NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Part 70 Operating Permit

for Maplehurst Bakeries, LLC in Hendricks County

Part 70 Operating Permit Renewal No.: T063-40955-00031

The Indiana Department of Environmental Management (IDEM) has received an application from Maplehurst Bakeries, LLC located at 50 Maplehurst Drive, Brownsburg, IN 46112 for a renewal of its Part 70 Operating Permit issued on October 20, 2014. If approved by IDEM’s Office of Air Quality (OAQ), this proposed renewal would allow Maplehurst Bakeries, LLC to continue to operate its existing source.

This draft permit does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

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

Brownsburg Public Library
450 South Jefferson Street
Brownsburg, IN 46112

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

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

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.
Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number T 063-40955-00031 in all correspondence.

Comments should be sent to:

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

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

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

What will happen after IDEM makes a decision?

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

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

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality
Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Maplehurst Bakeries, LLC
50 Maplehurst Drive
Brownsburg, Indiana 46112

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

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

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

Operation Permit No.: T063-40955-00031
Master Agency Interest ID: 11899

Issued by: Heath Hartley, Section Chief
Permits Branch
Office of Air Quality

Issuance Date:
Expiration Date:
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Part 70 Quarterly Report

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT
SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary commercial bakery operation.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>50 Maplehurst Drive, Brownsburg, Indiana 46112</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>317-858-9000</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>2051 (Bread and Other Bakery Products, Except Cookies and Crackers)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Hendricks</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Part 70 Operating Permit Program</td>
</tr>
<tr>
<td></td>
<td>Minor Source, under PSD and Emission Offset Rules</td>
</tr>
<tr>
<td></td>
<td>Minor Source, Section 112 of the Clean Air Act</td>
</tr>
<tr>
<td></td>
<td>Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

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

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

(a) One (1) dry ingredient storage and conveyance system, including, but not limited to, pneumatic conveyance process equipment and piping, storage silos, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, installed in April 2002 and modified in 2012, with a maximum throughput of 20,130 pounds of dry ingredients per hour. The pneumatic conveyance system includes the following emission units:

(1) Two (2) flour storage silos, identified as emission units EU01 and EU02, installed in December 1995 and May 2001, respectively, each with a maximum throughput of 5,873 pounds per hour, each equipped with a baghouse for control of particulate matter emissions, exhausting outside.

(2) One (1) minor ingredient storage silo, identified as emission unit EU03, installed in April 2002, with a maximum throughput of 2,794.50 pounds per hour, equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting outside.

(3) One (1) sugar storage silo, identified as emission unit EU04, installed in April 2002, with a maximum throughput of 2,794.50 pounds per hour, equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting outside.

(4) One (1) dextrose storage silo, identified as emission unit EU05, installed in April 2002, with a maximum throughput of 2,794.50 pounds per hour, equipped with
(5) Five (5) use bins, identified as emission units EU06, EU07, EU10, EU11, and EU14, installed in 2002 and modified in 2012, each equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting inside.

(6) Eight (8) use bins, identified as emission units EU08, EU9, EU12, EU13, and EU15 through EU18, installed in 2002. EU08 and EU09 are each equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting inside. EU12, EU13, and EU15 through EU18 are tied to one (1) central dust collector unit for control of particulate matter emissions, exhausting inside.

(7) Thirteen (13) dry ingredient scale hoppers/mixers, identified as emission units EU21 through EU33, installed in 2002, with a combined maximum throughput of 20,130 pounds per hour, each equipped with one (1) filter unit for control of particulate matter emissions, exhausting inside.

(8) Two (2) dry ingredient scale hoppers/mixers, identified as EU73 and EU74, installed in 2012, with a combined maximum throughput of 20,130 pounds per hour, each equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting inside.

(9) One (1) small hopper for flour dusting, permitted in 2019, with a maximum throughput of 500 pounds per hour, using a dust collector for particulate control, and exhausting inside.

(b) One (1) donut production line, identified as Moline I, installed in July 1993, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:

(1) One (1) proof box, identified as Proof1.

(2) One (1) natural gas-fired fryer, identified as Fryer1, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 1.

(c) One (1) cake donut production line, identified as Moline II, installed in December 1996, with a maximum production rate of 3,000 pounds per hour of premix dough/cake batter and water, consisting of the following:

(1) One (1) natural gas-fired fryer, identified as Fryer2, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 2.

(d) One (1) donut production line, identified as Moline III, installed in December 1998, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:

(1) One (1) proof box, identified as Proof3.

(2) One (1) natural gas-fired fryer, identified as Fryer3, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 3.

(e) One (1) donut production line, identified as Moline IV, installed in February 2001, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:
(1) One (1) proof box, identified as Proof4.

(2) One (1) natural gas-fired fryer, identified as Fryer4, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 7.

(f) One (1) donut production line, identified as Moline V, installed in February 2002, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:

(1) One (1) proof box, identified as Proof5.

(2) One (1) natural gas-fired fryer, identified as Fryer5, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 5.

(g) One (1) donut production line, identified as Moline VI, installed in February 2002, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:

(1) One (1) proof box, identified as Proof6.

(2) One (1) natural gas-fired fryer, identified as Fryer6, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 4.

(3) One (1) electric fryer, identified as Fryer6a, permitted in 2019, with a maximum production rate of 3,000 pounds per hour of premix dough and water, exhausting to Stack 4.

(h) One (1) frozen donut production line, identified as Rhake, installed in October 2008, with a maximum production rate of 3,000 pounds per hour of premix dough/cake batter and water, consisting of the following:

(1) One (1) natural gas-fired fryer, identified as Rhake Fryer, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stacks 9 and 10.

(i) One (1) donut production line, identified as Moline VII, installed in 2012, with a maximum production rate of 4,537 pounds of dough per hour, consisting of the following:

(1) One (1) proof box, identified as Proof7.

(2) One (1) electric fryer, identified as Fryer7, exhausting to Stack 11.

(j) One (1) dry ingredient super sack manual unloading operation, constructed in 2001 and permitted in 2019, with a maximum throughput of 180 pounds per hour, using no control, and exhausting indoors.

(k) One (1) dry ingredient manual unloading station, constructed in 2001 and permitted in 2019, with a maximum throughput of 180 pounds per hour, using no control, and exhausting indoors.

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

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

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

1. One (1) natural gas-fired boiler, identified as Ajax, installed in September 2000, with a rated capacity of 6.3 MMBtu per hour, exhausting to Stack 6.

2. One (1) natural gas-fired boiler, identified as Ajax Boiler #2, installed in June 2003, with a rated capacity of 5.25 MMBtu per hour, exhausting to Stack 8.

3. Six (6) natural gas-fired space heaters, identified as EU34, EU35, EU36, EU37, EU40, and EU82, with two (2) space heaters having a heat input capacity of 0.040 MMBtu per hour, three (3) space heaters having a heat input capacity of 0.030 MMBtu per hour, and one (1) space heater having a heat input capacity of 0.06 MMBtu per hour, each installed in June 2005, except EU37 which was installed in October 1994, and EU82 which was installed in 2019.

4. Two (2) natural gas-fired revert ovens, identified as EU38 and EU72, installed in June 2005, with heat input capacities of 0.170 MMBtu per hour and 0.177 MMBtu per hour, respectively.

5. Two (2) natural gas-fired water heaters, identified as EU39 and EU48, installed in June 2005, with heat input capacities of 0.199 MMBtu per hour and 0.370 MMBtu per hour, respectively.

6. Eleven (11) natural gas-fired makeup air units, identified as EU41 through EU47, EU49, and EU77 through EU79, each installed in June 2005, except EU47 which was installed in 2001, with heat input capacities that range from 0.137 MMBtu per hour to 4.125 MMBtu per hour.

7. Two (2) natural gas-fired makeup air units, identified as EU80 and EU81, constructed in 2019, with heat input capacities of 0.125 MMBtu per hour and 0.20 MMBtu per hour, respectively.

8. Twenty six (26) natural gas-fired rooftop heating/air conditioning units, identified as EU50 through EU64 and EU66 through EU76, installed between March 1994 and February 2013, with heat input capacities that range from 0.199 MMBtu per hour to 0.370 MMBtu per hour.

(b) Combustion source flame safety purging on startup.

(c) Any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs, including two (2) degreasing operations.

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

(e) Stationary fire pump engines, including one (1) electric fire pump engine.

(f) A laboratory, as defined in 326 IAC 2-7-1(21)(H).

(g) Activities with potential emissions within any of the following thresholds: equal to or less than 5 pounds per hour or 25 pounds per day PM_{10}, SO_2, or NO_x; equal to or less than 3 pounds per hour or 15 pounds per day VOC; equal to or less than 25 pounds per day CO; equal to or less than 0.6 tons per year or 3.29 pounds per day Pb; or greater than 1 pound per day but less than 5 pounds per day or 1 ton per year single HAP (and not regulated by a NESHAP):
(1) One (1) soy oil tank, with a capacity of 8,000 gallons.
(2) One (1) shortening tank, with a capacity of 10,000 gallons.
(3) Two (2) transfat tanks, with a capacity of 10,000 gallons.
(4) Two (2) cream yeast silos
(5) One (1) waste oil tank, with a capacity of 10,000 gallons.
(6) Two (2) waste water tanks, with a capacity of 5,000 gallons.
(7) One (1) corn syrup tank.

(h) Cleaning solvents, ChemSan 660, where the use does not exceed one hundred fifteen (115) gallons per twelve (12) months.

(i) Paved roadways and parking lots.

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);
(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).
SECTION B GENERAL CONDITIONS

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]
(a) This permit, T063-40955-00031, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]
Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:
(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7][IC 13-17-12]
Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-7-5(5)]
The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]
(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

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

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

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

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

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

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

and

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.
The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

**B.10 Preventive Maintenance Plan**

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<td>(a)</td>
<td>A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:</td>
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<td>1</td>
<td>Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;</td>
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<td>2</td>
<td>A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and</td>
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<td>3</td>
<td>Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.</td>
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The Permittee shall implement the PMPs.

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

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<td>A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and</td>
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<td>3</td>
<td>Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.</td>
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If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

1. An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
2. The permitted facility was at the time being properly operated;
3. During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
4. For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;
   Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
   Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
   Facsimile Number: 317-233-6865
5. For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:
   Indiana Department of Environmental Management
   Compliance and Enforcement Branch, Office of Air Quality
   100 North Senate Avenue
   MC 61-53 IGCN 1003
   Indianapolis, Indiana 46204-2251
   within two (2) working days of the time when emission limitations were exceeded due to the emergency.

   The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:
   (A) A description of the emergency;
   (B) Any steps taken to mitigate the emissions; and
   (C) Corrective actions taken.
The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

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

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

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

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

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to T063-40955-00031 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

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

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

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

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.
[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(1) That this permit contains a material mistake.

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the
B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(3) Any change in emissions; and

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

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

(c) Emission Trades [326 IAC 2-7-20(c)]

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

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

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

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

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

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

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.
Emission Limitations and Standards  [326 IAC 2-7-5(1)]

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

(2) If there is a change in the following:
   
   (A) Asbestos removal or demolition start date;
   
   (B) Removal or demolition contractor; or
   
   (C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.
Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

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

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

C.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

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

(1) monitoring results;
(2) review of operation and maintenance procedures and records; and/or
(3) inspection of the control device, associated capture system, and the process.

