

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary
Federally Enforceable State Operating Permit (FESOP) - Renewal
Flavorchem Corporation
1500-1525 Brook Drive
Downers Grove, Illinois

Site Identification No.: 043030AEV
Application No.: 06100028

Schedule

Public Comment Period Begins: September 17, 2014
Public Comment Period Closes: October 17, 2014

Illinois EPA Contacts

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I. Introduction

Flavorchem Corporation has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for their Flavor and Fragrance Products Manufacturing Facility. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the renewed permit that it would propose to issue for the plant. However, before renewing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

II. Source Description

Flavorchem Corporation is a manufacturer of liquid and dry flavor products and liquid fragrance products. The following processes are performed at the facility in the manufacturing of flavor and fragrance products:

Cocoa Press/South Wet Mix Area;
Coffee Press/ North Wet Mix Area;
Four (4) Small Dry Mixers controlled by Dry Mix Dust Hog;
One (1) Megablender Dry mixer controlled by Dry Mix Dust Hog;
Fragrance Area;
Spray Dryer controlled by baghouse;
Vanilla Concentrator;
Packaging Room;
6,000 Gallon Ethyl Alcohol Underground Storage Tank;
6,000 Gallon Propylene Glycol Underground Storage Tank
One (1) Bottle-Filling Line; and
Two (2) 2,600—gallon Processing Tanks

The emissions from flavor and fragrance batch-manufacturing activities emitted to the atmosphere during the manufacturing process are classified as volatile organic material (VOM). Also these materials also contain components that are considered hazardous air pollutants (HAPs).

III. General Discussion

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has been operating this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant

would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

IV. Applicable Emission Standards

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The Illinois Pollution Control Board has specific standards for units emitting volatile organic material (VOM) in the Greater Chicago Area. The specific standards for this company are 35 Ill. Adm. Code Part 218 Subpart RR (Miscellaneous Organic Chemical Manufacturing Processes) and 35 Ill. Adm. Code Part 218 Subpart TT (Other Emission Units). These regulations limit the amount of VOM that may be in the raw materials used. The application shows that the plant is in compliance with applicable state and federal emission standards.

The principal air contaminant of concern is volatile organic material (VOM) which is created by the flavor and fragrance products manufacturing. The facility has limited their throughput that will keep the VOM emissions below the major source threshold level of 100 tons per year for VOM.

Other emissions of hazardous air pollutants (HAP) are also emitted; however, their levels are also depended on the amount of VOM and will remain below the major source threshold level of 10 ton per year for single HAP and 25 ton per year for combined total HAPs.

V. Contents of the Permit

The renewed permit that the Illinois EPA is proposing to issue will identify the specific emission standards that apply to the emission units at the plant. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 tons major source threshold.)

The permit sets limitations on flavor and fragrance products manufacturing facility emissions. These limitations are consistent with the historical operation and capacity of the facility.

The permit conditions require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

VI. Request for Comments

It is the Illinois EPA's preliminary determination that the source has met the requirements for renewal of its permit. The Illinois EPA is therefore proposing to issue the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.