NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Federally Enforceable State Operating Permit (FESOP)

for Perfection Bakeries, Inc. in Lake County

Significant Permit Revision No.: 089-42093-00590

The Indiana Department of Environmental Management (IDEM) has received an application from Perfection Bakeries, Inc., located at 790 West Commercial Avenue, Lowell, IN 46356, for a significant revision of its FESOP issued on April 24, 2018. If approved by IDEM’s Office of Air Quality (OAQ), this proposed revision would allow Perfection Bakeries, Inc. to make certain changes at its existing source. Perfection Bakeries, Inc. has applied to make limit changes due to the reclassification of Lake County to serious nonattainment for ozone.

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:

Lowell Public Library
1505 E. Commercial Avenue
Lowell, Indiana 46356-2107

and

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

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

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

How can you participate in this process?

The date that this notice is 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 SPR 069-42093-00590 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 (317) 234-6555  
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, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

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

Heath Hartley, Section Chief  
Permits Branch  
Office of Air Quality
Mr. David Kent  
Perfection Bakeries, Inc.  
790 West Commercial Avenue  
Lowell, IN 46356

Re: 089-42093-00590  
Significant Revision to  
F089-39400-00590

Dear Mr. Kent:

Perfection Bakeries, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) No. F F089-39400-00590, on April 24, 2018, for a stationary baked good production facility located at 790 West Commercial Avenue, Lowell, IN 46356. On October 11, 2019, the Office of Air Quality (OAQ) received an application from the source requesting to make adjustments of VOC emission limits due to the redesignation of Lake County to serious nonattainment for ozone. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the Significant Permit Revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions regarding this matter, 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 (317) 234-6555 or (800) 451-6027, and ask for Paul Jump or (317) 234-6555.

Sincerely,

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

cc: File - Lake County
Lake County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northwest Regional Office
New Source Review and Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY
DRAFT

Perfection Bakeries, Inc.
790 W. Commercial Avenue
Lowell, Indiana 46356

(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. 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 2-8 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.

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

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### SECTION A  SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air 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 8 3(b)][40 CFR 81.315][326 IAC 2-1.1-4(a)]

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>790 W. Commercial Avenue, Lowell, Indiana 46356</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>219-224-3508</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>Lake</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Nonattainment for 8-hour ozone standard</td>
</tr>
<tr>
<td></td>
<td>Attainment for all other criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Federally Enforceable State 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 2-8-3(c)(3)]

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

(a) One (1) bread baking line, identified as EU01, constructed in 2017, with a maximum baking rate of 10,522 pounds of bread per hour, exhausting to Stack OS1, including:

1. One (1) natural gas-fired bread baking oven, identified as EU02, approved in 2018 for modification, with a maximum heat input capacity of 8.272 MMBtu/hr.

2. One (1) proof box, identified as EU03, with a maximum capacity of 10,522 pounds of dough per hour.

(b) One (1) Raw Material Handling area with pneumatic conveying system, including:

1. Three (3) storage silos, identified as EU06-EU08, constructed in 2017, each with a maximum capacity of 25,000 pounds per hour, using a fabric filter CE01 as particulate control, exhausting to stacks FS01, FS02, and FS03.

2. One (1) dry ingredient dump station, identified as EU09, constructed in 2017, with a maximum capacity of 3,566 pounds per hour, using a fabric filter as particulate control, exhausting indoors.

3. One (1) use bin for granulated sugar storage, identified as EU35, constructed in 2017, with a maximum capacity of 4,000 pounds, using no control, exhausting indoors.

4. One (1) scaling station, constructed in 2017, with a total maximum capacity of 3,566 pounds per hour, using a fabric filter as particulate control, exhausting outdoors.
(5) Three (3) mixers, identified as EU10, EU11, constructed in 2017, and EU34, approved for construction in 2018, with a total maximum capacity of 11,566 pounds per hour, using a fabric filter as particulate control, exhausting indoors.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

(a) Natural gas fired combustion units, including:

(1) One (1) boiler, identified as EU04, permitted in 2016, with a maximum rated heat input capacity of 4.063 MMBtu/hr, exhausting to stack B01.

(2) One (1) boiler, identified as EU05, permitted in 2016, with a maximum rated heat input capacity of 4.063 MMBtu/hr, exhausting to stack B02.

(3) Twenty-two (22) heaters, identified as EU12 through EU33, permitted in 2016, with a maximum total rated heat input capacity of 5.035 MMBtu/hr exhausting to stacks H01 through H22.

(b) Bulk liquid storage, permitted in 2016, including:

(1) Two (2) vegetable oil tanks, each with a maximum capacity of 3,700 gallons.

(2) Two (2) high fructose corn syrup (HFCS) tanks, each with a maximum capacity of 3,700 gallons.

(c) Paved roads.

A.4 FESOP Applicability [326 IAC 2-8-2][40 CFR 81.315][326 IAC 2-1.1-4(a)]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).
SECTION B  GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, 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 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F089-39400-00590, 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, 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 2-8-6][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 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(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 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
(1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source’s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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

(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 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

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

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

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(b) 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) 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.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

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

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

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

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

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

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

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

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

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-3(c)(6) 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 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

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

2. If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

   A. The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

   B. Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

(a) All terms and conditions of permits established prior to F089-39400-00590 and issued pursuant to permitting programs approved into the state implementation plan have been either:

   1. incorporated as originally stated,

   2. revised, or

   3. deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee’s right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.
B.15 Permit Modification, Reopening, Revocation and Reissue, or Termination

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissue, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-8(a)]

(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 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, 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 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (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 approval required by 326 IAC 2-8-11.1 has been obtained;

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

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
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 2-8-15(b)(1) and (c). 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 2-8-15(b)(1) and (c).

(b) Emission Trades [326 IAC 2-8-15(b)]
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 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) 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.19 Source Modification Requirement [326 IAC 2-8-11.1]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
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 FESOP 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, at reasonable times, 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, at reasonable times, 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, at reasonable times, 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than 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) 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.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 2-1-6]

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

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

C.1 Overall Source Limit [326 IAC 2-8][40 CFR 81.315][326 IAC 2-1.1-4(a)]

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than fifty (50) tons per twelve (12) consecutive month period;

(2) The potential to emit nitrogen oxides (NOx) from the entire source shall be limited to less than fifty (50) tons per twelve (12) consecutive month period;

(3) The potential to emit any regulated pollutant, except particulate matter (PM), volatile organic compounds (VOCs), and nitrogen oxides (NOx), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period;

(4) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(5) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source’s potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (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 twenty percent (20%) 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).

