

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT
and
City of Evansville EPA**

**Kerry Ingredients
1515 Park Street
Evansville, Indiana 47710**

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

This permit is issued 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.: F163-9185-00129	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	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 City of Evansville EPA and presented in the permit application.

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

The Permittee owns and operates a stationary bread crumb and batter mix formulation operation.

Responsible Official: Jeff Meyer
Source Address: 1515 Park Street, Evansville, Indiana 47710
Mailing Address: 1515 Park Street, Evansville, Indiana 47710
SIC Code: 2051
County Location: Vanderburgh
County Status: Attainment for all criteria pollutants. Nonattainment area for TSP, but this source is located within the Attainment portion of the county
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:

- (1) One (1) ABC (American Bread Crumb) natural gas fired bake oven, identified as 29 & 30 Baker Perkins, installed prior to 1974, with maximum heat input capacity of 4.2 million British thermal units per hour (mmBtu/hr), with maximum baking capacity of 9,886 pounds of baked product per hour, exhausting to two (2) stacks (19 and 20);
- (2) One (1) JBC (Japanese Bread Crumb) dielectric oven, identified as JBC Dielectric Oven, installed in 1978, with maximum baking capacity of 8,631 pounds of baked product per hour, exhausting to one (1) stack (6);
- (3) One (1) ABC (American Bread Crumb) natural gas fired dryer with two (2) burners, identified as AH-MA & TAH-R, installed prior to 1974, with maximum heat capacity of 7.0 million British thermal units per hour (mmBtu/hr), with maximum drying capacity of 6,406 pounds of American Bread Crumbs per hour, using two (2) baghouses as control, exhausting to one (1) stack (14);
- (4) One (1) JBC (Japanese Bread Crumb) natural gas fired dryer with two (2) burners, identified as AH-MA & RAH, installed in 1978, with maximum heat input capacity of 5.5 million British thermal units per hour (mmBtu/hr), with maximum drying capacity of 5,925 pounds of Japanese Bread Crumbs per hour, using two (2) baghouses as control, exhausting to two (2) stacks (23a and 23b);
- (5) Eleven (11) batter silos, identified as Batter Silos #2 - #12, installed prior to 1974, each with a maximum storage capacity of 2,750 cubic feet, using three (3) baghouses as control, exhausting to three (3) stacks (33, 34 and 35);
- (6) Three (3) ABC (American Bread Crumb) silos, identified as Bread Crumb Silos #13 - #15, installed prior to 1974, each with a maximum storage capacity of 4,000 cubic feet, each using a baghouse as control, each exhausting to one (1) stack (36, 37 and 38);
- (7) Three (3) JBC (Japanese Bread Crumb) silos, identified as Bread Crumb Silos #16 -

- #18, installed in 1978, each with a maximum storage capacity of 4,000 cubic feet, each exhausting to one (1) baghouse, each exhausting to one (1) stack (39, 40 and 41);
- (8) One (1) hand dump station, identified as the Redline Hand Dump Station, installed in 1978, with a maximum capacity of 2,844 pounds of raw materials per hour, using one (1) baghouse as control, exhausting to one (1) stack (3);
 - (9) One (1) hand dump station, identified as the Blueline Hand Dump Station, installed in 1978, with a maximum capacity of 11,362 pounds of raw materials per hour, using one (1) baghouse as control that is shared with the Redline Hand Dump Station, exhausting to one (1) stack (3);
 - (10) One (1) mixer, identified as the Redline Mixer, installed in 1978, with a maximum capacity of 10,000 pounds of mixed products per hour, using one (1) baghouse as control, exhausting to one (1) stack (28);
 - (11) One (1) mixer, identified as the Blueline Mixer, installed in 1978, with a maximum capacity of 17,500 pounds of mixed products per hour, using one (1) baghouse as control that is shared by the Redline Mixer, exhausting to one (1) stack (28);
 - (12) Two (2) ABC (American Bread Crumb) mixers, identified as ABC Mixer 1 and ABC Mixer 2, installed prior to 1974, with a combined maximum capacity of 11,854 pounds of mixed products per hour, each using one (1) sock as control, each exhausting to one (1) stack (42 and 43); and
 - (13) Two (2) JBC (Japanese Bread Crumb) mixers, identified as JBC Mixer 1 and JBC Mixer 2, installed in 1978, with a combined maximum capacity of 11,510 pounds of mixed products per hour, each using one (1) sock as control, each exhausting to one (1) stack (44 and 45).

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

- (1) One (1) 3.36 million British thermal units per hour (mmBtu/hr) natural gas fired Cleaver Brooks boiler, identified as CB720-8, installed prior to 1974, exhausting to one (1) stack (9);
- (2) One (1) 3.347 million British thermal units per hour (mmBtu/hr) natural gas fired Cleaver Brooks boiler, identified as CB773-80, installed prior to 1974, exhausting to one (1) stack (9); and
- (3) Applied air systems (warehouse heating system), identified as GHLIFP 300/175, installed prior to 1974, exhausting to one (1) stack (31).

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) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

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 City of Evansville EPA.
- (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 City of Evansville EPA.

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)]

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

B.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
Indianapolis, Indiana 46206-6015

and

City of Evansville EPA
Room 250

101 N.W. Martin Luther King Jr. Blvd.
Evansville, Indiana 47708

- (b) The Permittee shall furnish to IDEM, OAM, and City of Evansville EPA within a reasonable time, any information that IDEM, OAM, and City of Evansville EPA 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 City of Evansville EPA copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, and City of Evansville EPA along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

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

IDEM, OAM and City of Evansville EPA 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)] [326 IAC 2-8-5(1)]

- (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) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses

the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and 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

City of Evansville EPA
Room 250
101 N.W. Martin Luther King Jr. Blvd
Evansville, Indiana 47708

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and City of Evansville EPA on or before the date it is due.
- (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 City of Evansville EPA may require to determine the compliance status of the source.

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(34).

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated 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) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and City of Evansville EPA upon request and shall be subject to review and approval by IDEM, OAM, and City of Evansville EPA.

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 City of Evansville EPA, 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

City of Evansville EPA Telephone No.: 812-426-5597

City of Evansville EPA Facsimile No.: 812-426-7344

Failure to notify IDEM, OAM and City of Evansville EPA 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:

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

Indianapolis, Indiana 46206-6015

and

City of Evansville EPA
Room 250
101 N.W. Martin Luther King Jr. Blvd
Evansville, Indiana 47708

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(34).

- (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 City of Evansville EPA 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 City of Evansville EPA 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:
 - (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 response steps 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

City of Evansville EPA
Room 250
101 N.W. Martin Luther King Jr. Blvd
Evansville, Indiana 47708

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

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

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

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM and City of Evansville EPA at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM and City of Evansville EPA 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 City of Evansville EPA and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21).

