

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FIELD INSPECTION REPORT**



SOURCE INFORMATION	
<u>SOURCE NAME</u>	Harlan Bakeries
<u>SOURCE LOCATION</u>	7597 E US Hwy 36 Avon, Indiana 46123 Hendricks County
<u>MAILING ADDRESS</u>	7597 E US Hwy 36 Avon, Indiana 46123
<u>PLANT ID</u>	063-00059
<u>PERMIT INFORMATION</u>	Permit Type: FESOP Permit Number: 063-33421-00059 Permit Expiration Date: 6/22/2025 VFC Document No.(hyperlink): 80064210
<u>ATTAINMENT STATUS</u>	<input checked="" type="checkbox"/> Attainment for all criteria pollutants <input type="checkbox"/> Nonattainment for <input type="checkbox"/> SO ₂ <input type="checkbox"/> CO <input type="checkbox"/> O ₃ <input type="checkbox"/> NO ₂ <input type="checkbox"/> Pb <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5}
<u>SOURCE STATUS</u>	<input type="checkbox"/> PSD Major (326 IAC 2-2) <input type="checkbox"/> Major Source of HAPs <input type="checkbox"/> Emission Offset (326 IAC 2-3) <input type="checkbox"/> Area Source of HAPs <input type="checkbox"/> Acid Rain (326 IAC 21)
<u>SOURCE DESCRIPTION</u>	The source is a stationary intermediate and finished baked goods operation that produces bagels and flatbread. The source operates five (5) production "baking" lines, labeled BKL1, BKL2, Frozen Dough Line (FDL), BKL3, and BKL5, each composed of natural gas ovens and proofers. The BKL2 line is equipped with a catalytic oxidizer due to BACT applicability.

INSPECTION INFORMATION					
<u>INSPECTED BY</u>	Grant McKercher & Dawn Smith				
<u>INSPECTION DATE AND TIME</u>	12/10/2020	TIME IN: 9:50 AM	TIME OUT: 2:10 PM		
<u>REPORTED BY</u>	Grant McKercher	REPORT DATE: 12/15/2020			
<u>COMPLIANCE PERIOD REVIEWED</u>	1/20/2017 to 12/10/2020				
<u>INSPECTION NOTIFICATION</u>	<input type="checkbox"/> Unannounced <input checked="" type="checkbox"/> Announced: <i>Due to COVID-19, to determine operational status and PPE requirements</i>				
<u>INSPECTION OBJECTIVE(S)</u>	<input type="checkbox"/> Compliance Monitoring Strategy (CMS) <input checked="" type="checkbox"/> Commitment <input type="checkbox"/> Mega-Site: <input type="checkbox"/> FCE <input type="checkbox"/> PCE <input type="checkbox"/> Complaint <input type="checkbox"/> Other: <input type="checkbox"/> Surveillance				
<u>ACES TRACKING NUMBER(S)</u>	Inspection:	253107	Complaint:	N/A	Violation/Warning: 253177
<u>RM TRACKING NUMBER(S)</u>	Complaint:	N/A			
<u>INSPECTION BACKGROUND</u>	The source operates 24 hours/day during 5-day work weeks, then shuts down during weekends and holidays for cleaning. This inspection was a routine inspection; however, prior to the inspection, an active enforcement case related to issues with the catalytic oxidizer was reviewed. According to the source, during the inspection, the facility was operating fully and normally with all available baking lines in motion. The source explained that BKL5 was not operating due to lack of demand for the product from that line.				

SOURCE PERSONNEL INTERVIEWED			
<i>Name</i>	<i>Title</i>	<i>Phone Number</i>	<i>Email Address</i>
Darla Carlisle	Corporate Compliance Manager	317-272-1650	dcarlisle@harlanbakeries.com
Daniel Tucker	Plant Manager	317-272-1630	dtucker@harlanbakeries.com
Stanley Conwell	Maintenance Supervisor	317-209-2504	sconwell@harlanbakeries.com

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
<i>Date</i>	<i>Inspection/Complaint Type</i>	<i>Result</i>	<i>Comments</i>
1/19/2017 & 1/20/2017	Commitment	Violations Noted	Violation Letter Issued 2-20-2017: <ul style="list-style-type: none"> • Failure to maintain fan amperage in range. • Failure to maintain 3 -hour average temperature readings of the catalytic oxidizer. • Reporting erroneous monthly flour throughput in a quarterly report

