

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT
and the
EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

**Hartford Bakery, Inc.
500 N. Fulton Avenue
Evansville, Indiana 47708**

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-163-9331-00040	
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 the Evansville Environmental Protection Agency, and presented in the permit application.

A.1 General Information

The Permittee owns and operates a bakery.

Responsible Official: Robert M. Renock
Source Address: 500 N. Fulton Avenue, Evansville, Indiana 47708
Mailing Address: 500 N. Fulton Avenue, Evansville, Indiana 47708
SIC Code: 2051
County Location: Vanderburgh
County Status: Attainment for all criteria pollutants
Source Status: Minor Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary

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

one (1) natural gas fired baking oven, with a heat input capacity of 6.3 million Btu per hour, used for baking buns.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This existing source has submitted their Part 70 (T-163-5980-00040) application on May 31, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

SECTION B GENERAL CONSTRUCTION AND OPERATION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.4]

B.1 General Construction Conditions

- (a) The data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).

- (b) This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.3 Permit Review Rules [326 IAC 2]

Notwithstanding Operation Condition B.5, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of operation permits pursuant to 326 IAC 2 (Permit Review Rules).

B.4 Local Agency Requirement

That pursuant to 326 IAC 2-1-4 (Operating Permit), this document shall also become the first time state and local operating permit, when prior to start of operation (including testing and debugging), the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Evansville Environmental Protection Agency (EPA) and the Office of Air Management (OAM), Permit Administration & Development Section.

- (b) The Evansville EPA will verify that the facilities were constructed as proposed.

- (c) Pursuant to Municipal Code of Evansville (MCE) 3.30.18.221 (A)(Permits), a local operating permit must be obtained from Evansville EPA prior to start of operation. The local operating permit process will begin upon:
 - (i) Receipt of the Affidavit of Construction by Evansville EPA, and
 - (ii) Payment to Evansville EPA of a non-refundable \$100.00, for the local operating permit issuance fee.

Operations may only begin following the receipt of a valid local operating permit, issued by Evansville EPA.

Pursuant to MCE 3.30.18.221(D), local operating permits shall be issued within a

reasonable period of time. Thirty (30) days is considered reasonable in most cases.

- (d) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate Affidavit of Construction must be submitted for each phase of construction and an application for a local operating permit for each phase made to the Evansville EPA. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (e) The local operating permit issued by the Evansville EPA will contain at a minimum the conditions in the Operating Conditions section of this permit.

Operation Conditions

B.5 General Operation Conditions

- (a) The data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).
- (b) The Permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC13-17) and the rules promulgated thereunder.

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

Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:

- (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.
- (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.
- (c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

B.7 Transfer of Permit [326 IAC 2-1-6]

Pursuant to 326 IAC 2-1-6 (Transfer of Permits):

- (a) In the event that ownership of this bakery is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
- (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.

- (c) The OAM shall reserve the right to issue a new permit.

B.8 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

B.9 Availability of Permit [326 IAC 2-1-3(l)]

Pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of the source and shall make this permit available for inspection by the IDEM, OAM, Evansville EPA, or other public official having jurisdiction.

B.10 Malfunction Condition [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), Evansville EPA (EEPA), or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM and EEPA, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitation and Standards

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential emissions of volatile organic compounds (VOC) and particulate matter (PM-10) are less than 250 tons per year and it is not one of the 28 source categories listed under 326 IAC 2-2. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase the potential VOC emissions to 250 tons per year or more from the equipment covered in this permit must be approved by the Office of Air Management (OAM) before such change may occur.

C.2 Opacity Limitations [326 IAC 5-1-2]

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 30% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 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, and per Municipal Code of Evansville (3.30.18.212). 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. 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]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 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) and per Municipal Code of Evansville (3.30.18.212). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 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.

Compliance Monitoring Requirements

C.7 Compliance Monitoring

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

and

Evansville Environmental Protection Agency
Room 250
101 N.W. Martin Luther King Jr. Boulevard
Evansville, Indiana 47708

in writing, no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the 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.

C.8 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.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [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 ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) asbestos removal or demolition start date;
 - (B) removal or demolition contractor; or

- (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

Evansville Environmental Protection Agency
Room 250
101 N.W. Martin Luther King Jr. Boulevard
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.