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

City of Evansville EPA
Room 250
101 N.W. Martin Luther King Jr. Blvd
Evansville, Indiana 47708

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) 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) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM and City of Evansville EPA on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM and City of Evansville EPA 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 City of Evansville EPA 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 City of Evansville EPA any additional information 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 City of Evansville EPA 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), except as provided by 326 IAC 2-8-11(c).
- (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 provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, and City of Evansville EPA 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, review by affected states 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 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 (this term is defined at 326 IAC 2-7-1(36)) 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

City of Evansville EPA
Room 250
101 N.W. Martin Luther King Jr. Blvd
Evansville, Indiana 47708

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 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 City of Evansville EPA in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved 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 and City of Evansville EPA, 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;
- (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 City of Evansville EPA 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 by an administrative amendment pursuant to 326 IAC 2-8-10.
- (c) IDEM, OAM and City of Evansville EPA 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 City of Evansville EPA within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling 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.

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.
 - (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) 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. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1 or MCE 3.30.18.212. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

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 not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions) or MCE 3.30.18.212. 326 IAC 6-4-2(4) is not federally enforceable.

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

All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

**C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18]
[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 be accredited is federally enforceable.

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

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAM.

A test protocol, except as provided elsewhere in 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
Indianapolis, Indiana 46206-6015

and

City of Evansville EPA
Room 250
101 N.W. Martin Luther King Jr. Blvd
Evansville, Indiana 47708

no later than thirty-five (35) days before the intended test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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 as required by this permit. 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

City of Evansville EPA
Room 250
101 N.W. Martin Luther King Jr. Blvd.
Evansville, Indiana 47708

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(34).

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

- (a) 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.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. 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 according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement 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 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) The Permittee shall insure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

- (2) If there is a change in the following:
 - (A) asbestos removal or demolition start date;
 - (B) removal or demolition contractor; or
- (3) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

and

City of Evansville EPA
Room 250
101 N.W. Martin Luther Kind Jr. Blvd
Evansville, Indiana 47708

- (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
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. The requirement that the inspector be accredited is federally enforceable.

Corrective Actions and Response Steps [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 shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval 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

City of Evansville EPA
Room 250
101 N.W. Martin Luther King Jr. Blvd
Evansville, Indiana 47708

within ninety (90) days from the date of issuance of this permit.

- (c) If the ERP is disapproved by IDEM, OAM and City of Evansville EPA 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, then IDEM, OAM and City of Evansville EPA shall supply such a plan.
- (d) 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.
- (e) 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.
- (f) Upon direct notification by IDEM, OAM and City of Evansville EPA 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, subject to 40 CFR 68, is present in more than the threshold quantity, 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 a part of the compliance certification submitted under 326 IAC 2-7-6(5), 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 City of Evansville EPA 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 City of Evansville EPA that the Risk Management Plan is being properly implemented.

C.16 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and City of Evansville EPA upon request and shall be subject to review and approval by IDEM, OAM and City of Evansville EPA. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. 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.18 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

City of Evansville EPA
Room 250
101 N.W. Martin Luther King Jr. Blvd
Evansville, Indiana 47708

- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM and City of Evansville EPA on or before the date it is due.

C.19 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing 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) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, 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 City of Evansville EPA may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in 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.20 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 City of Evansville EPA 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 preventive maintenance shall be sufficient to demonstrate that

improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

- (b) The report required in (a) of this condition and 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
Indianapolis, Indiana 46206-6015

and

City of Evansville EPA
Room 250
101 N.W. Martin Luther King Jr. Blvd
Evansville, Indiana 47708

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

- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) 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.22 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.

SECTION D.1 FACILITY OPERATION CONDITIONS

- (1) One (1) ABC (American Bread Crumb) natural gas fired bake oven, identified as 29 & 30 Baker Perkins , installed prior to 1974, with maximum heat input capacity of 4.2 million British thermal units per hour (mmBtu/hr), with maximum baking capacity of 9,886 pounds of baked product per hour, exhausting to two (2) stacks (19 and 20);
- (2) One (1) JBC (Japanese Bread Crumb) dielectric oven, identified as JBC Dielectric Oven, installed in 1978, with maximum baking capacity of 8,631 pounds of baked product per hour, exhausting to one (1) stack (6);

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 (FESOP):

- (a) The ABC bake oven shall be limited to 3,667 tons of ABC dough per month, and
- (b) The JBC dielectric oven shall be limited to 3,459 tons of JBC dough per month.

These limits are equivalent to forty-nine (49) tons per year of volatile organic compound (VOC) for each bake oven. These limits will make 326 IAC 2-7 (Part 70) not applicable. The conversion from tons of dough to tons of VOC per month is as follows:

Tons dough per month * VOC Emission Factor/ 2000 lb/ton = Tons VOC per month

Emission Factors:

For ABC dough = 2.227 lb/ton

For JBC dough = 2.361 lb/ton

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the volatile organic compound (VOC) limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

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

D.1.4 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to EPA Alternative Control Technology for Bakery Oven Emissions using formulation data supplied by the manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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 record the total number of ABC dough and JBC dough produced each month.

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

- (3) One (1) ABC (American Bread Crumb) natural gas fired dryer with two (2) burners, identified as AH-MA & TAH-R, installed prior to 1974, with maximum heat capacity of 7.0 million British thermal units per hour (mmBtu/hr), with maximum drying capacity of 6,406 pounds of American Bread Crumbs per hour, using two (2) baghouses as control, exhausting to one (1) stack (14);
- (4) One (1) JBC (Japanese Bread Crumb) natural gas fired dryer with two (2) burners, identified as AH-MA & RAH, installed in 1978, with maximum heat input capacity of 5.5 million British thermal units per hour (mmBtu/hr), with maximum drying capacity of 5,925 pounds of Japanese Bread Crumbs per hour, using two (2) baghouses as control, exhausting to two (2) stacks (23a and 23b);

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

D.2.1 Particulate Matter (PM) and PM10 [326 IAC 6-3-2] [326 IAC 2-8-4]

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), the PM from the ABC dryer shall not exceed 8.94 pounds per hour and the PM from the JBC dryer shall not exceed 8.48 pounds per hour. The pounds per hour limitation was calculated with 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:

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

- (b) The total allowable particulate matter less than ten microns emissions from the whole source shall not exceed twenty-two (22) pounds per hour. This limit is to keep the allowable PM10 emissions below one hundred (100) tons per year and make 326 IAC 2-7 (Part 70) not applicable.