C.6 Fugitive Particulate Matter Emissions [326 IAC 6.8-10-3]
Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

(a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).

(b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).

(c) The opacity of fugitive particulate emissions from exposed areas shall not exceed ten percent (10%) on a six (6) minute average.

(d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.

(e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.

(f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.

(g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).

(h) Material processing facilities shall include the following:

(1) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.

(2) The PM$_{10}$ emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
(3) The PM\textsubscript{10} stack emissions from a material processing facility shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.

(4) The opacity of fugitive particulate emissions from the material processing facilities, except a crusher at which a capture system is not used, shall not exceed ten percent (10%) opacity.

(5) The opacity of fugitive particulate emissions from a crusher at which a capture system is not used shall not exceed fifteen percent (15%).

(i) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).

(j) Material transfer limits shall be as follows:

(1) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).

(2) Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%), three (3) minute average.

(3) Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:

(A) The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.

(B) The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6.8-10-3(9).

(k) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the attached Fugitive Dust Control Plan.

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.8 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.9 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ no 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.10 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 2-8-4(1)][326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.12 Continuous Compliance Plan [326 IAC 6.8-8-1][326 IAC 6.8-8-8]

(a) Pursuant to 326 IAC 6.8-8-1, the Permittee shall submit to IDEM and maintain at source a copy of the Continuous Compliance Plan (CCP). The Permittee shall perform the inspections, monitoring and record keeping in accordance with the information in 326 IAC 6.8-8-5 through 326 IAC 6.8-8-7 or applicable procedures in the CCP.

(b) Pursuant to 326 IAC 6.8-8-8, the Permittee shall update the CCP, as needed, retain a copy of any changes and updates to the CCP at the source and make the updated CCP available for inspection by the department. The Permittee shall submit the updated CCP, if required to IDEM, OAQ within thirty (30) days of the update.

(c) Pursuant to 326 IAC 6.8-8, failure to submit a CCP, maintain all information required by the CCP at the source, or submit update to a CCP is a violation of 326 IAC 6.8-8.

C.13 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(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 2-8-4][326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4][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.15 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(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 2-8-5(a)(1) by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

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

C.17 Emission Statement [326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement by July 1 following a calendar year when the source emits oxides of nitrogen or volatile organic compounds into the ambient air equal to or greater than twenty-five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(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 FESOP.

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.19 General Reporting Requirements [326 IAC 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. 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.20 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) bread baking line, identified as EU01, constructed in 2017, with a maximum baking rate of 10,522 pounds of bread per hour, exhausting to Stack OS1, including:

(1) One (1) natural gas-fired bread baking oven, identified as EU02, approved in 2018 for modification, with a maximum heat input capacity of 8.272 MMBtu/hr.

(2) One (1) proof box, identified as EU03, with a maximum capacity of 10,522 pounds of dough per hour.

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

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

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

Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), BACT has been determined to be the following for the bread baking line:

(a) Volatile organic compounds (VOC) emissions from the bread baking line EU01, including the natural gas fired oven EU02 and proof box EU03, shall not exceed 70.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The source shall operate the proof box EU03 in accordance with the manufacturer's design and operating specifications.

(c) In order to ensure proper operation and to minimize potential emissions, the source shall perform proof box cleaning operations for the proof box (EU03) on a tiered cleaning schedule in accordance with their Sanitation Standard Operating Procedure (SSOP):

1. The following procedures to be conducted every week:
   (A) Scraping of dough from racks and supports;
   (B) Sweeping of the proof box floor;
   (C) Removal of dough/product from inside the proof box.

2. The following procedures to be conducted every four (4) weeks:
   (A) Wipe-off of interior proof box channel rails as needed;
   (B) Removal of any dough or oil accumulations from channel rails and cross-over framework; and
   (C) Washing or mopping of floor of the proof box, and removal of accumulated waste from the floor.

D.1.2 FESOP and Emission Offset Minor Limits [326 IAC 2-8-4] [326 IAC 2-3]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable, the Permittee shall comply with the following:

(a) Volatile organic compounds (VOC) emissions from the bread baking line EU01, including the natural gas fired oven EU02 and proof box EU03, shall not exceed 48.68 tons per
twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, 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 50 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a), the emissions of particulate matter from the baking oven, EU02, shall not exceed 0.03 grain per dry standard cubic feet.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.5 Volatile Organic Compounds

Compliance with the VOC limit contained in D.1.1 and D.1.2 shall be determined by using the following equations:

\[
\text{VOC} = \sum_{m=1}^{12} \left( 1.1 \times \left( \sum_{i=1}^{n} \frac{E_i \times B_i}{2000 \text{ lb/ton}} \right) + 0.017 \right)_m
\]

Where:

- \( \text{VOC} \) = The VOC emissions from the bread baking line (tons per twelve (12) consecutive month period);
- \( n \) = The number of different dough types used during month \( m \).
- \( B_i \) = The amount of dough of type \( i \) produced during month \( m \) (tons/month);
- \( E_i \) = The VOC emission factor for type \( i \) dough (lb of VOC/ton of dough); and
- \( m \) = Each calendar month within the twelve (12) consecutive month period;

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

Note: In the equation above, the factor of 0.017 tons/month represents the maximum monthly VOC emissions from combustion of natural gas in EU02 at the maximum heat input capacity of 8.27 MMBtu/hr and using the AP-42 emission factor of 5.5 lb/MMCF.

The emission factor for each type of dough shall be calculated using the following equation from AP-42 Chapter 9.9.6:

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

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

**Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]**

**D.1.6 Record Keeping Requirement**

(a) In order to document the compliance status with Conditions D.1.1, and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emissions limits established in Conditions D.1.1 and D.1.2.

(1) The dates of the compliance period;

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

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

   (A) The initial baker's percent of yeast;
   (B) The total yeast action time in hours;
   (C) The final (spike) baker's percent of yeast; and
   (D) The spiking time in hours.

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

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

**D.1.7 Reporting Requirements**

A quarterly summary of the information to document the compliance status with Conditions D.1.1, and D.1.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) One (1) Raw Material Handling area with pneumatic conveying system, including:

(1) Three (3) storage silos, identified as EU06-EU08, constructed in 2017, each with a maximum capacity of 25,000 pounds per hour, using a fabric filter CE01 as particulate control, exhausting to stacks FS01, FS02, and FS03.

