

**NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT**

Proposed Approval of a Federal Enforceable State Operating Permit

for Interstate Brands Corporation
in Marion County

FESOP No.: F097-7413-00170

Notice is hereby given that the above-mentioned company, located at 2929 North Shadeland Avenue, Indianapolis, Indiana 46219 has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and the City of Indianapolis, Environmental Resources Management Division (ERMD) for a Federally Enforceable State Operating Permit (FESOP) Permit for bakery operations. Based on 8760 hours per year of operation, the potential emissions of Volatile Organic Compound (VOC) emissions are 326 tons per year. VOC emissions are limited by this FESOP at 91.4 tons per year.

Notice is hereby given that there will be a period of thirty (30) days from the date of publication of this notice during which any interested person may comment on why this proposed permit should or should not be issued. Appropriate comments should be related to any air quality issues, interpretation of the State and Federal rules, calculations made, technical issues, or the effect that the operation of this source would have on any aggrieved individuals.

A copy of the application and proposed permit is available for examination at the Indianapolis Public Library, 2822 East Washington Street, Indianapolis, Indiana, 46201. All statements, along with supporting documentation, should be submitted in writing to ERMD, 2700 South Belmont Avenue, Indianapolis, Indiana 46221-2097 and the IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015. If adverse comments concerning the air pollution impact of this proposed source are received, together with a request for a public hearing, such a hearing may be held to give further consideration to this application.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to ERMD and the IDEM-OAM, at the above address(es). All interested parties of record will receive a notice of the decision on this matter and will then have fifteen (15) days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to **Mark Caraher**, ERMD, 2700 South Belmont Avenue, Indianapolis, Indiana 46221-2097 at (317) 327-2234.

Robert F. Holm, PhD.
Administrator
City of Indianapolis
Environmental Resources Management Division

MBC

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**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
AIR QUALITY MANAGEMENT SECTION**

City of Indianapolis
Environmental Resources Management Division

**Interstate Brands Corporation
2929 North Shadeland Avenue
Indianapolis, Indiana 46219**

Interstate Brands Corporation, herein known as the Permittee, is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, 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.: F097-7413-00170	
Issued by: Robert F. Holm, Administrator Environmental Resources Management Division	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and the City of Indianapolis, Environmental Resources Management Division (ERMD), Air Quality Management Section and presented in the permit application.

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

The Permittee owns and operates a stationary source that manufactures leavened and unleavened bakery bread products.

Responsible Official: Interstate Brands Corporation
Source Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
Mailing Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
SIC Code: 2051
County Location: Marion
County Status: Nonattainment for PM
Source Status: Federally Enforceable State Operating Permit (FESOP),
Minor Source under PSD rules

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

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

- (a) One (1) Baker-Perkins Bakery Bread Oven # 3 identified as Emission Unit ID Oven # 3 exhausting to two (2) stacks/vents identified as Stack/Vent ID BD-A (Front Stack) and BD-C (Rear Stack). Equipped with natural gas fired oven heating at a maximum natural gas heat input rate of 6.1 million BTU per hour. Includes the application of Oven chain lubrication for Emission Unit ID Oven # 3 and Emission Unit ID Oven # 4. Installation date of 1982.
- (2) One (1) Baker-Perkins Bakery Bun Oven # 4 identified as Emission Unit ID Oven # 4 exhausting to two (2) stacks/vents identified as Stack/Vent ID BN-A (Front Stack) and BN-B (Rear Stack). Equipped with natural gas fired oven heating at a maximum natural gas heat input rate of 3.0 million BTU per hour. Includes the application of Oven chain lubrication for Emission Unit ID Oven # 4 and Emission Unit ID Oven # 3. Installation date of 1968.

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour.
- (2) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (3) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (4) Filling drums, pails or other packaging containers with lubricating oils, waxes and greases.
- (5) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (6) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (7) Closed loop heating and cooling systems.
- (8) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (9) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other

- air filtration equipment.
- (10) Heat exchanger cleaning and repair.
 - (11) Paved and unpaved roads and parking lots with public access.
 - (12) Blowdown for any of the following: sight glass, boiler, compressors, pumps and cooling tower.
 - (13) Muffin Oven # 1 and Muffin Oven # 2.
 - (14) Donut Fryer A and Donut Fryer B.
 - (15) Package Printers utilizing VOC/HAP solution(s) in Ink Jet Coder sprays for labeling packages. Maximum PTE of 1.2 tons per year VOC/HAP is less than significance threshold(s).
 - (16) Dough mixing and flour and sugar pneumatic transferring designated as Emission Unit ID Transfer Points. A total of thirty eight (38) transfer points are controlled by twenty two (22) baghouses or cartridge filters and sixteen (16) breather bag sock filters each with an internal exhaust. Each control device has been determined as integral to the system. Each filter has a design controlled exhaust rate of less than 0.02 gr/dscf. Each baghouse or cartridge filter has a rated exhaust air flow rate of 600 acfm.

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

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

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SECTION B GENERAL CONDITIONS

B.1 General Requirements [IC 13-15] [IC 13-17]

The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

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

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

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and ERMD.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by ERMD.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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

B.6 Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]

- (a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- (b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015

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Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data Group
2700 South Belmont
Indianapolis, Indiana 46221

- (b) The Permittee shall furnish to IDEM, OAM, and ERMD within a reasonable time, any information that IDEM, OAM, and ERMD 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and/or ERMD copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM, OAM, and ERMD along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM and ERMD).

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) 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.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(I)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) This certification shall be submitted on the attached Certification Form.
- (c) A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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- (a) The Permittee shall annually certify that this source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data Group
2700 South Belmont
Indianapolis, Indiana 46221

- (b) This annual compliance certification report required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, and/or ERMD may require to determine the compliance status of the source.
- (d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans (PMP) within ninety (90) days after the issuance of this permit, including the following information on each:
- (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;
 - (3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;

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- (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
 - (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- (b) PMPs shall be submitted to IDEM, OAM and/or ERMD, upon request and shall be subject to review and approval by IDEM, OAM and ERMD.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes 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, OAM and ERMD, 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 No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

and

Telephone No.: (317) 327-2234 (City of Indianapolis, ERMD)
Facsimile No.: (317) 327-2274 (City of Indianapolis, ERMD)

Failure to notify IDEM, OAM and ERMD, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

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Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data Group
2700 South Belmont
Indianapolis, Indiana 46221

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM and/or ERMD, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM and ERMD, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

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- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any corrective actions or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data Group
2700 South Belmont
Indianapolis, Indiana 46221

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) Written notification shall be submitted on the attached Deviation Occurrence Reporting Form(s) or their substantial equivalent.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM and/or ERMD determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM and/or ERMD 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

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permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

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

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data Group
2700 South Belmont
Indianapolis, Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) Delivered by any method and received and stamped by IDEM, OAM and ERMD on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM and/or ERMD upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM and/or ERMD 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 in writing by IDEM, OAM and ERMD any additional information

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identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAM and/or ERMD consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM and/or ERMD takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(I) and 326 IAC 2-8-11(c)(1), minor permit modification

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procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.23 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under 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
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data Group
2700 South Belmont
Indianapolis, Indiana 46221

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 which document, on a rolling five (5) year

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basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

- (b) For each such 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 by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (c) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAM 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.24 Construction Permit Requirement [326 IAC 2]

Modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, ERMD, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and ERMD within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner.
- (c) IDEM, OAM and/or ERMD shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM and/or ERMD consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM and/or ERMD or in a time period that is consistent with the payment schedule issued by IDEM, OAM and/or ERMD.
- (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

B.28 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

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SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

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

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-2 Prevention of Significant Deterioration (PSD) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) 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.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

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

The Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria

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specified in 326 IAC 6-4-2 (1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

- (a) All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B.13 - Preventive Maintenance Plan.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.
- (c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61, Subpart M]

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector must be Indiana accredited is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-2.1]

All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), utilizing methods approved by the IDEM,OAM.