Compliance Determination Requirements

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

Testing of this facility is not required by this permit. However, if testing is required, compliance with the particulate matter limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

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

D.2.3 Particulate Matter (PM)

Pursuant to 326 IAC 6-3, the baghouses for PM control shall be in operation at all times when the ABC dryer and JBC dryer are in operation and exhausting to the outside atmosphere.

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the ABC dryer and JBC dryer baghouses stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the ABC dryer and JBC dryer at least once daily when the ABC dryer and JBC dryer is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 1.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and City of Evansville EPA and shall be calibrated at least once every six (6) months.

D.2.6 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
- (b) Based upon the findings of the inspection, any additional response steps will be devised within eight (8) hours of discovery and will include a timetable for completion.

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

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the ABC dryer and JBC dryer baghouse stack exhausts.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure
 - (2) Documentation of all response steps implemented, per event.

- (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) A malfunction log shall be maintained which identifies all malfunctions to the pollution control equipment.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

- (5) Eleven (11) batter silos, identified as Batter Silos #2 - #12, installed prior to 1974, each with a maximum storage capacity of 2,750 cubic feet, using three (3) baghouses as control, exhausting to three (3) stacks (33, 34 and 35);
- (6) Three (3) ABC (American Bread Crumb) silos, identified as Bread Crumb Silos #13 - #15, installed prior to 1974, each with a maximum storage capacity of 4,000 cubic feet, each using a baghouse as control, each exhausting to one (1) stack (36, 37 and 38);
- (7) Three (3) JBC (Japanese Bread Crumb) silos, identified as Bread Crumb Silos #16 - #18, installed in 1978, each with a maximum storage capacity of 4,000 cubic feet, each exhausting to one (1) baghouse, each exhausting to one (1) stack (39, 40 and 41);
- (8) One (1) hand dump station, identified as the Redline Hand Dump Station, installed in 1978, with a maximum capacity of 2,844 pounds of raw materials per hour, using one (1) baghouse as control, exhausting to one (1) stack (3);
- (9) One (1) hand dump station, identified as the Blueline Hand Dump Station, installed in 1978, with a maximum capacity of 11,362 pounds of raw materials per hour, using one (1) baghouse as control that is shared with the Redline Hand Dump Station, exhausting to one (1) stack (3);
- (10) One (1) mixer, identified as the Redline Mixer, installed in 1978, with a maximum capacity of 10,000 pounds of mixed products per hour, using one (1) baghouse as control, exhausting to one (1) stack (28);
- (11) One (1) mixer, identified as the Blueline Mixer, installed in 1978, with a maximum capacity of 17,500 pounds of mixed products per hour, using one (1) baghouse as control that is shared by the Redline Mixer, exhausting to one (1) stack (28);

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

D.3.1 Particulate Matter (PM) and PM₁₀ [326 IAC 6-3-2] [326 IAC 2-8-4]

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations):
 - (1) The PM emissions from batter silo #2 shall not exceed 25.16 pounds per hour;
 - (2) The PM emissions from batter silos #3 - #12 shall not exceed 19.17 pounds per hour;
 - (3) The PM emissions from the three (3) ABC silos shall not exceed 25.16 pounds per hour;
 - (4) The PM emissions from the three (3) JBC silos shall not exceed 25.16 pounds per hour;
 - (5) The PM emissions from the Redline hand dump station shall not exceed 5.19 pounds per hour;
 - (6) The PM emissions from the Blueline hand dump station shall not exceed 13.12 pounds per hour;
 - (7) The PM emissions from the Redline mixer shall not exceed 12.05 pounds per hour; and
 - (8) The PM emissions from the Blueline mixer shall not exceed 17.53 pounds per hour.

The pounds per hour limitation was calculated with 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:

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

- (b) The total allowable particulate matter less than 10 microns emissions from the whole source shall not exceed twenty-two (22) pounds per hour. This limit is to keep the allowable PM10 emissions below one hundred (100) tons per year and make 326 IAC 2-7 (Part 70) not applicable.

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities except the Redline Hand Dump Station and its control devices.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the particulate matter limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

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

D.3.4 Particulate Matter (PM)

Pursuant to 326 IAC 6-3, the baghouses for PM control shall be in operation at all times when the eleven batter silos (#2 - #12), the three (3) ABC silos, the three (3) JBC silos, the Redline hand dump station, the Blueline hand dump station, the Redline mixer and the Blueline mixer are in operation and exhausting to the outside atmosphere.

D.3.5 Visible Emissions Notations

- (a) Daily visible emission notations of the eleven batter silos (#2 - #12), the three (3) ABC silos, the three (3) JBC silos, the Redline hand dump station, the Blueline hand dump station, the Redline mixer and the Blueline mixer stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in

conjunction with the eleven batter silos (#2 - #12), the three (3) ABC silos, the three (3) JBC silos, the Redline hand dump station, the Blueline hand dump station, the Redline mixer and the Blueline mixer at least once daily when the eleven batter silos (#2 - #12), the three (3) ABC silos, the three (3) JBC silos, the Redline hand dump station, the Blueline hand dump station, the Redline mixer and the Blueline mixer are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 4.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and City of Evansville EPA and shall be calibrated at least once every six (6) months.

D.3.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
- (b) Based upon the findings of the inspection, any additional response steps will be devised within eight (8) hours of discovery and will include a timetable for completion.

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

D.3.8 Record Keeping Requirements

- (a) To document compliance with Condition D.3.5, the Permittee shall maintain records of daily visible emission notations of the eleven batter silos (#2 - #12), the three (3) ABC silos, the three (3) JBC silos, the Redline hand dump station, the Blueline hand dump station, the Redline mixer and the Blueline mixer stack exhaust.
- (b) To document compliance with Condition D.3.6, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

- (12) Two (2) ABC (American Bread Crumb) mixers, identified as ABC Mixer 1 and ABC Mixer 2, installed prior to 1974, with a combined maximum capacity of 11,854 pounds of mixed products per hour, each using one (1) sock as control, each exhausting to one (1) stack (42 and 43); and
- (13) Two (2) JBC (Japanese Bread Crumb) mixers, identified as JBC Mixer 1 and JBC Mixer 2, installed in 1978, with a combined maximum capacity of 11,510 pounds of mixed products per hour, each using one (1) sock as control, each exhausting to one (1) stack (44 and 45).

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

D.4.1 Particulate Matter (PM) and PM10 [326 IAC 6-3-2] [326 IAC 2-8-4]

(a) Pursuant to 326 IAC 6-3-2 (Process Operations):

- (1) The PM emissions from the two (2) ABC mixers shall not exceed 13.50 pounds per hour, and
- (2) The PM emissions from the two (2) JBC mixers shall not exceed 13.24 pounds per hour.