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

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

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

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

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

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

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

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

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

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

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

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

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

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

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

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

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
SECTION D.1  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) dry ingredient storage and conveyance system, including, but not limited to, pneumatic conveyance process equipment and piping, storage silos, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, installed in April 2002 and modified in 2012, with a maximum throughput of 20,130 pounds of dry ingredients per hour. The pneumatic conveyance system includes the following emission units:

(1) Two (2) flour storage silos, identified as emission units EU01 and EU02, installed in December 1995 and May 2001, respectively, each with a maximum throughput of 5,873 pounds per hour, each equipped with a baghouse for control of particulate matter emissions, exhausting outside.

(2) One (1) minor ingredient storage silo, identified as emission unit EU03, installed in April 2002, with a maximum throughput of 2,794.50 pounds per hour, equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting outside.

(3) One (1) sugar storage silo, identified as emission unit EU04, installed in April 2002, with a maximum throughput of 2,794.50 pounds per hour, equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting outside.

(4) One (1) dextrose storage silo, identified as emission unit EU05, installed in April 2002, with a maximum throughput of 2,794.50 pounds per hour, equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting outside.

(5) Five (5) use bins, identified as emission units EU06, EU07, EU10, EU11, and EU14, installed in 2002 and modified in 2012, each equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting inside.

(6) Eight (8) use bins, identified as emission units EU08, EU09, EU12, EU13, and EU15 through EU18, installed in 2002. EU08 and EU09 are each equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting inside. EU12, EU13, and EU15 through EU18 are tied to one (1) central dust collector unit for control of particulate matter emissions, exhausting inside.

(7) Thirteen (13) dry ingredient scale hoppers/mixers, identified as emission units EU21 through EU33, installed in 2002, with a combined maximum throughput of 20,130 pounds per hour, each equipped with one (1) filter unit for control of particulate matter emissions, exhausting inside.

(8) Two (2) dry ingredient scale hoppers/mixers, identified as EU73 and EU74, installed in 2012, with a combined maximum throughput of 20,130 pounds per hour, each equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting inside.

(j) One (1) dry ingredient super sack manual unloading operation, constructed in 2001 and permitted in 2019, with a maximum throughput of 180 pounds per hour, using no control, and exhausting indoors.

(k) One (1) dry ingredient manual unloading station, constructed in 2001 and permitted in 2019,
with a maximum throughput of 180 pounds per hour, using no control, and exhausting indoors.

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

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

#### D.1.1 PSD Minor Limits [326 IAC 2-2]

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

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM Limit (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flour Silo (EU01) - Loading</td>
<td>0.92</td>
</tr>
<tr>
<td>Flour Silo (EU02) - Loading</td>
<td>0.92</td>
</tr>
<tr>
<td>Minor Ingredient (EU03) - Loading</td>
<td>0.44</td>
</tr>
<tr>
<td>Sugar Silo (EU04) - Loading</td>
<td>0.44</td>
</tr>
<tr>
<td>Dextrose Silo (EU05) - Loading</td>
<td>0.44</td>
</tr>
</tbody>
</table>

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

#### D.1.2 Particulate Emission Limitations [326 IAC 6-3-2]

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

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>Maximum Process Weight Rate (tons/hr)</th>
<th>326 IAC 6-3-2 Allowable PM Emission Rate (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flour Silos - Loading (EU01, EU02)</td>
<td>25 (each)</td>
<td>35.4 (each)</td>
</tr>
<tr>
<td>Minor Ingredient Silos - Loading (EU03, EU04, EU05)</td>
<td>25 (each)</td>
<td>35.4 (each)</td>
</tr>
<tr>
<td>Flour Silos - Conveying (EU01, EU02)</td>
<td>2.94 (each)</td>
<td>8.44 (each)</td>
</tr>
<tr>
<td>Minor Ingredient Silos - Conveying (EU03, EU04, EU05)</td>
<td>1.4 (each)</td>
<td>5.13 (each)</td>
</tr>
<tr>
<td>Scale Hoppers (EU21-EU33, EU73, EU74)</td>
<td>10.1</td>
<td>19.3</td>
</tr>
</tbody>
</table>

The pounds per hour limitation was calculated with the following equation:

\[ E = 4.10 P^{0.67} \]

Where \( E \) = rate of emission in pounds per hour; and \( P \) = process weight rate in tons per hour
D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.1.4 Particulate Control [326 IAC 2-1.1-11]

(a) In order to assure compliance with Condition D.1.1, the baghouses for particulate control shall be in operation and control emissions from the flour silos, EU01 and EU02, at all times the flour silos are being loaded.

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

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

D.1.5 Visible Emissions Notations

(a) Visible emission notations of the five (5) flour and minor ingredient silos pressure release openings shall be performed once per day during normal daylight operations when exhausting to the atmosphere. 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) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.6 Broken or Failed Baghouse Detection

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

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

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

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

D.1.7 Record Keeping Requirement

(a) To document the compliance status with Condition D.1.5, the Permittee shall maintain daily records of the visible emission notations of the silo pressure relief openings. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) One (1) donut production line, identified as Moline I, installed in July 1993, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:

(1) One (1) proof box, identified as Proof1.

(2) One (1) natural gas-fired fryer, identified as Fryer1, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 1.

(c) One (1) cake donut production line, identified as Moline II, installed in December 1996, with a maximum production rate of 3,000 pounds per hour of premix dough/cake batter and water, consisting of the following:

(1) One (1) natural gas-fired fryer, identified as Fryer2, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 2.

(d) One (1) donut production line, identified as Moline III, installed in December 1998, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:

(1) One (1) proof box, identified as Proof3.

(2) One (1) natural gas-fired fryer, identified as Fryer3, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 3.

(e) One (1) donut production line, identified as Moline IV, installed in February 2001, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:

(1) One (1) proof box, identified as Proof4.

(2) One (1) natural gas-fired fryer, identified as Fryer4, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 7.

(f) One (1) donut production line, identified as Moline V, installed in February 2002, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:

(1) One (1) proof box, identified as Proof5.

(2) One (1) natural gas-fired fryer, identified as Fryer5, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 5.

(g) One (1) donut production line, identified as Moline VI, installed in February 2002, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:

(1) One (1) proof box, identified as Proof6.

(2) One (1) natural gas-fired fryer, identified as Fryer6, with a maximum heat input
capacity of 1.3 MMBtu per hour, exhausting to Stack 4.

(3) One (1) electric fryer, identified as Fryer6a, permitted in 2019, with a maximum production rate of 3,000 pounds per hour of premix dough and water, exhausting to Stack 4.

(h) One (1) frozen donut production line, identified as Rhake, installed in October 2008, with a maximum production rate of 3,000 pounds per hour of premix dough/cake batter and water, consisting of the following:

(1) One (1) natural gas-fired fryer, identified as Rhake Fryer, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stacks 9 and 10.

(i) One (1) donut production line, identified as Moline VII, installed in 2012, with a maximum production rate of 4,537 pounds of dough per hour, consisting of the following:

(1) One (1) proof box, identified as Proof7.

(2) One (1) electric fryer, identified as Fryer7, exhausting to Stack 11

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

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

D.2.1 Volatile Organic Compounds (VOC) Emission Limitation [326 IAC 8-1-6][326 IAC 2-2]

In order to render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the VOC emissions attributable to proofing and fermentation from each donut production line (Moline I, Moline III, Moline IV, and Moline V) shall not exceed 24.4 tons per twelve (12) consecutive month period.

Compliance with this limit shall limit VOC emissions from each donut production line (Moline I, Moline III, Moline IV, and Moline V) to less than 25 tons per year and render the requirements of 326 IAC 8-1-6 not applicable to these facilities.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than two-hundred fifty (250) tons per year and render the requirements of 326 IAC 2-2 (PSD) not applicable.

D.2.2 BACT Requirements (VOC) [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 8-1-6 and SSM 063-31357-00031, BACT has been determined to be the following for the donut production line identified as Moline VI:

(1) VOC emissions attributable to proofing and fermentation from donut production line Moline VI (consisting of the fryer (Fryer6) and the proof box (Proof6)) shall not exceed 40.1 tons per twelve (12) consecutive month period.

(2) The source shall operate the proof box (Proof6) in accordance with the manufacturer’s design and operating specifications.

(3) In order to ensure proper operation and to minimize potential emissions, the source shall perform proof box cleaning operations for the proof box (Proof6), on a tiered cleaning schedule and perform at a minimum, the following operations,
or their equivalent, in accordance with their Sanitation Standard Operating Procedure:

\[\text{(A) Weekly Cleaning Procedure:}\]

(i) Remove all raw ingredients and/or product containers from the seeder area;
(ii) Scrape any dough from the racks and supports;
(iii) Scrape and sweep the proof box floor; and
(iv) Wet the entire floor with cleaning solvent mixture and then rinse.

\[\text{(B) Four Week Cleaning Procedure:}\]

(i) Wipe off interior proof box channel rails where needed;
(ii) Remove any dough or oil accumulations from channel rails and cross over framework; and
(iii) Wash or mop the floor of the proof box. Remove accumulated waste from floor.

(b) Pursuant to 326 IAC 8-1-6 and SSM 063-31357-00031, BACT has been determined to be the following for the donut production line identified as Moline VII:

(1) VOC emissions attributable to proofing and fermentation from donut production line Moline VII (consisting of the fryer (Fryer7) and the proof box (Proof7)) shall not exceed 60.7 tons per twelve (12) consecutive month period.

(2) The source shall operate the proof box (Proof7) in accordance with the manufacturer's design and operating specifications.

(3) In order to ensure proper operation and to minimize potential emissions, the source shall perform proof box cleaning operations for the proof box (Proof7), on a tiered cleaning schedule and perform at a minimum, the following operations, or their equivalent, in accordance with their Sanitation Standard Operating Procedure:

\[\text{(A) Weekly Cleaning Procedure:}\]

(i) Remove all raw ingredients and/or product containers from the seeder area;
(ii) Scrape any dough from the racks and supports;
(iii) Scrape and sweep the proof box floor; and
(iv) Wet the entire floor with cleaning solvent mixture and then rinse.

\[\text{(B) Four Week Cleaning Procedure:}\]

(i) Wipe off interior proof box channel rails where needed;
(ii) Remove any dough or oil accumulations from channel rails and cross over framework; and
(iii) Wash or mop the floor of the proof box. Remove accumulated waste from floor.

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

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.
Compliance Determination Requirements  [326 IAC 2-7-5(1)]

D.2.4 Volatile Organic Compounds  

Compliance with the VOC limits in Conditions D.2.1 and D.2.2 shall be determined by the following equation:

\[ \text{VOC} = \sum_{m=1}^{12} 1.1 \left( \frac{E_i \times B_i}{2000 \text{lb} / \text{ton}} \right) \]

Where:
- \( \text{VOC} \) = The VOC emissions per twelve (12) consecutive month period;
- \( B_i \) = The amount of dough of type \( i \) produced during month \( m \) (tons/month);
- \( E_i \) = The VOC emission factor for type \( i \) dough (lb of VOC/ton of dough); and
- \( m \) = Each calendar month within the twelve (12) consecutive month period.

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

\[ E = 0.95Y + 0.195t_i - 0.51S - 0.86t_s + 1.90 \]

Where:
- \( E \) = Pounds of VOC per ton of baked dough;
- \( Y \) = Initial baker’s percent of yeast;
- \( t_i \) = Total yeast action time in hours;
- \( S \) = Final (spike) baker’s percent of yeast; and
- \( t_s \) = Spiking time in hours.

