

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
Interstate Brands Corporation
for
Federally Enforceable State Operating Permit (FESOP) for
7225 Santa Fe Drive, Hodgkins, Illinois

Site Identification No.: 031126AAP

Application No.: 96030059

Schedule

Public Comment Period Begins: August 8, 2012

Public Comment Period Closes: September 7, 2012

Illinois EPA Contacts

Permit Analyst: Valeriy Brodsky

Community Relations Coordinator: Brad Frost

I. INTRODUCTION

Interstate Brands Corporation was operating under Clean Air Act Permit Program (CAAPP) permit as a major source of volatile organic materials (VOM) emission generated by its bread baking operations. As a result of redesignation of Chicago ozone non-attainment status from severe to moderate major source threshold level was raised from 25 tons/yr of VOM emission to 100 tons/yr and plant became eligible for a Federally Enforceable State Operating Permit (FESOP). 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 issuing 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

Interstate Brands Corporation produces baked bread products. The dough is prepared by mixing flour, water, yeast, salt, sugar and other additives. The dough with various fillings is shaped and then goes to proof boxes for leavening, i.e., the yeast causes the dough to rise. The dough is then baked in the gas fired ovens, cooled down, packaged and shipped. Cloverhill Pastry operates two baking ovens controlled by two catalytic oxidizers, three natural gas fired boilers and flour handling equipment.

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 to operate 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 Clean Air Act and regulations promulgated thereunder. 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 per year of VOM emission.

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 source VOM emissions are subject to the general VOM emission limitation found in 35 IAC 218.301 – Use of Organic Material.

The emissions of particulate Matter (PM) are regulated by general requirements of 35 IAC, Part 212, e.g., Sections 212.123, 212.301, etc..

The application shows that the plant is in compliance with applicable state and federal emission standards.

V. CONTENTS OF THE PERMIT

The permit that the Illinois EPA is proposing to issue identifies the specific emission standards that apply to the emission units at the plant. As explained, the baking ovens are subject to 35 IAC 218.301, which restricts VOM emissions from any emission unit to less than 8 lb/hr. 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 threshold level of 100 tons for VOM. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

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.