The pounds per hour limitation was calculated with 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:

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

- (b) The total allowable particulate matter less than ten microns emissions from the whole source shall not exceed twenty-two (22) pounds per hour. This limit is to keep the allowable PM10 emissions below one hundred (100) tons per year and make 326 IAC 2-7 (Part 70) not applicable.

D.4.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the particulate matter (PM) limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

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

D.4.4 Visible Emissions Notations

- (a) Daily visible emission notations of the two (2) ABC mixers and the two (2) JBC mixers stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.4.5 Sock Inspections

An inspection shall be performed each calendar quarter of all socks controlling the two (2) ABC mixers and the two (2) JBC mixers. All defective socks shall be replaced.

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

D.4.6 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4, the Permittee shall maintain records of daily visible emission notations of the two (2) ABC mixers and two (2) JBC mixers stack exhaust.
- (b) To document compliance with Condition D.4.5, the Permittee shall maintain records of the results of the inspections required under Condition D.4.5.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY CONDITIONS

(Insignificant Activity (1))	One (1) 3.36 million British thermal units per hour (mmBtu/hr) natural gas fired Cleaver Brooks boiler, identified as CB720-8, installed prior to 1974, exhausting to one (1) stack (9);
(Insignificant Activity (2))	One (1) 3.347 million British thermal units per hour (mmBtu/hr) natural gas fired Cleaver Brooks boiler, identified as CB773-80, installed prior to 1974, exhausting to one (1) stack (9);

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

D.5.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 3.36 mmBtu per hour boiler and the 3.347 mmBtu per hour boiler shall be limited to 0.8 pounds per mmBtu heat input. This limitation is used because the calculated limitation was greater than 0.80 pounds per million Btu.

The calculated limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where:

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

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

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 mmBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 mmBtu/hr heat input.

h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times pa_i \times Q}{\sum_{i=1}^N pa_i \times Q}$$

Where:

pa = the actual controlled emission rate in lb/mmBtu using the emission factor from AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

Compliance Determination Requirements

D.5.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the particulate matter (PM) limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

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

**AND
CITY OF EVANSVILLE EPA**

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

Source Name: Kerry Ingredients
Source Address: 1515 Park Street, Evansville, Indiana 47710
Mailing Address: 1515 Park Street, Evansville, Indiana 47710
FESOP No.: F163-9185-00129

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 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

AND

CITY OF EVANSVILLE EPA

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

Source Name: Kerry Ingredients
Source Address: 1515 Park Street, Evansville, Indiana 47710
Mailing Address: 1515 Park Street, Evansville, Indiana 47710
FESOP No.: F163-9185-00129

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
CThe Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 AND
 CITY OF EVANSVILLE EPA**

FESOP Quarterly Report

Source Name: Kerry Ingredients
 Source Address: 1515 Park Street, Evansville, Indiana 47710
 Mailing Address: 1515 Park Street, Evansville, Indiana 47710
 FESOP No.: F163-9185-00129
 Facility: ABC bake oven and JBC Dielectric Oven
 Parameter: VOC
 Limit: 3,667 tons of ABC dough per month and 3,459 tons of JBC dough per month. This is equivalent to forty-nine (49) tons VOC per year which converts to 4.08 tons per month.

YEAR: _____

Month	Tons ABC dough this month	Tons VOC from ABC Oven this month*	Tons JBC dough this month	Tons VOC from JBC Oven this month*

* $\text{Tons dough per month} \times \text{VOC Emission Factor (for ABC dough} = 2.227 \text{ lb/ton, for JBC dough} = 2.361 \text{ lb/ton)} / 2000 \text{ lb/ton} = \text{Tons VOC per month}$

- 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
 COMPLIANCE DATA SECTION
 AND
 CITY OF EVANSVILLE EPA**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY COMPLIANCE REPORT**

Source Name: Kerry Ingredients
 Source Address: 1515 Park Street, Evansville, Indiana 47710
 Mailing Address: 1515 Park Street, Evansville, Indiana 47710
 FESOP No.: F163-9185-00129

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Management
and
City of Evansville EPA**

Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP) and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name: Kerry Ingredients
Source Location: 1515 Park Street, Evansville, Indiana 47710
County: Vanderburgh
SIC Code: 2051
Operation Permit No.: F163-9185-00129
Permit Reviewer: Cathie Moore

The Office of Air Management (OAM) has reviewed a FESOP permit application from Kerry Ingredients relating to the operation of a bread crumb and batter mix formulation operation.

Permitted Emission Units and Pollution Control Equipment

There are no permitted facilities operating at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source also consists of the following unpermitted facilities/units:

- (1) One (1) ABC (American Bread Crumb) natural gas fired bake oven, identified as 29 & 30 Baker Perkins, installed prior to 1974, with maximum heat input capacity of 4.2 million British thermal units per hour (mmBtu/hr), with maximum baking capacity of 9,886 pounds of baked product per hour, exhausting to two (2) stacks (19 and 20);
- (2) One (1) JBC (Japanese Bread Crumb) dielectric oven, identified as JBC Dielectric Oven, installed in 1978, with maximum baking capacity of 8,631 pounds of baked product per hour, exhausting to one (1) stack (6);
- (3) One (1) ABC (American Bread Crumb) natural gas fired dryer with two (2) burners, identified as AH-MA & TAH-R, installed prior to 1974, with maximum heat capacity of 7.0 million British thermal units per hour (mmBtu/hr), with maximum drying capacity of 6,406 pounds of American Bread Crumbs per hour, using two (2) baghouses as control, exhausting to one (1) stack (14);
- (4) One (1) JBC (Japanese Bread Crumb) natural gas fired dryer with two (2) burners, identified as AH-MA & RAH, installed in 1978, with maximum heat input capacity of 5.5 million British thermal units per hour (mmBtu/hr), with maximum drying capacity of 5,925 pounds of Japanese Bread Crumbs per hour, using two (2) baghouses as control, exhausting to two (2) stacks (23a and 23b);
- (5) Eleven (11) batter silos, identified as Batter Silos #2 - #12, installed prior to 1974, each with a maximum storage capacity of 2,750 cubic feet, using three (3) baghouses as control, exhausting to three (3) stacks (33, 34 and 35);