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

D.2.5 Record Keeping Requirements

(a) To document the compliance status with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emissions limits established in Conditions D.2.1 and D.2.2.

(1) The dates of the compliance period.

(2) The total amount (in lbs) of dough produced for each bakery line operated during each month and each compliance period.

(3) The following information necessary to calculate the VOC emission factor for each bakery line operated during each compliance period:

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

(B) The total yeast action time in hours;

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

(D) The spiking time in hours.
(4) The VOC emissions for each month and each compliance period.

(b) To document the compliance status with Condition D.2.2(a)(3), the Permittee shall maintain records of the cleaning operations for the proof box (Proof6). The Permittee shall include in its record when a cleaning operation was not performed and the reason for the lack of cleaning operations.

(c) To document the compliance status with Condition D.2.2(b)(3), the Permittee shall maintain records of the cleaning operations for the proof box (Proof7). The Permittee shall include in its record when a cleaning operation was not performed and the reason for the lack of cleaning operations.

(d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the record keeping required by this condition.

D.2.6 Reporting Requirements
A quarterly summary of the information to document the compliance status with Conditions D.2.1 and D.2.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reports required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
SECTION D.3  EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

Insignificant Activities

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

1. One (1) natural gas-fired boiler, identified as Ajax, installed in September 2000, with a rated capacity of 6.3 MMBtu per hour, exhausting to Stack 6.
2. One (1) natural gas-fired boiler, identified as Ajax Boiler #2, installed in June 2003, with a rated capacity of 5.25 MMBtu per hour, exhausting to Stack 8.
3. Two (2) natural gas-fired water heaters, identified as EU39 and EU48, installed in June 2005, with heat input capacities of 0.199 MMBtu per hour and 0.370 MMBtu per hour, respectively.

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

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

**D.3.1 Particulate Emissions [326 IAC 6-2-4]**

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Unit ID</th>
<th>Pt (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ajax Boiler</td>
<td>-</td>
<td>0.60</td>
</tr>
<tr>
<td>Ajax Boiler #2</td>
<td>-</td>
<td>0.58</td>
</tr>
<tr>
<td>Hot Water Heater EU39</td>
<td>EU48</td>
<td>0.57</td>
</tr>
</tbody>
</table>

**D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]**

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.
This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:
Indiana Department of Environmental Management  
Office of Air Quality  
Compliance and Enforcement Branch  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865

PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT

Source Name: Maplehurst Bakeries, LLC  
Source Address: 50 Maplehurst Drive, Brownsburg, Indiana 46112  
Part 70 Permit No.: T063-40955-00031

This form consists of 2 pages

<table>
<thead>
<tr>
<th>□ This is an emergency as defined in 326 IAC 2-7-1(12)</th>
</tr>
</thead>
<tbody>
<tr>
<td>- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</td>
</tr>
<tr>
<td>- The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Facility/Equipment/Operation:</th>
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<th>Control Equipment:</th>
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<tr>
<th>Permit Condition or Operation Limitation in Permit:</th>
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<tr>
<th>Description of the Emergency:</th>
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<tr>
<th>Describe the cause of the Emergency:</th>
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</table>
If any of the following are not applicable, mark N/A

<table>
<thead>
<tr>
<th>Date/Time Emergency started:</th>
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</thead>
<tbody>
<tr>
<td>Date/Time Emergency was corrected:</td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency?</td>
</tr>
<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:</td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
</tr>
<tr>
<td>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:</td>
</tr>
</tbody>
</table>

Form Completed by:______________________________
Title / Position: ________________________________
Date:_________________________________________
Phone:_______________________________________
Source Name: Maplehurst Bakeries, LLC  
Source Address: 50 Maplehurst Drive, Brownsburg, Indiana 46112  
Part 70 Permit No.: T063-40955-00031  
Facility: Moline I, Moline III, Moline IV, Moline V, Moline VI, and Moline VII  
Parameter: Volatile Organic Compounds (VOC)  
Limit: 24.4 tons per 12 consecutive month period each, for Moline I, Moline III, Moline IV, and Moline V  
40.1 tons per 12 consecutive month period for Moline VI  
60.7 tons per 12 consecutive month period for Moline VII  

Compliance with these VOC limits shall be determined by the following equation:

\[
\text{VOC} = \sum_{m=1}^{12} \left( 1.1 \times \left( \frac{E_i \times B_i}{2000 \text{lb/ton}} \right) \right)_{m}
\]

Where:
- VOC = The VOC emissions per twelve (12) consecutive month period;  
- \( B_i \) = The amount of dough of type i produced during month m (tons/month);  
- \( E_i \) = The VOC emission factor for type i bread (lb of VOC/ton of dough); and  
- m = Each calendar month within the twelve (12) consecutive month period.  

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

\[
E = 0.95Y + 0.195t_i - 0.51S - 0.86t_s + 1.90
\]

Where:
- E = Pounds of VOC per ton of baked dough;  
- Y = Initial baker’s percent of yeast;  
- \( t_i \) = Total yeast action time in hours;  
- S = Final (spike) baker’s percent of yeast; and  
- ts = Spiking time in hours.
### Part 70 Quarterly Report

**QUARTER:** ____________  **YEAR:** ____________

<table>
<thead>
<tr>
<th>Unit ID</th>
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<th>Column 2</th>
<th>Column 1 + Column 2</th>
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<td>Moline I</td>
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- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
  Deviation has been reported on:

Submitted by: ____________________________
Title / Position: ____________________________
Signature: ____________________________
Date: ____________________________
Phone: ____________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Maplehurst Bakeries, LLC
Source Address: 50 Maplehurst Drive, Brownsburg, Indiana 46112
Part 70 Permit No.: T063-40955-00031

Months: __________ to __________ Year: __________

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

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
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</tr>
<tr>
<td>Response Steps Taken:</td>
</tr>
</tbody>
</table>

Form Completed by: ________________________________
Title / Position: ________________________________
Date: ________________________________
Phone: ________________________________
Source Description and Location

Source Name: Maplehurst Bakeries, LLC
Source Location: 50 Maplehurst Drive, Brownsburg, IN 46112
County: Hendricks
SIC Code: 2051 (Bread and Other Bakery Products, Except Cookies and Crackers)
Permit Renewal No.: T 063-40955-00031
Permit Reviewer: Tamera Wessel

On January 22, 2019, Maplehurst Bakeries, LLC submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Maplehurst Bakeries, LLC relating to the operation of a stationary commercial bakery operation. Maplehurst Bakeries, LLC was issued its first Part 70 Operating Permit Renewal (T 063-34014-00031) on October 20, 2014.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T 063-34014-00031 on October 20, 2014. The source has since received the following approval:

Administrative Amendment No. 063-39164-00031 on November 20, 2017.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) dry ingredient storage and conveyance system, including, but not limited to, pneumatic conveyance process equipment and piping, storage silos, use bins, weigh scale hoppers, ingredient mixers, transfer equipment, other process equipment and piping, and associated pollution control equipment, installed in April 2002 and modified in 2012, with a maximum throughput of 20,130 pounds of dry ingredients per hour. The pneumatic conveyance system includes the following emission units:

(1) Two (2) flour storage silos, identified as emission units EU01 and EU02, installed in December 1995 and May 2001, respectively, each with a maximum throughput of 5,873 pounds per hour, each equipped with a baghouse for control of particulate matter emissions, exhausting outside.

(2) One (1) minor ingredient storage silo, identified as emission unit EU03, installed in April 2002, with a maximum throughput of 2,794.50 pounds per hour, equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting outside.

(3) One (1) sugar storage silo, identified as emission unit EU04, installed in April 2002, with a maximum throughput of 2,794.50 pounds per hour, equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting outside.
(4) One (1) dextrose storage silo, identified as emission unit EU05, installed in April 2002, with a maximum throughput of 2,794.50 pounds per hour, equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting outside.

(5) Five (5) use bins, identified as emission units EU06, EU07, EU10, EU11, and EU14, installed in 2002 and modified in 2012, each equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting inside.

(6) Eight (8) use bins, identified as emission units EU08, EU09, EU12, EU13, and EU15 through EU18, installed in 2002. EU08 and EU09 are each equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting inside. EU12, EU13, and EU15 through EU18 are tied to one (1) central dust collector unit for control of particulate matter emissions, exhausting inside.

(7) Thirteen (13) dry ingredient scale hoppers/mixers, identified as emission units EU21 through EU33, installed in 2002, with a combined maximum throughput of 20,130 pounds per hour, each equipped with one (1) filter unit for control of particulate matter emissions, exhausting inside.

(8) Two (2) dry ingredient scale hoppers/mixers, identified as EU73 and EU74, installed in 2012, with a combined maximum throughput of 20,130 pounds per hour, each equipped with one (1) dust collector unit for control of particulate matter emissions, exhausting inside.

(b) One (1) donut production line, identified as Moline I, installed in July 1993, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:

(1) One (1) proof box, identified as Proof1.

(2) One (1) natural gas-fired fryer, identified as Fryer1, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 1.

(c) One (1) cake donut production line, identified as Moline II, installed in December 1996, with a maximum production rate of 3,000 pounds per hour of premix dough/cake batter and water, consisting of the following:

(1) One (1) natural gas-fired fryer, identified as Fryer2, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 2.

(d) One (1) donut production line, identified as Moline III, installed in December 1998, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:

(1) One (1) proof box, identified as Proof3.

(2) One (1) natural gas-fired fryer, identified as Fryer3, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 3.

(e) One (1) donut production line, identified as Moline IV, installed in February 2001, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:

(1) One (1) proof box, identified as Proof4.

(2) One (1) natural gas-fired fryer, identified as Fryer4, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 7.
(f) One (1) donut production line, identified as Moline V, installed in February 2002, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:

1. One (1) proof box, identified as Proof5.
2. One (1) natural gas-fired fryer, identified as Fryer5, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 5.

(g) One (1) donut production line, identified as Moline VI, installed in February 2002, with a maximum production rate of 3,000 pounds per hour of premix dough and water, consisting of the following:

1. One (1) proof box, identified as Proof6.
2. One (1) natural gas-fired fryer, identified as Fryer6, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stack 4.

(h) One (1) frozen donut production line, identified as Rhake, installed in October 2008, with a maximum production rate of 3,000 pounds per hour of premix dough/cake batter and water, consisting of the following:

1. One (1) natural gas-fired fryer, identified as Rhake Fryer, with a maximum heat input capacity of 1.3 MMBtu per hour, exhausting to Stacks 9 and 10.

(i) One (1) donut production line, identified as Moline VII, installed in 2012, with a maximum production rate of 4,537 pounds of dough per hour, consisting of the following:

1. One (1) proof box, identified as Proof7.
2. One (1) electric fryer, identified as Fryer7, exhausting to Stack 11.

The source also consists of the following emission units that were constructed and/or operated without a permit:

(a) One (1) dry ingredient super sack manual unloading operation, constructed in 2001 and permitted in 2019, with a maximum throughput of 180 pounds per hour, using no control, and exhausting indoors.

(b) One (1) dry ingredient manual unloading station, constructed in 2001 and permitted in 2019, with a maximum throughput of 180 pounds per hour, using no control, and exhausting indoors.

---

### Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

(a) One (1) natural gas-fired rooftop heating/air conditioning unit, identified as EU65, installed between March 1994 and February 2013, with a heat input capacity of 0.08 MMBtu per hour.

(b) One (1) shock freezer spiral conveyor.