(2) One (1) dry ingredient dump station, identified as EU09, constructed in 2017, with a maximum capacity of 3,566 pounds per hour, using a fabric filter as particulate control, exhausting indoors.

(3) One (1) use bin for granulated sugar storage, identified as EU35, constructed in 2017, with a maximum capacity of 4,000 pounds, using no control, exhausting indoors.

(4) One (1) scaling station, constructed in 2017, with a total maximum capacity of 3,566 pounds per hour, using a fabric filter as particulate control, exhausting outdoors.

(5) Three (3) mixers, identified as EU10, EU11, constructed in 2017, and EU34, approved for construction in 2018, with a total maximum capacity of 11,566 pounds per hour, using a fabric filter as particulate control, exhausting indoors.

(a) Natural gas fired combustion units, including:

(1) One (1) boiler, identified as EU04, permitted in 2016, with a maximum rated heat input capacity of 4.063 MMBtu/hr, exhausting to stack B01.

(2) One (1) boiler, identified as EU05, permitted in 2016, with a maximum rated heat input capacity of 4.063 MMBtu/hr, exhausting to stack B02.

(3) Twenty-two (22) heaters, identified as EU12 through EU33, permitted in 2016, with a maximum total rated heat input capacity of 5.035 MMBtu/hr exhausting to stacks H01 through H22.

(c) Paved roads.

(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 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6.8-1-2]

(a) Pursuant to 326 IAC 6.8-1-2(b)(3), the emissions of particulate matter from the natural gas-fired boilers EU04 and EU05 shall not exceed 0.01 grain per dry standard cubic foot.

(b) Pursuant to 326 IAC 6.8-1-2(a), the emissions of particulate matter from the space heaters, EU12 through EU33, each of the emission units comprising the raw material handling area, EU06 through EU11, EU34, and EU35, and paved roads shall not exceed 0.03 grain per dry standard cubic feet, each.
D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.2.3 Particulate Matter

(a) In order to assure compliance with Condition D.2.1(b), the fabric filter CE01 for the storage silos EU06 through EU08, fabric filter for dry ingredient dump station EU09, and the fabric filter for the scaling operation and mixers EU10, EU11, and EU34 for particulate control, shall be in operation and control emissions at all times the associated units are in operation.

(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.

D.2.4 Broken or Failed Filter Detection

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

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

Filter failure can be indicated by a significant drop in the dust collector'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.

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

D.2.5 Visible Emissions Notations

(a) Daily visible emission notations of flour silos EU06-EU08 stack exhaust FS01, FS02, and FS03 shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.6 Filter Inspection

The Permittee shall perform an inspection each calendar quarter of all filters controlling the mixers and scales, use bin and dump station to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective filters shall be replaced.

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

D.2.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the stacks exhausts from stacks FS01, FS02, and FS03. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) To document the compliance status with Condition D.2.6, the Permittee shall maintain records of the results of the inspections.

(c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: Perfection Bakeries, Inc.
Source Address: 790 W. Commercial Avenue, Lowell, Indiana 46356
FESOP Permit No.: F089-39400-00590

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: _________________________________________________________
Date: _________________________________________________________________
This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

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

<table>
<thead>
<tr>
<th>Facility/Equipment/Operation:</th>
</tr>
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<tbody>
<tr>
<td>Control Equipment:</td>
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<tr>
<td>Permit Condition or Operation Limitation in Permit:</td>
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<td>Description of the Emergency:</td>
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<td>Describe the cause of the Emergency:</td>
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<tr>
<td>If any of the following are not applicable, mark N/A</td>
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<tr>
<th>Date/Time Emergency started:</th>
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<tr>
<td>Date/Time Emergency was corrected:</td>
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<tr>
<td>Was the facility being properly operated at the time of the emergency?</td>
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<tr>
<td>Describe:</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>
</tbody>
</table>

If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: ________________________________
Title / Position: ________________________________
Date: ________________________________
Phone: ________________________________
Source Name: Perfection Bakeries, Inc.
Source Address: 790 W. Commercial Avenue, Lowell, Indiana 46356
FESOP Permit No.: F089-39400-00590
Facility: Bread Baking Line EU01 (including oven EU02 and proof box EU03)
Parameter: Volatile Organic Compounds (VOC)
Limit: Volatile organic compounds (VOC) emissions from the bread baking line EU01, including the natural gas-fired oven EU02 and proof box EU03, shall not exceed 48.68 tons per twelve (12) consecutive month period.

| QUARTER : ___________________ | YEAR: ___________________
<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Month</td>
<td>Column 1</td>
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<td>This Month</td>
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</table>

☐ No deviation occurred in this quarter.

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

Submitted by: ________________________________
Title / Position: ________________________________
Signature: ________________________________
Date: ________________________________
Phone: ________________________________
Source Name: Perfection Bakeries, Inc.  
Source Address: 790 W. Commercial Avenue, Lowell, Indiana 46356  
FESOP Permit No.: F089-39400-00590

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".

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

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

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### Permit Requirement (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

---

### Permit Requirement (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

---

**Form Completed by:**

**Title / Position:**

**Date:**

**Phone:**
Indiana Department of Environmental Management  
Office of Air Quality  
Technical Support Document (TSD) for a Significant Permit Revision to a  
Federally Enforceable State Operating Permit (FESOP)  

Source Description and Location  

Source Name: Perfection Bakeries, Inc.  
Source Location: 790 West Commercial Avenue, Lowell, IN 46356  
County: Lake (West Creek Township)  
SIC Code: 2051 (Bread and Other Bakery Products, Except Cookies and Crackers)  
Operation Permit No.: F 089-39400-00590  
Operation Permit Issuance Date: April 24, 2018  
Significant Permit Revision No.: 089-42093-00590  
Permit Reviewer: Paul Jump  

Existing Approvals  
The source was issued FESOP No. 089-39400-00590 on April 24, 2018. There have been no subsequent approvals issued.  

County Attainment Status  
The source is located in Lake County, West Creek Township.  

<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>Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.</td>
</tr>
<tr>
<td>O₃</td>
<td>Serious nonattainment effective September 23, 2019, for the 2008 8-hour ozone standard.¹</td>
</tr>
<tr>
<td>PM₂.⁵</td>
<td>Unclassifiable 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>
<tr>
<td>PM₁₀</td>
<td>Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.</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>

¹Nonattainment Severe 17 effective November 15, 1990, for the Chicago-Gary-Lake County area for the 1-hour ozone standard, which was revoked effective June 15, 2005. The U. S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Lake County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3 for the 1-hour standard.  