- (6) Three (3) ABC (American Bread Crumb) silos, identified as Bread Crumb Silos #13 - #15, installed prior to 1974, each with a maximum storage capacity of 4,000 cubic feet, each using a baghouse as control, each exhausting to one (1) stack (36, 37 and 38);
- (7) Three (3) JBC (Japanese Bread Crumb) silos, identified as Bread Crumb Silos #16 - #18, installed in 1978, each with a maximum storage capacity of 4,000 cubic feet, each exhausting to one (1) baghouse, each exhausting to one (1) stack (39, 40 and 41);
- (8) One (1) hand dump station, identified as the Redline Hand Dump Station, installed in 1978, with a maximum capacity of 2,844 pounds of raw materials per hour, using one (1) baghouse as control, exhausting to one (1) stack (3);
- (9) One (1) hand dump station, identified as the Blueline Hand Dump Station, installed in 1978, with a maximum capacity of 11,362 pounds of raw materials per hour, using one (1) baghouse as control that is shared with the Redline Hand Dump Station, exhausting to one (1) stack (3);
- (10) One (1) mixer, identified as the Redline Mixer, installed in 1978, with a maximum capacity of 10,000 pounds of mixed products per hour, using one (1) baghouse as control, exhausting to one (1) stack (28);
- (11) One (1) mixer, identified as the Blueline Mixer, installed in 1978, with a maximum capacity of 17,500 pounds of mixed products per hour, using one (1) baghouse as control that is shared by the Redline Mixer, exhausting to one (1) stack (28);
- (12) Two (2) ABC (American Bread Crumb) mixers, identified as ABC Mixer 1 and ABC Mixer 2, installed prior to 1974, with a combined maximum capacity of 11,854 pounds of mixed products per hour, each using one (1) sock as control, each exhausting to one (1) stack (42 and 43); and
- (13) Two (2) JBC (Japanese Bread Crumb) mixers, identified as JBC Mixer 1 and JBC Mixer 2, installed in 1978, with a combined maximum capacity of 11,510 pounds of mixed products per hour, each using one (1) sock as control, each exhausting to one (1) stack (44 and 45).

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) One (1) 3.36 million British thermal units per hour (mmBtu/hr) natural gas fired Cleaver Brooks boiler, identified as CB720-8, installed prior to 1974, exhausting to one (1) stack (9);
- (2) One (1) 3.347 million British thermal units per hour (mmBtu/hr) natural gas fired Cleaver Brooks boiler, identified as CB773-80, installed prior to 1974, exhausting to one (1) stack (9); and
- (3) Applied air systems (warehouse heating system), identified as GHLIFP 300/175, installed prior to 1974, exhausting to one (1) stack (31).

Existing Approvals

The source does not have any existing approvals.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner 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 November 5, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (three (3) pages).

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	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO _x	less than 100

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

HAP's	Potential Emissions (tons/year)
TOTAL	0.00

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of volatile organic compounds (VOC) 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.
- (c) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
ABC Oven and JBC Dielectric Oven	-	-	-	98	-	-	-
Natural Gas Combustion	-	-	-	1	-	-	-
Total Emissions	-	-	-	99	-	-	-

County Attainment Status

The source is located in Vanderburgh County.

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

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) 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. Vanderburgh County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) The 3.36 million British thermal units per hour Cleaver Brooks boiler and the 3.347 million British thermal units per hour Cleaver Brooks boiler are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40, 40a, 40b, and 40c, Subparts D, Da, Db, and Dc), because the heat capacities are less than ten (10) million British thermal units per hour.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63, applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) because the potential volatile organic compound (VOC) emissions are limited to less than one hundred (100) tons per year and therefore less than two hundred fifty (250) tons per year.

326 IAC 2-3 (Emission Offset)

This source is not subject to the requirements of 326 IAC 2-3 (Emission Offset) because the potential particulate matter (PM) emissions are less than one hundred (100) tons per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of volatile organic compound (VOC) and it is located in Vanderburgh 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 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 2-8 (FESOP)

Pursuant to 326 IAC 2-8 (FESOP):

- (a) The ABC bake oven shall be limited to 3,667 tons of ABC dough per month, and
- (b) The JBC dielectric oven shall be limited to 3,459 tons of JBC dough per month.

These limits are equivalent to a total of ninety-eight (98) tons per year of volatile organic

compound (VOC) for both bake ovens. These limits will make 326 IAC 2-7 (Part 70) not applicable.

The volatile organic compound emission factor was based on the following equation:

$$\text{VOC E.F.} = 0.95Y_i + 0.195t_i + 1.90$$

where:

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

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

These limits were established using the following calculations:

ABC oven limited throughput = 49 tons VOC/year / 57.80 tons VOC/year * 51,920 tons ABC dough/year = 44,015 tons ABC dough/year / 12 months/year = **3,667 tons ABC dough/month**

JBC oven limited throughput = 49 tons VOC/year / 59.50 tons VOC/year * 50,409 tons JBC dough/year = 41,513 tons JBC dough/year / 12 months/year = **3,459 tons JBC dough/month**

326 IAC 8-1-6 (General Reduction Requirements)

The ABC Oven and the JBC Dielectric Oven are not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because they were constructed prior to 1974 and in 1978, respectively, which is prior to the January 1, 1980 applicability date.

326 IAC 8-6 (Organic Solvent Emissions Limitations)

The ABC Oven and the JBC Dielectric Oven are not subject to the requirements of 326 IAC 8-6 (Organic Solvent Emissions Limitations) because the potential volatile organic compound (VOC) emissions from the source are limited to less than one hundred (100) tons per year and it was constructed prior to 1974, which is prior to the October 7, 1974 applicability date for Vanderburgh County.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the ABC dryer, the JBC dryer, the eleven (11) batter silos (#2 - #12), the three (3) ABC silos, the three (3) JBC silos, the two (2) hand dump stations, the Redline Mixer, the BlueLine Mixer, the two (2) ABC mixers, and the two (2) JBC mixers 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:

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

(a) For the ABC dryer:

P = 6,406 pounds per hour = 3.203 tons per hour

E = 8.94 pounds PM per hour

The total allowable particulate matter emissions from the whole source shall not exceed twenty-two (22) pounds per hour. This limit is to keep the allowable PM emissions below one hundred (100) tons per year and make 326 IAC 2-7 (Part 70) not applicable.

The two (2) baghouses shall be in operation at all times the ABC dryer is in operation in order to comply with this limit.

(b) For the JBC dryer:

P = 5,925 pounds per hour = 2.9625 tons per hour

E = 8.48 pounds PM per hour

The total allowable particulate matter emissions from the whole source shall not exceed twenty-two (22) pounds per hour. This limit is to keep the allowable PM emissions below one hundred (100) tons per year and make 326 IAC 2-7 (Part 70) not applicable.

The two (2) baghouses shall be in operation at all times the JBC dryer is in operation in order to comply with this limit.

(c) For the eleven (11) batter silos:

P (for batter silo #2) = 30,000 pounds per hour = 15 tons per hour

E (for batter silo #2) = 25.16 pounds PM per hour

P (for batter silos #3 - #12) = 20,000 pounds per hour = 10 tons per hour

E (for batter silos #3 - #12) = 19.17 pounds PM per hour

The total allowable particulate matter emissions from the whole source shall not exceed twenty-two (22) pounds per hour. This limit is to keep the allowable PM emissions below one hundred (100) tons per year and make 326 IAC 2-7 (Part 70) not applicable.