Record Keeping and Reporting Requirements

C.10 Monitoring Data Availability

- (a) All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) 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 the 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 stated in (a) above.

C.11 General Record Keeping Requirements

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

C.12 General Reporting Requirements

- (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
- Evansville Environmental Protection Agency
Room 250
101 N.W. Martin Luther King Jr. Boulevard
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 the 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);
 - (3) failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation; or
 - (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.

C.13 Annual Emission Reporting [326 IAC 2-6]

The Permittee must annually submit an emission statement for the source. This 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 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

Evansville Environmental Protection Agency
Room 250
101 N.W. Martin Luther King Jr. Boulevard
Evansville, Indiana 47708

The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30.

Stratospheric Ozone Protection

C.14 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 OPERATIONS CONDITIONS

One (1) natural gas fired baking oven, with a heat input capacity of 6.3 million Btu per hour, used for baking buns

Emissions Limitation and Standards

D.1.1 BACT Minor Limitation [326 IAC 8-1-6]

(a) The input VOC for the baking oven shall be limited to 24 tons per 12 month period, on a variable fixed monthly basis. The monthly bread production shall be limited according to the VOC emission factor, 3.53 pounds of VOC per ton of bread produced, as follows:

(i)	January	680 tons;
(ii)	February	680 tons;
(iii)	March	736 tons;
(iv)	April	1020 tons;
(v)	May	1700 tons;
(vi)	June	1700 tons;
(vii)	July	1700 tons;
(viii)	August	1700 tons;
(ix)	September	1133 tons;
(x)	October	962 tons;
(xi)	November	906 tons; and
(xii)	December	680 tons, for a total of 13,597 tons of bread produced.

(b) Therefore, the Best Available Control Technology (BACT) requirements of 326 IAC 8-1-6 will not apply.

D.1.2 Particulate Matter (PM) Process Operation [326 IAC 6-3]

The PM from the baking oven shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.3 Preventive Maintenance Plan

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

Record Keeping and Reporting Requirements

D.1.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address 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.

Indiana Department of Environmental Management Office of Air Management Compliance Data Section Quarterly Report

Company Name: Hartford Bakery, Inc.
 Location: 500 N. Fulton Avenue, Evansville, Indiana 47708
 Permit No.: CP-163-9331-00040
 Source/Facility: 6.3 million Btu per hour, natural gas fired, Baketech bun baking oven
 Pollutant: Volatile Organic Compounds (VOC)

Year: _____

Month	Limit (tons/month)		Usage/Emissions (tons/month)	
	Bread Produced	VOC Emissions*	Bread Produced	VOC Emissions*
January	680	1.2		
February	680	1.2		
March	736	1.3		
April	1020	1.8		
May	1700	3		
June	1700	3		
July	1700	3		
August	1700	3		
September	1133	2		
October	962	1.7		
November	906	1.6		
December	680	1.2		
Total	13,597	24		

* VOC Emissions = Tons of Input Bread Product * (3.53 lb VOC / Ton of Input Bread Product) * (1 ton / 2000 lb)

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE: IT HAS POTENTIAL TO EMIT 25 LBS/HR PARTICULATES ? _____, 100 LBS/HR VOC ? _____, 100 LBS/HR SULFUR DIOXIDE ? _____ OR 2000 LBS/HR OF ANY OTHER POLLUTANT ? _____ EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: Hartford Bakery, Inc. _____ PHONE NO. (812)425-4642 _____

LOCATION: (CITY AND COUNTY) Evansville / Vanderburgh _____
PERMIT NO. 163-9331 _____ AFS PLANT ID: 163-00040 _____ AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL * SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____

_____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. The requirements of this rule (326 IAC 1-6) shall apply to the owner or operator of any facility which has the potential to emit twenty-five (25) pounds per hour of particulates, one hundred (100) pounds per hour of volatile organic compounds or SO₂, or two thousand (2,000) pounds per hour of any other pollutant; or to the owner or operator of any facility with emission control equipment which suffers a malfunction that causes emissions in excess of the applicable limitation.