The test protocol shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data Group
2700 South Belmont
Indianapolis, Indiana 46221

no later than thirty-five (35) days before the intended test date.[326 IAC 3-2.1-2(a)]

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

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented in accordance with the provisions of

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326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data Group
2700 South Belmont
Indianapolis, Indiana 46221

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

C.10 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) The Permittee shall perform all necessary maintenance and make all necessary and reasonable attempts to keep all required monitoring equipment in proper operating condition at all times.
- (b) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (c) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment.
- (d) Preventive Maintenance Plans of the monitors shall be implemented. In addition, prompt corrective action shall be initiated whenever indicated.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.12 Pressure Gauge Specifications

Whenever a condition in this permit requires the taking of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two

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percent ($\pm 2\%$) of full scale reading.

C.13 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (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) Written notification is to be 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
 - (3) Waste disposal site.
- (c) The Permittee shall postmark or deliver the notice 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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data Group
2700 South Belmont
Indianapolis, Indiana 46221

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) Indiana Accredited Asbestos Inspector

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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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

C.14 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 13, 1996.
- (b) If the ERP is disapproved by IDEM, OAM and/or ERMD, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, IDEM, OAM and/or ERMD shall supply such a plan.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM and/or ERMD, 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.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance is present in more than the threshold quantity that is subject to 40 CFR 68, 40 CFR 68 is an applicable requirement, and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM and ERMD that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM and ERMD that the Risk Management Plan is being properly implemented.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C.8 - Performance Testing, of this permit, exceed the level specified in any condition of this permit, appropriate corrective actions shall be taken. A description of these corrective actions shall be submitted to IDEM, OAM and ERMD within thirty (30) days of receipt of the test results. These corrective actions shall be implemented immediately unless notified by IDEM, OAM

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and ERMD that they are not acceptable. The Permittee shall make every effort to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM and ERMD reserve(s) the right to utilize enforcement activities to resolve the non-compliant stack test(s).

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data Group
2700 South Belmont
Indianapolis, Indiana 46221

- (b) This annual emission statement required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM and ERMD on or before the date it is due. [326 IAC 2-5-3]

C.18 Monitoring Data Availability

- (a) All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) When the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in

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any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM and/or ERMD representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015

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Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data Group
2700 South Belmont
Indianapolis, Indiana 46221

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM and ERMD on or before the date it is due. [326 IAC 2-5-3]
- (c) Unless otherwise specified in this permit any report shall be submitted within thirty (30) days of the end of the reporting period.
- (d) All instances of deviations from any requirements of this permit must be clearly identified in such reports.
- (e) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- (f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.21 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 the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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SECTION D.1

FACILITY OPERATION CONDITIONS

Emission Unit ID Oven # 3 One (1) Baker-Perkins Bakery Bread Oven # 3 identified as Emission Unit ID Oven # 3 exhausting to two (2) stacks/vents identified as Stack/Vent ID BD-A (Front Stack) and BD-C (Rear Stack). Equipped with natural gas fired oven heating at a maximum natural gas heat input rate of 6.1 million BTU per hour. Includes the application of Oven chain lubrication for Emission Unit ID Oven # 3 and Emission Unit ID Oven # 4. Installation date of 1982.

Emission Unit ID Oven # 4 One (1) Baker-Perkins Bakery Bun Oven # 4 identified as Emission Unit ID Oven # 4 exhausting to two (2) stacks/vents identified as Stack/Vent ID BN-A (Front Stack) and BN-B (Rear Stack). Equipped with natural gas fired oven heating at a maximum natural gas heat input rate of 3.0 million BTU per hour. Includes the application of Oven chain lubrication for Emission Unit ID Oven # 4 and Emission Unit ID Oven # 3. Installation date of 1968.

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Combined total VOC emissions from Emission Unit ID Oven # 3, Emission Unit ID Oven # 4 and the use of Chain Lubrication for Oven # 3 and Oven # 4 shall not exceed the limit specified by Condition D.1.1 a) and/or Condition D.1.1 b). The selection of record keeping described by Conditions D.1.1 a) and D.1.1 b) shall be made by the Permittee and shall be changed only once. A Permit Amendment is required to return to the initial record keeping basis. Compliance with either Condition D.1.1 a) or D.1.1 b) shall make the requirements of 326 IAC 2-7 and 326 IAC 2-2 not applicable.

- a) Pursuant to 326 IAC 2-8-4 (1) (FESOP) and pursuant to 326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities), combined total VOC emissions from Emission Unit ID Oven # 3, Emission Unit ID Oven # 4 and the use of Chain Lubrication for Oven # 3 and Oven # 4 shall not exceed 89.3 tons per rolling thirteen (13) consecutive twenty eight (28) day period.
- b) Pursuant to 326 IAC 2-8-4 (1) (FESOP) and pursuant to 326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities), combined total VOC emissions from Emission Unit ID Oven # 3, Emission Unit ID Oven # 4 and the use of Chain Lubrication for Oven # 3 and Oven # 4 shall not exceed 95.0 tons per rolling fifty two (52) consecutive week period.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), PM from the Emission Unit ID Oven # 3 and Emission Unit ID Oven # 4 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation 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

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Emission Unit ID Oven # 3, P is rated at 8.6 tons of bread production per hour and Oven # 4, P is rated at 6.4 tons of bun production per hour. PM shall not exceed 17.3 pounds per hour for Oven # 3 and 14.2 pounds per hour for Oven # 4.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this Permit, is required for Emission Unit ID Oven # 3 and Emission Unit ID Oven # 4.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(1)]

Testing of Emission Unit ID Oven # 3 and Emission Unit ID Oven # 4 is not specifically required by this Permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-5(1).

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC limitation contained in Condition D.1.1 shall be determined by:

- a) Actual chain lubrication usage in Oven # 3 and Oven # 4 per rolling thirteen (13) consecutive twenty eight (28) day production periods or per rolling fifty two (52) consecutive week periods; and
- b) Pursuant to the emission factor equation for bakery oven VOC emissions found in "Alternative Control Technology (ACT) Document for Bakery Oven Emissions" 453/R-92-017 for actual bread and bun production per rolling thirteen (13) consecutive twenty eight (28) day production periods or per rolling fifty two (52) consecutive weekly periods. The ACT emission factor utilized for Compliance Determination is:

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

where: Y_i = initial baker's % yeast to the nearest tenth of a percent
 t_i = total yeast action time in hours to the nearest tenth of an hour
 S = final (spike) baker's % yeast to the nearest tenth of a percent
 t_s = spiking time in hours to the nearest tenth of an hour

IDEM, OAM and/or ERMD reserves the authority to determine compliance using alternate method(s) as approved by the Administrator.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.6 Record Keeping Requirements

To Document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with either Condition D.1.6 a) or Condition D.1.6 b). The selection of record keeping described by Condition D.1.6 a) or Condition D.1.6 b) shall made by the Permittee and changed only once. A Permit Amendment is required to return to the initial record keeping basis.

- a) To document compliance with Condition D.1.1 a), the Permittee shall maintain records of actual bread and bun production, chain lubrication usage and VOC emissions per rolling thirteen (13) consecutive twenty eight (28) day period. Records maintained shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1 a).

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- b) To document compliance with Condition D.1.1 b), the Permittee shall maintain records of actual bread and bun production, chain lubrication usage and VOC emissions per rolling fifty two (52) consecutive week period. Records maintained shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1 b).

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.6 shall be submitted to the addresses listed in Section C.20 - General Reporting Requirements, of this permit, using the reporting form(s) located at the end of this Permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. Each quarterly report shall consist of, at a minimum, a rolling thirteen (13) consecutive twenty eight (28) day production period VOC emissions total including all completed twenty eight (28) day production periods in the calendar quarter being reported if record keeping is performed pursuant to Section D.1.1a). The quarterly report shall also include the end date of all twenty eight (28) day production periods completed during the quarter. If weekly records are kept, pursuant to Condition D.1.1b), the quarterly report shall include a rolling fifty two (52) consecutive week production period VOC emissions total including all completed weekly production periods in the calendar quarter being reported and the weekly end date of all weekly periods being reported per calendar quarter.