(a) Ozone Standards  
U.S. EPA, in the Federal Register Notice 84 FR 44238 dated August 23, 2019, designated Lake County as serious nonattainment for the 2008 8-hour ozone standard effective September 23, 2019. An emergency rulemaking for 326 IAC 1-4 is in process to adopt the U.S. EPA's serious nonattainment designation for Lake and Porter County. The OAQ will rely on the serious nonattainment designation under 40 CFR 81.315 until the emergency rulemaking for 326 IAC 1-4 is effective. 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. Therefore, VOC and NOx emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.

(b) PM2.5
Lake 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.

(c) Other Criteria Pollutants
Lake 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) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

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

### Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Revision (ton/year)</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.⁵₁⁻²</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>190.55</td>
<td>66.29</td>
<td>66.29</td>
<td>0.06</td>
<td>9.20</td>
<td>70.31</td>
<td>7.73</td>
<td>3.57</td>
</tr>
</tbody>
</table>
### Source-Wide Emissions Prior to Revision (ton/year)

<table>
<thead>
<tr>
<th></th>
<th>PM&lt;sup&gt;1&lt;/sup&gt;</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;&lt;sup&gt;1&lt;/sup&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;&lt;sup&gt;1,2&lt;/sup&gt;</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>50</td>
<td>50</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>--</td>
</tr>
<tr>
<td>Emission Offset Major Source Thresholds</td>
<td>---</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>50</td>
<td>50</td>
<td>NA</td>
<td>--</td>
</tr>
</tbody>
</table>

<sup>1</sup>Under the Part 70 Permit program (40 CFR 70), PM<sub>10</sub> and PM<sub>2.5</sub>, not particulate matter (PM), are each considered as a "regulated air pollutant."

<sup>2</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

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

---

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

(b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3) because NOₓ and VOC, each a nonattainment regulated pollutant, is not emitted at a rate of 50 tons per year or more.

(c) This existing 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.

(d) These emissions are based on the TSD of FESOP No. 089-39400-00590, issued on April 24, 2018.

### Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Perfection Bakeries, Inc. on October 11, 2018, relating to the adjustments of VOC emission limits due to the redesignation of Lake County to serious nonattainment for ozone.

### Enforcement Issues

There are no pending enforcement actions related to this revision.

### Emission Calculations

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

### Permit Level Determination – FESOP Significant Permit Revision

There are no new emission units or modifications to existing emission units (i.e., no physical change or change in the method of operation occurring at the source) as a result of this revision. See the "Description of Proposed Revision" section above for more detail.

Pursuant to 326 IAC 2-8-11.1(f), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves adjusting VOC Emission Offset limits.
The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions After Issuance (ton/year)</th>
<th>PM(^1)</th>
<th>PM(_{10})(^1)</th>
<th>PM(_{2.5})(^{1, 2})</th>
<th>SO(_2)</th>
<th>NO(_X)</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives*</td>
<td>190.55</td>
<td>66.29</td>
<td>66.29</td>
<td>0.06</td>
<td>9.20</td>
<td>48.99</td>
<td>7.73</td>
<td>3.57</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>50</td>
<td>50</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></td>
<td>--</td>
</tr>
<tr>
<td>Emission Offset Major Source Thresholds</td>
<td>---</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>50</td>
<td>50</td>
<td>NA</td>
<td>--</td>
</tr>
</tbody>
</table>

\(^1\)Under the Part 70 Permit program (40 CFR 70), PM\(_{10}\) and PM\(_{2.5}\), not particulate matter (PM), are each considered as a "regulated air pollutant."

\(^2\)PM\(_{2.5}\) listed is direct PM\(_{2.5}\).

*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 VOC limit(s) in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-3 (Emission Offset) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-3 (Emission Offset) and 326 IAC 2-8 (FESOP) for more information regarding the limit(s).

(a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the potential to emit criteria pollutants and HAPs from the entire source will continue to be less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than or limited to less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(c) This existing minor Emission Offset stationary source will continue to be minor under 326 IAC 2-3 because the potential to emit of all nonattainment regulated pollutant(s), NO\(_X\) and VOC, from the entire source will continue to be less than or limited to less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.
Federal Rule Applicability Determination

Due to the proposed revision, federal rule applicability has been reviewed as follows:

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

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

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

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

**Compliance Assurance Monitoring (CAM):**

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

Due to this revision, state rule applicability has been reviewed as follows:

**326 IAC 2-8-4 (FESOP) and 326 IAC 2-3 (Emission Offset)**

FESOP and Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

**FESOP VOC Limit and EO Minor Source Limit(s)**

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

(a) Volatile organic compounds (VOC) emissions from the bread baking line EU01, including the natural gas fired oven EU02 and proof box EU03, shall not exceed 48.68 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, 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 50 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 2-7 (Part 70 Permits) not applicable.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

(1) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
(2) 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.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
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 6.8 (Particulate Matter Limitations for Lake County)
This source (located in Lake County) is not one of the sources specifically listed in 326 IAC 6.8-4, 326 IAC 6.8-5, or 326 IAC 6.8-8 through 326 IAC 6.8-11. The source-wide PTE of PM is 10 tons per year or more. Therefore, this source is subject to the requirements of 326 IAC 6.8-1-2 because the source-wide actual emissions of PM can be 10 tons per year or more.

326 IAC 6.8 (Lake County: Fugitive Particulate Matter)
Pursuant to 326 IAC 6.8-10-1, this source (located in Lake County) is not subject to the requirements of 326 IAC 6.8-10 because is not one of the sources specifically listed in 326 IAC 6.8-10-1(2)(A) through (V) and the source-wide PTE of fugitive PM and PM10 is less than 5 tons per year, each.

## Compliance Determination and Monitoring Requirements

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

(1) The monthly VOC emission from the baking oven and proof box shall be determined by the following:

\[
VOC = \sum_{m=1}^{12} \left( 1.1 \times \left( \sum_{i=1}^{n} \frac{E_i \times B_i}{2000 \text{ lb ton}} \right) + 0.017 \right) \\
\]

Where:

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

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

\[
E = 0.95Y + 0.195ti - 0.51S - 0.86ts + 1.90
\]

Where:

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

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

**Note:** In the equation above, the factor of 0.0135 tons/month represents the maximum monthly VOC emissions from combustion of natural gas in EU02 at the maximum heat input capacity of 6.88 MMBtu/hr and using the AP-42 emission factor of 5.5 lb/MMCF.