326 IAC 1-2-39 “Malfunction” definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. (Air Pollution Control Board; 326 IAC 1-2-39; filed Mar 10, 1988, 1:20 p.m. : 11 IR 2373)

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management
Office of Air Management
 and
The Evansville Environmental Protection Agency

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name: Hartford Bakery, Inc.
 Source Location: 500 N. Fulton Avenue, Evansville, Indiana 47708
 County: Vanderburgh
 Construction Permit No.: CP-163-9331-00040
 SIC Code: 2051
 Permit Reviewer: Jon C. Akin

The Office of Air Management (OAM) has reviewed an application from Hartford Bakery, Inc. relating to the construction and operation of the following equipment:

one (1) natural gas fired baking oven, with a heat input capacity of 6.3 million Btu per hour, used for baking buns.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
3	Bake Oven	28	1.5	3344	350

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on December 29, 1997.

Emissions Calculations

Calculations were submitted by the applicant for the VOC emissions from the yeast fermentation in the baking process. See Appendix A (Emissions Calculation Spreadsheets) for additional detailed bake oven combustion calculations (1 page).

Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	38.74	0.3
Particulate Matter (PM10)	38.74	0.3
Sulfur Dioxide (SO ₂)	-	-
Volatile Organic Compounds (VOC)	-	50.38
Carbon Monoxide (CO)	-	0.6
Nitrogen Oxides (NO _x)	-	2.8
Single Hazardous Air Pollutant (HAP)	-	-
Combination of HAPs	-	-

- (a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3. The PM from the bake oven shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

$$P = \text{process weight rate in tons per hour}$$

$$P = 6300 \text{ lb/hr} = 3.15 \text{ tons/hr}$$

$$E = 8.84 \text{ lbs/hr} = 38.74 \text{ tons/yr}$$

- (b) The potential emissions before control are less than the allowable emissions, therefore, the potential emissions before control are used for the permitting determination.
- (c) Potential emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

County Attainment Status

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Vanderburgh County has been classified as attainment or unclassifiable for carbon

monoxide (CO), particulate matter (PM-10), sulfur dioxide (SO₂), and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (c) Vanderburgh County has been classified as nonattainment for total suspended particles (TSP). Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (d) Fugitive Emissions
Since this type of operation is not one of the 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 PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.2
PM10	0.2
SO ₂	0.04
VOC	137.06
CO	1.39
NO _x	8.68

- (a) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year, no attainment regulated pollutant is emitted at a rate of 250 tons per year, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the Part 70 (T-163-5980-00040) application submitted on May 31, 1996 and the inspection report dated June , 1996.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	0.3	0.3	-	24	0.6	2.8
PSD Threshold Level	250	250	250	250	250	250

- (a) This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels for sulfur dioxide (SO₂), volatile organic compounds (VOC), carbon monoxide (CO), particulate matter (PM-10), total suspended particles (TSP), and oxides of nitrogen (NO_x). Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.
- (b) The applicant has chosen to take a variable fixed monthly limitation for VOC emissions at 24 tons per 12 month period to avoid being subject to the BACT requirements of 326 IAC 8-1-6.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T-163-5980-00040) application on May 31, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 60 applicable to this facility.

There are no National Emission Standards for Hazardous Air Pollutants (40 CFR 61 and 63) applicable to this facility.

State Rule Applicability

326 IAC 2-6 (Emission Reporting)

This facility is subject to 326 IAC 2-6 (Emission Reporting), because the source is located in Vanderburgh County and emits more than 10 tons/yr of VOC. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by April 15 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Visible emission limitations) except as provided in 326 IAC 5-1-3

(Temporary exemptions), the visible emissions shall meet the following for this facility to be located in Vanderburgh County:

- (a) visible emissions shall not exceed an average of 30% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

326 IAC 6-1-2 (Particulate Emission Limitations)

Although the source is located in a nonattainment county listed in 326 IAC 6-1-7, the bake oven is not subject to this rule because:

- (a) the source is not specifically listed 326 IAC 6-1-16.
- (b) the source, including the bake oven, does not have the potential to emit one hundred (100) tons or more of particulate matter per year or have actual emissions of ten (10) tons or more of particulate matter per year.