### Insignificant Activities

The source also consists of the following insignificant activities:

(a) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
(1) One (1) natural gas-fired boiler, identified as Ajax, installed in September 2000, with a rated capacity of 6.3 MMBtu per hour, exhausting to Stack 6.

(2) One (1) natural gas-fired boiler, identified as Ajax Boiler #2, installed in June 2003, with a rated capacity of 5.25 MMBtu per hour, exhausting to Stack 8.

(3) Five (5) natural gas-fired space heaters, identified as EU34, EU35, EU36, EU37 and EU40, with two (2) space heaters having a heat input capacity of 0.040 MMBtu per hour and three (3) space heaters having a heat input capacity of 0.030 MMBtu per hour, each installed in June 2005, except EU37 which was installed in October 1994.

(4) Two (2) natural gas-fired revert ovens, identified as EU38 and EU72, installed in June 2005, with heat input capacities of 0.170 MMBtu per hour and 0.177 MMBtu per hour, respectively.

(5) Two (2) natural gas-fired water heaters, identified as EU39 and EU48, installed in June 2005, with heat input capacities of 0.199 MMBtu per hour and 0.370 MMBtu per hour, respectively.

(6) Eleven (11) natural gas-fired makeup air units, identified as EU41 through EU47, EU49, and EU77 through EU79, each installed in June 2005, except EU47 which was installed in 2001, with heat input capacities that range from 0.137 MMBtu per hour to 4.125 MMBtu per hour.

(7) Twenty six (26) natural gas-fired rooftop heating/air conditioning units, identified as EU50 through EU64 and EU66 through EU76, installed between March 1994 and February 2013, with heat input capacities that range from 0.199 MMBtu per hour to 0.370 MMBtu per hour.

(b) Combustion source flame safety purging on startup.

(c) Any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs, including two (2) degreasing operations.

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

(e) Stationary fire pump engines, including one (1) electric fire pump engine.

(f) A laboratory, as defined in 326 IAC 2-7-1(21)(H).

(g) Activities with potential emissions within any of the following thresholds: equal to or less than 5 pounds per hour or 25 pounds per day PM_{10}, SO_{2}, or NO_{x}; equal to or less than 3 pounds per hour or 15 pounds per day VOC; equal to or less than 25 pounds per day CO; equal to or less than 0.6 tons per year or 3.29 pounds per day Pb; or greater than 1 pound per day but less than 5 pounds per day or 1 ton per year single HAP (and not regulated by a NESHAP):

(1) One (1) soy oil tank, with a capacity of 8,000 gallons.

(2) One (1) shortening tank, with a capacity of 10,000 gallons.

(h) Paved roadways and parking lots.

---

**Emission Units and Pollution Control Equipment**

**Constructed Under the Provisions of 326 IAC 2-1.1-3 (Exemptions)**

As part of this permitting action, the source requested to add the following existing emission unit(s) constructed under the provisions of 326 IAC 2-1.1-3 (Exemptions):
(a) Two (2) natural gas-fired makeup air units, identified as EU80 and EU81, constructed in 2019, with heat input capacities of 0.125 MMBtu per hour and 0.20 MMBtu per hour, respectively.

(b) One (1) natural gas-fired space heater, identified as EU82, having a heat input capacity of 0.06 MMBtu per hour, installed in 2019.

(c) Activities with potential emissions within any of the following thresholds: equal to or less than 5 pounds per hour or 25 pounds per day PM10, SO2, or NOx; equal to or less than 3 pounds per hour or 15 pounds per day VOC; equal to or less than 25 pounds per day CO; equal to or less than 0.6 tons per year or 3.29 pounds per day Pb; or greater than 1 pound per day but less than 5 pounds per day or 1 ton per year single HAP (and not regulated by a NESHAP):

1. Two (2) transfat tanks, with a capacity of 10,000 gallons.
2. Two (2) cream yeast silos
3. One (1) waste oil tank, with a capacity of 10,000 gallons.
4. Two (2) waste water tanks, with a capacity of 5,000 gallons.
5. One (1) corn syrup tank.

(d) One (1) electric fryer, identified as Fryer6a, permitted in 2019, with a maximum production rate of 3,000 pounds per hour of premix dough and water, exhausting to Stack 4.

(e) One (1) small hopper for flour dusting, permitted in 2019, with a maximum throughput of 500 pounds per hour, using a dust collector for particulate control, and exhausting inside.

(f) Cleaning solvents, ChemSan 660, where the use does not exceed one hundred fifteen (115) gallons per twelve (12) months.

The total potential to emit of the emission unit(s) is less than levels specified at 326 IAC 2-1.1-3(e)(1)(A) through (G) and the addition of the emission unit(s) did not require the source to transition to a higher operation permit level. Therefore, pursuant to 326 IAC 2-1.1-3(e), the modification approval requirements under 326 IAC 2-7-10.5, including the requirement to submit an application, do not apply to the emission units. See Appendix A of this Technical Support Document for detailed emission calculations.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

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

County Attainment Status

The source is located in Hendricks County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO2</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O3</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.¹</td>
</tr>
<tr>
<td>PM2.5</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM2.5 standard.</td>
</tr>
<tr>
<td>PM2.5</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM2.5 standard.</td>
</tr>
</tbody>
</table>
### Pollutant Designation

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

*Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.*

### Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Hendricks County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### PM₂.₅

Hendricks County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Other Criteria Pollutants

Hendricks County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

### Greenhouse Gas (GHG) Emissions

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

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

This table reflects the unrestricted potential emissions of the source.

<table>
<thead>
<tr>
<th>Unrestricted Potential Emissions (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM¹</td>
</tr>
<tr>
<td>-----</td>
</tr>
<tr>
<td>319.49</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂.₅ listed is direct PM₂.₅.
*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM₁₀, PM₂.₅, and VOC is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.
### Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)

<table>
<thead>
<tr>
<th></th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂₅¹,²</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>193.30</td>
<td>122.75</td>
<td>122.75</td>
<td>0.12</td>
<td>19.42</td>
<td>204.79</td>
<td>16.31</td>
<td>8.23</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>NA</td>
</tr>
</tbody>
</table>

*Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂₅, not particulate matter (PM), are each considered as a "regulated air pollutant."

²PM₂₅ listed is direct PM₂₅.

*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take limit(s) in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD), for more information regarding the limit(s).

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

(b) This source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

### Federal Rule Applicability

Federal rule applicability for this source has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) The requirements of the New Source Performance Standard for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, 40 CFR 60, Subpart D and 326 IAC 12, are not included in the permit for the Ajax Boiler and Ajax Boiler#2, because they each have a heat input capacity less than 250 MMBtu/hr.

(b) The requirements of the New Source Performance Standard for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After September 18, 1978, 40 CFR 60, Subpart Da and 326 IAC 12, are not included in the permit for the Ajax Boiler and Ajax Boiler#2, because they do not supply electricity to a utility grid.

(c) The requirements of the New Source Performance Standard for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db and 326 IAC 12, are not included in the permit for the Ajax Boiler and Ajax Boiler#2, because they each have a heat input capacity less than 100 MMBtu/hr.

(d) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in
the permit for the Ajax Boiler and Ajax Boiler#2, because they each have a heat input capacity less than 10 MMBtu/hr.

(e) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60, Subpart Kb and 326 IAC 12, are not included in the permit for the soy oil tank or shortening tank, because each of these tanks as a storage capacity less than 75 m³ (19,813 gallons) and these tanks do not store a volatile organic liquid.

(f) The requirements of the New Source Performance Standard for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart III and 326 IAC 12, are not included in the permit for the fire pump, because the fire pump is electric and does not have an internal combustion engine.

(g) The requirements of the New Source Performance Standard for Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJJ and 326 IAC 12, are not included in the permit for the fire pump, because the fire pump is electric and does not have a spark ignition internal combustion engine.

(h) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T and 326 IAC 20-6 are not included in the permit for the insignificant degreasers, since these units do not use halogenated cleaning solvents.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Manufacturing of Nutritional Yeast, 40 CFR 63, Subpart CCCC and 326 IAC 20-51 are not included in the permit for this source, since this source does not manufacture nutrional yeast.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD and 326 IAC 20-95 are not included in the permit for the Ajax Boiler and Ajax Boiler#2, since these units are not located at a major source of HAPs.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJJ are not included in the permit for the Ajax Boiler and Ajax Boiler#2, since each of the boilers are gas-fired boilers, as defined by 40 CFR 63.11237, and are specifically exempted under 40 CFR 63.11195(e).

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ and 326 IAC 20-82 are not included in the permit for the fire pump engine, since the fire pump engine is electric and does not have an internal combustion engine.

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

**Compliance Assurance Monitoring (CAM):**

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
(1) has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;

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

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

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

The following table is used to identify the applicability of CAM to each emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

<table>
<thead>
<tr>
<th>Emission Unit/Pollutant</th>
<th>Control Device</th>
<th>Applicable Emission Limitation</th>
<th>Uncontrolled PTE (tons/year)</th>
<th>Controlled PTE (tons/year)</th>
<th>CAM Applicable (Y/N)</th>
<th>Large Unit (Y/N)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flour Silo (EU01)</td>
<td>PM</td>
<td>326 IAC 2-2</td>
<td>--</td>
<td>--</td>
<td>N ²</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM*</td>
<td>326 IAC 6-3-2</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₁₀</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₂.₅</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td>Flour Silo (EU02)</td>
<td>PM</td>
<td>326 IAC 2-2</td>
<td>--</td>
<td>--</td>
<td>N ²</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM*</td>
<td>326 IAC 6-3-2</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₁₀</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₂.₅</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td>Flour Silo (EU03)</td>
<td>PM</td>
<td>326 IAC 2-2</td>
<td>--</td>
<td>--</td>
<td>N ²</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM*</td>
<td>326 IAC 6-3-2</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₁₀</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₂.₅</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td>Sugar Silo (EU04)</td>
<td>PM</td>
<td>326 IAC 2-2</td>
<td>--</td>
<td>--</td>
<td>N ²</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM*</td>
<td>326 IAC 6-3-2</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₁₀</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₂.₅</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td>Dextrose Silo (EU05)</td>
<td>PM</td>
<td>326 IAC 2-2</td>
<td>--</td>
<td>--</td>
<td>N ²</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM*</td>
<td>326 IAC 6-3-2</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₁₀</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₂.₅</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td>Use Bins (EU06, EU07, EU10, EU11, and EU14)</td>
<td>PM</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₁₀</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₂.₅</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td>Use Bins (EU08, EU09)</td>
<td>PM</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₁₀</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₂.₅</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td>Use Bins (EU12, EU13, and EU15-EU18)</td>
<td>PM</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₁₀</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₂.₅</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td>Hoppers/Mixers (EU12, EU13, and EU15-EU18)</td>
<td>PM*</td>
<td>326 IAC 6-3-2</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₁₀</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>PM₂.₅</td>
<td>None</td>
<td>&lt;100</td>
<td>--</td>
<td>N ¹</td>
<td>--</td>
</tr>
</tbody>
</table>
Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for criteria pollutants (PM10, PM2.5, SO2, NOX, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy. Under the Part 70 Permit program (40 CFR 70), PM is not a regulated pollutant.

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

N1 CAM does not apply for pollutant because the uncontrolled PTE of pollutant is less than the major source threshold.

N2 Under 326 IAC 2-2, PM is not a surrogate for a regulated air pollutant. Therefore, CAM does not apply to these emission units for the 326 IAC 2-2 PM limitation.