The three (3) baghouses shall be in operation at all times the eleven (11) batter silos are in operation in order to comply with this limit.

(d) For the three (3) ABC silos:

P = 30,000 pounds per hour = 15 tons per hour

E = 25.16 pounds PM per hour

The total allowable particulate matter emissions from the whole source shall not exceed twenty-two (22) pounds per hour. This limit is to keep the allowable PM emissions below one hundred (100) tons per year and make 326 IAC 2-7 (Part 70) not applicable.

The three (3) baghouses shall be in operation at all times the three (3) ABC silos are in operation in order to comply with this limit.

(e) For the three (3) JBC silos:

P = 30,000 pounds per hour = 15 tons per hour

E = 25.16 pounds PM per hour

The total allowable particulate matter emissions from the whole source shall not exceed twenty-two (22) pounds per hour. This limit is to keep the allowable PM emissions below one hundred (100) tons per year and make 326 IAC 2-7 (Part 70) not applicable.

The three (3) baghouses shall be in operation at all times the three (3) JBC silos are in operation in order to comply with this limit.

(f) For the two (2) hand dump stations:

P (Redline hand dump station) = 2,844 pounds per hour = 1.422 tons per hour

E (Redline hand dump station) = 5.19 pounds PM per hour

P (Blueline hand dump station) = 11,362 pounds per hour = 5.681 tons per hour

E (Blueline hand dump station) = 13.12 pounds PM per hour

The total allowable particulate matter emissions from the whole source shall not exceed twenty-two (22) pounds per hour. This limit is to keep the allowable PM emissions below one hundred (100) tons per year and make 326 IAC 2-7 (Part 70) not applicable.

The one (1) baghouse shall be in operation at all times the Redline hand dump station and the Blueline hand dump station are in operation in order to comply with this limit.

(g) For the Redline mixer and the Blueline Mixer:

P (Redline Mixer) = 10,000 pounds per hour = 5 tons per hour

E (Redline Mixer) = 12.05 pounds PM per hour

P (Blueline Mixer) = 17,500 pounds per hour = 8.75 tons per hour

E (Blueline Mixer) = 17.53 pounds PM per hour

The total allowable particulate matter emissions from the whole source shall not exceed twenty-two (22) pounds per hour. This limit is to keep the allowable PM emissions below one hundred (100) tons per year and make 326 IAC 2-7 (Part 70) not applicable.

The one (1) baghouse shall be in operation at all times the Redline mixer and the Blueline mixer are in operation in order to comply with this limit.

(h) For the two (2) ABC mixers:

P = 11,854 pounds per hour = 5.927 tons per hour

E = 13.50 pounds PM per hour

The total allowable particulate matter emissions from the whole source shall not exceed twenty-two (22) pounds per hour. This limit is to keep the allowable PM emissions below one hundred (100) tons per year and make 326 IAC 2-7 (Part 70) not applicable.

The two (2) socks shall be in operation at all times the two (2) ABC mixers are in operation in order to comply with this limit.

(i) For the two (2) JBC mixers:

P = 11,510 pounds per hour = 5.755 tons per hour

E = 13.24 pounds PM per hour

The total allowable particulate matter emissions from the whole source shall not exceed twenty-two (22) pounds per hour. This limit is to keep the allowable PM emissions below one hundred (100) tons per year and make 326 IAC 2-7 (Part 70) not applicable.

The two (2) socks shall be in operation at all times the two (2) JBC mixers are in operation in order to comply with this limit.

326 IAC 6-2-3 (Emissions Limitations for Facilities specified in 326 IAC 6-2-1(b))

Pursuant to 326 IAC 6-2-3 (Emissions Limitations for Facilities specified in 326 IAC 6-2-1(b)), the 3.36 million British thermal units per hour Cleaver Brooks boiler and the 3.347 million British thermal units per hour Cleaver Brooks boiler both constructed prior to 1974 shall be limited to 0.8 pounds per million British thermal unit per hour. This limitation

The calculated limitation is based on the following equation:

$$P_t = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where:

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

P_t = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

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

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise.

The value 0.67 shall be used for Q less than or equal to 1,000 mmBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 mmBtu/hr heat input.

h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times p_{a_i} \times Q}{\sum_{i=1}^N p_{a_i} \times Q}$$

Where:

pa = the actual controlled emission rate in lb/mmBtu using the emission factor from AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

For the 3.36 mmBtu/hr boiler and the 3.347 mmBtu/hr boiler:

$$C = 50$$

$$Q = 3.36 + 3.347 = 6.707$$

$$N = 1$$

$$a = 0.67$$

$$h = 28$$

Pt = 2.94 lb/mmBtu > 0.8 lb/mmBtu. Therefore the two (2) boilers are limited to 0.8 lb/mmBtu.

When using natural gas as fuel:

13.7 lbs/MMCF ÷ 1,000 mmBtu/MMCF = 0.014 lbs/mmBtu < 0.8 lbs/mmBtu. Therefore the 3.36 mmBtu/hr boiler and the 3.347 mmBtu/hr boiler are in compliance with this requirement.

Compliance Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. The ABC dryer and the JBC dryer have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the ABC dryer and JBC dryer stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
 - (b) The Permittee shall record the total static pressure drop across the baghouses controlling the ABC dryer and JBC dryer, at least once daily when the ABC dryer and JBC dryer are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 1.0 to 6.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouses for the ABC dryer and JBC dryer must operation properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

2. The Redline and Blueline hand dump stations, the Redline and Blueline mixers, the eleven (11) batter silos (#2 - #12), the ABC silos, and the JBC silos have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the Redline and Blueline hand dump stations, the Redline and Blueline mixers, the eleven (11) batter silos (#2 - #12), the ABC silos, and the JBC silos stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
 - (b) The Permittee shall record the total static pressure drop across the baghouses controlling the Redline and Blueline hand dump stations, the Redline and Blueline mixers, the eleven (11) batter silos (#2 - #12), the ABC silos, and the JBC silos, at least once daily when the Redline and Blueline hand dump stations, the Redline and Blueline mixers, the eleven (11) batter silos (#2 - #12), the ABC silos, and the JBC silos are in operation. Unless operated under

conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 4.0 to 6.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

3. The ABC mixers and the JBC mixers have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of The ABC mixers and the JBC mixers stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
 - (b) An inspection shall be performed each calender quarter of all socks controlling the ABC mixers and JBC mixers. All defective socks shall be replaced.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) 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) Part 70 Application Form GSD-08.

None of the listed air toxics will be emitted from this source.