326 IAC 6-3 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Particulate emission limitations), the bake oven shall not exceed the allowable particulate matter (PM) emission rate of 8.84 pounds per hour (page 2, allowable emissions). This facility complies with this rule because the particulate matter emissions from the bake oven are less than 8.84 pounds per hour.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

This bake oven is subject to this rule because it is a new facility which has potential VOC emissions of 25 tons per year or more that is not regulated by any other 326 IAC 8 provisions. The applicant has chosen to take an VOC emission limitation of 24 tons per year to avoid being subject to this rule. The applicant has requested a variable fixed monthly limitation to account for their increased production during the summer months. The monthly bread production shall be limited according to the emission factor, 3.53 pounds of VOC per ton of bread produced, as follows:

- (a) January 680 tons;
- (b) February 680 tons;
- (c) March 736 tons;
- (d) April 1020 tons;
- (e) May 1700 tons;
- (f) June 1700 tons;
- (g) July 1700 tons;
- (h) August 1700 tons;
- (i) September 1133 tons;
- (j) October 962 tons;
- (k) November 906 tons; and
- (l) December 680 tons, for a total of 13,597 tons of bread produced.

Therefore, the Best Available Control Technology (BACT) requirements of 326 IAC 8-1-6 will not apply.

Air Toxic Emissions

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

None of these listed air toxics will be emitted from this proposed construction.

Conclusion

The construction of this bake oven will be subject to the conditions of the attached proposed **Construction Permit No. CP-163-9331-00040.**

Indiana Department of Environmental Management
Office of Air Management
 and
The Evansville Environmental Protection Agency

Addendum to the
 Technical Support Document for New Construction and Operation

Source Name: Hartford Bakery, Inc.
 Source Location: 500 N. Fulton Avenue, Evansville, Indiana 47708
 County: Vanderburgh
 Construction Permit No.: CP-163-9331-00040
 SIC Code: 2051
 Permit Reviewer: Jon C. Akin

On February 25, 1998, the Office of Air Management (OAM) had a notice published in the Evansville Courier, Evansville, Indiana, stating that Hartford Bakery, Inc. had applied for a construction permit to construct and operate a bun baking oven. The notice also stated that OAM proposed to issue a permit for this installation 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 and the Evansville EPA (EEPA) have made the following changes (changes are bolded for emphasis):

- 1: Since the federal rule which eliminates references to TSP was published on April 16, 1997, at 62 FR 18521, the TSP nonattainment status for Vanderburgh County has been changed, Condition No. A.1, County Status is revised as follows:

~~Nonattainment for total suspended particles (TSP)~~ **Attainment for all criteria pollutants**

- 2: Condition B.9 is revised as follows to incorporate The Evansville EPA:

Pursuant to 326 IAC 2-1-3(I), the Permittee shall maintain the applicable permit on the premises of the source and shall make this permit available for inspection by the IDEM, **OAM, Evansville EPA**, or other public official having jurisdiction.

- 3: Condition B.10 (a) is revised as follows to incorporate The Evansville EPA:

A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), **Evansville EPA (EEPA)**, or appointed representative upon request.

- 4: Condition B.10 (b) is revised as follows to incorporate The Evansville EPA:

When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM **and EEPA**, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

- 5: Condition C.3 is revised as follows to incorporate the Municipal Code of Evansville (3.30.18.212):

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4, 326 IAC 4-1-6, **and per Municipal Code of Evansville (3.30.18.212)**. 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

- 6: Condition C.5 is revised as follows to incorporate the Municipal Code of Evansville (3.30.18.212):

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) **and per Municipal Code of Evansville (3.30.18.212)**. 326 IAC 6-4-2(4) is not federally enforceable.

- 7: Due to the federal rule which eliminates references to TSP, TSP attainment status for Vanderburgh County, TSD, Page 3, County Attainment Status is revised as follows:

~~(c) Vanderburgh County has been classified as nonattainment for total suspended particles (TSP). Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.~~

~~(c)~~ (c) Fugitive Emissions

Since this type of operation is not one of the 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 PM emissions are not counted toward determination of PSD and Emission Offset applicability.

:

**Appendix A: Emission Calculations
 Natural Gas Combustion Only
 MM Btu/hr 0.3 - < 10
 Baking Oven**

Company Name: Hartford Bakery, Inc.
Address City IN Zip: 500 N. Fulton Avenue
CP: 163-9331
Plt ID: 163-00040
Reviewer: Jon C. Akin
Date: 1/21/98

Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMCF/yr

6.3

55.2

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.3	0.3	0.0	2.8	0.1	0.6

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

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