

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
1021 N. Grand Avenue East  
P.O. Box 19506  
Springfield, Illinois 62794-9506

Project Summary for an Application from  
Russell T. Bundy Associates, Inc. for Renewal of the  
Federally Enforceable State Operating Permit (FESOP) for  
Used Baking Pan Cleaning and Coating Line Facility  
Rockdale, Illinois

Site Identification No.: 197085AAS  
Application No.: 92060055

Schedule

Public Comment Period Begins: May 31, 2011  
Public Comment Period Closes: June 30, 2011

Illinois EPA Contacts

Permit Analyst: Jocelyn Stakely  
Community Relations Coordinator: Brad Frost

## **I. INTRODUCTION**

Russell T. Bundy Associates, Inc. has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for their used baking pan cleaning and coating line 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**

Russell T. Bundy Associates, Inc. operates a baking pan cleaning and re-coating facility, servicing area commercial bakeries, which cleans and re-coats baking pans with a release coating. Commercial baking pans which are soiled with bakery oils and greases and/or whose release coating has dissipated are brought to the facility for cleaning and recoating. The purpose of the silicone release coating is to assist in the release of the baked product from the baking pan in order to eliminate sticking and tearing away of part of the baked products which would make it unsalable.

On receipt, pans are loaded into expanded metal baskets and submerged in caustic cleaning solutions to remove oil, grease and old silicone coating. After cleaning the pans are rinsed and run through a clear water conveyORIZED washer and dried.

The dried pans are spray coated in a conveyORIZED spray machine. After coating the pans are cured at 425-450° for 90 minutes to polymerize the coating.

After curing the pans are re-stacked on pallets or dollies and returned to the bakery.

The facility operates natural gas-fired (300,000 Btu/hr) tin melting pot, a decarbonizing tank, a deglaze tank, a clean and deglaze tank, an acid neutralization tank, a Glaze Spray Machine with a solids filter, five (5) natural gas-fired drying and curing ovens (0.5 mmBtu/hr, each), and ten (10) natural gas-fired (0.3 mmBtu/hr, each).

The primary emissions of concern are generated from used baking pan cleaning and coating line are volatile organic material (VOM) and hazardous air pollutants (HAP).

## **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 not 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 board has standards for sources of Volatile Organic Material (VOM) emission. This source has emission limits in its permit that keep the amount of hazardous air pollutants below major levels therefore the NESHAP regulations do not apply. 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 generated during solvent handling/usage throughout the used baking pan cleaning and recoating. 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 would continue to identify the specific emission standards that apply to the emission units at the plant.

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 ton major source threshold.)

The permit would also set limitations on requirements to assure that this facility will be operated as a non-major source. The permit sets limitations on used baking pan

cleaning and coating emissions. These limitations are consistent with the historical operation and capacity of the facility.

The permit conditions would also continue to 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 renew 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.