$PM_{2.5}$	
Description	ID #	lb/hr	tons/hr	lb/ton	lb/ton	lb/ton	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr
Sifter 1	Flour Sifter	14,000	7.000	3.14	1.10	1.10	96.27	33.73	33.73	0.96	0.34	0.34	19.27	4.40	6.75	1.54	6.75	1.54
Sifter 2	Flour Sifter	14,000	7.000	3.14	1.10	1.10	96.27	33.73	33.73	0.96	0.34	0.34	19.27	4.40	6.75	1.54	6.75	1.54
Silo 1	S1	14,000	7.000	3.14	1.10	1.10	96.27	33.73	33.73	0.96	0.34	0.34	19.27	4.40	6.75	1.54	6.75	1.54
Silo 2	S2	14,000	7.000	3.14	1.10	1.10	96.27	33.73	33.73	0.96	0.34	0.34	19.27	4.40	6.75	1.54	6.75	1.54
Silo 3	S3	14,000	7.000	3.14	1.10	1.10	96.27	33.73	33.73	0.96	0.34	0.34	19.27	4.40	6.75	1.54	6.75	1.54
Silo 4	S4	14,000	7.000	3.14	1.10	1.10	96.27	33.73	33.73	0.96	0.34	0.34	19.27	4.40	6.75	1.54	6.75	1.54
Silo 5	S5	14,000	7.000	3.14	1.10	1.10	96.27	33.73	33.73	0.96	0.34	0.34	19.27	4.40	6.75	1.54	6.75	1.54
Silo 6	S6	14,000	7.000	3.14	1.10	1.10	96.27	33.73	33.73	0.96	0.34	0.34	19.27	4.40	6.75	1.54	6.75	1.54
Bun Line																		
Flour Scale Bin	BNS1	3,600	1.800	3.14	1.10	1.10	24.76	8.67	8.67	0.25	0.09	0.09	4.95	1.13	1.75	0.40	1.75	0.40
Flour Use Bin	BNFU	3,600	1.800	3.14	1.10	1.10	24.76	8.67	8.67	0.25	0.09	0.09	4.95	1.13	1.75	0.40	1.75	0.40
Flour Scale Bin	BNS2	3,600	1.800	3.14	1.10	1.10	24.76	8.67	8.67	0.25	0.09	0.09	4.95	1.13	1.75	0.40	1.75	0.40
Manual Weigh Station*	BNWS1	1,800	0.900	0.0048	0.0028	0.003	0.02	0.011	0.011	n/a	n/a	n/a	0.02	0.02	0.011	0.003	0.01	0.003
Manual Weigh Station*	BNWS2	1,800	0.900	0.0048	0.0028	0.003	0.02	0.011	0.011				0.02	0.02	0.011	0.003	0.01	0.003
Breaker 1A*	BNBB	300	0.150	0.0048	0.0028	0.003	0.003	0.002	0.002	0.0000	0.0000	0.0000	negl.	negl.	negl.	negl.	negl.	negl.
Mixer 1	BNM	6,000	3.000	0.572	0.1560	0.156	7.52	2.05	2.05	0.075	0.020	0.020	1.49	0.34	0.39	0.09	0.39	0.09
Flour Station*	BNF	120	0.060	0.0048	0.0028	0.003	0.001	0.001	0.001	0.0000	0.0000	0.0000	negl.	negl.	negl.	negl.	negl.	negl.
Depanning*	BNDP	4,657	2.329	0.0048	0.0028	0.003	0.05	0.029	0.029	0.0005	0.0003	0.0003	0.05	0.01	0.03	0.01	0.03	0.01
Bread Line																		
Flour Scale Bin	BFC1	4,500	2.250	3.14	1.10	1.10	30.94	10.84	10.84	0.31	0.11	0.11	6.18	1.41	2.19	0.50	2.19	0.50
Flour Scale Bin	BFC2	4,500	2.250	3.14	1.10	1.10	30.94	10.84	10.84	0.31	0.11	0.11	6.18	1.41	2.19	0.50	2.19	0.50
Flour Scale Bin to Blend Tnk.	BFC3	4,500	2.250	3.14	1.10	1.10	30.94	10.84	10.84	0.31	0.11	0.11	6.18	1.41	2.19	0.50	2.19	0.50
Flour Use Bin	BDFU1	4,500	2.250	3.14	1.10	1.10	30.94	10.84	10.84	0.31	0.11	0.11	6.18	1.41	2.19	0.50	2.19	0.50
Flour Use Bin	BDFU2	4,500	2.250	3.14	1.10	1.10	30.94	10.84	10.84	0.31	0.11	0.11	6.18	1.41	2.19	0.50	2.19	0.50
Manual Weigh Station*	BWS1	4,320	2.160	0.0048	0.0028	0.0028	0.045	0.026	0.026	n/a	n/a	n/a	0.05	0.01	0.03	0.01	0.03	0.01
Manual Weigh Station*	BWS2	4,320	2.160	0.0048	0.0028	0.0028	0.045	0.026	0.026				0.05	0.01	0.03	0.01	0.03	0.01
Breaker 1A*	BB1A	1,200	0.600	0.0048	0.0028	0.0028	0.013	0.007	0.007	0.000	0.000	0.000	0.01	negl.	negl.	negl.	negl.	negl.
Mixer 1	BM1	6,000	3.000	0.572	0.1560	0.1560	7.52	2.05	2.05	0.075	0.020	0.020	1.49	0.34	0.39	0.09	0.39	0.09
Mixer 2	BM2	6,000	3.000	0.572	0.1560	0.1560	7.52	2.05	2.05	0.075	0.020	0.020	1.49	0.34	0.39	0.09	0.39	0.09
Flour Station*	BFS1	120	0.060	0.0048	0.0028	0.0028	0.0013	0.0007	0.0007	0.000	0.000	0.000	negl.	negl.	negl.	negl.	negl.	negl.
Depanning*	BDDP	12,000	6.000	0.0048	0.0028	0.0028	0.13	0.07	0.07	0.001	0.001	0.001	0.13	0.03	0.07	0.02	0.07	0.02
						Total Emissions	**1022.04**	**356.37**	**356.37**	**10.22**	**3.56**	**3.56**	**204.69**	46.76	**71.53**	16.33	**71.53**	16.33
						Total Emissions After Consideration of Integral Controls	**450.18**	**156.03**	**156.03**									

Notes:
Each silo is bottlenecked by the amount of dry ingredient that can be conveyed pneumatically from the silo. This is the maximum capacity used for purposes of determining compliance with 326 IAC 2-2.
The emission factors are from AP-42, Ch. 11.12, Table 11.12-2 (February 2011 revisions) for cement unloading (SCC# 3-05-011-17), hopper loading (SCC# 3-05-011-08), and mixer loading (SCC# 3-05-011-09) and Ch. 11.19.2 , Table 11.19.2-2 for fines screening (SCC# 3-05-020-21)
$PM_{2.5}$ has been assumed to be equal to PM_{10}.
* - Limited PM/PM10/PM2.5 Emissions (tons/yr) = Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr)
negl. = Negligible emissions