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)			
Informal Enforcement Actions			
<i>Date Issued</i>	<i>Action Taken</i>	<i>Describe Violation(s)</i>	
2/20/2017	Violation Letter	Related to January 2017 Inspection <ul style="list-style-type: none"> • Failure to maintain fan amperage in range, violating D.1.7(c). • Failure to maintain 3 -hour average temperature readings of the catalytic oxidizer, violating D.1.8(b). • Reporting erroneous monthly flour throughput in a quarterly report, violating D.4.8. 	
Formal Enforcement Actions			
<i>Case Number</i>	<i>Enforcement Type</i>	<i>Civil Penalty</i>	<i>Describe Violation(s)</i>
2019-26214-A	Formal Enforcement	\$ N/A	Enforcement Action Letter dated 5/31/2019 alleged a failure to meet VOC emission limits and general oxidizer emission control requirements from reported malfunctions on 4/22 and 4/23/2019. These violations were related to an attempted stack test on 3/19/2019 and enforcement has not been closed by the date of this inspection.
Other Relevant Actions			
<i>Action Taken</i>	<i>Comments</i>		
Stack Test Extension	On 3/19/2019, IDEM received a stack test extension request after an attempted test on 3/19/2019 was aborted during setup and the source was addressing a 5-year testing deadline of 3/25/2019. IDEM issued a Stack Test Extension Response Letter on 4/11/2019 indicating that no enforcement action would be taken for failing to test before the original deadline if the test were completed prior to 6/25/2019. A stack test on 6/14/2019.		

PERMIT SECTION D.1			
<u>Emission Units and Control Devices:</u>			
One (1) Bagel Baking Line, identified as BKL2, constructed in 1999, consisting of: <ul style="list-style-type: none"> • One (1) natural gas-fired bagel bake oven, identified as OVEN-0002, constructed in 1999, with a maximum heat input capacity of 9.00 MMBtu per hour and a maximum throughput capacity of 2.68 tons of dough per hour, with emissions controlled by a catalytic oxidizer, identified as OXIDIZER-0001, and exhausting to stack S-1. • Ancillary Baking Equipment, including PROOFER-0002, constructed in 1999. • Ancillary Baking Equipment, including PROOFER-0010, constructed in 2005. 			
<u>Pollutants with Emission Limits or Applicable Standards:</u>			
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS			
<u>Applicable Rules:</u>			
<ul style="list-style-type: none"> • VOC BACT 326 IAC 8-1-6, FESOP limit 326 IAC 2-8-4 • Testing 326 IAC 2-8-5(a)(1),(4), 326 IAC 2-1.1-11 • Compliance Monitoring 326 IAC 2-8-4 • Record Keeping 326 IAC 2-8-4(3) 			
<u>Requirement:</u>		Applicable	Violation Noted
Emission Limitations and Standards		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Compliance Monitoring Requirements		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Recordkeeping Requirements		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: proofer cleaning procedures, oxidizer parametric monitoring records, stack tests			
Reporting Requirements		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<u>Observations and Comments:</u>			
<p>During the inspection BKL2 was observed with a recently configured system to prevent emissions if the oxidizer malfunctions. Mr. Tucker explained that the installation of a new conveyor shutdown system on BKL2 prevents product from entering the oven if the oxidizer was not controlling emissions. The system is configured to shut down automatically and is equipped with an alarm system.</p> <p>During the inspection, the BKL2 processes and associated rooftop catalytic oxidizer were observed in operation. For compliance purposes, the source maintains continuous temperature records of the catalytic oxidizer. Upon inspection, no 3-hour average temperature records were observed or reported during BKL2 oven operation below the limit set by stack testing. Without any evidence to the contrary, the oxidizer operated at or above a setpoint temperature determined by the most recent stack test.</p> <p>Parametric monitoring requirements in D.1.7(b-c) require the source to also record the fan amperage (or duct pressure) of the oven system within the "normal" range as observed during the most recent stack test. The instantaneous fan amperage observed during the inspection was outside of the range listed for the compliance test on 6/14/2019 (see table below). This is a violation of condition D.1.7(c). However, the source showed continuous data with average fan amperage for several days during the compliance period at ~44 amps. Mr. Tucker explained that instantaneous fan amperage indicates the amount of current that the fan requires, which fluctuates throughout each operating day as to maintain a continuously induced draft from the oven. In other words, the source has a fan setpoint for flow, but not for the fan amperage. Mr. Tucker said that the fan's setpoint has not been adjusted since the stack test on 6/14/2019. Based upon this information, it is very likely that the observed fan amperage did not correlate with reductions in the flow captured by the oxidizer.</p>			
<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observed</i>
BKL2 Catalytic Oxidizer	3-hour average temperature	≥651°F from 6/14/2019 test ≥651°F from 3/25/2014 test	665-669°F
BKL2 Catalytic Oxidizer	Fan amperage	43.6-44.6 from 6/14/2019 test 41.7-45.9 from 3/25/2014 test	42.6 amps