Controls: BH = Baghouse, C = Cyclone, DC = Dust Collection System

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

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to any of the existing units as part of this Part 70 permit renewal.

State Rule Applicability - Entire Source

State rule applicability for this source has been reviewed as follows:

326 IAC 2-2 (PSD)
PSD applicability is discussed under the Potential to Emit After Issuance section of this document.

PSD Minor Source Limits
In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) The PM emissions from the following operations shall not exceed the emission limits listed in the table below:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM Limit (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flour Silo (EU01) - Loading</td>
<td>0.92</td>
</tr>
<tr>
<td>Flour Silo (EU02) - Loading</td>
<td>0.92</td>
</tr>
<tr>
<td>Minor Ingredient (EU03) - Loading</td>
<td>0.44</td>
</tr>
<tr>
<td>Sugar Silo (EU04) - Loading</td>
<td>0.44</td>
</tr>
<tr>
<td>Dextrose Silo (EU05) - Loading</td>
<td>0.44</td>
</tr>
</tbody>
</table>

(b) The VOC emissions attributable to proofing and fermentation for each donut production line (Moline I and Moline III through Moline V) shall not exceed 24.4 tons per twelve (12) consecutive month period.

Compliance with these limits, combined with the potential to emit PM and VOC from all other emission units at this source, shall limit the source-wide total potential to emit of PM and VOC to less than 250 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that
was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**326 IAC 2-6 (Emission Reporting)**
This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

**326 IAC 5-1 (Opacity Limitations)**
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

**326 IAC 6-4 (Fugitive Dust Emissions Limitations)**
The source is subject to the requirements of 326 IAC 6-4, because the source has the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

**326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Hendricks County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

**326 IAC 6.8 (Particulate Matter Limitations for Lake County)**
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Hendricks County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

### State Rule Applicability – Individual Facilities

State rule applicability has been reviewed as follows:

**326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)**
Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:
\[ Pt = \frac{1.09}{Q^{0.26}} \]

Where:

- \( Pt \) = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).
- \( Q \) = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility’s permit application, except when some lower capacity is contained in the facility’s operation permit; in which case, the capacity specified in the operation.

<table>
<thead>
<tr>
<th>Facility</th>
<th>Construction Date (Removal Date)</th>
<th>Operating Capacity (MMBtu/hr)</th>
<th>( Q ) (MMBtu/hr)</th>
<th>Calculated Pt (lb/MMBtu)</th>
<th>Particulate Limitation, (Pt) (lb/MMBtu)</th>
<th>PM PTE based on AP-42 (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ajax Boiler</td>
<td>2000</td>
<td>6.3</td>
<td>6.3</td>
<td>0.68</td>
<td>0.60*</td>
<td>0.0019</td>
</tr>
<tr>
<td>Ajax Boiler #2</td>
<td>2003</td>
<td>5.25</td>
<td>11.55</td>
<td>0.58</td>
<td>0.58</td>
<td>0.0019</td>
</tr>
<tr>
<td>Water Heater (EU39)</td>
<td>2005</td>
<td>0.199</td>
<td>11.75</td>
<td>0.57</td>
<td>0.57</td>
<td>0.0019</td>
</tr>
<tr>
<td>Water Heater (EU48)</td>
<td>2005</td>
<td>0.370</td>
<td>12.12</td>
<td>0.57</td>
<td>0.57</td>
<td>0.0019</td>
</tr>
</tbody>
</table>

Where: \( Q \) = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed.

Note: Emission units shown in strikethrough were subsequently removed from the source. The effect of removing these units on "Q" is shown in the year the boiler was removed.

*Pursuant to 326 IAC 6-2-4(a), for \( Q \) less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.

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

(a) Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the Silos (Loading & Conveying) and Scale Hoppers, since they are manufacturing processes not exempted from this rule under 326 IAC 6-3-1(b) and are not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Silos (Loading & Conveying) and Scale Hoppers shall not exceed the allowable PM emission rates as listed in the table below. The pound per hour limitation was calculated with the following equation:

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

\[ E = 4.10 \ P^{0.67} \]  

where

- \( E \) = rate of emission in pounds per hour and
- \( P \) = process weight rate in tons per hour
### Summary of Process Weight Rate Limits

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>P (ton/hr)</th>
<th>E (lb/hr)</th>
<th>Uncontrolled PM PTE (lb/hr)</th>
<th>Control Device Needed to Comply (Y/N)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flour Silos - Loading / (EU01, EU02)</td>
<td>25 (each)</td>
<td>35.4 (each)</td>
<td>9.22 (each)</td>
<td>No</td>
</tr>
<tr>
<td>Minor Ingredient Silos - Loading / (EU03, EU04, EU05)</td>
<td>25 (each)</td>
<td>35.4 (each)</td>
<td>4.39 (each)</td>
<td>No</td>
</tr>
<tr>
<td>Flour Silos - Conveying / (EU01, EU02)</td>
<td>2.94 (each)</td>
<td>8.44 (each)</td>
<td>9.22 (each)</td>
<td>Yes</td>
</tr>
<tr>
<td>Minor Ingredient Silo - Conveying / (EU03, EU04, EU05)</td>
<td>1.4 (each)</td>
<td>5.13 (each)</td>
<td>4.39 (each)</td>
<td>No</td>
</tr>
<tr>
<td>Scale Hoppers / (EU21-EU33, EU73, EU74)</td>
<td>10.1</td>
<td>19.3</td>
<td>5.76</td>
<td>No</td>
</tr>
</tbody>
</table>

The baghouses shall be in operation at all times when dry ingredients are being pneumatically conveyed from the flour silos (EU01 and EU02), in order to comply with this limit.

(b) Pursuant to 326 IAC 6-3-1(b)(14), the thirteen (13) use bins (EU06-EU18) are not subject to the requirements of 326 IAC 6-3, since each of the bins has potential particulate emissions less than 0.551 lb/hr.

(c) Pursuant to 326 IAC 6-3-1(b)(14), the dusting hopper is not subject to the requirements of 326 IAC 6-3, since the dusting hopper has potential particulate emissions less than 0.551 lb/hr.

(d) Pursuant to 326 IAC 6-3-1(b)(14), the super sack and dry ingredient manual unloading stations are not subject to the requirements of 326 IAC 6-3, since each of the stations has potential particulate emissions less than 0.551 lb/hr.

(e) Fryers:

(1) Process Emissions

(A) Pursuant to 326 IAC 6-3-1(b)(14), the fryers are not subject to the requirements of 326 IAC 6-3 for process emissions, since each fryer has potential particulate emissions less than 0.551 lb/hr.

(2) Combustion Emissions

(A) The natural gas combustion units (Fryer1 through Fryer6 and Rhake Fryer) are not subject to the requirements of 326 IAC 6-3, because pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight rate.

(B) The electric fryers (Fryer7 and Fryer6a) are not subject to the requirements of 326 IAC 6-3, since these units are electric.

### 326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

The boilers and water heaters are not subject to 326 IAC 326 IAC 7-1.1 because each unit has a potential to emit sulfur dioxide (SO2) of less than 25 tons per year or 10 pounds per hour.
326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

(a) Even though, the donut production lines, Moline line II and Rhake, were constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because the unlimited VOC potential emissions of each of these production lines are less than twenty-five (25) tons per year.

(b) The Moline line I, line III, line IV, and line V were constructed after January 1, 1980, and each of their unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year and the Moline lines are not regulated by other rules in 326 IAC 8. The source has opted to limit the potential to emit VOC from the Moline line I, line III, line IV, and line V to less than twenty-five (25) tons per twelve (12) consecutive month period in order to render the requirements of 326 IAC 8-1-6 not applicable. Therefore, Moline line I, line III, line IV, and line V are not subject to the requirements of 326 IAC 8-1-6.

In order to render the requirements of 326 IAC 8-1-6 not applicable, Permittee shall comply with the following:

(1) VOC emissions from each donut production line (Moline I, Moline III, Moline IV, and Moline V), including natural gas combustion and proof box, shall not exceed 24.4 tons per twelve (12) consecutive month period.

(c) The donut production lines, Moline VI and Moline VII, are subject to the requirements of 326 IAC 8-1-6, because they were constructed after January 1, 1980, and their unlimited VOC potential emissions are each equal to or greater than twenty-five (25) tons per year, and the donut production lines are not regulated by other rules in 326 IAC 8. Therefore, a Best Available Control Technology (BACT) analysis was required for the donut production lines, Moline VI and Moline VII.

(a) According to the BACT analysis determined in SSM 063-31357-00031, IDEM, OAQ has determined that the following requirements represent BACT for Moline VI:

(1) VOC emissions attributable to proofing and fermentation from donut production line Moline VI (consisting of the fryer (Fryer6) and the proof box (Proof6)) shall not exceed 40.1 tons per twelve (12) consecutive month period.

(2) The source shall operate the proof box (Proof6) in accordance with the manufacturer's design and operating specifications.

(3) In order to ensure proper operation and to minimize potential emissions, the source shall perform proof box cleaning operations for the proof box (Proof6), on a tiered cleaning schedule and perform at a minimum, the following operations, or their equivalent, in accordance with their Sanitation Standard Operating Procedure:

(A) Weekly Cleaning Procedure:

(i) Remove all raw ingredients and/or product containers from the seeder area;
(ii) Scrape any dough from the racks and supports;
(iii) Scrape and sweep the proof box floor; and
(iv) Wet the entire floor with cleaning solvent mixture and then rinse.

(B) Four Week Cleaning Procedure:

(i) Wipe off interior proof box channel rails where needed;
(ii) Remove any dough or oil accumulations from channel rails and cross over framework; and
(iii) Wash or mop the floor of the proof box. Remove accumulated waste from floor.

(b) According to the BACT analysis determined in SSM 063-31357-00031, IDEM, OAQ has determined that the following requirements represent BACT for Moline VII:

(1) VOC emissions attributable to proofing and fermentation from donut production line Moline VII (consisting of the fryer (Fryer7) and the proof box (Proof7)) shall not exceed 60.7 tons per twelve (12) consecutive month period.

(2) The source shall operate the proof box (Proof7) in accordance with the manufacturer's design and operating specifications.

(3) In order to ensure proper operation and to minimize potential emissions, the source shall perform proof box cleaning operations for the proof box (Proof7), on a tiered cleaning schedule and perform at a minimum, the following operations, or their equivalent, in accordance with their Sanitation Standard Operating Procedure:

(A) Weekly Cleaning Procedure:

(i) Remove all raw ingredients and/or product containers from the seeder area;
(ii) Scrape any dough from the racks and supports;
(iii) Scrape and sweep the proof box floor; and
(iv) Wet the entire floor with cleaning solvent mixture and then rinse.

(B) Four Week Cleaning Procedure:

(i) Wipe off interior proof box channel rails where needed;
(ii) Remove any dough or oil accumulations from channel rails and cross over framework; and
(iii) Wash or mop the floor of the proof box. Remove accumulated waste from floor.

Compliance Determination and Monitoring Requirements

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

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

The Compliance Determination Requirements applicable to this source are as follows:

(a) VOC Compliance Determination

Compliance with the VOC limit shall be determined by the following equation:
\[ \text{VOC} = \sum_{m=1}^{12} \left( 1.1 \times \left( \frac{E_i \times B_i}{2000 \text{ lb/ton}} \right) \right)_m \]

Where:
\( \text{VOC} \) = The VOC emissions per twelve (12) consecutive month period;
\( B_i \) = The amount of dough of type \( i \) produced during month \( m \) (tons/month);
\( E_i \) = The VOC emission factor for type \( i \) dough (lb of VOC/ton of dough); and
\( m \) = Each calendar month within the twelve (12) consecutive month period.