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SECTION D.2

FACILITY OPERATION CONDITIONS

**Emission Unit ID Transfer Points
(Insignificant Activity)**

Dough mixing and flour and sugar pneumatic transferring designated as Emission Unit ID Transfer Points. Maximum capacity of flour and sugar transferring is rated at fifty-five (55) tons per hour. A total of thirty eight (38) transfer points are controlled by twenty two (22) baghouses or cartridge filters and sixteen (16) breather bag sock filters each with an internal exhaust. Each control device has been determined as integral to the system. Each filter has a design controlled exhaust rate of less than 0.02 gr/dscf. Each baghouse or cartridge filter has a rated exhaust air flow rate of 600 acfm. Installation dates varied since 1968.

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

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

Pursuant to 326 IAC 6-3-2(c), PM from the Emission Unit ID Transfer Points shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

For Transfer Points, E shall not exceed; 45.5 pounds PM per hour

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of Emission Unit ID Transfer Points is not specifically required by this Permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-5(1).

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SECTION D.3 FACILITY OPERATION CONDITIONS

Insignificant Activities

Boilers # 1, # 2 and # 3 Natural Gas-fired - less than 10 mmBtu/hr

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

D.3.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-2 (Particulate Matter Emission Limitations for Sources of Indirect Heating, PM emissions from Boiler # 1, Boiler # 2 and Boiler # 3, each less than 10 mmBtu per hour heat input (Q sum to 3.0 mmBtu per hour), shall each be limited to 0.6 pounds per mmBtu heat input.

Compliance Determination Requirement

D.3.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of each boiler is not specifically required by this permit. However, this does not preclude testing requirements under 326 IAC 2-1-4(f) and 326 IAC 2-8-4(1).

Degreasing Operations **Cleaners and solvents, that do not exceed 145 gallons usage per 12 months, except if subject to 326 IAC 20-6**

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

D.3.3 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Process Weight Activities **Muffin Oven # 1 - Maximum process rate (P) of 2.7 tons per hour**
Muffin Oven # 2 - Maximum process rate (P) of 3.0 tons per hour

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

D.3.4 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from Muffin Oven # 1 and # 2 shall each not exceed the allowable PM emission rate based on the following equation:

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

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

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

For Muffin Oven # 1, E shall not exceed;

7.9 pounds PM per hour

For Muffin Oven # 2, E shall not exceed;

8.6 pounds PM per hour

Compliance Determination Requirement

D.3.5 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4(1).

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State Form 47738 (5-96)

Mail to:

City of Indianapolis
ERMD
Air Quality Management Section
Compliance Data Group
2700 S. Belmont Ave.
Indianapolis, Indiana 46221-2091
Phone 317/327-2234 Fax: 317/ 327- 2274

Indiana Department of Environmental Management
Office of Air Management
Compliance Data Section
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Interstate Brands Corporation
Source Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
Mailing Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
FESOP No.: F097-7413-00170

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:

- 9 Annual Compliance Certification Letter
- 9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- 9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

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State Form 47739 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION COMPLIANCE DATA GROUP**

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

Source Name: Interstate Brands Corporation
Source Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
Mailing Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
FESOP No.: F097-7413-00170

If a deviation has occurred a separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit .
Attach a signed certification to complete this report.

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
9 Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40% VOC in inks, 0.5% sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
9 Permit Has No Content Limitations for this Parameter.
Comments:

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION**

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION COMPLIANCE DATA GROUP**

FESOP Quarterly Report

Source Name: Interstate Brands
 Source Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
 Mailing Address: 2929 North Shadeland Avenue, Indianapolis, Indiana 46219
 FESOP No.: F097-7413-00170
 Facility: Oven # 3, Oven # 4 and Chain Lubrication Usage
 Parameter: VOC Emissions
 Limit: 89.3 tons VOC per rolling 13 consecutive 4-Week periods;

YEAR: _____ Quarter: _____

4-Week Period Ending Date	Oven # 3 VOC 4-Week Period Total (tons VOC)	Oven # 4 VOC 4-Week Period Total (tons VOC)	Chain Lubrication Usage (gallons)	Thirteen 4-Week Period Rolling Total (tons VOC)

9 No deviation occurred in this quarter.

9 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 Management
and
City of Indianapolis
Environmental Resources Management Division**

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP)

Source Background And Description

Source Name: Interstate Brands Corporation
Source Location: 2929 North Shadeland Avenue
Indianapolis, Indiana 46219
County: Marion
SIC Code: 2051
Operation Permit No.: F097-7413-00170
Permit Reviewer: M. Caraher

The City of Indianapolis Environmental Resources Management Division (ERMD) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Interstate Brands Corporation relating to the manufacture of leavened and unleavened bakery bread products.

Unpermitted Emission Units and Pollution Control Equipment

Permitting of emission units did not exist at this source prior to this review. The source consists of the following unpermitted facilities/units:

- (1) One (1) Baker-Perkins Bakery Bread Oven # 3 identified as Emission Unit ID Oven # 3, rated at a maximum dough feed rate to the Oven of 6.6 tons per hour, exhausting to three (3) stacks/vents identified as Stack/Vent ID BD-A (Front Stack), BD-B (Middle Stack) and BD-C (Rear Stack). Equipped with natural gas fired oven heating at a maximum natural gas heat input rate of 6.1 million BTU per hour. Includes the application of 1417 total maximum annual gallons of Oven chain lubrication for Emission Unit ID Oven # 3 and Emission Unit ID Oven # 4. Installation date of 1982.
- (2) One (1) Baker-Perkins Bakery Bun Oven # 4 identified as Emission Unit ID Oven # 4, rated at a maximum dough feed rate to the Oven of 4.8 tons per hour, exhausting to two (2) stacks/vents identified as Stack/Vent ID BN-A (Front Stack) and BN-B (Rear Stack). Equipped with natural gas fired oven heating at a maximum natural gas heat input rate of 3.0 million BTU per hour. Includes the application of 1417 total maximum annual gallons of Oven chain lubrication for Emission Unit ID Oven # 4 and Emission Unit ID Oven # 3. Installation date of 1968.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process. Permitting of emission units did not exist at this source prior to this review. The requirements of the construction permit rules in 326

IAC 2 are satisfied by this permit for any previously unpermitted facilities.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour.
- (2) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (3) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (4) Filling drums, pails or other packaging containers with lubricating oils, waxes and greases.
- (5) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (6) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (7) Closed loop heating and cooling systems.
- (8) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (9) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (10) Heat exchanger cleaning and repair.
- (11) Paved and unpaved roads and parking lots with public access.
- (12) Blowdown for any of the following: sight glass, boiler, compressors, pumps and cooling tower.
- (13) Muffin Oven # 1 and Muffin Oven # 2.
- (14) Donut Fryer A and Donut Fryer B.
- (15) Package Printers utilizing VOC/HAP solution(s) in Ink Jet Coder sprays for labeling packages. Maximum PTE of 1.2 tons per year VOC/HAP is less than significance threshold(s).
- (16) Dough mixing and flour and sugar pneumatic transferring designated as Emission Unit ID Transfer Points. A total of thirty eight (38) transfer points are controlled by twenty two (22) baghouses or cartridge filters and sixteen (16) breather bag sock filters each with an internal exhaust. Each control device has been determined as integral to the system. Each filter

has a design controlled exhaust rate of less than 0.02 gr/dscf. Each baghouse or cartridge filter has a rated exhaust air flow rate of 600 acfm.

Existing Approvals

This source has no existing approvals.

Air Pollution Control Justification as Integral Part of the Process

The company has submitted the following justification such that the pneumatic transfer baghouses, cartridge filters and breather bag sock filters are to be considered as an integral part of bakery products manufacturing:

- (1) Control equipment is necessary to pneumatically transfer flour and sugar throughout the source in a manner consistent with Federal food products manufacturing industry standards. Recovered baghouse catch material is recycled on-site in the process.
- (2) All control equipment exhaust is vented inside the building with no direct exhaust to the outside air.
- (3) Controlled PM/PM10 emissions for each filtration unit is less than 0.02 gr/dscf at a design exhaust flow rate of 600 acfm.