Conclusion

The operation of this bread crumb and batter mix formulation operation shall be subject to the conditions of the attached proposed **FESOP No. F163-9185-00129**.

Appendix A: Emission Calculations
ABC Oven - Baking

Company Name: Kerry Ingredients
Address City IN Zip: 1515 Park Street, Evansville, Indiana 47710
FESOP: F163-9185-00129
Plt ID: 163-00129
Reviewer: Cathie Moore
Date: 12/11/97

Potential Throughput
 tons/yr

51920.52

	Pollutant					
Emission Factor in lb/ton	PM	PM10	SO2	NOx	VOC	CO
	-	-	-	-	2.227	-
Potential Emission in tons/yr	0.0	0.00	0.0	0.0	57.80	0.0

Methodology

Emission Factors from EPA Alternative Control Technology (ACT) Document for Bakery Oven Emissions (EPA-453/R-92-017)

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

VOC EF: the pounds of VOC per ton of baked bread (VOC EF = .95(Yi) + .195(ti) + 1.90)

Yi: the initial baker's percent of yeast to the nearest tenth of a percent

VOC EF

2.2265

ti: the total yeast action time in hours to the nearest tenth of an hour

Yi =	0.2
ti =	0.7

ABC Bake Oven - 4.2 mmBtu/hr
 ABC Dryer - 7.0 mmBtu/hr
 JBC Dryer - 5.5 mmBtu/hr
 CB720-8 boiler - 3.36 mmBtu/hr
 CB773-80 boiler - 3.347 mmBtu/hr
 GHLIFP 300/175 heating - 2.1875 mmBtu/hr

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

Company Name: Kerry Ingredients
Address City IN Zip: 1515 Park Street, Evansville, Indiana 47710
FESOP: F163-9185-00129
Plt ID: 163-00129
Reviewer: Cathie Moore
Date: 12/11/97

Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMCF/yr

25.6

224.2

Emission Factor in lb/MMCF	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	13.7	13.7	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	1.5	1.5	0.1	15.7	0.3	3.9

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Low NOx Burner = 81, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

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

Appendix A: Emission Calculations
JBC Oven - Baking

Company Name: Kerry Ingredients
Address City IN Zip: 1515 Park Street, Evansville, Indiana 47710
FESOP: F163-9185-00129
Plt ID: 163-00129
Reviewer: Cathie Moore
Date: 12/11/97

Potential Throughput
 tons/yr

50409.42

	Pollutant					
Emission Factor in lb/ton	PM	PM10	SO2	NOx	VOC	CO
	-	-	-	-	2.361	-
Potential Emission in tons/yr	0.0	0.00	0.0	0.0	59.50	0.0

Methodology

Emission Factors from EPA Alternative Control Technology (ACT) Document for Bakery Oven Emissions (EPA-453/R-92-017)

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

VOC EF: the pounds of VOC per ton of baked bread (VOC EF = .95(Yi) + .195(ti) + 1.90)

Yi: the initial baker's percent of yeast to the nearest tenth of a percent

VOC EF

2.3605

ti: the total yeast action time in hours to the nearest tenth of an hour

Yi =	0.3
ti =	0.9

**Indiana Department of Environmental Management
Office of Air Management
and Evansville EPA**

Addendum to the
Technical Support Document for
Federally Enforceable State Operating Permit (FESOP)
and Enhanced New Source Review (ENSR)

Source Name: Kerry Ingredients
Source Location: 1515 Park Street, Evansville, Indiana 47710
County: Vanderburgh
SIC Code: 2051
Operation Permit No.: F163-9185-00129
Permit Reviewer: Cathie Moore

On January 23, 1998, the Office of Air Management (OAM) had a notice published in the Evansville Courier, Evansville, Indiana, stating that Kerry Ingredients had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a bakery. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit 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 permit should be issued as proposed.

Upon further review, OAM has made the following changes to the final FESOP permit (strikeout added to show what was deleted and bold added to show what was added):

1. Condition A.1 "General Information" has been changed to be as follows to change the attainment status of the source. No other conditions of this permit will be changed as a result of this change:

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

The Permittee owns and operates a stationary bread crumb and batter mix formulation operation.

Responsible Official: Jeff Meyer
Source Address: 1515 Park Street, Evansville, Indiana 47710
Mailing Address: 1515 Park Street, Evansville, Indiana 47710
SIC Code: 2051
County Location: Vanderburgh
County Status: ~~Attainment for Ozone, CO, PM₁₀, SO₂, and Lead~~ **all criteria pollutants**
~~Nonattainment for TSP~~ **Nonattainment area for TSP, but this source is located within the Attainment portion of the county**
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules.

2. Condition A.2(8) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows to correct a grammatical error:

(8) One (1) hand dump station, identified as the Redline Hand Dump Station, installed in 1978, with a maximum capacity of 2,844 pounds of raw materials per hour, using one (1) baghouse ~~has as~~ **control**, exhausting to one (1) stack (3);

3. Condition A.3 "Insignificant Activities" has been changed to be as follows:
A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities ~~which are specifically regulated~~, as defined in 326 IAC 2-7-1(21):

- (1) One (1) 3.36 million British thermal units per hour (mmBtu/hr) natural gas fired Cleaver Brooks boiler, identified as CB720-8, installed prior to 1974, exhausting to one (1) stack (9);
 - (2) One (1) 3.347 million British thermal units per hour (mmBtu/hr) natural gas fired Cleaver Brooks boiler, identified as CB773-80, installed prior to 1974, exhausting to one (1) stack (9); and
 - (3) Applied air systems (warehouse heating system), identified as GHLIFP 300/175, installed prior to 1974, exhausting to one (1) stack (31).
4. Condition B.12(a) "Annual Compliance Certification" has been changed to be as follows:
- (a) The Permittee shall annually ~~certify that the source has complied~~ **submit a compliance certification report which addresses the status of the source's compliance** with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

5. Condition C.2 "Opacity" has been changed to be as follows:

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.

~~This condition is not federally enforceable.~~

6. Condition C.3 "Open Burning" has been changed to be as follows:

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1 **or MCE 3.30.18.212. This condition is not federally enforceable. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.**

7. Condition C.4 "Incineration" has been changed to be as follows:

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. ~~This condition is not federally enforceable.~~

8. Condition C.5 "Fugitive Dust Emissions" has been changed to be as follows:

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions) **or MCE 3.30.18.212.** ~~Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.~~

9. Condition C.21 "General Reporting Requirements" has been changed to be as follows:

C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

(a) **To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.**

~~(a)~~ (b) **The report required in (a) of this condition and** 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
Indianapolis, Indiana 46206-6015

and

City of Evansville EPA
Room 250
101 N.W. Martin Luther King Jr. Blvd
Evansville, Indiana 47708

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

~~(c)~~ (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

~~(d)~~ (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the

required compliance monitoring is a deviation.