Methodology:
Maximum Capacity (tons/hr) = Maximum Capacity (lb/hr) ÷ 2000 lb/ton
Uncontrolled Emissions (tons/yr) = Maximum Capacity (tons/hr) * Emission Factor (lb/ton) * 8760 hr/yr ÷ 2000 lb/ton
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) * (1 - Actual Control Efficiency)
Limited PM/PM10/PM2.5 Emissions (tons/yr) = Limited PM/PM10/PM2.5 Emissions (lb/hr) * 8,760 hrs/yr * 1 ton / 2,000 lbs

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

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 800 Boyd Boulevard, LaPorte, IN 46350
Significant Source Modification No.: 091-40293-00106
Significant Permit Modification No.: 091-40524-00106
Permit Reviewer: Tamera Wessel
Date: August 7, 2018

				AP-42, Section 9.9.6 Equation Values				Emission Factor	Potential Emissions	
Production Line	Product	Maximum Capacity (lb/hr)	Maximum Throughput (tons/yr)	Initial Baker's % Yeast	Yeast Action Time (hours)	Final (Spike) Baker's % Yeast	Spike Time (hours)	VOC (lb/ton)	VOC (tons/yr)	Acetaldehyde (tons/yr)
Bun Line	buns	5,400	23,652.00	3.6	2.5	1.5	1.3	3.92	46.36	1.39
Bread Line	bread	15,862	69,475.56	3.6	2.6	2.7	1.1	3.50	121.57	3.65

Methodology:
Maximum Throughput (tons/yr) = Maximum Capacity (lb/hr) * 8760 hr/yr ÷ 2000 lb/ton
Potential Emissions (tons/yr) = Maximum Throughput (tons/yr) * Emission Factor (lb/ton) ÷ 2000 lb/ton

The process VOC emission calculations for the dough fermentation are based upon the following EPA recommended bakery oven emissions:
AP-42 Section 9.9.6

VOC = 0.95Yi + 0.195ti - 0.51S - 0.86ts + 1.90

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

The equation values for both production lines have been rounded to the nearest tenth.
The equation values for the bread production line are from the Technical Support Document (TSD) for Operating Permit Renewal No. T091-27352-00106.
The equation values for the bun production line are for the production of its highest-emitting product, as supplied by the source.

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

Appendix A: Emissions Calculations
VOC and HAP Emissions
Proof Boxes

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 800 Boyd Boulevard, LaPorte, IN 46350
Significant Source Modification No.: 091-40293-00106
Significant Permit Modification No.: 091-40524-00106
Permit Reviewer: Tamera Wessel
Date: August 7, 2018

Production Line	Product	Emission Unit	Uncontrolled Potential VOC from Fermentation (tons/year)	Uncontrolled Potential VOC from Proofing (tons/year)	Uncontrolled Potential Acetaldehyde from Proofing (tons/year)
Bun Line	buns	BNP	46.36	4.64	0.14
Bread Line	bread	BDP	121.57	12.16	0.36
TOTAL				**16.79**	**0.50**

Notes:
VOC emissions from proofing shall be assumed to be 10% of the emissions calculated for fermentation based on the following document:
"Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017. December 1992)
VOCs emitted during fermentation (leavening) are assumed to be 97% ethanol and 3% acetaldehyde (VOC/HAP), based on the following document and supporting information:
1. "Alternative Control Technology Document for Bakery Oven Emissions" (EPA 453/R-92-017. December 1992)
2. Henderson D.C., 1977 "Commercial Bakeries as a Major Source of Reactive Volatile Organic Gases", U.S. EPA, Region XI Surveillance and Analysis Division

Methodology:
VOC Emissions from Proofing (tons/yr) = 0.10 * Fermentation Emissions (tons/yr)
Acetaldehyde Emissions from Proofing (tons/yr) = 0.03 * VOC Emissions from Proofing (tons/yr)

Appendix A: Emissions Calculations
Natural Gas Combustion
Bun Oven (Line 3)

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 800 Boyd Boulevard, LaPorte, IN 46350
Significant Source Modification No.: 091-40293-00106
Significant Permit Modification No.: 091-40524-00106
Permit Reviewer: Tamera Wessel
Date: August 7, 2018

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
5.180	1020	44.5

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.04	0.17	0.17	0.01	2.22	0.12	1.87

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

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

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	0.075	1.80	3.4E-03	
Potential Emission in tons/yr	4.671E-05	2.669E-05	1.668E-03	0.040	7.563E-05	**0.042**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.112E-05	2.447E-05	3.114E-05	8.453E-06	4.671E-05	**1.219E-04**

Total HAPs	**0.04**	
Worst HAP	**0.04**	**Hexane**

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

Appendix A: Emissions Calculations
Natural Gas Combustion
Bread Oven (Line 1)

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 800 Boyd Boulevard, LaPorte, IN 46350
Significant Source Modification No.: 091-40293-00106
Significant Permit Modification No.: 091-40524-00106
Permit Reviewer: Tamera Wessel
Date: August 7, 2018

Heat Input Capacity MMBtu/hr	HHV mmBtu/mmscf	Potential Throughput MMCF/yr
7.82	1020	67.2

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/	0.06	0.26	0.26	0.02	3.36	0.18	2.82

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

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

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMc	2.1E-03	1.2E-03	0.075	1.80	3.4E-03	
Potential Emission in tons/	7.052E-05	4.030E-05	2.519E-03	0.060	1.142E-04	**0.063**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMc	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/	1.679E-05	3.694E-05	4.701E-05	1.276E-05	7.052E-05	**1.840E-04**

Total HAPs	**0.06**	
Worst HAP	**0.06**	**Hexane**

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

Appendix A: Emissions Calculations
Natural Gas Combustion
Insignificant Activities

Heat Input Capacity MMBtu/hr		HHV mmBtu mmscf	Potential Throughput MMCF/yr
2.9	Boiler B1		
5.4	Boiler B2		
0.022	H1		
0.12	H2		
0.13	H3		
0.40	H4		
0.58	H5		
0.40	H6		
0.195	H7		
0.15	H8		
0.58	H9		
0.58	H10		
0.58	H11		
0.195	H12		
0.195	H13		
0.40	Water Heater		
12.83		1020	110.2

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 800 Boyd Boulevard, LaPorte, IN 46350
Significant Source Modification No.: 091-40293-00106
Significant Permit Modification No.: 091-40524-00106
Permit Reviewer: Tamera Wessel
Date: August 7, 2018

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.10	0.42	0.42	0.03	5.51	0.30	4.63

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

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

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	0.075	1.80	3.4E-03	
Potential Emission in tons/yr	1.157E-04	6.610E-05	4.131E-03	0.10	1.873E-04	**0.10**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.754E-05	6.059E-05	7.711E-05	2.093E-05	1.157E-04	**3.018E-04**