ERMD and IDEM, OAM has evaluated the justifications and agreed that pneumatic transfer and storage of flour and sugar will be considered as an integral part of bakery operations. Therefore, the permitting level will be determined using the potential emissions after air pollution control equipment. Operating conditions will be specified in the proposed permit that air pollution control equipment for pneumatic transfer and storage of flour and sugar shall be in operation at all times when the bakery is in operation.

Enforcement Issue

- (a) IDEM is aware that the following equipment has been constructed and/or operated prior to receipt of the proper permit:
 - (1) Emission Unit ID Oven # 3 installed in 1982 as a replacement oven.
 - (2) Emission Unit ID Oven # 4 installed in 1968.
- (b) ERMD and IDEM, OAM is reviewing this matter and will take appropriate action. This proposed permit will also satisfy the requirements of the construction permit rules.

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and

additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on December 13, 1996. Additional information was received on August 20, 1997 and September 29, 1997.

Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations (Page 1 through 6).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	12.8
PM-10	12.8
SO ₂	0.1
VOC	326.1
CO	3.4
NO _x	15.9

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

See attached spreadsheets for detailed calculations (Appendix A Pages 1 through 6).

HAP	Potential Emissions (tons/year)
Ethylene Glycol	0.1
Methanol	1.1
TOTAL	1.2

See attached spreadsheet for additional information (Appendix A Page 6).

- (a) The potential emissions (as defined in the Indiana Rule) of Volatile Organic Compounds are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

Limited Potential To Emit

- (a) To simplify record keeping and to accommodate unpredictable variations in production, the source has accepted federally enforceable production limitations that limit potential to emit Volatile Organic Compounds (VOC) to 91.4 tons per rolling thirteen (13) consecutive twenty eight (28) day periods. This limit was established at 12/13 ths of 99 tons per year to

eliminate the effect that daily variations would have on any 365 day period. This limit consists of:

- (i) 89.3 tons per year for the significant activities; and
- (ii) 2.1 tons per year for the insignificant activities.

The FESOP contains provisions that allow the source to use weekly and/or daily records to document compliance with limitations that correspond to 99 tons.

- (b) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Process/ facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Emission Unit ID Oven # 3 Bread Oven and Emission Unit ID Oven # 4 Bun Oven and Chain Lubrication for Oven # 3 and Oven # 4	5.5	5.5	0.0	89.3	0.9	4.0	0.0
Insignificant Activities	7.3	7.3	0.1	2.1	2.5	11.9	1.2
Total Emissions	12.8	12.8	0.1	91.4	3.4	15.9	1.2

Attached **Tables 1 and 2** summarize the permit conditions and requirements.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
TSP	nonattainment
PM-10	unclassifiable
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone.

Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-5-2 Episode Alert Levels: Submission of Emergency Reduction Plans

This source has been subject to 326 IAC 1-5-2 because potential to emit VOC has been in excess of 100 tons per year and, as a result, was to have submitted an Emergency Reduction Plan by December 19, 1979. Because this source was CWOP/OWOP, an Emergency Reduction Plan outlining facility procedures during an alert, warning and episode was submitted with the FESOP application submitted by Interstate Brands Corporation on December 13, 1996.

326 IAC 1-6 Malfunctions

The source is initially subject to 326 IAC 1-6 because it is required to obtain a permit under 326 IAC 2 Permit Review Rules. However, 326 IAC 1-6 emergency or upset provisions are superseded by 326 IAC 2-8-12 which requires the source to report verbally within four (4) business hours any emergency which results in an increase of an emission limitation or violation of an applicable rule. A written excess emissions report is required to be submitted within two (2) working days of any such occurrence. Records of all such occurrences are to be retained at the source for a period of three (3) years from the date of such occurrence(s) and shall be made available to IDEM,OAM and/or ERMD upon request.

326 IAC1-6-3 Malfunctions: Preventive Maintenance (PM) Plans and 326 IAC 2-8-3

Any person responsible for operating any facility specified in 326 IAC 1-6 shall prepare and maintain a Preventive Maintenance Plan which includes the following information:

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

PM Plans shall be submitted to IDEM,OAM and/or ERMD upon request and shall be subject to review and approval by IDEM,OAM and/or ERMD.

326 IAC 2-1 State Construction and Operating Permits; Rule Applicability

Source is required, by 326 IAC 2-1, to obtain an operating permit for two (2) emission units because potential VOC emissions exceed 25 tons per year. Because PTE, prior to the issuance of a FESOP, exceeds 100 tons per year of VOC, the source is electing to obtain a FESOP under 326 IAC 2-8 Federally Enforceable State Operating Permit (FESOP) Program.

326 IAC 2-6 Emission Reporting

This source is subject to 326 IAC 2-6 Emission Reporting, because it emits more than ten (10) tons per year of VOC and NOx in Marion County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 2-8 Federally Enforceable State Operating Permit (FESOP) Program

Source has actual VOC emissions of less than 100 tons per year and elects to obtain a FESOP under 326 IAC 2-8 to enforceably limit PTE to below 100 tons per year.

326 IAC 5-1 Visible Emissions Limitations

Pursuant to 326 IAC 5-1-2 Visible Emissions Limitations, except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

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

Boiler #1, # 2 and # 3 (Insignificant Activities)

Pursuant to 326 IAC 6-2-2 (b), for Q (total source maximum operating capacity in pounds per million Btu of heat input) less than 10.0 million Btu per hour, particulate matter (PM) emissions from each unit shall not exceed 0.6 pounds of particulate matter per million Btu of heat input.

Based on an AP-42 emission factor of 13.7 pounds of PM per million cubic feet of natural gas, these insignificant activities appear to be in compliance at an emission rate of 0.01 pounds of PM per million Btu (13.7# PM/MMCF x MMCF/.001 MMBtu = 0.0137 # PM/MMBtu).

326 IAC 6-3-2 Process Operations

Emission Unit ID's Oven # 3, Oven # 4, Individual Transfer Points and Muffin Ovens # 1 and # 2 (Insignificant Activities)

Pursuant to 326 IAC 6-3-2 Process Operations, particulate matter (PM) emissions from each Emission Unit ID shall be limited by the following:

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

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

Based on the maximum capacity (P) of each Emission Unit ID, each Emission Unit ID appears to be in compliance with the limit established by 326 IAC 6-2-3 Process Operations. As an example calculation, Muffin Oven # 1 has the lowest hourly process rate, P, of 2.7 tons per hour. Allowable hourly emissions are:

$$\begin{array}{l} \text{Muffin Oven \# 1} \quad P = 2.7 \text{ tons product per hour} \\ \\ E = 4.1 (2.7)^{0.67} \\ \\ E = 7.9 \text{ lbs PM per hour} \end{array}$$

PM emissions from Emission Unit ID Oven # 3 and Oven # 4 are each estimated to be 0.55 lbs PM per hour. Muffin Oven # 1 and # 2 are each estimated to be 0.55 lbs PM per hour. PM emissions after transfer point emissions control, which was determined to be integral to the system, are estimated to be 0.9 tons per year (0.2 lbs PM per hour).

326 IAC 8-1-6 Volatile Organic Compound Rules; General Reduction Provisions Relating to VOC Rules

Emission Unit ID Oven # 3

Pursuant to 326 IAC 8-1-6, new facilities, as of January 1, 1980, which have potential VOC emissions of 25 tons or more per year which are not otherwise regulated by other provisions of 326 IAC 8 shall reduce emissions using Best Available Control Technology (BACT). Oven # 3 was installed in 1982 and has potential emissions of 220.0 tons VOC per year (see Appendix A Page 3 of 6). Actual emissions are less than 95.0 tons per year. Oven # 3 is a replacement oven which increased maximum production capacity from 3.2 tons of bread per hour to 6.6 tons of bread per hour and, using ACT emission factors for bakery oven emissions, appeared to result in an increase of greater than 25 tons of VOC per year.

A BACT analysis for VOC emission control of a maximum actual annual VOC emission rate of 95.0 tons per year was submitted by Interstate Brands Corporation on August 20, 1997 and a revised BACT analysis was submitted on September 29, 1997. The top two (2) performing options in terms of economic and technical feasibility are displayed below as well as with no control.