PERMIT SECTION D.1

Recordkeeping requirements in D.1.8(c) state that the source must maintain daily fan amperage records to demonstrate compliance with parametric monitoring requirements. During the inspection, the source provided continuous monitoring records of fan amperage rather than daily records. For the purposes of this inspection, the lack of specifically isolated daily fan amperage records is not a violation of D.1.8(c).

Further, as identified here and by the previous inspector, it would be more consistent with current parametric monitoring compliance determination language to consider whether the source is responding reasonably when changes in values are observed. Permit deviations do not generally occur when values are identified out of range unless the source fails to respond reasonably. Compliance assistance was provided to Mr. Tucker and Ms. Carlisle to encourage better response tracking and to suggest permit modifications. The source indicated that they are working with a third-party vendor to make improvements in compliance data collection and display to best comply with monitoring requirements.

Permit Section Compliance Status:

- No violations were observed or determined for this permit section at the time of the inspection.
- The following violations were determined for this permit section at the time of the inspection:

<i>Condition/Citation</i>	<i>Comments</i>
D.1.7(c)	Fan amperage observed during the inspection was outside of the range set by the most recent stack test.

PERMIT SECTION D.2		
Emission Units and Control Devices:		
One (1) Bagel Baking Line, identified as BKL3, constructed in 2003, consisting of: <ul style="list-style-type: none"> • One (1) natural gas-fired bagel bake oven, identified as OVEN-0005, constructed prior to 2003, with a maximum heat input capacity of 1.65 MMBtu per hour & max throughput capacity of 1.24 tons of dough per hour. • Ancillary Baking Equipment, including PROOFER-0005, constructed in 2003. 		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS		
Applicable Rules:		
<ul style="list-style-type: none"> • VOC FESOP limit 326 IAC 2-8-4 • Record Keeping & Reporting 326 IAC 2-8-4(3) 		
Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Recordkeeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: VOC emissions calculations and emission factor inputs		
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Observations and Comments:		
During the inspection, BKL3 was observed in operation. Ms. Carlisle and Mr. Tucker explained and showed that BKL3 has undergone multiple process changes since permitted in 2015. For example, the old proofer was removed, and a new proofer was installed in a different area of the floor, the old tunnel oven was disconnected and a new, smaller rack oven was installed, and the shape of produced bagels changed. Ms. Carlisle explained that these changes were not related to increases in emissions and showed how emissions calculations accounted for changes in bagel type. Quarterly reports indicated that calculated BKL3 VOC emissions during the compliance period were below 2 tons per year while the limit is 16.50 tons per year.		
Permit Section Compliance Status:		
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:		

PERMIT SECTION D.3		
<u>Emission Units and Control Devices:</u>		
One (1) Pita Bread Baking Line, identified as BKL5, constructed in 2010, consisting of: <ul style="list-style-type: none"> • One (1) natural gas-fired pita bread bake oven, identified as OVEN-0015, constructed in 2010, with a maximum heat input capacity of 5.25 MMBtu per hour and a maximum throughput capacity of 1.89 tons of dough per hour, with emissions uncontrolled, and exhausting to stacks BL5-01 through BL5-04. • Ancillary Baking Equipment, including PROOFER-0012, constructed in 2010. 		
<u>Pollutants with Emission Limits or Applicable Standards:</u>		
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS		
<u>Applicable Rules:</u>		
<ul style="list-style-type: none"> • VOC limit 326 IAC 8-1-6 • Record Keeping & Reporting 326 IAC 2-8-4(3) 		
<u>Requirement:</u>	<u>Applicable</u>	<u>Violation Noted</u>
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Recordkeeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: VOC emissions calculations and emission factor inputs		
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<u>Observations and Comments:</u>		
The source explained that BKL5 was not operating during the inspection due to lack of demand for the product from that line. This is a recent reduction in activity; however, as quarterly reports indicated rolling VOC emissions near 12 tons per year for this line in 2019. The limit is 24.8 tons per year.		
<u>Permit Section Compliance Status:</u>		
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:		