These conditions are necessary to assure compliance with 326 IAC 8-1-6 (VOC BACT), 326 IAC 2-8-4 (FESOP) and 326 IAC 2-3 (Emission Offset).

### Proposed Changes

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

1. Based on the reclassification of Lake County to serious nonattainment for the 2008 ozone standard, changes to the language in Section A - General Information of the permit are necessary to clarify the attainment status of Lake County.

2. Based on the reclassification of Lake County to serious nonattainment for the 2008 ozone standard, IDEM added the rule citations 40 CFR 81.315 and 326 IAC 2-1.1-4(a) to Section A - FESOP Applicability to clarify the authority of this condition.

3. Based on the reclassification of Lake and Porter Counties to serious nonattainment for the 2008 ozone standard, changes to the language in Section C - Overall Source Limit of the permit are required pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

4. IDEM OAQ has added a FESOP and Emission Offset Limit to the bread baking line (EU01, EU02, and EU03) in Section D.1.2, based on the reclassification of Lake County to serious nonattainment for the 2008 ozone standard.

A.1 General Information [326 IAC 2-8-3(b)][40 CFR 81.315][326 IAC 2-1.1-4(a)]

The Permittee owns and operates a stationary hot mix asphalt-drum mix plant.

***

A.4 FESOP Applicability [326 IAC 2-8-2][40 CFR 81.315][326 IAC 2-1.1-4(a)]

C.1 Overall Source Limit [326 IAC 2-8][40 CFR 81.315][326 IAC 2-1.1-4(a)]

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

(a) Pursuant to 326 IAC 2-8:

1. The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period;

2. The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

3. The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
(1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than fifty (50) tons per twelve (12) consecutive month period;

(2) The potential to emit nitrogen oxides (NOx) from the entire source shall be limited to less than fifty (50) tons per twelve (12) consecutive month period;

(3) The potential to emit any regulated pollutant, except particulate matter (PM), volatile organic compounds (VOCs), and nitrogen oxides (NOx), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period;

(4) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(5) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

D.1.1 BACT Requirements (VOC) [326 IAC 8-1-6] [326 IAC 2-8-4]

***

Compliance with these limits, combined with the potential to emit VOC from all other emissions units at this source, shall limit the source-wide total VOC emissions to less than 100 tons per twelve (12) consecutive month period and will render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.2 FESOP and Emission Offset Minor Limits [326 IAC 2-8-4] [326 IAC 2-3]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable, the Permittee shall comply with the following:

(a) Volatile organic compounds (VOC) emissions from the bread baking line EU01, including the natural gas fired oven EU02 and proof box EU03, shall not exceed 48.68 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, 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 50 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-3 (Emission Offset) and 26 IAC 2-7 (Part 70 Permits) not applicable.
Perfection Bakeries, Inc.
Lowell, Indiana
Permit Reviewer: Paul Jump

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

FESOP Quarterly Report

Source Name: Perfection Bakeries, Inc.
Source Address: 790 W. Commercial Avenue, Lowell, Indiana 46356
FESOP Permit No.: F089-39400-00590
Facility: Bread Baking Line EU01 (including oven EU02 and proof box EU03)
Parameter: Volatile Organic Compounds (VOC)
Limit: Volatile organic compounds (VOC) emissions from the bread baking line EU01, including the natural gas-fired oven EU02 and proof box EU03, shall not exceed 70.048.68 tons per twelve (12) consecutive month period.

QUARTER: _____________ YEAR: __________________

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
<td></td>
</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.

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

Submitted by: ________________________________
Title / Position: ________________________________
Signature: ________________________________
Date: ________________________________
Phone: ________________________________
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 October 11, 2019.

The operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 089-42093-00590. The staff recommends to the Commissioner that the FESOP Significant Permit Revision 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 (317) 234-6555 or (800) 451-6027, and ask for Paul Jumpp or (317) 234-6555.

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

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

#### Source Summary

**Source Name:** Perfection Bakeries, Inc.  
**Source Address:** 790 W. Commercial Avenue, Lowell, IN 46356  
**Permit No.:** 089-42093-00590  
**Permit Reviewer:** Paul Jump

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Single HAP</th>
<th>HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU01 (Oven Fermentation)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Acetaldehyde</td>
</tr>
<tr>
<td>EU03 (Proofing)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Acetaldehyde</td>
</tr>
<tr>
<td>EU02 (Oven Natural Gas Combustion)</td>
<td>0.07</td>
<td>0.27</td>
<td>0.27</td>
<td>0.02</td>
<td>3.55</td>
<td>0.20</td>
<td>2.98</td>
<td>0.07</td>
<td>0.06 Hexane</td>
</tr>
<tr>
<td>EU06-08 (Flour Storage Silos)</td>
<td>171.92</td>
<td>60.23</td>
<td>60.23</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Acetaldehyde</td>
</tr>
<tr>
<td>EU04 (Boiler #1)</td>
<td>0.03</td>
<td>0.13</td>
<td>0.13</td>
<td>0.01</td>
<td>1.74</td>
<td>0.10</td>
<td>1.47</td>
<td>0.03</td>
<td>0.03 Hexane</td>
</tr>
<tr>
<td>EU05 (Boiler #2)</td>
<td>0.03</td>
<td>0.13</td>
<td>0.13</td>
<td>0.01</td>
<td>1.74</td>
<td>0.10</td>
<td>1.47</td>
<td>0.03</td>
<td>0.03 Hexane</td>
</tr>
<tr>
<td>EU35 (Sugar Storage Bin)</td>
<td>3.90</td>
<td>1.37</td>
<td>1.37</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Acetaldehyde</td>
</tr>
<tr>
<td>EU09 (Bag Dump)</td>
<td>0.04</td>
<td>0.02</td>
<td>0.02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Acetaldehyde</td>
</tr>
<tr>
<td>EU10-11, EU34 (Mixers and Scaling Station)</td>
<td>14.53</td>
<td>3.97</td>
<td>3.97</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Hexane</td>
</tr>
<tr>
<td>EU12 (Space Heaters)</td>
<td>0.04</td>
<td>0.16</td>
<td>0.16</td>
<td>0.01</td>
<td>2.16</td>
<td>0.12</td>
<td>1.82</td>
<td>0.04</td>
<td>0.04 Hexane</td>
</tr>
<tr>
<td>Paved Roads (Fugitive)</td>
<td>4.00</td>
<td>0.80</td>
<td>0.20</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Acetaldehyde</td>
</tr>
<tr>
<td><strong>Total (excluding fugitives)</strong></td>
<td>190.55</td>
<td>66.29</td>
<td>66.29</td>
<td>0.06</td>
<td>9.20</td>
<td>113.82</td>
<td>7.73</td>
<td>3.57</td>
<td>3.40 Acetaldehyde</td>
</tr>
<tr>
<td><strong>Total (including fugitives):</strong></td>
<td>194.55</td>
<td>67.08</td>
<td>66.48</td>
<td>0.06</td>
<td>9.20</td>
<td>113.82</td>
<td>7.73</td>
<td>3.57</td>
<td>3.40 Acetaldehyde</td>
</tr>
</tbody>
</table>