BACT Cost Analysis
Capital Cost

Option	Base Price \$	Direct Cost \$	Indirect Cost \$	Total \$
Catalytic Oxidation	300,000	350,000	87,000	737,000

Turbine/Generator VOCgen System	Leased at 114,975 per year			114,975
No Control	0	0	0	0

Annual Operating, Maintenance and Recovery Cost

Option	Direct Cost \$	Indirect Cost \$	Capital Recovery Cost \$	Total \$
Catalytic Oxidation	131,563	47,168	194,419	373,150
Turbine/Generator VOCgen System	Leased at 114,975 per year. Annual Service Agreement at 81,120 per year. Fuel Cost at 260,315 per year. Recover 146,016 in Annual Electrical Savings.	52,484		362,878
No Control	0	0	0	0

Evaluation

Option	Potential Emissions (tons/yr)	Emission Removed (tons/yr)	Control Efficiency (%)	\$/ton removed
Catalytic Oxidation	95	76.9	81% overall	4,849
Turbine/Generator VOCgen System	95	76.9	81% overall	4,716
No Control	95	0	0	0

For this particular scenario, BACT was chosen as no control for a number of reasons. The VOC being emitted is ethanol which is not a HAP. At the time of Oven # 3 replacement, 1982, no other bakery operations in Indiana had obtained air pollution permitting. At the time of oven replacement, no reliable emission estimate would have been known because VOC emission factors for bakeries were varied and not reliable. The industry only recently concurred on an emission factor estimate which appears in the EPA document entitled "Alternative Control Technology Document for Bakery Oven Emissions" EPA 453/R-92-017.

In addition, only two bakeries nationwide are found as entered in the BACT/LAER Clearinghouse. Each unit entered has at least a maximum bread production capacity of 9.0 tons per hour which is higher than 6.6 tons per hour for Oven # 3. In conversation with the American Institute of Bakeries in Washington D.C., it was stated that only 23 bakeries of over 2000 nationwide have some form of add on VOC emissions control.

The BACT analysis resulted in a cost of \$ 4,716 per ton of VOC emissions removed. The source has stated that the profit margin in the bakery industry would not allow for an add on expense of over \$ 360,000 annually for operation of add on control and, therefore, add on control would not be economically feasible.

For this particular scenario, BACT has been determined to be an emissions limitation of 95.0 tons of VOC per year. However, source wide VOC emissions are restricted by this FESOP to less than **12/13ths of the major source threshold which has been determined to be 91.4 tons**. This is equivalent to total Butter Top Wheat bread production of 22, 368 tons per rolling thirteen (13) consecutive twenty eight (28) day period at a maximum VOC emission factor of 7.6 pounds of VOC per ton of bread product (@ 5.1 % Sponge Yeast) and the application of a maximum of 1417 gallons of chain lubrication at 6.0 pounds of VOC per gallon per rolling thirteen (13) consecutive twenty eight (28) day period.

Should the source wish to change record keeping at a later date, as proposed in the FESOP application from the current proposed frequency of thirteen (13) twenty eight (28) day periods to weekly record keeping, source wide VOC emissions would then be limited to 51/52 of the major source threshold which has been determined to be 97.1 tons per year. This is equivalent to total Butter Top Wheat bread production of 23,868 tons per rolling fifty two (52) consecutive week period at a maximum VOC emission factor of 7.6 pounds of VOC per ton of bread product (@ 5.1 % Sponge Yeast) and the application of a maximum of 1417 gallons of chain lubrication at 6.0 pounds of VOC per gallon per rolling fifty two (52) consecutive week period.

The source wide VOC emissions limit includes 2.1 tons of VOC per 365 day calendar period from insignificant activities.

326 IAC 8-3-2 Organic Solvent Degreasing Operations: Cold Cleaners

Parts Washers (Insignificant Activity)

These operations qualify as an insignificant activity because degreasing operations do not exceed 145 gallons per 12 month period. However, 326 IAC 8-3-2 is applicable.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. 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.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.
- (b) See Appendix A Page 6 and Form GSD-08 for additional information.

Conclusion

The operation of this bakery bread products manufacturing operation will be subject to the conditions of the attached proposed **FESOP No. F097-7413-00170**.

Table 1

Stack/Vent ID: Oven # 3 , Oven # 4 and Oven Chain Lubrication				
Stack/Vent Dimensions: Ht: > 26 ft Dia: > 17 inches Temp: > 100 F Flow: > 4000				
Emission Unit: Oven # 3 , Oven # 4 and Chain Lubrication				
Date of Construction: 1982 for Oven # 3 and 1968 for Oven # 4				
Alternative Scenario:				
Pollution Control Equipment: none				
General Description of Requirement:	VOC	PM		
Numerical Emission Limit:	89.3 tons/yr	PM = 4.1(P) ^{0.16}		
Regulation/Citation:	326 IAC 2-8	326 IAC 6-3-2(c)		
Compliance Demonstration:	record keeping	stack testing		
PERFORMANCE TESTING				
Parameter/Pollutant to be Tested:	none	none		
Testing Method/Analysis:	none	none		
Testing Frequency/Schedule:	none	none		
Submittal of Test Results:	none	none		
COMPLIANCE MONITORING				
Monitoring Description:	none	none		
Monitoring Method:	none	none		
Monitoring Regulation/Citation:	none	none		
Monitoring Frequency:	none	none		
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	actual bread/bun production/chain lubrication usage VOC	none		
Recording Frequency:	13 28-day production periods	none		
Submittal Schedule of Reports:	quarterly	none		
REPORTING REQUIREMENTS				
Information in Report:	actual production/VOC emissions	none		
Reporting Frequency/Submittal:	quarterly	none		

Additional Comments:				
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**Office of Air Management
and
Indianapolis Environmental Resource Management Division(ERMD)
Air Quality Management Section**

Addendum to the
Technical Support Document for Federally Enforceable State Operating
Permit (FESOP)

Source Name: Interstate Brands Corporation
Source Location: 2929 North Shadeland Avenue
Indianapolis, Indiana 46219
County: Marion
SIC Code: 2051
Operation Permit No.: F097-7413-00170
Permit Reviewer: M. Caraher

On October 14, 1997, the Environmental Resources Management Division (ERMD) had a notice published in the Indianapolis Star Newspaper in Indianapolis, Indiana, stating that Interstate Brands had applied for a Federally Enforceable State Operating Permit (FESOP) to manufacture leavened and unleavened bakery bread products under an SIC of 2051 with no add on with control. The notice also stated that ERMD proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

During the 30 day public notice period ERMD received written comments from the Indiana Department of Environmental Management (IDEM) on October 28, 1997 and from Environmental Concepts, Incorporated (ECI), a consulting firm submitting comments on behalf of Interstate Brands dated November 13, 1997. ERMD response to these paraphrased comments are stated below along with the following changes to the FESOP:

Section A and Section D.1 Comments/Changes - Emission Unit Description(s)

Comment # 1: ECI indicated that the Bread Oven, Oven # 3, does have three (3) stacks. However, the middle stack had been a purge vent for back up propane fuel use to fire the oven. Propane is no longer utilized at the oven and no emissions would occur from this stack.

Response: The Middle stack, Stack/Vent ID BD-B, was included in the FESOP application unit description(s). However, in light of this information, reference to Stack/Vent ID BD-B is now **deleted** from the description in Section A.2 Emission Units and Pollution Control Summary and is also **deleted** from the description in Section D.1 Emission Unit ID Oven # 3.

Comment # 2: ECI commented that stating maximum capacity in tons of bread manufactured per hour in Section A.2 and Sections D.1.1a) and b) would be misleading and confusing and would not lead to an adequate description of bakery bread manufacturing capacity in Emission Unit ID Oven # 3 or Emission Unit ID Oven # 4. There are many different bakery bread products manufactured. Each product would have a separate maximum capacity determination because of variations in initial and spike percent yeast, yeast action time and spiking time. The bread and bun oven hourly production capacities of 6.6 tons per hour and 4.8 tons per

hour listed in Section A.2 and D.1 Emission Unit descriptions represent the one variety with the highest VOC emission factor. Other varieties may have a higher throughput rate for determining compliance with a process weight rate which is different than the basis for determining oven VOC Potential to Emit (PTE). Limitations referenced should be specific to emissions and not production since production can be much higher for varieties that have lower emission factors when referenced to an emissions quantity. Referencing equipment capacity appears to limit the equipment to the amount referenced in the permit.