~~(e)~~ (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

~~(f)~~ (g) 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.

10. The rule cite in Condition D.1.2 "Preventive Maintenance Plan" has been changed to be as follows:

D.1.2 Preventive Maintenance Plan ~~[326 IAC 2-8-3(e)(6)]~~ **[326 IAC 2-8-4(9)]**

11. Condition D.1.3 "Testing Requirements" has been changed to be as follows:

D.1.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the volatile organic compound (VOC) limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under ~~326 IAC 2-1-4(f)~~, 326 IAC 2-8-4 and 326 IAC 2-8-5.

12. Condition D.1.6 "Record Keeping Requirements" has been changed to be as follows:

D.1.6 Record Keeping Requirements

To document compliance with Condition D.1.1, the Permittee shall record the total number of ABC dough and JBC dough ~~used~~ **produced** each month.

13. Condition D.2.1 "Particulate Matter" has been changed to be as follows:

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2] **[326 IAC 2-8-4]**

(a) Pursuant to 326 IAC 6-3-2 (Process Operations), the PM from the ABC dryer shall not exceed 8.94 pounds per hour and the PM from the JBC dryer shall not exceed 8.48 pounds per hour. The pounds per hour limitation was calculated with 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:

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

(b) The total allowable particulate matter **less than ten microns** emissions from the whole source shall not exceed twenty-two (22) pounds per hour. This limit is to keep the allowable **PM10** emissions below one hundred (100) tons per year and make 326 IAC 2-7 (Part 70) not applicable.

14. Condition D.2.2 "Testing Requirements" has been changed to be as follows:

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

Testing of this facility is not required by this permit. However, if testing is required, compliance with the particulate matter limit specified in Condition D.2.1 shall be determined by a

performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under ~~326 IAC 2-1-4(f)~~, 326 IAC 2-8-4 and 326 IAC 2-8-5.

15. Condition D.2.4(a) "Visible Emissions Notations" has been changed to be as follows:

- (a) Daily visible emission notations of the ABC dryer and JBC dryer **baghouses** stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

16. Condition D.2.5 "Parametric Monitoring" has been changed to be as follows:

D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the ABC dryer and JBC dryer at least once daily when the ABC dryer and JBC dryer is in operation **when venting to the atmosphere**. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 1.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and City of Evansville EPA and shall be calibrated at least once every six (6) months.

17. Condition D.2.7 "Record Keeping Requirements" has been changed to be as follows:

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain ~~records a~~ **log** of daily visible emission notations of the ABC dryer and JBC dryer stack **baghouse** exhausts.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation **when venting to the atmosphere**:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(c) **A malfunction log shall be maintained which identifies all malfunctions to the pollution control equipment.**

~~(d)~~ (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

18. The equipment listed as (8) in Section D.3 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

(8) One (1) hand dump station, identified as the Redline Hand Dump Station, installed in 1978, with a maximum capacity of 2,844 pounds of raw materials per hour, using one (1) baghouse ~~has as~~ control, exhausting to one (1) stack (3);

19. Condition D.3.1 "Particulate Matter" has been changed to be as follows:

D.3.1 Particulate Matter (PM) and PM10 [326 IAC 6-3-2] [326 IAC 2-8-4]

(a) Pursuant to 326 IAC 6-3-2 (Process Operations):

- ~~(a)~~(1) The PM emissions from batter silo #2 shall not exceed 25.16 pounds per hour;
- ~~(b)~~(2) The PM emissions from batter silos #3 - #12 shall not exceed 19.17 pounds per hour;
- ~~(c)~~(3) The PM emissions from the three (3) ABC silos shall not exceed 25.16 pounds per hour;
- ~~(d)~~(4) The PM emissions from the three (3) JBC silos shall not exceed 25.16 pounds per hour;
- ~~(e)~~(5) The PM emissions from the Redline hand dump station shall not exceed 5.19 pounds per hour;
- ~~(f)~~(6) The PM emissions from the Blueline hand dump station shall not exceed 13.12 pounds per hour;
- ~~(g)~~(7) The PM emissions from the Redline mixer shall not exceed 12.05 pounds per hour; and
- ~~(h)~~(8) The PM emissions from the Blueline mixer shall not exceed 17.53 pounds per hour.

The pounds per hour limitation was calculated with 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:

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

(b) The total allowable particulate matter **less than 10 microns** emissions from the whole source shall not exceed twenty-two (22) pounds per hour. This limit is to keep the

allowable **PM10** emissions below one hundred (100) tons per year and make 326 IAC 2-7 (Part 70) not applicable.

20. The rule cite in Condition D.3.2 "Preventive Maintenance Plan" has been changed to be as follows:

D.3.2 Preventive Maintenance Plan ~~[326 IAC 2-8-3(e)(6)]~~ **[326 IAC 2-8-4(9)]**

21. Condition D.3.3 "Testing Requirements" has been changed to be as follows:

D.3.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the particulate matter limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under ~~326 IAC 2-1-4(f)~~, 326 IAC 2-8-4 and 326 IAC 2-8-5.

22. Condition D.4.1 "Particulate Matter" has been changed to be as follows:

D.4.1 Particulate Matter (PM) and **PM10** [326 IAC 6-3-2] **[326 IAC 2-8-4]**

(a) Pursuant to 326 IAC 6-3-2 (Process Operations):

~~(a)(1)~~ **(1)** The PM emissions from the two (2) ABC mixers shall not exceed 13.50 pounds per hour, and

~~(b)(2)~~ **(2)** The PM emissions from the two (2) JBC mixers shall not exceed 13.24 pounds per hour.

The pounds per hour limitation was calculated with 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:

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

(b) The total allowable particulate matter **less than ten microns** emissions from the whole source shall not exceed twenty-two (22) pounds per hour. This limit is to keep the allowable **PM10** emissions below one hundred (100) tons per year and make 326 IAC 2-7 (Part 70) not applicable.

23. The rule cite in Condition D.4.2 "Preventive Maintenance Plan" has been changed to be as follows:

D.4.2 Preventive Maintenance Plan ~~[326 IAC 2-8-3(e)(6)]~~ **[326 IAC 2-8-4(9)]**

24. Condition D.4.3 "Testing Requirements" has been changed to be as follows:

D.4.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the particulate matter (PM) limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under ~~326 IAC 2-1-4(f)~~, 326 IAC 2-8-4 and 326 IAC 2-8-5.

25. Condition D.5.2 "Testing Requirements" has been changed to be as follows:

D.5.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the particulate matter (PM) limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under ~~326 IAC 2-1-4(f)~~, 326 IAC 2-8-4 and 326 IAC 2-8-5.