PERMIT SECTION D.4

Emission Units and Control Devices:

- One (1) flour silo, identified as SILO-0011, constructed in 2012, with a maximum capacity of 110,000 pounds of flour, and maximum throughput capacity of 25,000 tons of flour per year, with particulate emissions controlled by two dust collectors, identified as Silo 11 DC1 and Silo 11 DC2, exhausting outdoors to exhaust ID S11-DC1 and S11-DC2.
- One (1) flour silo, identified as BIN-USE-0001, constructed in 2002, with a maximum throughput capacity of 15,000 tons of flour per year, with particulate emissions controlled by a baghouse, identified as COLL-D-0001, exhausting indoors.
- Other Silos (a-g) listed below:
 - (a) Six (6) flour silos, identified as SILO-0001 through SILO-0006, all constructed in 1995, with a total maximum throughput capacity of 67,900 tons of flour per year. Particulate emissions from SILO-0001, SILO-0002, and SILO-0003 are controlled by integral baghouse COLL-D-0006 and exhaust indoors. Particulate emissions from SILO-0004, SILO-0005, and SILO-0006 are controlled by integral baghouse COLL-D-0005 and exhaust indoors.
 - (b) One (1) flour silo, identified as BIN-USE-0002, constructed in 1995, with a maximum throughput capacity of 25,000 tons of flour per year, and with particulate emissions controlled by an integral baghouse, identified as COLL-D-0002, exhausting indoors.
 - (c) One (1) flour silo, identified as SILO-0007, constructed in 2000, with a maximum throughput capacity of 25,000 tons of flour per year, with particulate emissions controlled by an integral baghouse, identified as D0007, exhausting outdoors to exhaust ID COLL-D-0007.
 - (d) One (1) flour silo, identified as SILO-0008, constructed in 2005, with a maximum throughput capacity of 25,000 tons of flour per year, with particulate emissions controlled by an integral baghouse, identified as COLL-D-0008, exhausting outdoors to exhaust ID D0008.
 - (e) One (1) flour silo, BL5 North Flour Silo identified as SILO-0009, approved for construction in 2010, with a maximum throughput capacity of 25,000 tons of flour per year, with particulate emissions controlled by an integral baghouse, identified as COLL-D-0009, exhausting outdoors to exhaust ID SILO9.
 - (f) One (1) flour silo, BL5 South Flour Silo identified as SILO-0010, approved for construction in 2010, with a maximum throughput capacity of 25,000 tons of flour per year, with particulate emissions controlled by an integral baghouse, exhausting outdoors to exhaust ID SILO10.
 - (g) One (1) flour silo, BL5 Day Bin identified as BIN-USE-0003, approved for construction in 2010, with a maximum throughput capacity of 25,000 tons of flour per year, with particulate emissions controlled by an integral baghouse, exhausting indoors.

Pollutants with Emission Limits or Applicable Standards:

SO₂ NO_x CO VOC PM PM₁₀ PM_{2.5} HAPS

Applicable Rules:

- PSD Minor PM Limits 326 IAC 2-2, PM rate limits 326 IAC 6-3-2
- Compliance Monitoring 326 IAC 2-8-4(3)
- Record Keeping & Reporting 326 IAC 2-8-4(3)

<u>Requirement:</u>	<u>Applicable</u>	<u>Violation Noted</u>
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Recordkeeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: throughput, maintenance records		
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Observations and Comments:

During the inspection, flour silos were observed in operation. The source maintains flour throughput records through purchasing and receives a significant amount of flour via rail. Flour is transported into and throughout the facility via closed systems. No visible emissions were observed during the inspection and indoor silo areas appeared clean. Mr. Tucker explained and showed that facility personnel conduct monthly inspections of indoor silos and Mr. Conwell explained that facility maintenance personnel make daily visible emission observations of outdoor silos during normal

PERMIT SECTION D.4

daylight operations. Mr. Tucker also explained and provided records of annual preventative maintenance activities including recent full cartridge replacements on two of the outdoor silo baghouses (SILO-0008 & SILO-0011).