In addition, stating the name of a bread product with the highest VOC emission factor, such as Butter Top Wheat bread, should not be identified in the FESOP public document. We suggest that the agency delete the reference to any variety names specifically; reference to the basis for the emission calculation would be more appropriate and acceptable.

Response: ERMD stated a maximum production capacity in tons per hour in the Emission Unit descriptions found in Section A.2 and D.1 for the bakery bread and/or bun product with the highest VOC emission factor. These Sections are Emission Unit descriptions and not FESOP limitations. Oven capacities of 6.6 and 4.8 tons per hour represented the maximum production capacity of the highest VOC emitting product in order to determine PTE and rule applicability based on this threshold. Interstate Brands does manufacture bakery bread and bun products with higher ton per hour production than what is listed in Section A.2 and D.1. A different lower VOC emitting product with a higher production capacity may very well determine PTE for PM and the resultant PM process weight rate limitation. Section D.1.2 Particulate Matter lists the PM allowable, pursuant to 326 IAC 6-3-2(c), based on the highest VOC emitting hourly production and not the highest hourly production of any single product. In addition, referencing the name of a bread product and a resultant equivalency throughput limitation of that product to stay under the major source threshold does not make the overall tons VOC/year limitation practically enforceable. Staying under the equivalency limitation stated in Section D.1.1 for one product does not guarantee the source would be able to comply with the FESOP ton/yr limitation because a number of products are manufactured.

For this revision, ERMD has deleted all references to production capacities listed in Section A.2 and D.1. Reference to Butter Top Wheat production as an equivalent limitation has been **deleted** from Section D.1.1 and is **replaced** in Compliance Determination Section D.1.5 Volatile Organic Compounds with the currently acceptable EPA emission factor for VOC emissions from bakery bread products entitled, "Alternative Control Technology Document (ACT) for Bakery Oven Emissions" 453/R-92-017. The source wishes to demonstrate practical enforceability with the major source threshold limitation by the use of the ACT emission factor, tracking chain lubrication use and record keeping of production. The ACT emission factor is applied, individually, to each bread product with its varying yeast, action and spiking times. The ACT emission factor **inserted** into the new Section D.1.5 is:

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

where: Y_i = initial baker's % yeast to the nearest tenth of a percent
 t_i = total yeast action time in hours to the nearest tenth of an hour
 S = final (spike) baker's % yeast to the nearest tenth of a percent
 t_s = spiking time in hours to the nearest tenth of an hour

Initially, actual individual bread product production during each thirteen 28 day production period will be tracked while VOC emissions will be tracked by use of the ACT equation.

Comment # 3: Reference to chain lubrication usage of 1417 gallons annually should be removed from the equipment descriptions so that it is not perceived to have a separate limitation. The descriptions appear to split overall VOC tons in the FESOP between chain lubrication and oven emissions.

Response: 1417 gallons of chain lubrication annually was the maximum usage used to determine PTE from this activity associated with the ovens. This throughput quantity is not intended to be a usage limitation. Reference to a throughput quantity of chain lubrication has been **deleted** from the equipment descriptions in Section A.2, D.1 and D.1.1. The use of chain lubrication will be still be stated as an activity in the descriptions and tracking and reporting of actual usage will make the emission threshold limitation practically enforceable. Oven emissions and chain lubrication emissions are grouped together under the 89.3/95.0 ton per year allowable FESOP VOC limitation(s) found in Section D.1.1a) and D.1.1b).

Section B Comments/Changes

None

Section C Comments/Changes

Comment # 4: Ann Mclver of IDEM-OAM commented that Section C.1 Overall Source Limit limits the source, in lieu of any Section D requirement(s), to less than 100 tons per 365 consecutive day period. Please clarify the rationale for less than major source levels rather than the threshold of 99.0 tons which were in all previously issued FESOPs.

Response: The IDEM-OAM model FESOP of July 3, 1997 and the October 27, 1997 revision to the model FESOP both contain language limiting the source to less than 100 tons per 365 consecutive day period. This draft FESOP was compiled using the July 3rd model. ERMD assumes that a source who can demonstrate they are less than the major source threshold and have requirements in the FESOP demonstrating that the limitation is enforceable as a practical matter would be a minor source. **No changes.**

See Comment/Response # 9

Section D.1 Comments/Changes

See Comment/Responses # 1, # 2 and # 3 for Emission Unit description changes in Section D.1 and in Section D.1.1.

Comment # 5: Ann Mclver of IDEM-OAM stated having two VOC limits on the baking ovens in Section D.1.1 may make it confusing on the source. A source would need to keep different records in order to comply with the two different formats of the limits, VOC's per rolling 52 week period versus thirteen consecutive 28 day periods. Logically, since two limits are stated as being based on limiting use of lubricating oil to 1417 "annual" gallons, it would make sense to choose only one of the limits for the FESOP and eliminate the other. In addition, I am not aware of IDEM or local agencies calculating limits based on a 12/13ths approach. The 28 day compliance period represents a myriad of problems with record keeping; Condition D.1.8 indicates compliance reports are due quarterly. There will be times when the 28 day

period is split between quarters. At what point does a source report information which is split between quarters? Eventually the 28 day period will be split between years which presents even more challenges. I strongly recommend that the source discuss a more traditional approach with monthly records and an 11/12ths limit with quarterly reporting of monthly records. As this permit is currently proposed, the record keeping and reporting requirements will become overly burdensome on the source and on the agency when it comes to tracking reports.

Comment # 6: ECI commented that the source keeps records, as most bakeries do, based on a 28 day production period only. June 1st of every year signifies the start of their production year and/or cycle. As a result, Interstate Brands production year, on a June to May calendar basis, would always consist of thirteen 28 day production periods. Interstate Brands wants to submit quarterly reports to verify compliance with any FESOP limitation. However, they want to submit weekly emissions quarterly as a 52 week rolling total. The 28 day production period would be divided by four at the end of the production period to obtain a weekly record. In this respect, the source would be allowed 51/52nds of 99.0 tons VOC source wide minus 2.1 tons of insignificant activity VOC emissions which equates to 95.0 tons of VOC per rolling 52 consecutive week period as stated in Section D.1.1b).

Response: Throughout the FESOP application review period, ERMD notified Interstate Brands that unless daily records were kept, the FESOP limitation in allowable tons per year would be further limited less the fraction of one record keeping period. For example, source wide allowable tons would be limited to 51/52nds of 99.0 tons for weekly record keeping or 11/12ths of 99.0 tons for monthly record keeping. ERMD is aware that USEPA mandates that the record keeping term to verify compliance be as short as possible and be no longer in duration than monthly with, preferably, daily records being kept. Interstate Brands initially proposed 12/13ths of 99.0 tons as a source wide FESOP limitation. This proposal coincides with the current level of record keeping at Interstate Brands. No weekly records are currently being kept. Interstate Brands has actual VOC emissions of, approximately, 85 tons per year and would be very close to a 12/13 ths of 99.0 tons FESOP limitation. Annual fluctuations in production could cause the source to exceed 89.3 tons per rolling thirteen consecutive 28 day periods. The source recognized this and wished to have language inserted that would allow the source to change to weekly record keeping to increase the amount of FESOP limited tons to 95.0 tons per rolling 52 consecutive week periods as stated in Section D1.1b). ERMD Section D.1.1 and Section D.1.7 state that the switch to weekly record keeping may be made by the source but the change can be made only once unless an Administrative Amendment is first procured to revert to twenty eight day period record keeping. A switch back to record keeping based on thirteen 28 day production periods might be deemed a relaxation of record keeping or reporting provisions. Once the source had demonstrated that weekly records could be kept, it may not be beneficial for the source to switch to 28 day production periods and again risk noncompliance with the 89.3 tons VOC annual limitation. ERMD has previously allowed a switch to weekly record keeping if the source wishes to change to weekly record keeping in order to have an increase in FESOP limited tons based on the record keeping term(s). The 12/13ths allotment has been approved as draft language by IDEM-OAM peer review and the switch to weekly record keeping has been previously approved in an issued FESOP by IDEM-OAM. The possible switch to weekly record keeping seems appropriate given the proximity of actual emissions to 89.3 tons.