Total HAPs	**0.10**
Worst HAP	**0.10** **Hexane**

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

Appendix A: Emission Calculations
Gasoline-fired Emergency Generators
Output Rating (<=600 HP)
Maximum Input Rate (<=4.2 MMBtu/hr)

Company Name: **Holsum of Fort Wayne, Inc.**
Address City IN Zip: **800 Boyd Boulevard, LaPorte, IN 46350**
Significant Source Modification No.: **091-40293-00106**
Significant Permit Modification No.: **091-40524-00106**
Permit Reviewer: **Tamera Wessel**
Date: **August 7, 2018**

Emissions calculated based on output rating (hp)

Output Horsepower Rating (hp)	10.0
Maximum Hours Operated per Year	500
Potential Throughput (hp-hr/yr)	5,000

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	7.21E-04	7.21E-04	7.21E-04	5.91E-04	0.011	0.015	6.96E-03
Potential Emission in tons/yr	1.80E-03	1.80E-03	1.80E-03	1.48E-03	0.03	0.04	0.02

*PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Hazardous Air Pollutants (HAPs)

	Pollutant							
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	Total PAH HAPs***
Emission Factor in lb/hp-hr****	6.53E-06	2.86E-06	2.00E-06	2.74E-07	8.26E-06	5.37E-06	6.48E-07	1.18E-06
Potential Emission in tons/yr	1.63E-05	7.16E-06	4.99E-06	6.84E-07	2.07E-05	1.34E-05	1.62E-06	2.94E-06

***PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

****Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-2).

Potential Emission of Total HAPs (tons/yr)	**6.78E-05**

Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - Natural Gas
4-Stroke Lean-Burn (4SLB) Engines

Company Name: Holsum of Fort Wayne, Inc.
Significant Source Modification No.: 091-40293-00106
Significant Permit Modification No.: 091-40524-00106
Permit Reviewer: Tamera Wessel
Date: August 7, 2018

Maximum Heat Input Capacity (MMBtu/hr)	1.51
Maximum Hours Operated per Year (hr/yr)	500
Potential Fuel Usage (MMBtu/yr)	755
High Heat Value (MMBtu/MMscf)	1020
Potential Fuel Usage (MMcf/yr)	0.74

	Pollutant						
Criteria Pollutants	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor (lb/MMBtu)	7.71E-05	9.99E-03	9.99E-03	5.88E-04	4.08E+00	1.18E-01	3.17E-01
Potential Emissions (tons/yr)	2.91E-05	3.77E-03	3.77E-03	2.22E-04	1.54	0.04	0.12

*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM.
PM2.5 emission factor is filterable PM2.5 + condensable PM.

Hazardous Air Pollutants (HAPs)

Pollutant	Emission Factor (lb/MMBtu)	Potential Emissions (tons/yr)
Acetaldehyde	8.36E-03	3.16E-03
Acrolein	5.14E-03	1.94E-03
Benzene	4.40E-04	1.66E-04
Biphenyl	2.12E-04	8.00E-05
1,3-Butadiene	2.67E-04	1.01E-04
Formaldehyde	**5.28E-02**	**0.02**
Methanol	2.50E-03	9.44E-04
Hexane	1.10E-03	4.15E-04
Toluene	4.08E-04	1.54E-04
2,2,4-Trimethylpentane	2.50E-04	9.44E-05
Xylene	1.84E-04	6.95E-05
	Total	**0.03**

HAP pollutants consist of the eleven highest HAPs included in AP-42 Table 3.2-2.

Methodology

Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-2
Potential Fuel Usage (MMBtu/yr) = [Maximum Output Horsepower Rating (hp)] * [Brake Specific Fuel Consumption (Btu/hp-hr)] * [Maximum Hours Operated per Year (hr/yr)] / [1000000 Btu/M
Potential Emissions (tons/yr) = [Potential Fuel Usage (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2000 lb/ton]

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 800 Boyd Boulevard, LaPorte, IN 46350
Significant Source Modification No.: 091-40293-00106
Significant Permit Modification No.: 091-40524-00106
Permit Reviewer: Tamera Wessel
Date: August 7, 2018

Unpaved Roads at Industrial Site
The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	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)
Moving Trailers in and out	2.1	2.1	4.5	20.0	89.9	714	0.135	0.6	221.8
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
		Totals	**4.5**		**89.9**			**0.6**	**221.8**

Average Vehicle Weight Per Trip = 20.0 tons/trip
Average Miles Per Trip = 0.14 miles/trip

Unmitigated Emission Factor, Ef = k*[(s/12)^a]*[(W/3)^b] (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	20.0	20.0	20.0	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365] (Equation 2 from AP-42 13.2.2)
Mitigated Emission Factor, Eext = E * [(365 - P)/365]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	6.06	1.54	0.15	lb/mile
Mitigated Emission Factor, Eext =	3.98	1.02	0.10	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)	0.67	0.17	0.02	0.44	0.11	0.01
Vehicle (leaving plant) (one-way trip)	0.00	0.00	0.00	0.00	0.00	0.00
	0.00	0.00	0.00	0.00	0.00	0.00
Totals	0.67	0.17	0.02	**0.44**	**0.11**	**0.01**

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)

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

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Holsum of Fort Wayne, Inc.
Source Address: 800 Boyd Boulevard, LaPorte, IN 46350
Significant Source Modification No.: 091-40293-00106
Significant Permit Modification No.: 091-40524-00106
Permit Reviewer: Tamera Wessel
Date: August 7, 2018

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

Vehicle Informtation (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Tankers	5.0	1.0	5.0	25.0	125.0	1528	0.289	1.4	528.1
Tractor-Trailers	45.0	1.0	45.0	10.0	450.0	574	0.109	4.9	1785.6
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
		Totals	**50.0**		**575.0**			**6.3**	**2313.7**

Average Vehicle Weight Per Trip = 11.5 tons/trip
Average Miles Per Trip = 0.13 miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	11.5	11.5	11.5	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, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	1.050	0.210	0.0516	lb/mile
Mitigated Emission Factor, Eext =	0.960	0.192	0.0471	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)	0.28	0.06	0.01	0.25	0.05	0.01
Vehicle (leaving plant) (one-way trip)	0.94	0.19	0.05	0.86	0.17	0.04
	0.00	0.00	0.00	0.00	0.00	0.00
	0.00	0.00	0.00	0.00	0.00	0.00
Totals	**1.21**	**0.24**	**0.06**	**1.11**	**0.22**	**0.05**

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
Office of Air Quality

Appendix B
Best Available Control Technology (BACT) Analysis Determination

Source Background and Description

Source Name:	Holsum of Fort Wayne, Inc.
Source Location:	800 Boyd Boulevard, LaPorte, Indiana 46350
County:	LaPorte
SIC Code:	2051 (Bread and Other Bakery Products, Except Cookies and Crackers)
Significant Source Modification No.:	091-40293-00106
Significant Permit Modification No.:	091-40524-00106
Part 70 Operating Permit No.:	T091-33988-00106
Permit Reviewer:	Tamera Wessel

Background Information

On August 7, 2018, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) received an application, submitted by Holsum of Fort Wayne, Inc., relating to modifications to the bread line proof box cleaning procedure that was established in Significant Source Modification (SSM) 091-34059-00106, issued on June 26, 2015.