### Potential to Emit After Issuance (ton/yr)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Single HAP</th>
<th>HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU01 (Oven Fermentation)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Acetaldehyde</td>
</tr>
<tr>
<td>EU03 (Proofing)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Acetaldehyde</td>
</tr>
<tr>
<td>EU02 (Oven Natural Gas Combustion)</td>
<td>0.07</td>
<td>0.27</td>
<td>0.27</td>
<td>0.02</td>
<td>3.55</td>
<td>0.20</td>
<td>2.98</td>
<td>0.07</td>
<td>0.06 Hexane</td>
</tr>
<tr>
<td>EU06-08 (Flour Storage Silos)</td>
<td>171.92</td>
<td>60.23</td>
<td>60.23</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Acetaldehyde</td>
</tr>
<tr>
<td>EU04 (Boiler #1)</td>
<td>0.03</td>
<td>0.13</td>
<td>0.13</td>
<td>0.01</td>
<td>1.74</td>
<td>0.10</td>
<td>1.47</td>
<td>0.03</td>
<td>0.03 Hexane</td>
</tr>
<tr>
<td>EU05 (Boiler #2)</td>
<td>0.03</td>
<td>0.13</td>
<td>0.13</td>
<td>0.01</td>
<td>1.74</td>
<td>0.10</td>
<td>1.47</td>
<td>0.03</td>
<td>0.03 Hexane</td>
</tr>
<tr>
<td>EU35 (Sugar Storage Bin)</td>
<td>3.90</td>
<td>1.37</td>
<td>1.37</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Acetaldehyde</td>
</tr>
<tr>
<td>EU09 (Bag Dump)</td>
<td>0.04</td>
<td>0.02</td>
<td>0.02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Acetaldehyde</td>
</tr>
<tr>
<td>EU10-11, EU34 (Mixers and Scaling Station)</td>
<td>14.53</td>
<td>3.97</td>
<td>3.97</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Hexane</td>
</tr>
<tr>
<td>EU12 (Space Heaters)</td>
<td>0.04</td>
<td>0.16</td>
<td>0.16</td>
<td>0.01</td>
<td>2.16</td>
<td>0.12</td>
<td>1.82</td>
<td>0.04</td>
<td>0.04 Hexane</td>
</tr>
<tr>
<td>Paved Roads (Fugitive)</td>
<td>4.00</td>
<td>0.80</td>
<td>0.20</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Acetaldehyde</td>
</tr>
<tr>
<td><strong>Total (excluding fugitives)</strong></td>
<td>190.55</td>
<td>66.29</td>
<td>66.29</td>
<td>0.06</td>
<td>9.20</td>
<td>48.99</td>
<td>7.73</td>
<td>3.57</td>
<td>3.40 Acetaldehyde</td>
</tr>
<tr>
<td><strong>Total (including fugitives):</strong></td>
<td>194.55</td>
<td>67.08</td>
<td>66.48</td>
<td>0.06</td>
<td>9.20</td>
<td>48.99</td>
<td>7.73</td>
<td>3.57</td>
<td>3.40 Acetaldehyde</td>
</tr>
</tbody>
</table>
Appendix A: Emissions Calculations

Dry Ingredients Handling

Source Name: Perfection Bakeries, Inc.
Source Address: 790 W. Commercial Avenue, Lowell, IN 46356
Permit No.: 089-42093-00590
Permit Reviewer: Paul Jump

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Capacity (lb/hr)</th>
<th>Control Efficiency (%)</th>
<th>Emission Factors (lb/ton)</th>
<th>Uncontrolled Emissions (ton/yr)</th>
<th>Controlled Emissions (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>PM</td>
<td>PM10</td>
<td>PM2.5</td>
</tr>
<tr>
<td>EU06-EU08 Flour Silos (3)*</td>
<td>25,000</td>
<td>99.0%</td>
<td>3.14</td>
<td>1.10</td>
<td>1.10</td>
</tr>
<tr>
<td>EU35 Sugar Storage Bin</td>
<td>567</td>
<td>0.0%</td>
<td>3.14</td>
<td>1.10</td>
<td>1.10</td>
</tr>
<tr>
<td>EU09 Bag Dump (1)</td>
<td>3,566</td>
<td>0.0%</td>
<td>0.0048</td>
<td>0.0028</td>
<td>0.0028</td>
</tr>
<tr>
<td>EU10-11, EU34</td>
<td>11,566</td>
<td>99.0%</td>
<td>0.572</td>
<td>0.156</td>
<td>0.156</td>
</tr>
</tbody>
</table>

| Methodology: |
| Maximum Capacity (ton/hr) = Maximum Capacity (lb/hr) * (1 ton/2000 lb) |
| Uncontrolled Emissions (ton/yr) = Maximum Capacity (ton/hr) * Emission Factor (lb/ton) * (8760 hr/yr) * (1 ton/2000 lb) |
| Controlled Emissions (ton/yr) = Uncontrolled Emissions (ton/yr) * (1 - Control Efficiency) |

* Each silo has a maximum capacity of 8,000 lb per hour. Only one silo operating at a time.

The flour is delivered via hopper truck and the silos are filled pneumatically. Each silo and mixer is equipped with a breather bag to prevent the flour from being emitted into the atmosphere.

**Emission Factors:**
The emission factors used for the Flour Silos was taken from AP-42, Ch. 11.12, Table 11.12-2 (February 2011 revisions) for cement supplement unloading (3-05-011-17). PM2.5 has been assumed to equal PM10.