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

\[ E = 0.95Y + 0.195t_i - 0.51S - 0.86t_s + 1.90 \]

Where:
\( E \) = Pounds of VOC per ton of baked dough;
\( Y \) = Initial baker’s percent of yeast;
\( t_i \) = Total yeast action time in hours;
\( S \) = Final (spike) baker’s percent of yeast; and
\( t_s \) = Spiking time in hours.

VOC emissions from proofing shall be assumed to be 10% of the emissions calculated for fermentation based on the “Alternative Control Technology Document for Bakery Oven Emissions” (EPA 453/R-92-017, December 1992).

(b) Emission Controls Operation

1. A baghouse for particulate emissions control shall be in operation and control particulate emissions whenever flour silo EU01 is being loaded.

2. A baghouse for particulate emissions control shall be in operation and control particulate emissions whenever flour silo EU02 is being loaded.

3. The central dust collector for particulate emissions control shall be in operation and control particulate emissions whenever any of the following emission units are being loaded: flour silo EU03, sugar silo EU04, and dextrose silo EU05.

These requirements are required to ensure compliance with 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and 326 IAC 6-3-2 (Particulate Matter Limitations for Manufacturing Processes) and to render 326 IAC 2-2 (PSD) not applicable.

Testing Requirements:

(a) IDEM OAQ has determined that testing of the silos (EU01-EU05) is not required at this time to determine compliance with the PM emission limits. IDEM has the authority to require testing at a later time if necessary to demonstrate compliance with any applicable requirement.
(b) The Compliance Monitoring Requirements applicable to this source are as follows:

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Emission Unit</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baghouse</td>
<td>Flour Silo (EU01)</td>
<td>Visible Emission Notations</td>
<td>Daily</td>
<td>Normal or Abnormal</td>
</tr>
<tr>
<td>Baghouse</td>
<td>Flour Silo (EU02)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dust Collector</td>
<td>Minor Ingredient Silo</td>
<td>Visible Emission Notations</td>
<td>Daily</td>
<td>Normal or Abnormal</td>
</tr>
<tr>
<td>Dust Collector</td>
<td>Sugar Silo (EU04)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dust Collector</td>
<td>Dextrose Silo (EU05)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the baghouses and dust collectors for the silos and scale hoppers must operate properly to assure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and to render the requirements of 326 IAC 2-2 (PSD) not applicable.

### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on January 22, 2019. Additional information was received on April 25, 2019.

The operation of this stationary commercial bakery operation shall be subject to the conditions of the attached proposed Part 70 Operating Permit Renewal No. T063-40955-00031.

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved.

### IDEM Contact

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

(b) A copy of the findings is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/)

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: [http://www.in.gov/idem/airquality/2356.htm](http://www.in.gov/idem/airquality/2356.htm); and the Citizens’ Guide to IDEM on the Internet at: [http://www.in.gov/idem/6900.htm](http://www.in.gov/idem/6900.htm).
## Emissions Calculations

### Emissions Summary

**Company Name:** Maplehurst Bakeries, LLC  
**Address City IN Zip:** 50 Maplehurst Drive, Brownsburg, Indiana 46112  
**Part 70 Renewal No.:** T063-40955-00031  
**Permit Reviewer:** Tamera Wessel/Paul Jump

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAP</th>
<th>Single HAP (Acetaldehyde)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Silo Loading</td>
<td>140.90</td>
<td>49.36</td>
<td>49.36</td>
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<td>0</td>
<td>0</td>
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</tr>
<tr>
<td>Dry Ingredient Conveyance</td>
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<td>55.66</td>
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<td>0</td>
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<tr>
<td><strong>Moline I</strong></td>
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<td></td>
<td></td>
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<td></td>
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<td>Proofing</td>
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<td>Natural Gas Combustion</td>
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<tr>
<td><strong>Moline II</strong></td>
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<td>Proofing</td>
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<td><strong>Moline III</strong></td>
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<td>Natural Gas Combustion</td>
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<tr>
<td><strong>Moline IV</strong></td>
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## Appendix A: Emissions Calculations

### Emissions Summary

**Company Name:** Maplehurst Bakeries, LLC  
**Address City IN Zip:** 50 Maplehurst Drive, Brownsburg, Indiana 46112  
**Part 70 Renewal No.:** T063-40955-00031  
**Permit Reviewer:** Tamera Wessel/Paul Jump

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<tr>
<th>Emission Units</th>
<th>PM</th>
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<th>VOC</th>
<th>CO</th>
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* Moline II and RHAKE produce either (1) unfried yeast donuts which are frozen without proofing, or (2) chemically leavened fried cake donuts which are then frozen. Moline II and RHAKE do not produce emissions due to proofing and/or fermentation.

** The fryer for Moline VII is electric and does not produce emissions due to natural gas combustion.
**Appendix A: Emissions Calculations**

**Administrative Amendment Summary**

**Company Name:** Maplehurst Bakeries, LLC  
**Address City IN Zip:** 50 Maplehurst Drive, Brownsburg, Indiana 46112  
**Part 70 Renewal No.:** T063-40955-00031  
**Permit Reviewer:** Tamera Wessel/Paul Jump

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<th>VOC</th>
<th>CO</th>
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Appendix A: Emissions Calculations
Particulate Emissions from Silo Loading

Company Name: Maplehurst Bakeries, LLC
Address City IN Zip: 50 Maplehurst Drive, Brownsburg, Indiana 46112
Part 70 Renewal No.: T063-40955-00031
Permit Reviewer: Tamera Wessel/Paul Jump

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

Control Device Efficiency: 99%

### Emission Calculations

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### Methodology:

**Maximum Capacity (tons/hr) = Maximum Capacity (lb/hr) ÷ 2000 lb/ton**

**Uncontrolled Emissions (tons/yr) = Maximum Capacity (tons/hr) * Emission Factor (lb/ton) ÷ 2000 lb/ton**

**Limited Emissions (tons/yr) = PSD Minor Limit (lb/hr) ÷ 2000 lb/ton**

**Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) * (1 - Actual Control Efficiency)**

### Notes:

Each silo can be filled pneumatically by tanker trucks at a rate of 25 tons per hour. This is the process weight rate of the silo for purposes of determining compliance with 326 IAC 6-3-2. Each silo is bottlenecked by the amount of dry ingredient that can be conveyed pneumatically out of the silo. This is the maximum capacity of the silo for purposes of determining compliance with 326 IAC 2-2.

The emission factors are from AP-42, Ch. 11.12, Table 11.12-2 for cement unloading (SCC# 3-05-011-17).

*PM₂.₅ has been assumed to be equal to PM₁₀.*

**The silos only have PSD Minor limits for PM. PM10 and PM2.5 are unlimited.**
Appendix A: Emissions Calculations
Particulate Emissions from Dry Ingredient Conveyance

Company Name: Maplehurst Bakeries, LLC
Address City IN Zip: 50 Maplehurst Drive, Brownsburg, Indiana 46112
Part 70 Renewal No.: T063-40955-00031
Permit Reviewer: Tamera Wessel/Paul Jump

The following calculations determine the emissions from the pneumatic conveyance of the dry ingredients from the silos to the mixers.

Control Device Efficiency: 99%

<table>
<thead>
<tr>
<th>ID #</th>
<th>Description</th>
<th>Maximum Capacity</th>
<th>Emission Factors</th>
<th>Uncontrolled</th>
<th>Controlled</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>lb/hr</td>
<td>PM PM&lt;sub&gt;10&lt;/sub&gt; PM&lt;sub&gt;2.5&lt;/sub&gt; tons/yr</td>
<td>PM PM&lt;sub&gt;10&lt;/sub&gt; PM&lt;sub&gt;2.5&lt;/sub&gt; tons/yr</td>
<td>PM PM&lt;sub&gt;10&lt;/sub&gt; PM&lt;sub&gt;2.5&lt;/sub&gt; tons/yr</td>
</tr>
<tr>
<td>EU01</td>
<td>Flour Silo</td>
<td>5,873</td>
<td>2.937</td>
<td>3.14</td>
<td>1.10</td>
</tr>
<tr>
<td>EU02</td>
<td>Flour Silo</td>
<td>5,873</td>
<td>2.937</td>
<td>3.14</td>
<td>1.10</td>
</tr>
<tr>
<td>EU03</td>
<td>Minor Ingredient Silo</td>
<td>2,794.5</td>
<td>1,397</td>
<td>3.14</td>
<td>1.10</td>
</tr>
<tr>
<td>EU04</td>
<td>Minor Ingredient Silo</td>
<td>2,794.5</td>
<td>1,397</td>
<td>3.14</td>
<td>1.10</td>
</tr>
<tr>
<td>EU05</td>
<td>Minor Ingredient Silo</td>
<td>2,794.5</td>
<td>1,397</td>
<td>3.14</td>
<td>1.10</td>
</tr>
<tr>
<td>EU06-EU18</td>
<td>Use Bins (13)</td>
<td>20,130</td>
<td>10,065</td>
<td>0.0048</td>
<td>0.0028</td>
</tr>
<tr>
<td>EU21-EU33, EU73, EU74</td>
<td>Scale Hoppers/Mixers (15)</td>
<td>20,130</td>
<td>10,065</td>
<td>0.572</td>
<td>0.156</td>
</tr>
<tr>
<td></td>
<td>Dusting Flour Hopper</td>
<td>500</td>
<td>0.250</td>
<td>0.572</td>
<td>0.156</td>
</tr>
</tbody>
</table>

Emissions Total 164.48 55.66 55.66

Allowable Emissions:
The use bins are exempt from 326 IAC 6-3-2 because, pursuant to 326 IAC 6-3-1(b)(14), each bin has potential particulate emissions less than 0.551 lb/hr.

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

**Flour Silos (EU01, EU02):**

\[ P = 2.937 \text{ tons/hr} \]

\[
\text{P} = 4.1 \times \left( 2.937 \times 0.67 \right) = 8.44 \text{ lb/hr (allowable)}
\]

with uncontrolled potential:

\[
40.39 \text{ tons/yr} \times \frac{2000 \text{ lb/ton}}{8760 \text{ hr/yr}} = 9.22 \text{ lb/hr (will not comply)}
\]

**Minor Ingredient Silos:**

\[ P = 1.397 \text{ tons/hr} \]

\[
\text{P} = 4.1 \times \left( 1.397 \times 0.67 \right) = 5.13 \text{ lb/hr (allowable)}
\]

with uncontrolled potential:

\[
19.22 \text{ tons/yr} \times \frac{2000 \text{ lb/ton}}{8760 \text{ hr/yr}} = 4.39 \text{ lb/hr (capable of complying)}
\]

**Scale Hoppers/Mixers:**

\[ P = 10.065 \text{ tons/hr} \]

\[
\text{P} = 4.1 \times \left( 10.065 \times 0.67 \right) = 19.3 \text{ lb/hr (allowable)}
\]

with uncontrolled potential:

\[
25.22 \text{ tons/yr} \times \frac{2000 \text{ lb/ton}}{8760 \text{ hr/yr}} = 5.76 \text{ lb/hr (capable of complying)}
\]

Notes:
Each silo is bottlenecked by the amount of dry ingredient that can be conveyed pneumatically from the silo. This is the maximum capacity used for purposes of determining compliance with 326 IAC 2-2. The emission factors are from AP-42, Ch. 11.12, Table 11.12-2 (February 2011 revisions) for cement unloading (SCC# 3-05-011-17), hopper loading (SCC# 3-05-011-08), and mixer loading (SCC# 3-05-011-09). PM<sub>2.5</sub> has been assumed to be equal to PM<sub>10</sub>.