Due to the sensitive operating conditions required of the proof box for the proper chemical rising of the bread, Holsum of Fort Wayne, Inc. was unable to comply with the work practice standards as determined in SSM 091-34059-00106. Opening and closing proof box doors repeatedly to remove product from the floor, prevents the proper required room temperature to be maintained. Once the proof box is brought to temperature, it may be required to run for over twenty-four (24) hours to meet product requirements and demands. Therefore, daily cleaning is not always feasible. The source has requested to revise their proof box cleaning procedure to allow for a cleaning schedule that minimizes disruption to the proofing process. Existing VOC emission BACT limits for the bread production line will remain the same.

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) has performed the following Best Available Control Technology (BACT) review for the existing stationary bakery plant, owned and operated by Holsum of Fort Wayne, Inc. located at 800 Boyd Boulevard, LaPorte, Indiana 46350. The following existing emission units were constructed after January 1, 1980, have the potential to emit volatile organic compounds greater than twenty-five (25) tons per twelve (12) consecutive month period and are not regulated under any other rule in 326 IAC 8. Pursuant to the provisions of 326 IAC 8-1-6 Best Available Control Technology, an analysis for VOC was performed for these units:

(a) One (1) bread production line with a maximum production rate of 15,862 pounds per hour of bread, consisting of the following:

(1) One (1) natural gas-fired oven, identified as BD2, constructed in 2005, with a maximum heat input capacity of 7.82 MMBtu per hour, exhausting to Stacks 3 and 4.

(2) One (1) proof box, identified as BDP

Note: The bread production line is considered one facility for evaluation of 326 IAC 8-1-6.

Since the bread production line is subject to 326 IAC 8-1-6 and changes to the Sanitation Standard Operating Procedure (SSOP) are being requested, a new top-down BACT analysis must be conducted.

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

(1) Identify all potentially available control options;
(2) Eliminate technically infeasible control options;
(3) Rank remaining control technologies;
(4) Evaluate the most effective controls and document the results; and
(5) Select BACT.

Also in accordance with the *"Top-Down" Best Available Control Technology Guidance Document* outlined in the 1990 draft U.S. EPA *New Source Review Workshop Manual*, BACT analyses take into account the energy, environmental, and economic impacts of the control options. Emission reductions may be determined through the application of available control techniques, process design, and/or operational limitations. Such reductions are necessary to demonstrate that the emissions remaining after application of BACT will not cause adverse environmental effects to public health and the environment.

VOC BACT Determination

Step One: Identify All Potentially Available Control Technologies

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

(a) Catalytic Oxidizer:

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

The two types of catalytic oxidation systems include recuperative and regenerative catalytic oxidizers, which are differentiated by the type of heat recovery equipment used. In a recuperative catalytic oxidizer, the waste gas stream is preheated using the heat content of the treated gas stream, resulting in improved oxidizer efficiency and significant fuel cost savings. In a regenerative thermal oxidizer, a high-density media such as a packed ceramic bed, which was heated in a previous cycle, is used to preheat the

incoming waste gas stream, resulting in improved oxidizer efficiency and significant fuel cost savings. VOC destruction efficiencies greater than 98% are achievable under certain operating conditions (EPA-453/R-92-017). However, based on the information reviewed for this BACT determination, a VOC destruction efficiency of 95% or a VOC outlet concentration of 10 ppmv or less is achievable on a consistent basis under normal operational conditions for a typical bread baking operation.

(b) Thermal Oxidizer:

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

The three types of thermal oxidation systems include direct flame, recuperative, and regenerative thermal oxidizers, which are differentiated by the type of heat recovery equipment used. A direct flame thermal oxidizer consists of only a combustion chamber with no heat recovery equipment. In a recuperative thermal oxidizer, the waste gas stream is preheated using the heat content of the treated gas stream, resulting in improved oxidizer efficiency and significant fuel cost savings. In a regenerative thermal oxidizer, a high-density media such as a packed ceramic bed, which was heated in a previous cycle, is used to preheat the incoming waste gas stream, resulting in improved oxidizer efficiency and significant fuel cost savings. In general, thermal oxidizers are less efficient at treating waste gas streams with highly variable flow rates since the variable flow rate results in varying residence times, combustion chamber temperature, and poor mixing. VOC destruction efficiencies greater than 98% are achievable under certain operating conditions (EPA-453/R-92-017). However, a VOC destruction efficiency of 95% is achievable on a consistent basis under normal operational conditions for a typical bakery operation.

(c) Wet Packed Bed Scrubber:

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

(d) Biofiltration:

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

microorganisms. In addition, the bed must be monitored and maintained at an optimum moisture content and pH in order to prevent cracking of the bed media and to maintain the viability of the microorganisms.

(e) Carbon Adsorption Unit:

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

(f) Condensation Unit:

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

Step Two: Eliminate Technically Infeasible Control Options

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that the use of carbon adsorption, condensation, and biofiltration systems are not technically feasible options for this source for the following reasons:

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

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

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

Step Three: Rank Remaining Control Technologies by Control Effectiveness

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

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

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

Step 4 – Evaluate Top Control Alternatives

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

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
Holsum of Fort Wayne, Inc. Fort Wayne, IN	Proposed 2018	Bread Production Line	None	VOC emissions from the bread production line, consisting of the natural gas-fired oven, identified as BD2, and the proof box, identified as BDP, shall not exceed 70.0 tons per twelve (12) consecutive month period. The source shall operate the proof box (BDP) in accordance with the manufacturer's design and operating specifications. The source shall perform proof box cleaning operations for the proof box (BDP) on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedure (SSOP): Daily Procedure:	Proposed Indiana Part 70 Significant Source Modification SSM 091-40293-00106

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
				(A) Inspect the proof box once per day of operation for waste dough and other materials. To the extent possible, without interrupting the proof box operational temperature and/or without contamination of product, remove the dough/other materials. (B) Document the daily inspection on a log sheet. Weekly Cleaning Procedure: (A) Remove all bread pans. (B) Check and clean all areas over the food path. (C) Scrape dough from conveyor, grids, supports, roller, and bars. Wipe down walls as necessary to remove any debris. (D) Scrape all dough from floor and curbing. (E) Sweep proof box floor. Put sweepings in covered bucket. (F) Wet entire floor and then rinse. (G) Scrape dough from bread pans and put into inedibles cart. Monthly Cleaning Procedure (A) Remove all raw ingredients and product containers from the area. (B) Remove all bread pans. (C) Scrape dough from conveyor, grids, and supports. (D) Scrape all dough from floor. (E) Sweep proof box floor. Put sweepings in bucket. Empty bucket into inedibles cart (F) Wet entire floor and then rinse. (G) Scrape dough from bread pans and put into inedibles. (H) Vacuum. Move equipment and repeat procedure on remaining sides of proof box top. (I) Wash top with Lift Off. (J) Put all equipment away in proper locations. (K) Rinse exterior of box with water. (L) Wash with Lift Off. Let stand 15 minutes and rinse with water. (M) Wet mop floor.	