The emission factors used for the Minor Ingredient Bag Dump and the Scaling Station were taken from AP-42, Ch. 11.12, Table 11.12-2 (February 2011 revisions) for Weigh hopper loading (3-05-011-08). PM2.5 has been assumed to equal PM10.

The emission factors used for the Mixers were derived from AP-42, Ch. 11.12 (February 2011 revisions) for Mixer loading (3-05-011-9).
Appendix A: Emissions Calculations

Fermentation

Source Name: Perfection Bakeries, Inc.
Source Address: 790 W. Commercial Avenue, Lowell, IN 46356
   Permit No.: 089-42093-00590
   Permit Reviewer: Paul Jump

<table>
<thead>
<tr>
<th>Unit</th>
<th>Maximum Capacity (lb/hr)</th>
<th>Maximum Throughput (ton/yr)</th>
<th>Maximum Sponge % Yeast Yi</th>
<th>Fermentation Time (ti) (hr)</th>
<th>Dough % Yeast (S)</th>
<th>Spike Time ts (hr)</th>
<th>VOC (lb/ton)</th>
<th>VOC (ton/yr)</th>
<th>Acetaldehyde (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU01 (Oven Fermentation)</td>
<td>10,522</td>
<td>46,086.36</td>
<td>3.00</td>
<td>4.30</td>
<td>0.00</td>
<td>1.30</td>
<td>4.47</td>
<td>103.01</td>
<td>3.09</td>
</tr>
</tbody>
</table>

Methodology:

Oven calculations are based on the worst case scenario, which is running the bread line 8760 hours per year.

Maximum Throughput (ton/yr) = Maximum Capacity (lb/hr) * (8760 hr/yr) * (1 ton/2000 lb)
Potential Acetaldehyde Emissions (ton/yr) = Potential VOC Emissions x 0.03

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

\[
\text{VOC Emission Factor (lb/ton baked bread)} = 0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.90
\]

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
- \(t_s\) = 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

**Proofing**

<table>
<thead>
<tr>
<th>Unit</th>
<th>Uncontrolled Potential VOC Emissions from Fermentation (ton/yr)</th>
<th>Proofing VOC Emission Factor (% of Fermentation VOC Emissions)</th>
<th>Uncontrolled Potential Emissions from Proofing</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU03 (Proofing)</td>
<td>103.01</td>
<td>10%</td>
<td>10.30</td>
</tr>
</tbody>
</table>

Notes:
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:
Potential VOC Emissions from Proofing (ton/yr) = 0.10 * Potential VOC Emissions from Fermentation (ton/yr)
Potential Acetaldehyde Emissions from Proofing (ton/yr) = 0.03 * Potential VOC Emissions from Proofing (ton/yr)
## Appendix A: Emissions Calculations

### Natural Gas Combustion Only

**MM BTU/HR <100**

### Source Name:
Perfection Bakeries, Inc.

### Source Address:
790 W. Commercial Avenue, Lowell, IN 46356

### Permit No.:
089-42093-00590

### Permit Reviewer:
Paul Jump

### HHV

<table>
<thead>
<tr>
<th>Heat Input Capacity (MMBtu/hr)</th>
<th>Potential Throughput (MMCF/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>21.4</td>
<td>1020</td>
</tr>
<tr>
<td>184.1</td>
<td></td>
</tr>
</tbody>
</table>

### Emission Factor in lb/MMcf

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
</tr>
</tbody>
</table>

*see below

### Emission Factor in lb/MMcf

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
<th>Potential Throughput (MMCF/yr)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU02 (Oven NG Combustion)</td>
<td>8.272</td>
<td>71.04</td>
<td>0.07</td>
</tr>
<tr>
<td>EU04 (Boiler #1)</td>
<td>4.063</td>
<td>34.89</td>
<td>0.03</td>
</tr>
<tr>
<td>EU05 (Boiler #2)</td>
<td>4.063</td>
<td>34.89</td>
<td>0.03</td>
</tr>
<tr>
<td>EU12 (Space Heaters)</td>
<td>5.035</td>
<td>43.24</td>
<td>0.04</td>
</tr>
</tbody>
</table>

### Potential Emission in tons/yr

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>EU02 (Oven NG Combustion)</th>
<th>EU04 (Boiler #1)</th>
<th>EU05 (Boiler #2)</th>
<th>EU12 (Space Heaters)</th>
<th>EU02 (Oven NG Combustion)</th>
<th>EU04 (Boiler #1)</th>
<th>EU05 (Boiler #2)</th>
<th>EU12 (Space Heaters)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>21.43</td>
<td>184.07</td>
<td>1.9</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
</tr>
</tbody>
</table>

### Hazardous Air Pollutants (HAPs)

#### HAPs - Organics

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
<th>Potential Throughput (MMCF/yr)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU02 (Oven NG Combustion)</td>
<td>8.272</td>
<td>71.04</td>
<td>0.07</td>
</tr>
<tr>
<td>EU04 (Boiler #1)</td>
<td>4.063</td>
<td>34.89</td>
<td>0.03</td>
</tr>
<tr>
<td>EU05 (Boiler #2)</td>
<td>4.063</td>
<td>34.89</td>
<td>0.03</td>
</tr>
<tr>
<td>EU12 (Space Heaters)</td>
<td>5.035</td>
<td>43.24</td>
<td>0.04</td>
</tr>
</tbody>
</table>

#### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
<th>Potential Throughput (MMCF/yr)</th>
<th>Potential Emissions (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU02 (Oven NG Combustion)</td>
<td>8.272</td>
<td>71.04</td>
<td>2.07E-06</td>
</tr>
<tr>
<td>EU04 (Boiler #1)</td>
<td>4.063</td>
<td>34.89</td>
<td>1.02E-06</td>
</tr>
<tr>
<td>EU05 (Boiler #2)</td>
<td>4.063</td>
<td>34.89</td>
<td>1.02E-06</td>
</tr>
<tr>
<td>EU12 (Space Heaters)</td>
<td>5.035</td>
<td>43.24</td>
<td>1.26E-06</td>
</tr>
</tbody>
</table>

### Methodology

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

### Additional Information

- 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.
Emission Calculations
Fugitive Dust Emissions - Paved Roads

Source Name: Perfection Bakeries, Inc.
Source Address: 790 W. Commercial Avenue, Lowell, IN 46356
Permit No.: 089-42093-00590
Permit Reviewer: Paul Jump