Methodology:
Maximum Capacity (tons/hr) = Maximum Capacity (lb/hr) / 2000 lb/ton

Uncontrolled Emissions (tons/yr) = Maximum Capacity (tons/hr) * Emission Factor (lb/ton) * 8760 hr/yr + 2000 lb/ton

Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr) * (1 - Actual Control Efficiency)
Appendix A: Emissions Calculations
VOC Emissions from Fermentation
(Released at the Fryer)

Company Name: Maplehurst Bakeries, LLC
Address City IN Zip: 50 Maplehurst Drive, Brownsburg, Indiana 46112
Part 70 Renewal No.: T063-40955-00031
Permit Reviewer: Tamera Wessel/Paul Jump

<table>
<thead>
<tr>
<th>Bakery Line</th>
<th>Product</th>
<th>Maximum Capacity (lb/hr)</th>
<th>Maximum Throughput (tons/yr)</th>
<th>Average Sponge % Yeast</th>
<th>Ferm Time Hours</th>
<th>Dough % Yeast</th>
<th>Spike Time Hours</th>
<th>VOC (lb/ton)</th>
<th>VOC (tons/yr)</th>
<th>Acetaldehyde (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Moline I</td>
<td>yeast product</td>
<td>3,000</td>
<td>13,140.00</td>
<td>3.9</td>
<td>1.2</td>
<td>0.0</td>
<td>0.0</td>
<td>5.84</td>
<td>38.36</td>
<td>1.15</td>
</tr>
<tr>
<td>Moline II</td>
<td>yeast/cake product</td>
<td>3,000</td>
<td>13,140.00</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>see note</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Moline III</td>
<td>yeast product</td>
<td>3,000</td>
<td>13,140.00</td>
<td>3.7</td>
<td>1.2</td>
<td>0.0</td>
<td>0.0</td>
<td>5.65</td>
<td>37.11</td>
<td>1.11</td>
</tr>
<tr>
<td>Moline IV</td>
<td>yeast product</td>
<td>3,000</td>
<td>13,140.00</td>
<td>3.4</td>
<td>1.2</td>
<td>0.0</td>
<td>0.0</td>
<td>5.36</td>
<td>35.24</td>
<td>1.08</td>
</tr>
<tr>
<td>Moline V</td>
<td>yeast product</td>
<td>3,000</td>
<td>13,140.00</td>
<td>3.5</td>
<td>1.2</td>
<td>0.0</td>
<td>0.0</td>
<td>5.46</td>
<td>35.87</td>
<td>1.08</td>
</tr>
<tr>
<td>Moline VI</td>
<td>yeast product</td>
<td>3,000</td>
<td>13,140.00</td>
<td>3.6</td>
<td>1.2</td>
<td>0.0</td>
<td>0.0</td>
<td>5.55</td>
<td>36.49</td>
<td>1.09</td>
</tr>
<tr>
<td>RHAKE</td>
<td>yeast/cake product</td>
<td>3,000</td>
<td>13,140.00</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>see note</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Moline VII</td>
<td>yeast product</td>
<td>4,537</td>
<td>19,872.06</td>
<td>3.6</td>
<td>1.2</td>
<td>0.0</td>
<td>0.0</td>
<td>5.55</td>
<td>55.18</td>
<td>1.66</td>
</tr>
</tbody>
</table>

Notes:
Moline II and RHAKE produce either (1) unfried yeast donuts which are frozen without proofing, or (2) chemically leavened fried cake donuts which are then frozen.
Moline II & RHAKE do not produce emissions due to proofing and/or fermentation.

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

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

\[ \text{VOC} = 0.95Y_i + 0.195t_i - 0.51S - 0.86ts + 1.90 \]

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

VOCs emitted during fermentation (leavening) are assumed to be 97% ethanol and 3% acetaldehyde (VOC/HAP), based on the following document and supporting information:
Appendix A: Emissions Calculations
VOC and HAP Emissions
Proof Boxes

Company Name: Maplehurst Bakeries, LLC
Address City IN Zip: 50 Maplehurst Drive, Brownsburg, Indiana 46112
Part 70 Renewal No.: T063-40955-00031
Permit Reviewer: Tamera Wessel/Paul Jump

<table>
<thead>
<tr>
<th>Fryer</th>
<th>Product</th>
<th>Uncontrolled Potential VOC from Fermentation (tons/year)</th>
<th>Uncontrolled Potential VOC from Proofing (tons/year)</th>
<th>Uncontrolled Potential Acetaldehyde from Proofing (tons/year)</th>
<th>Limited VOC Emissions from Fermentation and Proofing (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Moline I</td>
<td>yeast product</td>
<td>38.36</td>
<td>3.84</td>
<td>0.12</td>
<td>24.4</td>
</tr>
<tr>
<td>Moline II</td>
<td>yeast/cake product</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>n/a</td>
</tr>
<tr>
<td>Moline III</td>
<td>yeast product</td>
<td>37.11</td>
<td>3.71</td>
<td>0.11</td>
<td>24.4</td>
</tr>
<tr>
<td>Moline IV</td>
<td>yeast product</td>
<td>35.24</td>
<td>3.52</td>
<td>0.11</td>
<td>24.4</td>
</tr>
<tr>
<td>Moline V</td>
<td>yeast product</td>
<td>35.87</td>
<td>3.59</td>
<td>0.11</td>
<td>24.4</td>
</tr>
<tr>
<td>Moline VI</td>
<td>yeast product</td>
<td>36.49</td>
<td>3.65</td>
<td>0.11</td>
<td>40.1</td>
</tr>
<tr>
<td>RHAKE</td>
<td>yeast/cake product</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>n/a</td>
</tr>
<tr>
<td>Moline VII</td>
<td>yeast product</td>
<td>55.18</td>
<td>5.52</td>
<td>0.17</td>
<td>60.7</td>
</tr>
</tbody>
</table>

Notes:
Moline II and RHAKE produce either (1) unfried yeast donuts which are frozen without proofing, or (2) chemically leavened fried cake donuts which are then frozen.
Moline II and RHAKE do not produce emissions due to proofing and/or fermentation.
VOC emissions from proofing shall be assumed to be 10% of the emissions calculated for fermentation based on the following document:
VOCs emitted during fermentation (leavening) are assumed to be 97% ethanol and 3% acetaldehyde (VOC/HAP), based on the following document and supporting information:

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

#### Particulate and VOC Emissions

**Frying**

**Company Name:** Maplehurst Bakeries, LLC  
**Address City IN Zip:** 50 Maplehurst Drive, Brownsburg, Indiana 46112  
**Part 70 Renewal No.:** T063-40955-00031  
**Permit Reviewer:** Tamera Wessel/Paul Jump

<table>
<thead>
<tr>
<th>Production Line</th>
<th>Fryer</th>
<th>Product Description</th>
<th>Maximum Capacity (lb/hr)</th>
<th>Maximum Throughput (tons/yr)</th>
<th>Emission Factors</th>
<th>Potential Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Moline I</td>
<td>Fryer1</td>
<td>yeast product</td>
<td>3,000</td>
<td>13,140.00</td>
<td>PM 0.22, PM10 0.26, PM2.5 0.26, VOC 0.085</td>
<td>PM 1.45, PM10 1.71, PM2.5 1.71, VOC 0.56</td>
</tr>
<tr>
<td>Moline II</td>
<td>Fryer2</td>
<td>yeast/cake product</td>
<td>3,000</td>
<td>13,140.00</td>
<td>PM 0.22, PM10 0.26, PM2.5 0.26, VOC 0.085</td>
<td>PM 1.45, PM10 1.71, PM2.5 1.71, VOC 0.56</td>
</tr>
<tr>
<td>Moline III</td>
<td>Fryer3</td>
<td>yeast product</td>
<td>3,000</td>
<td>13,140.00</td>
<td>PM 0.22, PM10 0.26, PM2.5 0.26, VOC 0.085</td>
<td>PM 1.45, PM10 1.71, PM2.5 1.71, VOC 0.56</td>
</tr>
<tr>
<td>Moline IV</td>
<td>Fryer4</td>
<td>yeast product</td>
<td>3,000</td>
<td>13,140.00</td>
<td>PM 0.22, PM10 0.26, PM2.5 0.26, VOC 0.085</td>
<td>PM 1.45, PM10 1.71, PM2.5 1.71, VOC 0.56</td>
</tr>
<tr>
<td>Moline V</td>
<td>Fryer5</td>
<td>yeast product</td>
<td>3,000</td>
<td>13,140.00</td>
<td>PM 0.22, PM10 0.26, PM2.5 0.26, VOC 0.085</td>
<td>PM 1.45, PM10 1.71, PM2.5 1.71, VOC 0.56</td>
</tr>
<tr>
<td>Moline VI</td>
<td>Fryer6</td>
<td>yeast product</td>
<td>3,000</td>
<td>13,140.00</td>
<td>PM 0.22, PM10 0.26, PM2.5 0.26, VOC 0.085</td>
<td>PM 1.45, PM10 1.71, PM2.5 1.71, VOC 0.56</td>
</tr>
<tr>
<td>Moline VII</td>
<td>Fryer7</td>
<td>yeast product</td>
<td>4,537</td>
<td>19,872.06</td>
<td>PM 0.22, PM10 0.26, PM2.5 0.26, VOC 0.085</td>
<td>PM 2.19, PM10 2.58, PM2.5 2.58, VOC 0.84</td>
</tr>
</tbody>
</table>

**Allowable Emissions:**
The fryers are exempt from 326 IAC 6-3-2 because, pursuant to 326 IAC 6-3-1(b)(14), each fryer has potential particulate emissions less than 0.551 lb/hr.

**Notes:**
Emission factors are based on AP-42, Ch. 9.13, Tables 9.13.3-2 and 9.13.3-3 for snack chip deep frying with standard mesh pad mist eliminator. PM2.5 has been assumed to be equal to PM10.