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
				Twice Per Year (After Step E of Monthly Cleaning) (A) Wash down the interior walls in small sections and rinse. (B) Continue with item (F) in monthly Cleaning Procedure.	
Kerry, Incorporated Evansville, IN	2016	JBC-1 Line Dielectric Oven JBC-2 Line Dielectric Oven	None	VOC emissions from the JBC dielectric oven, identified as JBC Dielectric Oven, shall not exceed 49.0 tons per twelve (12) consecutive month period. The source shall perform oven cleaning operations on a tiered cleaning schedule in accordance with their SSOP. VOC emissions from the JBC-2 dielectric oven, identified as JBC-2 Dielectric Oven-2, shall not exceed 49.0 tons per twelve (12) consecutive month period. The source shall perform oven cleaning operations on a tiered cleaning schedule in accordance with their SSOP.	RBLC ID: IN-0262 Indiana Federally Enforceable State Operating Permit Significant Permit Revision SPR163-36839-00129
Perfection Bakeries, Inc. Lowell, IN	2016	Bread Baking Line	None	VOC emissions from the bread baking line EU01, including the natural gas-fired oven EU02 and proof box EU03, shall not exceed 70.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The source shall operate the proof box EU03 in accordance with the manufacturer's design and operating specifications. The source shall perform proof box cleaning operations for the proof box EU3 on a weekly cleaning schedule in accordance with the Sanitation Standard Operating Procedure (SSOP).	RBLC ID: IN-0250 Indiana Minor Source Operating Permit M089-37029-00590
KBI, Inc. Morristown, IN	2015	Bun Line	None	VOC emissions from the bun production line, consisting of a natural gas-fired oven and proof box, shall not exceed 109.8 tons per twelve (12) consecutive month period.	RBLC ID: IN-0237 Indiana Part 70 Significant Source Modification SSM 145-35383-00037

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
				The source shall operate the proof box in accordance with the manufacturer's design and operating specifications. The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP).	
Holsum of Fort Wayne, Inc. Fort Wayne, IN	2015	Bread Production Line	None	VOC emissions from the bread production line, consisting of the natural gas-fired oven, identified as BD2, and the proof box, identified as BDP, shall not exceed 70.0 tons per twelve (12) consecutive month period. The source shall operate the proof box (BDP) in accordance with the manufacturer's design and operating specifications. The source shall perform proof box cleaning operations for the proof box (BDP) on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedure (SSOP): Daily cleaning procedure: (1) All areas directly over food pat must be checked and cleaned. (2) Remove product from floor of proof box; (3) Scrape any built-up dough on rollers or bars; (4) Check entrance and exit openings for any debris that may fall in product; (5) Clean all curbing: (6) Scrape and sweep or squeegee flour area. Proof box floor cleaning procedure: (1) Pick up all dough on floor; (2) Rinse floor of proof box to remove any hidden dough; (3) Spray all walls, under duct work, and on floor area; (4) Allow to sit 30 minutes;	RBLC ID: IN-0216 Indiana Part 70 Significant Source Modification SSM 091-34059-00106

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
				(5) Begin rinsing with the power hose or washer, starting at one end and going in through all the side doors, and finishing at the drain area; (6) After box is rinsed down and is dried, go inside box and check for areas that need to be manually scrubbed. state bact.	
Harlan Bakeries Avon, IN	2015	Bagel Baking Line BKL2	Catalytic Oxidizer	The VOC emissions from OVEN-0002 shall be controlled by a catalytic oxidizer (OXIDIZER-0001). The overall VOC control efficiency for the catalytic oxidizer (including the capture efficiency and destruction efficiency) shall be at least 95%, or the VOC outlet concentration shall not exceed 10 ppmv. The VOC emissions from the catalytic oxidizer (OXIDIZER-0001) stack exhaust (S-1) shall not exceed 0.36 pounds per hour. The source shall perform proof box cleaning operation for PROOFER-0002 and PROOFER-0010 in accordance with the manufacturer's design and operating specifications. The source shall perform cleaning operations on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedure (SSOP): Weekly cleaning shall include: (1) Scraping of dough from racks and supports; (2) Sweeping of the proof box floor; (3) Removal of dough/product from inside proof box. Monthly cleaning shall include: (1) Wiping off interior proof box channel rails; (2) Removal of dough and oil accumulations from channel rails and cross over framework; (3) Washing or mopping of the floor of the proof box;	RBLC ID: IN-0214 Indiana Federally Enforceable State Operating Permit Renewal F063-33421-00059

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
				(4) Removal of accumulated waste from floor.	
New Horizons Baking Company Fremont, IN	2013	Muffin Line B Muffin Line H	None	VOC emissions from the muffin line, identified as Line B (consisting of the muffin griddle (Unit B) and the proof box (Line B Proof Box)), shall not exceed 35.16 tons per twelve (12) consecutive month period. The source shall operate Line B (consisting of the muffin griddle (Unit B) and proof box (Line B Proof Box)) in accordance the manufacturer's design and operating specifications. The source shall perform proof box cleaning operations for the proof box (Line B Proof Box) on a weekly cleaning schedule in accordance with their Sanitation Standard Operating Procedure (SSOP): (1) Clean inner housing top and bottom using a hand brush and knife scraper; (2) Clean inner conveyor shafts and bearing housings. use a clean cloth for removal of residual debris and any bearing over lubrication; (3) Clean inner door ledge framework using a hand brush and clean cloth; (4) Wash inner housing; (5) Wash inner conveyor shafts and bearing housings; (6) Wash inner door ledge framework; (7) Clean debris from lower proofer doors using a hand brush and clean cloth. If there are problem areas on the doors, a knife scraper can be used to remove encrusted debris. (8) Wash lower proofer doors. VOC emissions from the muffin line, identified as Line H (consisting of the muffin griddle (Unit H) and the proof box (Line H Proof Box)), shall not exceed 31.65 tons per twelve (12) consecutive month period.	RBLC ID: IN-0161 Indiana Part 70 Significant Source Modification SSM 161-32848-00060

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
				The source shall operate Line H (consisting of the muffin griddle (Unit H) and proof box (Line H Proof Box)) in accordance the manufacturer's design and operating specifications. The source shall perform proof box cleaning operations for the proof box (Line H Proof Box) on a weekly cleaning schedule in accordance with their Sanitation Standard Operating Procedure (SSOP): Weekly cleaning process: (1) Clean inner housing top and bottom using a hand brush and knife scraper; (2) Clean inner conveyor shafts and bearing housings. use a clean cloth for removal of residual debris and any bearing over lubrication; (3) Clean inner door ledge framework using a hand brush and clean cloth; (4) Wash inner housing; (5) Wash inner conveyor shafts and bearing housings; (6) Wash inner door ledge framework; (7) Clean debris from lower proofer doors using a hand brush and clean cloth. If there are problem areas on the doors, a knife scraper can be used to remove encrusted debris. (8) Wash lower proofer doors.	