Permit Section Compliance Status:

- No violations were observed or determined for this permit section at the time of the inspection.
- The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION D.5		
Emission Units and Control Devices:		
<ul style="list-style-type: none"> Three (3) natural gas-fired boilers, identified as BOILER-S-0001, BOILER-S-0002, and BOILER-S-0003, all constructed after 1983, and with maximum heat input capacities of 3.36, 3.36, and 8.40 MMBtu/hr, respectively. 		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS		
Applicable Rules:		
<ul style="list-style-type: none"> Particulate Emission Limitations for Sources of Indirect Heating 326 IAC 6-2-4 		
Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Recordkeeping Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: N/A		
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Observations and Comments:		
The boilers were observed and operating during the inspection. They are required to meet a heat input-based PM emissions limit. No violations were noted.		
Permit Section Compliance Status:		
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection.		
<input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:		

PERMIT SECTION E.1		
Emission Units and Control Devices:		
<ul style="list-style-type: none"> • One (1) natural gas-fired emergency generator, identified as GEN-0001, constructed in April 2007, rated at 67 horsepower, used for IT backup. • One (1) diesel-fired 4-stroke lean-burn emergency generator, identified as GEN-0002, constructed in 2002, and with an output of 2,233 horsepower. 		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS		
Applicable Rule:		
<ul style="list-style-type: none"> • National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [326 IAC 20-82][40 CFR 63, Subpart ZZZZ] • 40 CFR Part 63, Subpart A - General Provisions 		
Applicability Information:		
<ul style="list-style-type: none"> • GEN-0001 is a natural gas-fired emergency generator; a stationary spark ignition (SI) internal combustion engine (ICE) not subject to the NSPS for stationary SI engines because it was constructed prior to 2005. For NESHAP 4Z, it is considered a new (construction commenced on or after June 12, 2006) stationary RICE at an area source HAPs. • GEN-0002 is a 2,233 HP diesel-fired 4-stroke lean-burn emergency generator; a stationary compression ignition (CI) ICE not subject to the NSPS for stationary CI engines because it was constructed prior to 2009. For NESHAP 4Z, it is considered an existing stationary RICE (construction commenced before June 12, 2006) at an area source of HAPs. Construction of GEN-0002 commenced in 2002. 		
Requirement:		
Emission Limitations/Standards	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Work Practice/Operating Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Record Keeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: hours of operation, diesel fuel purchase records		
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan [326 IAC 1-6-3]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Observations and Comments:		
The engines were observed during the inspection. Neither were operating. GEN-0002 (the diesel emergency engine) has been operated for maintenance only and the hour meter was observed to have recorded 100.6 hours of operation. Non-startup oil change and inspection requirements from NESHAP 4Z thus were not applicable. No violations noted.		
Permit Section Compliance Status:		
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:		

ADDITIONAL SOURCE COMPLIANCE REVIEW:	
The following reports are required and were reviewed:	
<input checked="" type="checkbox"/> Annual Compliance Certification(s)	<input checked="" type="checkbox"/> Deviation & Compliance Monitoring Report(s)
<input type="checkbox"/> Annual Notification(s)	<input type="checkbox"/> Emission Statement(s)
The reports are consistent with inspection observations.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
The permit accurately represents emission units observed on site.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Compliance assistance was provided during the inspection.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
The source is required to have a Risk Management Plan [40 CFR 68].	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, the source has a plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
If yes, the employees have been trained.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Additional Information and Comments:	
<p>The permit TSD lists that baking and proofing lines not regulated by the D and E sections of the permit are not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because the unlimited potential VOC emissions from each of these lines is less than twenty-five (25) tons per year.</p> <p>Compliance assistance was provided regarding the parametric monitoring violation listed for the BKL2 oxidizer. The source explained that they may soon apply for permit changes related to process modifications and they were encouraged to apply for a permit update that addresses the parametric monitoring requirements.</p>	
Additional Source Compliance Review Status:	
<input checked="" type="checkbox"/> No violations were observed or determined at the time of the inspection. <input type="checkbox"/> The following violations were determined at the time of the inspection:	

INSPECTION FINDINGS	
<input type="checkbox"/> No violations were observed or determined at the time of the inspection. <input checked="" type="checkbox"/> The following violations were determined at the time of the inspection:	
<i>Condition/Citation</i>	<i>Description of Violation(s)</i>
D.1.7(c)	Fan amperage observed during the inspection was outside of the range set by the most recent stack test.
RECOMMENDED ACTION	Issue inspection summary/violation letter.
EXIT INTERVIEW	I explained my findings, recommendations, and conclusions with Ms. Carlisle, Mr. Tucker, and Mr. Conwell prior to exiting the facility. I explained additional details during phone calls with Ms. Carlisle and Mr. Tucker on 12/11/2020 and 12/15/2020.

ATTACHMENTS	
<ul style="list-style-type: none"> N/A 	