**Methodology:**
Maximum Throughput (tons/yr) = Maximum Capacity (lb/hr) * 8760 hr/yr / 2000 lb/ton
Potential Emissions (tons/yr) = Maximum Throughput (tons/yr) * Emission Factor (lb/ton) / 2000 lb/ton
Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/hr <100  
Fryers  
Company Name: Maplehurst Bakeries, LLC  
Address City IN Zip: 50 Maplehurst Drive, Brownsburg, Indiana 46112  
Part 70 Renewal No.: T063-40955-00031

<table>
<thead>
<tr>
<th>Production Line</th>
<th>Fryer ID</th>
<th>MMBtu/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Moline I</td>
<td>Fryer1</td>
<td>1.3</td>
</tr>
<tr>
<td>Moline II</td>
<td>Fryer2</td>
<td>1.3</td>
</tr>
<tr>
<td>Moline III</td>
<td>Fryer3</td>
<td>1.3</td>
</tr>
<tr>
<td>Moline IV</td>
<td>Fryer4</td>
<td>1.3</td>
</tr>
<tr>
<td>Moline V</td>
<td>Fryer5</td>
<td>1.3</td>
</tr>
<tr>
<td>Moline VI</td>
<td>Fryer6</td>
<td>1.3</td>
</tr>
<tr>
<td>Heat Input Capacity</td>
<td>HHV</td>
<td>MJ/hr</td>
</tr>
<tr>
<td>Moline VI</td>
<td>Fryer7</td>
<td>1.3</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>1.8</td>
<td>0.01</td>
</tr>
<tr>
<td>PM10</td>
<td>7.6</td>
<td>0.04</td>
</tr>
<tr>
<td>direct PM2.5</td>
<td>7.8</td>
<td>0.04</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>3.35E-03</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>0.56</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.03</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>0.47</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only.  PM10 emission factor is filterable and condensable PM10 combined.  PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx:  Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

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

**HAPs Calculations**  
<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>2.1E-03</td>
<td>1.17E-06</td>
</tr>
<tr>
<td>Dichlorobenzene</td>
<td>1.2E-03</td>
<td>6.69E-06</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>7.5E-02</td>
<td>4.187E-04</td>
</tr>
<tr>
<td>Hexane</td>
<td>1.8E+00</td>
<td>1.005E-02</td>
</tr>
<tr>
<td>Toluene</td>
<td>3.4E-03</td>
<td>1.896E-05</td>
</tr>
<tr>
<td><strong>Total - Organics</strong></td>
<td>1.053E-02</td>
<td></td>
</tr>
</tbody>
</table>

**HAPs - Metals**  
<table>
<thead>
<tr>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th><strong>Total - Metals</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td><strong>3.095E-05</strong></td>
</tr>
<tr>
<td>2.79E-06</td>
<td>6.14E-06</td>
<td>7.81E-06</td>
<td>2.12E-06</td>
<td>1.17E-05</td>
<td><strong>1.053E-02</strong></td>
</tr>
</tbody>
</table>

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

**Greenhouse Gas Calculations**  
<table>
<thead>
<tr>
<th>Greenhouse Gas</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO2</td>
<td>120,000</td>
<td>670</td>
</tr>
<tr>
<td>CH4</td>
<td>2.3</td>
<td>0.0</td>
</tr>
<tr>
<td>N2O</td>
<td>2.2</td>
<td>0.0</td>
</tr>
<tr>
<td>Total CO2</td>
<td>670</td>
<td>670</td>
</tr>
</tbody>
</table>

**Methodology**  
The N2O Emission Factor for uncontrolled is 2.2.  The N2O Emission Factor for low Nox burner is 0.64.  
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.  
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton  
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).
### HAPS Calculations

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM7.6</th>
<th>PM10*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.0</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
</tr>
</tbody>
</table>

### Methodology

All emission factors are based on normal firing, MMBTU = 1,000,000 Btu.

**HAPS - Organic**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMCF</th>
<th>2.1E+00</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential Emission in tons/yr</td>
<td>3.26E-04</td>
</tr>
</tbody>
</table>

**HAPS - Metals**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMCF</th>
<th>5.0E-04</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential Emission in tons/yr</td>
<td>7.76E-05</td>
</tr>
</tbody>
</table>

**Methodology**

The five highest organic and metal HAPS emission factors are provided above.

Additional HAPS emission factors are available in AP-42, Chapter 1.4.
Appendix A: Emissions Calculations
VOC Emissions from Cleaning Solvents

Company Name: Maplehurst Bakeries, LLC
Address City IN Zip: 50 Maplehurst Drive, Brownsburg, Indiana 46112
Part 70 Renewal No.: T063-40955-00031
Permit Reviewer: Tamera Wessel

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lbs/gal)</th>
<th>Maximum Usage (gal/yr)</th>
<th>Weight % VOC</th>
<th>PTE VOC (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>ChemSan 660</td>
<td>6.6</td>
<td>115</td>
<td>1.2</td>
<td>4.55E-03</td>
</tr>
</tbody>
</table>

**Methodology**

PTE VOC/HAP (tons/yr) = Density (lbs/gal) x Maximum Usage (gal/yr) x Weight % VOC x 1 ton/2,000 lbs
Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Maplehurst Bakeries, LLC
Source Address: 50 Maplehurst Drive, Brownsburg, Indiana 46112
Permit Number: 7063-40955-00031
Reviewer: Tamera Wessel

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

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight of Loaded Vehicle (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (miles/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Truck (bagged and/or boxed ingredients in)</td>
<td>4</td>
<td>1.0</td>
<td>4.0</td>
<td>40.25</td>
<td>161.0</td>
<td>1271</td>
<td>0.241</td>
</tr>
<tr>
<td>Truck (bagged and/or boxed ingredients exiting site)</td>
<td>1.0</td>
<td>4.0</td>
<td>40.25</td>
<td>161.0</td>
<td>1271</td>
<td>0.241</td>
<td>1.0</td>
</tr>
<tr>
<td>Semi-trailer Truck (bulk ingredients in)</td>
<td>5</td>
<td>1.0</td>
<td>5.0</td>
<td>66.0</td>
<td>320.0</td>
<td>1568</td>
<td>3.31</td>
</tr>
<tr>
<td>Semi-trailer Truck (empty truck exiting site)</td>
<td>5</td>
<td>1.0</td>
<td>5.0</td>
<td>66.0</td>
<td>320.0</td>
<td>1568</td>
<td>3.31</td>
</tr>
<tr>
<td>Semi-trailer Truck (empty truck entering)</td>
<td>15</td>
<td>1.0</td>
<td>15</td>
<td>40.0</td>
<td>533</td>
<td>214</td>
<td>7.5</td>
</tr>
<tr>
<td>Semi-trailer Truck (product out)</td>
<td>15</td>
<td>1.0</td>
<td>15</td>
<td>40.0</td>
<td>533</td>
<td>214</td>
<td>7.5</td>
</tr>
</tbody>
</table>

 Totals | 48.0                           | 2042.0                          | 9.2                                         | 3357.7                                |

Average Vehicle Weight Per Trip = 42.5 tons/trip
Average Miles Per Trip = 0.19 miles/trip

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

where k = 0.011 0.0022 0.00054 lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W = 42.5 42.5 42.5 tons = average vehicle weight
sL = 9.7 9.7 9.7 g/m² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = Ef * [1 - (p/N)] (Equation 2 from AP-42 13.2.1)

where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

Mitigated Emission Factor, Eext = 3.988 0.798 0.1958 lb/mile

Dust Control Efficiency = 0% 0% 0% (pursuant to control measures outlined in fugitive dust control plan)

<table>
<thead>
<tr>
<th>Process</th>
<th>Mitigated PTE of PM (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM10 (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (Before Control) (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Truck (bagged and/or boxed ingredients in)</td>
<td>0.27</td>
<td>0.06</td>
<td>0.01</td>
</tr>
<tr>
<td>Truck (bagged and/or boxed ingredients exiting site)</td>
<td>0.64</td>
<td>0.13</td>
<td>0.03</td>
</tr>
<tr>
<td>Semi-trailer Truck (bulk ingredients in)</td>
<td>0.98</td>
<td>0.19</td>
<td>0.04</td>
</tr>
<tr>
<td>Semi-trailer Truck (empty truck exiting site)</td>
<td>1.00</td>
<td>0.20</td>
<td>0.05</td>
</tr>
<tr>
<td>Semi-trailer Truck (empty truck entering)</td>
<td>2.40</td>
<td>0.46</td>
<td>0.12</td>
</tr>
<tr>
<td>Semi-trailer Truck (product out)</td>
<td>2.40</td>
<td>0.46</td>
<td>0.12</td>
</tr>
</tbody>
</table>

 Totals | 6.12                           | 1.22                           | 0.30                           |

Methodology

| | = [Maximum Weight of Loaded Vehicle (ton/trip)] * [Maximum trips per day (trip/day)] |
| | PM10 = Particulate Matter (<10 um) |
| Maximum one-way distance (miles) = [Maximum one-way distance (miles/trip)] / [5280 ft/mile] |
| Average Vehicle Weight Per Trip (ton/trip) = [SUM (Total Weight driven per day (ton/day)) / [SUM (Maximum trips per day (trip/day))] |
| Average Miles Per Trip (miles/trip) = [SUM (Maximum one-way miles (miles/day)) / [SUM (Maximum trips per day (trip/day))] |
| Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs) |
| Mitigated PTE (Before Control) (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs) |
| Mitigated PTE (After Control) (tons/yr) = [Mitigated PTE (Before Control) (tons/yr)] * [1 - Dust Control Efficiency] |

Abbreviations

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

Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
October 25, 2019

Mr. Matt Evans
Maplehurst Bakeries, LLC
50 Maplehurst Drive
Brownsburg, IN 46112

Re: Public Notice
Maplehurst Bakeries, LLC
Permit Level: Title V - Renewal
Permit Number: 063-40955-00031

Dear Mr. Evans:

Enclosed is a copy of your draft Title V - Renewal, Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Brownsburg Public Library, 450 S. Jefferson Street in Brownsburg, IN 46112-1310. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Paul Jump, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-2251 or dial (317) 234-2251.

Sincerely,

Vicki Biddle
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
October 25, 2019

To: Brownsburg Public Library

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

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

Applicant Name: Maplehurst Bakeries, LLC
Permit Number: 063-40955-00031

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.
Notice of Public Comment

October 25, 2019
Maplehurst Bakeries, LLC
063-40955-00031

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

Enclosure
PN AAA Cover Letter 4/12/2019
AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

October 25, 2019

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

Permit Number: 063-40955-00031
Applicant Name: Maplehurst Bakeries, LLC
Location: Brownsburg, Hendricks County, Indiana

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

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

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

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification 1/9/2017
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<th>Article Number</th>
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<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
<th>Due Send if COD</th>
<th>R.R. Fee</th>
<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
<th>Remarks</th>
</tr>
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<tbody>
<tr>
<td>1</td>
<td></td>
<td>Matt Evans Maplehurst Bakeries LLC 50 Maplehurst Dr Brownsburg IN 46112 (Source CAATS)</td>
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<td>2</td>
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<td>Greg Taylor Maplehurst Bakeries LLC 50 Maplehurst Dr Brownsburg IN 46112 (RO CAATS)</td>
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<td>Brownsburg Brown and Lincoln Twp Library 450 S Jefferson St Brownsburg IN 46112-1310 (Library)</td>
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<td></td>
<td>V.P., Board of County Commissioners 355 S. Washington Street Room 204 Danville IN 46122 (Affected Party)</td>
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<td>Larry and Becky Bischoff 10979 North Smokey Row Road Mooresville IN 46158 (Affected Party)</td>
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<td>6</td>
<td></td>
<td>Hendricks County Commissioners 355 S Washington Danville IN 46122 (Local Official)</td>
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<td>7</td>
<td></td>
<td>Betty Bartley P.O. Box 149 Danville IN 46122 (Affected Party)</td>
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<td>8</td>
<td></td>
<td>Brownsburg Town Council and Town Manager 61 North Green Street Brownsburg IN 46112 (Local Official)</td>
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<td>Hendricks County Health Department 355 S Washington Street, Suite G30 Danville IN 46122-1759 (Health Department)</td>
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<td></td>
<td>Alic Bent August Mack Environmental, Inc. 1302 N Meridian St, Suite 300 Indianapolis IN 46202 (Consultant)</td>
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<td>11</td>
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<td>Kathy Linton The Lebanon Reporter 117 E Washington St Lebanon IN 46052 (Affected Party)</td>
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</tbody>
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**Total number of pieces Listed by Sender**: 11

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