Maplehurst Bakeries, Inc. Brownsburg, IN	2012	Donut Production Line - Moline VI Donut Production Line - Moline VIII	None	VOC emissions attributable to proofing and fermentation from donut production line Moline VI (consisting of the fryer (Fryer6) and the proof box (Proof6)) shall not exceed 40.1 tons per twelve (12) consecutive month period. The source shall operate the proof box (Proof6) in accordance with manufacturer's design and operating specifications. The source shall perform proof box cleaning operations for the proof box (Proof6) on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP): Weekly Cleaning Procedure: (1) Remove all raw ingredients and/or product containers from the seeder area; (2) Scrape any dough from the racks and supports; (3) Scrape and sweep the proof box floor; and (4) Wet the entire floor with cleaning solvent mixture and then rinse. Four Week Cleaning Procedure: (1) Wipe off interior proof box channel rails where needed; (2) Remove any dough or oil accumulations from channel rails and cross over framework; and (3) Wash or mop the floor of the proof box. Remove accumulated waste from floor. VOC emissions attributable to proofing and fermentation from donut production line Moline VIII (consisting of fryer (Fryer8) and the proof box (Proof6)) shall not exceed 60.7 tons per twelve (12) consecutive month period. The source shall operate the proof box (Proof8) in accordance with manufacturer's design and operating specifications.	RBLC ID: IN-0134 Indiana Part 70 Significant Source Modification SSM 063-31357-00031

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
				The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP): Weekly Cleaning Procedure: (1) Remove all raw ingredients and/or product containers from the seeder area; (2) Scrape any dough from the racks and supports; (3) Scrape and sweep the proof box floor; and (4) Wet the entire floor with cleaning solvent mixture and then rinse. Four Week Cleaning Procedure: (1) Wipe off interior proof box channel rails where needed; (2) Remove any dough or oil accumulations from channel rails and cross over framework; and (3) Wash or mop the floor of the proof box. Remove accumulated waste from floor.	
Allen Foods, Inc. Elkhart, IN	2013	Bakery Ovens (Bread Line 028) (Bun Line 048)	Catalytic Oxidizer	The VOC emissions from the baking oven 028 and baking oven 048 shall be controlled by a single catalytic oxidizer (029). The overall VOC control efficiency for the catalytic oxidizer (including capture efficiency and destruction efficiency) shall be at least 95%, or the VOC outlet concentration shall not exceed 10 ppmv. The combined VOC emissions from baking oven 028 and the bun line baking oven (048), jointly controlled by catalytic oxidizer 029 and exhausting through vent S17, shall not exceed 4.30 lbs/hr. The Permittee shall operate bread line (Line 028) (consisting of the baking oven and proof box) in accordance with the manufacturer's design and operating specifications.	RBLC ID: IN-0155 Indiana Federally Enforceable State Operating Permit Significant Permit Revision SPR 039-32174-00643

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
				The Permittee shall operate the bun line (Line 048) (consisting of the baking oven and proof box) in accordance with the manufacturer's design and operating specifications. The source shall perform proof box cleaning operations for the proof box associated with Bread Line 028 on a weekly cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP). The source shall perform proof box cleaning operations for the proof box associated with Bun Line 048 on a weekly cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP).	
Hartford Bakery, Inc. Evansville, IN	2012	Bun Production Line (Line 3)	None	VOC emission shall be limited to 46.7 tons per twelve (12) consecutive month period. The source shall operate the proof box in accordance with manufacturer's and operating specifications. The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP): Weekly Cleaning Procedure: (1) Scrape any dough from the conveyor, grids, and supports; (2) Scrape any dough from the floor; (3) Sweep the proof box floor from the center out; (4) Wet the entire floor with cleaning solvent mixture and then rinse; (5) Scrape any dough from the bun pans; and (6) Wash the pans, if necessary. Monthly Cleaning Procedure: Wet mop the floor of the proof box. Semi-annually Cleaning Procedure:	RBLC ID: IN 0148 Indiana Part 70 Significant Source Modification SSM 163-31953-00040

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
				Wash down the interior walls in small sections with cleaning solvent mixture and then rinse.	
Maplehurst Bakeries, Inc. Brownsburg, IN	2012	Donut Fryer 6 (Donut Production Line - Moline VI)	None	VOC emission shall be limited to 40.1 tons per twelve (12) consecutive month period. The source shall operate the proof box in accordance with manufacturer's and operating specifications. The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP).	RBLC ID: IN-0134 Indiana Part 70 Significant Source Modification SSM 063-31357-00031
Maplehurst Bakeries, Inc. Brownsburg, IN	2012	Donut Fryer 8 (Donut Production Line - Moline VIII)	None	VOC emission shall be limited to 60.7 tons per twelve (12) consecutive month period. The source shall operate the proof box in accordance with manufacturer's and operating specifications. The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP).	RBLC ID: IN-0134 Indiana Part 70 Significant Source Modification SSM 063-31357-00031
Allen Foods, Inc. Elkhart, IN	2012	Bakery Oven (Bread Line 028)	Catalytic Oxidizer	VOC emissions from the bread oven shall be controlled by a catalytic oxidizer. Overall VOC efficiency of the catalytic oxidizer shall be 95%, or the VOC outlet concentration shall not exceed 10 ppmv. VOC emissions shall not exceed 2.29 lbs/hr. The source shall operate the proof box in accordance with manufacturer's and operating specifications. The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP): Weekly Cleaning Procedure:	RBLC ID: IN-0124 Indiana Federally Enforceable State Operating Permit SPR 039-29392-00643

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
				Knock down all dough and residue from interior framework; Sweep floor; Use floor scraper for excess debris; Foam floor and scrub with brush; and rinse floor.	
The Kroger Company - Indianapolis Bakery Indianapolis, IN	2012	Bakery Oven (Bun Line BU4)	Catalytic Oxidizer	VOC emissions from the bun oven shall be controlled by a catalytic oxidizer. Overall VOC efficiency of the catalytic oxidizer shall be 95%, or the VOC outlet concentration shall not exceed 10 ppmv. VOC emissions from the bun oven shall not exceed 2.75 pounds per hour. The source shall operate the proof box in accordance with manufacturer's and operating specifications. The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP): Weekly Cleaning Procedure: Scrape the interior cross members of the proofer interior to remove old product; Hand wash cross members and supports as needed; Clean the openings in the walls that pan conveyors pass through; Hand wash the walls; and mop floors as needed, clean the floor drains. Four to Six Week Cleaning Procedure: Open water and air valves on the south side of the proofer; Connect the pressure washer; Activate proofer grid washer program. Turn on the washer, soap, rinse, and air dry; Start the endless chain; Allow the system to run two (2) cycles;	RBLC ID: IN-0245 Indiana Federally Enforceable State Operating Permit Significant Permit Revision F097-29287-00161