ERMD believes that the intent of weekly record keeping is to directly account for production

and emissions on a weekly basis. Dividing a 28 day production period by four produces a weekly average emission rate for the period and does not produce an actual weekly record which is clearly the intent of weekly record keeping. However, the 28 day production period and initial record keeping cycle provides a record keeping term less than a month in duration and the 12/13ths term would seem to be satisfactory to meet IDEM-OAM and ERMD policy on FESOP limitations.

Except for Emission Unit descriptions and equivalent limitations, Section D.1.1a) and D.1.1b) **remain unchanged.**

Comment # 7: There are many different bakery bread products manufactured. Each product would have a separate maximum capacity determination because of variations in initial and spike percent yeast, yeast action time and spiking time. The bread and bun oven hourly production capacities of 6.6 tons per hour and 4.8 tons per hour listed in Section A.2 and D.1 Emission Unit descriptions represent the one variety with the highest VOC emission factor. Other varieties may have a higher throughput rate for determining compliance with a process weight rate which is different than the basis for determining oven VOC Potential to Emit (PTE). Limitations referenced should be specific to emissions and not production since production can be much higher for varieties that have lower emission factors when referenced to an emissions quantity. Referencing equipment capacity appears to limit the equipment to the amount referenced in the permit

Response: Section D.1.2 Particulate Matter utilized the highest VOC emitting bread and bun products in the process weight rate allowable PM emission limit. The highest VOC emitting product stated for each oven does not correctly address maximum capacity for each oven. 326 IAC 6-3-2 sets a PM emission limit based on the maximum process weight rate and not on production throughput. Through the application process, Interstate Brands has stated that 8.6 tons per hour would correspond to the one variety with the single highest throughput rate in Oven # 3 and 6.4 tons per hour would correspond to the single highest throughput rate in Oven # 4. At an emission factor of 0.064 pounds of PM emitted per ton of product handled, compliance with 326 IAC 6-3-2(c) at these higher production capacities is still demonstrated. As a result, Section D.1.2 has been **amended** to state:

Pursuant to 326 IAC 6-3-2(c), PM from the Emission Unit ID Oven # 3 and Emission Unit ID Oven # 4 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

Emission Unit ID Oven # 3, P is rated at 8.6 tons of bread production per hour and Oven # 4, P is rated at 6.4 tons of bun production per hour. PM shall not exceed 17.3 pounds per hour for Oven # 3 and 14.2 pounds per hour for Oven # 4.

Comment # 8: ECI commented that a Preventive Maintenance Plan per Section D.1.3 should not be required for Oven # 3 and Oven # 4 because there is no add on control equipment. The FESOP should reference what the bakery already has in place to avoid a duplicate plan.

Should any instance arise, the bakery would take corrective action regardless of a FESOP condition and a separate PM plan is not needed.

Response: 326 IAC 2-8-3(c)(6) FESOP: Application and 326 IAC 2-8-4(9) FESOP: Permit Content require that a Preventive Maintenance (PM) Plan be in any FESOP for activities that have limitations on the source's capacity to emit such that 326 IAC 2-7: Part 70 Permit Program would not apply. 326 IAC 2-8-3(c)(6) references 326 IAC 1-6-3 which states any source which is required to obtain a permit shall prepare and maintain a PM plan. No reference is made to applicability based on whether or not control equipment is in place. If Interstate Brands already has a PM plan for this activity, then this plan should be submitted upon request if IDEM-OAM or ERMD requests it. This condition is not meant to duplicate what already may be in place. **No changes** to Section D.1.3 Preventive Maintenance Plan are made at this time.

Comment # 9: ECI commented that Interstate Brands strongly objects to recording daily visible emissions from the oven stacks as currently proposed in Section D.1.6 Visible Emissions Notations. Due to the nature of the process, no visible emissions should ever reasonably occur. The fermentation process evolves ethanol which is then exhausted from the ovens. Natural gas firing to heat the oven at less than 6.1 million Btu per hour for either oven should not produce any visible emissions except steam during cold weather periods.

Response: ERMD agrees that 326 IAC 5-1 Opacity Limitations should be a generally applicable requirement to all activities source wide as stated in Section C.2 Opacity. The oven stacks release ethanol and the products of combustion of natural gas and would serve little purpose to provide a daily record account of visible emissions. In a somewhat similar scenario, per IDEM-OAM guidance, daily visible emissions are not required for natural gas boilers even though it is a generally applicable requirement. Therefore, the current Section D.1.6 Visible Emissions Notations is **deleted** from the FESOP. Since there are no compliance monitoring requirements in Section D.1, Section C.18 - Compliance Monitoring Plan - Failure to Take Corrective Action is now **deleted** from Section C.

Comment # 10: See Comment # 5 regarding the fluctuation in the number of 28 day record keeping periods which serve to comprise a quarterly report.

Response: ERMD agrees that the number of 28 day reporting periods in a calendar quarter may fluctuate from one quarterly reporting period to the next. However, the FESOP limitation to signify that the source is a minor source eligible for a FESOP is stated in terms of 13 consecutive rolling 28 day production periods. The quarterly report is not intended to be a FESOP emission limitation. However, ERMD does acknowledge that the intent of the quarterly report is to account for four complete calendar quarters of activity. If rolling thirteen consecutive 28 day period emissions are reported then, essentially, activity for the previous year, on a rolling basis, should be known. The comment signifies that it is imperative that emissions for each day of a calendar quarter be reported.

The quarterly reporting form for 28 day production period emissions found on page 36 of the FESOP provides an accounting of the rolling thirteen consecutive 28 day period emissions as a rolling total as well as each 28 day period ending date for all periods completed during the calendar quarter.

The intent of the quarterly report is to provide a rolling thirteen consecutive 28 day period

VOC emissions total. If all completed 28 day period emission totals in a quarter are reported and a rolling average is supplied, verification of annual emission limitation could be made.

ERMD agrees that Section D.1.8 Reporting Requirements does need to specifically address what information is to be contained in each quarterly report to clarify this ambiguity.

Therefore, Section D.1.8 Reporting Requirements is now Section D.1.7 and is **amended** to state:

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.6 shall be submitted to the addresses listed in Section C.20 - General Reporting Requirements, of this permit, using the reporting form(s) located at the end of this Permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. Each quarterly report shall consist of, at a minimum, a rolling thirteen (13) consecutive twenty eight (28) day production period VOC emissions total including all completed twenty eight (28) day production periods in the calendar quarter being reported if record keeping is performed pursuant to Section D.1.1a). The quarterly report shall also include the end date of all twenty eight (28) day production periods completed during the quarter. If weekly records are kept, pursuant to Condition D.1.1b), the quarterly report shall include a rolling fifty two (52) consecutive week production period VOC emissions total including all completed weekly production periods in the calendar quarter being reported and the weekly end date of all weekly periods being reported per calendar quarter.

Section D.2 Comments/Changes

Comment # 11: ECI commented that none of the equipment under Emission Unit ID Transfer Points exhausts Particulate Matter (PM) outdoors. All equipment including storage silos for bulk receiving of flour and sugar are located inside the building and vent back in to the building. Emission Unit ID Transfer Points has been determined to be an Insignificant Activity and add on control has been determined to be integral to the system. FDA requirements, as well as the recovery of the controlled product, deem the add on control integral to the system. Each piece of add on control varies in the control scheme and its associated equipment. Sock filters with no pressure gauges are in place at some transfer points. Baghouses may have variation in the optimum operating pressure drop range. Some baghouses do not have pressure gauges. Requiring daily records of visible emissions notations as currently stated in Section D.2.5 is overly burdensome since problems would be noted immediately because of venting back in to the building. The requirement of a PM plan as required by Section D.2.2 Preventive Maintenance Plan is overly burdensome for an activity deemed insignificant. If required, the FESOP should address what the bakery already has in place as a PM plan to avoid a duplicate plan.