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>Number of one-way trips per day</th>
<th>Maximum one-way distance (mi/trip)</th>
<th>Maximum one-way weight (tons/trip)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Truck (empty truck entering)</td>
<td>19</td>
<td>18.0</td>
<td>22</td>
<td>118.0</td>
</tr>
<tr>
<td>Truck (finished product exiting site)</td>
<td>19</td>
<td>18.0</td>
<td>22</td>
<td>118.0</td>
</tr>
<tr>
<td>Truck (bagged and/or boxed ingredients in)</td>
<td>2</td>
<td>2.0</td>
<td>30</td>
<td>80.0</td>
</tr>
<tr>
<td>Semi-trailer truck (bulk ingredients in)</td>
<td>4</td>
<td>4.0</td>
<td>80</td>
<td>80.0</td>
</tr>
<tr>
<td>Truck (bagged and/or boxed ingredients in)</td>
<td>4</td>
<td>4.0</td>
<td>80</td>
<td>80.0</td>
</tr>
<tr>
<td>Truck (empty truck exiting site)</td>
<td>1</td>
<td>1.0</td>
<td>25</td>
<td>10.0</td>
</tr>
<tr>
<td>Truck (empty truck exiting site)</td>
<td>13</td>
<td>13.0</td>
<td>12.0</td>
<td>157.6</td>
</tr>
<tr>
<td>Truck (empty truck entering)</td>
<td>1</td>
<td>1.0</td>
<td>25</td>
<td>10.0</td>
</tr>
<tr>
<td>Truck (product out)</td>
<td>1</td>
<td>1.0</td>
<td>25</td>
<td>10.0</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Vehicle Information (provided by source)</th>
<th>Total Weight driven per day (ton/yr)</th>
<th>Average Vehicle Weight Per Trip (ton/trip)</th>
<th>Average Miles Per Trip (mi/trip)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>10.4</td>
<td>24.7</td>
<td>0.13</td>
</tr>
</tbody>
</table>

Unmitigated Emission Factor, \( E_f \) = \( k \cdot (sL)^{0.91} \cdot (W)^{1.02} \) (Equation 1 from AP-42 13.2.1)

\( k = 0.011, 0.0022, 0.00054 \) lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
\( W = 24.7, 24.7, 24.7 \) tons = average vehicle weight (provided by source)
\( sL = 9.7, 9.7, 9.7 \) 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, \( E_{ext} = E \cdot \left[1 - \left(p/\frac{4N}{2}\right)\right] \) (Equation 2 from AP-42 13.2.1)

\( n = 125 \) days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)

\( N = 365 \) days per year

<table>
<thead>
<tr>
<th>Process</th>
<th>Unmitigated PTE of PM (tons/yr)</th>
<th>Mitigated PTE of PM (tons/yr)</th>
<th>Mitigated PTE of PM10 (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Truck (empty truck entering)</td>
<td>0.94</td>
<td>0.94</td>
<td>0.19</td>
<td>0.05</td>
</tr>
<tr>
<td>Truck (finished product exiting site)</td>
<td>0.94</td>
<td>0.94</td>
<td>0.19</td>
<td>0.05</td>
</tr>
<tr>
<td>Truck (bagged and/or boxed ingredients in)</td>
<td>0.17</td>
<td>0.17</td>
<td>0.03</td>
<td>0.01</td>
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<td>Semi-trailer truck (bulk ingredients in)</td>
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<td>Truck (bagged and/or boxed ingredients in)</td>
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<tr>
<td>Truck (empty truck entering)</td>
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<td>Truck (empty truck exiting site)</td>
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<tr>
<td>Truck (empty truck entering)</td>
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<td>Semi-trailer truck (empty truck entering)</td>
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<td>Semi-trailer truck (empty truck exiting)</td>
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</table>

| Totals                                       | 4.08                            | 4.08                         | 0.80                            | 0.20                            |

Methodology

\( \text{Total Weight driven per day (ton/day)} = \left(\text{Maximum Weight Loaded (tons/day)} \times \text{Maximum trips per day (trip/day)}\right) \times \text{Average Vehicle Weight Per Trip (ton/trip)} \times \text{Average Miles Per Trip (miles/trip)} \times 0.13 \text{ miles/trip} \times 2000 \text{ lbs/ton} \)

\( \text{Mitigated PTE (Before Control) (tons/yr)} = \left(\text{Maximum one-way miles (mi/yr)} \times \text{Mitigated Emission Factor (lb/mile)} \times 0.13 \text{ miles/trip} \times 2000 \text{ lbs/ton} \right) \times (1 - \text{Dust Control Efficiency}) \)

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
December 11, 2019

David Kent
Perfection Bakeries Inc
2100 Enterprise St
Jackson, MI  49203

Re: Public Notice
Perfection Bakeries
Permit Level: FESOP Significant Permit Rev
Permit Number: 089-42093-00590

Dear David Kent:

Enclosed is a copy of your draft FESOP Significant Permit Rev (Minor PSD/EO) (120), 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 Lowell Public Library, 1505 East Commercial in Lowell IN 46356. 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 4-6555 or dial (317) 234-6555.

Sincerely,

L. Pogost

L. Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
December 11, 2019

To: Lowell Public Library 1505 East Commercial Lowell IN 46356 (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:** Perfection Bakeries  
**Permit Number:** 089-42093-00590

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.

Enclosures  
PN Library updated 4/2019
Notice of Public Comment

December 11, 2019
Perfection Bakeries
089-42093-00590

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
# Mail Code 61-53

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| IDEM Staff | LPOGOST 12/11/2019
Perfection Bakeries Inc 089-42093-00590 draft/ |

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<th>Remarks</th>
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<td>Mark Porter  Perfection Bakeries Inc 2100 Enterprise St Jackson MI 492033410 (RO CAATS)</td>
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<td>Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)</td>
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<td>Lowell Town Council and Town Manager PO Box 157, 501 East Main Street Lowell IN 46356 (Local Official)</td>
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<td>Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)</td>
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<td>Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)</td>
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<td>Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)</td>
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**Total number of pieces Listed by Sender:**

**Total number of Pieces Received at Post Office:**

**Postmaster, Per (Name of Receiving employee):**

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See **Domestic Mail Manual** R900, S913, and S921 for limitations of coverage on insured and COD mail. See **International Mail Manual** for limitations on coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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