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
				Deactivate the program; Close air and water valves, disconnect washer; and clean floors as needed.	
White Castle Systems, Inc. Rensselaer, IN	2011	Bakery Oven/ Proof Box	Catalytic Oxidizer	VOC emission from the bread baking oven shall be controlled by a catalytic oxidizer. Overall VOC efficiency of the catalytic oxidizer shall be 95%, or the VOC outlet concentration shall not exceed 10 ppmv. VOC emissions from the bread oven shall not exceed 0.54 lbs/hr The source shall operate the proof box in accordance with manufacturer's and operating specifications. The source shall perform proof box cleaning operations for the proof box on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedures (SSOP): Weekly Cleaning Procedure: Scrape, sweep, and remove dough/product from floor inside proof box. Four Week Cleaning Procedure: Wipe off interior proof box channel rails where needed; Remove any dough or oil accumulations from channel rails and cross over framework; And wash or mop the floor of the proof box. Remove accumulated waste from floor.	RBLC ID: IN-0128 Indiana Minor Source Operating Permit M073-29819-00039

Alpha Baking Co., Inc. LaPorte, IN	2011	Bakery Ovens Proof Boxes	Catalytic Oxidizer	VOC emission from the baking ovens shall be controlled by a catalytic oxidizer. Overall VOC efficiency of the catalytic oxidizer shall be 95%, or the VOC outlet concentration shall not exceed 10 ppmv. The source shall operate the proof boxes in accordance with manufacturer's and operating specifications. The source shall perform proof box cleaning operations for the proof boxes on tiered cleaning schedules in accordance with their Sanitation Standard Operating Procedures (SSOP): Weekly Cleaning Procedure: Remove all raw ingredients and/or product containers from seeder area; Remove all bun pans; scrape dough from conveyor, grids, and supports; Scrape all dough from floor; sweep proof box floor; Wet entire floor with cleaning solvent mixture and then rinse; Scrape dough from bun pans; Put bun pans on proper pan car Four (4) Week Cleaning Procedure: Remove all raw ingredients and/or product containers from seeder area; Remove all bun pans; scrape dough from conveyor, grids, and supports; Scrape all dough from floor; Sweep proof box floor; Wet entire floor with cleaning solvent mixture and then rinse; Scrape dough from bun pans; Rinse exterior of box with water; Foam with cleaning solvent, let stand fifteen (15) minutes and rinse with water; Wet mop floor; Return ingredients to proper location Thirteen (13) Week Cleaning Procedure: Vacuum sides and top of proof box.	RBLC ID: IN-0132 Indiana Federally Enforceable State Operating Permit F091-28222-00135

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
Harlan Bakeries, Inc. Avon, IN	2008	Bakery Oven	Catalytic Oxidizer	VOC emissions from the bagel oven shall be controlled by a catalytic oxidizer. Overall VOC efficiency of the catalytic oxidizer shall be 95%, or the VOC outlet concentration shall not exceed 10 ppmv. VOC emissions shall not exceed 0.36 lbs/hr.	Indiana Minor Source Operating Permit M063-24103-00059
Allen Foods, Inc. Elkhart, IN	2006	Bakery Oven	Catalytic Oxidizer	VOC emissions from the bread oven shall be controlled by a catalytic oxidizer. Overall VOC efficiency of the catalytic oxidizer shall be 95%, or the VOC outlet concentration shall not exceed 10 ppmv. VOC emissions shall not exceed 2.29 lbs/hr.	RBLC ID: IN-0120 Indiana Federally Enforceable State Operating Permit F039-22633-00643
Holsum of Fort Wayne, Inc. Fort Wayne, IN	2005	Bakery Oven	None	VOC emission shall be limited to 60 tons per twelve (12) consecutive month period	Indiana Part 70 Significant Source Modification SSM 091-27352-00106
The Kroger Company - Indianapolis Bakery Indianapolis, IN	2003	Bakery Oven and Chain Lubricant (Bread Line BD1)	None	VOC emissions shall not exceed 49.0 tons per thirteen (13) consecutive twenty-eight (28) day period.	Indiana Federally Enforceable State Operating Permit Significant Permit Revision F097-16909-00161
Maple Leaf Bakery CA	1998	Bakery Oven	Catalytic Oxidizer	92 % Destruction Removal Efficiency Minimal 600°F Operating Temperature	RBLC ID: CA-0854 Permit No.: 0473-170
Freund Baking Company CA	1997	Bakery Oven	Catalytic Oxidizer	95.4 % Destruction Removal Efficiency	RBLC ID: CA-0859 Permit No.: 328570
Interstate Brands Corporation Indianapolis, IN	1997	Combined Bakery Ovens and Chain Lubricant	None	VOC emissions shall not exceed 95 tons per thirteen (13) consecutive twenty-eight (28) day period.	Indiana Federally Enforceable State Operating Permit F097-7413-00171
Holsum Bakery, Inc. AZ	1996	Bakery Oven	Quencher / Scrubber	81 % Control Efficiency 49.9 tons per year	RBLC ID: AZ-0029 Permit No.:95-0432

Company/ Location	Year Issued	Process Description	Control Device	BACT Emission Limits/Requirements	Reference
KBI, Inc. Morristown, IN	1996	Dough Mixing, Fermentation, and Baking Area	None	VOC emissions shall not exceed a total of 99.9 tons per twelve (12) consecutive month period	Indiana Federally Enforceable State Operating Permit F145-15375-00037
Certified Grocers of California, Ltd CA	1990	Bakery Oven	Catalytic Afterburner	95% Control Efficiency	RBLC ID: CA-0468 Permit Nos.: 228274, 219899
Automatic Rolls of Virginia, Inc. VA	1988	Bakery Oven	None	13.80 pounds per hour 23.00 tons per year	RBLC ID: VA-0110 Permit No.: (7)40761

Since the proposed BACT for the bread production line is at least as stringent as other similar BACT determinations for VOC and potential VOC emissions are not increasing, costs associated with making modifications to the proof boxes or installing controls to control VOC emissions from the bread production line were not evaluated for this modification.

However, an evaluation of the cost analysis performed for this source for Significant Source Modification No. 091-37989-00106, issued on April 25, 2017, summarized below, reveals it is still not economically feasible to add control to the bread production line.