Response: Emission Unit ID Transfer Points has been deemed integral to the system. Therefore, PTE is determined after add on control. At 8760 hours of operation and maximum capacity, PTE for Emission Unit ID Transfer Points has been determined to be 0.9 tons per year of PM10 (and 0.9 tons per year of PM). The source is not major for PM10 and has no PM10 emission limitations either source wide or for this facility such that 326 IAC 2-7 is not applicable. Based on the PTE determination, Interstate Brands appears to be an existing minor source for PM10.

Therefore, this Insignificant Activity should have no Compliance Monitoring requirements for daily visible emissions notations because the source does not have emission limitations to restrict PM10 emissions source wide to less than the applicable major source threshold for PM10.

In addition, daily compliance monitoring for baghouse pressure drop checks, as currently required by Section D.2.6 Baghouse Pressure Drop, should also be deleted as this activity has been deemed insignificant and is not limited to restrict over all PM10 PTE.

In addition, the PM plan, currently required by Section D.2.2 Preventive Maintenance Plan, should also not be relevant to an Insignificant Activity not limited such that 326 IAC 2-7 is not applicable. ECI stated that any duplication of what they already currently have in regards to regularly scheduled preventive maintenance would be overly burdensome. It was not ERMD's intent to devise a duplicate plan or a plan that necessarily goes above and beyond what they currently have in place. The draft FESOP merely required a PM plan to be in place and submitted upon request. A plan already in place may possibly be deemed appropriate.

As a result, Section D.2.2 Preventive Maintenance Plan is **deleted**. Section D.2.5 Visible Emissions Notations is **deleted**. Section D.2.6 Baghouse Pressure Drop is **deleted** and the record keeping requirements under Section D.2.7 are **deleted**.

Technical Support Document Changes

Compliance Requirements

See Comment/Reponses # 8, #9 and # 11

Comment # 12: There should be no applicable compliance monitoring requirements with regard to daily visible emissions evaluations for Emission Unit ID Oven # and Oven # 4 and Emission Unit ID Transfer Points. There should be no applicable compliance monitoring requirements with regard to recording daily the static pressure drop across Emission Unit ID Transfer Points control devices.

Response: There are no applicable compliance monitoring requirements for these Emission Unit ID's. Interstate Brands is not a major source for PM10. PM10 emissions are not being limited such that 326 IAC 2-7 does not apply.

Section (a) and (b) of the Technical Support Document under Compliance Requirements is now **deleted** from the TSD per this TSD Addendum revision.

TSD Table 1 and Table 2 Pages 12 and 13 of TSD

See Comment/Responses # 12

Response: Compliance Monitoring and Compliance Demonstration provisions in Table 1 on Page 12 of 13 of the TSD with regard to PM/PM10 emission limitations are **changed** to none. Table 2 on Page 13 of 13 is now **deleted**. The new Table 1 is:

Table 1

Stack/Vent ID: Oven # 3 , Oven # 4 and Oven Chain Lubrication
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Stack/Vent Dimensions: Ht: > 26 ft Dia: > 17 inches Temp: > 100 F Flow: > 4000				
Emission Unit: Oven # 3 , Oven # 4 and Chain Lubrication				
Date of Construction: 1982 for Oven # 3 and 1968 for Oven # 4				
Alternative Scenario:				
Pollution Control Equipment: none				
General Description of Requirement:	VOC	PM		
Numerical Emission Limit:	89.3 tons/yr	PM = 4.1(P) ^{0.16}		
Regulation/Citation:	326 IAC 2-8	326 IAC 6-3-2(c)		
Compliance Demonstration:	record keeping	stack testing		
PERFORMANCE TESTING				
Parameter/Pollutant to be Tested:	none	none		
Testing Method/Analysis:	none	none		
Testing Frequency/Schedule:	none	none		
Submittal of Test Results:	none	none		
COMPLIANCE MONITORING				
Monitoring Description:	none	none		
Monitoring Method:	none	none		
Monitoring Regulation/Citation:	none	none		
Monitoring Frequency:	none	none		
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	actual bread/bun production/chain lubrication usage VOC	none		
Recording Frequency:	13 28-day production periods	none		
Submittal Schedule of Reports:	quarterly	none		
REPORTING REQUIREMENTS				
Information in Report:	actual production/VOC emissions	none		
Reporting Frequency/Submittal:	quarterly	none		
Additional Comments:				

Limited PTE

There are no changes to Limited PTE. The Limited PTE Table of the TSD remains the same as listed in the TSD and appears below for information purposes.

Process/ facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Emission Unit ID Oven # 3 Bread Oven and Emission Unit ID Oven # 4 Bun Oven and Chain Lubrication for Oven # 3 and Oven # 4	5.5	5.5	0.0	89.3	0.9	4.0	0.0
Insignificant Activities	7.3	7.3	0.1	2.1	2.5	11.9	1.2
Total Emissions	12.8	12.8	0.1	91.4	3.4	15.9	1.2

Interstate Brands Corporation
SUM of Emission Unit PTE
05/20/97

Emission Unit	PM	PM10	SO2	NOx	VOC	CO	HAP (METHANOL)	Combined HAP's
Oven # 3								
fuel (1)	0.4	0.4	0.0	2.7	0.1	0.6	0.0	0.0
process (2)	2.4	2.4	0.0	0.0	220.0	0.0	0.0	0.0
Oven # 4								
fuel (1)	0.2	0.2	0.0	1.3	0.1	0.3	0.0	0.0
process (2)	2.4	2.4	0.0	0.0	99.5	0.0	0.0	0.0
Oven # 3 & Oven # 4								
Chain Lubrication (3)	0.0	0.0	0.0	0.0	4.3	0.0	0.0	0.0
Insignificant Activities								
Fuel Combustion (sum) (4)	1.6	1.6	0.1	11.9	0.6	2.5	0.0	0.0
Muffin Oven # 1 (2)	2.4	2.4	0.0	0.0	0.0	0.0	0.0	0.0
Muffin Oven # 2 (2)	2.4	2.4	0.0	0.0	0.0	0.0	0.0	0.0
Transfer Points (sum) (5)	0.9	0.9	0.0	0.0	0.0	0.0	0.0	0.0
Printing (6)	0.0	0.0	0.0	0.0	1.2	0.0	1.1	1.2
Parts Washers (7)	0.0	0.0	0.0	0.0	0.3	0.0	0.0	0.0
Sum	12.8	12.8	0.1	15.9	326.1	3.4	1.1	1.2

NOTES

- (1) AP-42 emfacs for natural gas combustion only.
- (2) EPA ACT for Bakeries Document to generate highest bread product VOC emfac.
PM/PM10 emissions assume 0.55 lbs/hr from mixing dough/flour/sugar at ovens & @ 8760 = 2.41 tons per year.
- (3) Based on max usage @ 8760 of 1417.5 gals per year @ 6 # VOC per gal.
- (4) Includes 10 natural gas fuel combustion units. See TSD App A Page 1 of 6.
- (5) Includes 38 transfer point emission control devices determined to be integral to the system. PM/PM10 emissions represent value after control. All pneumatically transferred ingredients baghouse catch reused.
- (6) Based on max usage @ 8760 of 542 gal ink/makeup solution per year.
- (7) Based on max usage @ 8760 of 100 gal per year @ 6.8 # VOC per gal.

12/13ths of 99 tons = 91.4 tons per year 51/52nds of 99 tons = 97.1 tons per year

0170calc.wk4

2.1 = sum tons of insignificant activities
89.3 = available tons to split between Oven # 3 & Oven # 4 & chain lubrication
89.3 - 4.3 = 85 = available tons to split between Oven # 3 & Oven # 4

22, 368 tons product x 7.6 # VOC/ton x ton/2000 # =	85 tons VOC per year if recordkeeping/reporting is 12/13ths	oven thru
23,868 tons product x 7.6 # VOC/ton x ton/2000 # =	90.7 tons VOC per year if recordkeeping/reporting is 51/52	limitations