Control Option	Control Efficiency (%)	Equipment Cost	Total Operating Cost ($/yr)	Total Annualized Costs ($/yr)	Potential VOC (tons/year)	Potential VOC removal (tons/year)	Cost Effectiveness ($/ton VOC removed)
RTO	95%	$1,341,533	$186,042	$414,329	70.0	66.5	$6,231
Catalytic Oxidizer	95%	$1,131,371	$245,298	$434,075	70.0	66.5	$6,527
VOC Emission Limit	-	-	-	-	-	-	$0.00

As part of the existing BACT for the bread production line, the source has been required to comply with the following cleaning operation schedule, or their equivalent, in accordance with their Sanitation Standard Operating Procedure:

(A) Daily Cleaning Procedure:

(i) All areas directly over food path must be checked and cleaned.
(ii) Remove product from floor of proof box;
(iii) Scrape any built-up dough on rollers or bars;
(iv) Check entrance and exit openings for any debris that may fall in product;
(v) Clean all curbing;
(vi) Scrape and sweep or squeegee flour area; and

(B) Proof Box Floors

(i) Pick up all dough on floor;
(ii) Rinse floor of proof box to remove any hidden dough;

(iii) Spray all walls, under duct work, and on floor area.
(iv) Allow to sit 30 minutes;
(v) Begin rinsing with the power hose or washer, starting at one end and going in through all the side doors, and finishing at the drain area.
(vi) After box is rinsed down and is dried, go inside box and check for areas that need to be manually scrubbed.

The proposed Sanitation Standard Operating Procedure (see below) will provide an equal level of control of emissions from the bread baking line proof box while still allowing the proper required room temperature of the proofing process to be maintained. The source will be held accountable for daily inspections of the proof box with the requirement of a daily log entry of the inspection. More intensive monthly and semi-annual cleaning procedures have been proposed to further increase control of emissions from the proof box.

Step 5 – Select BACT

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

(a) VOC emissions from the bread production line, consisting of the natural gas-fired oven, identified as BD2, and the proof box, identified as BDP, shall not exceed 70.0 tons per twelve (12) consecutive month period.

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

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

(1) Daily Procedure:

(A) Inspect the proof box once per day of operation for waste dough and other materials. To the extent possible, without interrupting the proof box operational temperature and/or without contamination of product, remove the dough/other materials.
(B) Document the daily inspection on a log sheet.

(2) Weekly Cleaning Procedure:

(A) Remove all bread pans.
(B) Check and clean all areas over the food path.
(C) Scrape dough from conveyor, grids, supports, roller, and bars. Wipe down walls as necessary to remove any debris.
(D) Scrape all dough from floor and curbing.
(E) Sweep proof box floor. Put sweepings in covered bucket.
(F) Wet entire floor and then rinse.
(G) Scrape dough from bread pans and put into inedibles cart.

(3) Monthly Cleaning Procedure

(A) Remove all raw ingredients and product containers from the area.
(B) Remove all bread pans.
(C) Scrape dough from conveyor, grids, and supports.
(D) Scrape all dough from floor.

(E) Sweep proof box floor. Put sweepings in bucket. Empty bucket into inedibles cart.
(F) Wet entire floor and then rinse.
(G) Scrape dough from bread pans and put into inedibles.
(H) Vacuum. Move equipment and repeat procedure on remaining sides of proof box top.
(I) Wash top with Lift Off.
(J) Put all equipment away in proper locations.
(K) Rinse exterior of box with water.
(L) Wash with Lift Off. Let stand 15 minutes and rinse with water.
(M) Wet mop floor.

(4) Twice Per Year (After Step E of Monthly Cleaning)

(A) Wash down the interior walls in small sections and rinse.
(B) Continue with item (F) in monthly Cleaning Procedure.

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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 26, 2018

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

Re: Public Notice
Holsum of Fort Wayne, Inc.
Permit Level: Title V Significant Source Modification and Significant Permit Modification
Permit Number: 091-40293-00106 and 091-40524-00106

Dear Mr. Renock:

Enclosed is a copy of your draft Title V Significant Source Modification and Significant Permit Modification, 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 LaPorte Herald-Argus in LaPorte, Indiana publish the abbreviated version of the public notice no later than November 26, 2018. 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 LaPorte County Public Library, 904 Indiana Avenue in LaPorte, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

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

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 1/9/2017

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

November 21, 2018

LaPorte Herald-Argus
701 State Street
LaPorte, IN 46350

Account Number 60010521

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Holsum of Fort Wayne, Inc., LaPorte 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 November 26, 2018.

Please send the invoice, notarized form, clippings showing the date of publication to Bo Liu, at the Indiana Department of Environmental Management, Accounting, Room N1340, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vivian Haun at 800-451-6027 and ask for extension 317-233-6878 or dial 317-233-6878.

Sincerely,

Vivian Haun

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: Title V Significant Source Modification and Significant Permit Modification
Permit Number: 091-40293-00106 and 091-40524-00106

Enclosure
PN Newspaper.dot 1/9/2017

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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 26, 2018

To: LaPorte County Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: Holsum of Fort Wayne, Inc.
Permit Number: 091-40293-00106 and 091-40524-00106

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 1/9/2017

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Eric J. Holcomb
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Bruno L. Pigott
Commissioner

Notice of Public Comment

November 26, 2018
Holsum of Fort Wayne, Inc.
091-40293-00106 and 091-40524-00106

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 Letter 1/9/2017

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

November 26, 2018

A 30-day public comment period has been initiated for:

Permit Number: **091-40293-00106 and 091-40524-00106**
Applicant Name: **Holsum of Fort Wayne, Inc.**
Location: **LaPorte, LaPorte County, Indiana**

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Mail Code 61-53

IDEM Staff	VHAUN 11/26/2018 HOLSUM OF FORT WAYNE INC 091-40293 and 40524-00106 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		Robert Renock HOLSUM OF FORT WAYNE INC 800 Boyd Blvd La Porte IN 46350 (Source RM)									
2		Dean Allen Vice President HOLSUM OF FORT WAYNE INC 800 Boyd Blvd La Porte IN 46350 *(RO RM)*									
3		LaPorte Co Public Library - LaPorte Branch 904 Indiana Ave. LaPorte IN 46350-4307 *(Library)*									
4		LaPorte City Council/ Mayors Ofc. 801 Michigan Avenue LaPorte IN 46350 *(Local Official)*									
5		LaPorte County Commissioners 555 Michigan Avenue # 202 LaPorte IN 46350 *(Local Official)*									
6		Mr. Dennis Hahney Pipefitters Association, Local Union 597 1461 East Summit St Crown Point IN 46307 *(Affected Party)*									
7		Ms. Pamela Block Air Quality Services, LLC 425 Main Street Evansville IN 47708 *(Consultant)*									
8		LaPorte County Health Department County Complex, 4th Floor, 809 State St. LaPorte IN 46350-3329 *(Health Department)*									
9		Mr. Dick Paulen Barnes & Thornburg 52700 Independence Court, Suite 150 Elkhart IN 46514-8155 *(Affected Party)*									
10		Jeff Mayes News-Dispatch 422 Franklin St Michigan City IN 46360 *(Affected Party)*									
11											
12											
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