

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Ferrara Pan Candy Co.  
Attn: Albert Maronta  
7301 Harrison Street  
Forrest Park, Illinois 60130

Application No.: 73010040

I.D. No.: 031090AAY

Applicant's Designation:

Date Received: November 16, 2000

Subject: Candy Manufacturing

Date Issued: October 23, 2006

Expiration Date: October 23, 2011

Revised Date Issued:

Location: 7301 Harrison St., Forrest Park

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of equipment itemized in Attachment B pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
  - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 ton/year of particulate matter less than 10 microns in diameter (PM<sub>10</sub>), 100 tons/year of volatile organic material 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs. As a result, the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
  - ii. To limit the emissions of VOM from the construction of new emission units and other modifications at the source, which occurred without first obtaining construction permit(s) between November 15, 1992 and June 15, 2005 (the period during which the Chicago area was classified as severe nonattainment for ozone), to less than 25 tons/year. As a result, the source is excluded from the requirements of 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification.
  - iii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.

- 2a. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.
- b. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
3. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm.
- 4a. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall apply only to photochemically reactive material.
- b. Pursuant to 35 Ill. Adm. Code 218.405(d)(2), on and after March 15, 1996, 35 Ill. Adm. Code 218.407 through 218.410 shall apply to all owners or operators of heatset web offset, non-heatset web offset, or sheet-fed offset lithographic printing line(s), unless the combined emissions of VOM from all lithographic printing line(s) at the source (including solvents used for cleanup operations associated with the lithographic printing line(s)) never exceed 45.5 kg/day (100 lbs/day), as determined in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B), before the application of capture systems and control devices.
- c. Pursuant to 35 Ill. Adm. Code 218.986, every owner or operator of an emission unit subject to 35 Ill. Adm. Code 218 Subpart TT shall comply with the requirements of 35 Ill. Adm. Code 218.986(a), (b), (c), (d), or (e):
  - i. Emission capture and control equipment which achieves an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit, or
  - ii. For coating lines, the daily-weighted average VOM content shall not exceed 0.42 kg VOM/l (3.5 lbs VOM/gallon) of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied during any day. Owners and operators complying with 35 Ill. Adm. Code 218.986 are not required to comply with 35 Ill. Adm. Code 218.301.

- 5a. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the catalytic oxidizer such that the catalytic oxidizer be kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- c. The catalytic oxidizer's combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test. This temperature shall be maintained during operation.
- d. The source shall only be operated with natural gas as the fuel. The use of any other fuel at the source requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- 5a. Emissions and operation of the candy panning rooms, starch molders, lithographic printing lines, and natural gas-fired equipment shall not exceed the following limits:

i. Panning Rooms:

<u>Process/Material</u>	<u>VOM Usage</u>		<u>Overall Control Efficiency (%)</u>	<u>VOM Emissions</u>	
	<u>(lbs/Day)</u>	<u>(lbs/Yr)</u>		<u>(lb/Day)</u>	<u>(Tons/Yr)</u>
Candy and Chocolate Panning/Glaze (Total)*	482	144,600	95	24	3.62
Miscellaneous Glazing (Total)	7	2,100		7	1.05
Panning (Flavor Addition)	68	20,400		68	<u>10.20</u>
				Total	<u>14.87</u>

ii. Starch Molders:

<u>Process/Material</u>	<u>Candy Throughput</u>		<u>VOM Emission Factor</u>	<u>VOM Emissions</u>	
	<u>(Tons/Day)</u>	<u>(Tons/Yr)</u>	<u>(lbs/Ton)</u>	<u>(lb/Day)</u>	<u>(Tons/Yr)</u>
Starch Molding (Flavor Addition)	208	62,500.00	0.1618	34	5.06

- \* Controlled by catalytic oxidizer
- iii. These limits are based on maximum material usage, maximum VOM contents, a stack test emission factor for the starch molding and when controlled the control efficiency the catalytic oxidizer.
- iv. Operation of the five non-heatset lithographic printing lines shall not exceed the following limits:

<u>Process/Material</u>	<u>Material Usage</u>		<u>VOM Emissions</u>	
	<u>(lb/Day)</u>	<u>(lb/Yr)</u>	<u>(lb/Day)</u>	<u>(Tons/Yr)</u>
Confection Ink	25.7	7,702.2	0.4	0.06
Dilution & Clean-Up Solvent (Total)	26.2	7,850.0	26.2	<u>3.93</u>
		Total		<u>3.99</u>

These limits are based on the maximum material usage, an ink emission adjustment factor of 0.05 for non-heatset inks and 100% VOM for dilution and clean-up solvent.

- v. Operation of fuel combustion emission sources shall not exceed the following limits:

<u>Natural Gas Usage</u>		<u>Pollutant</u>	<u>Factor</u>	<u>Emissions</u>	
<u>(mmscf/Day)</u>	<u>(mmscf/Yr)</u>		<u>(lbs/mmscf)</u>	<u>(lb/Day)</u>	<u>(Tons/Yr)</u>
1	300	CO	84	84.0	12.6
		NO <sub>x</sub>	100	100.0	15.0
		PM	7.6	7.6	1.1
		SO <sub>2</sub>	0.6	0.6	0.1
		VOM	5.5	5.5	0.8

These limits are based on maximum fuel usage and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D , July 1998).

- iv. The above limitations contain revisions to previously issued Federally Enforceable State Operating Permit (FESOP) 73010040. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit. The source has requested these revisions and has addressed the applicability and compliance of Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification. These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the above-listed construction permit application contains the most current and accurate

information for the source. Specifically, the emission limits for VOM from the panning and starch molding have been increase from 6.25 tons/year to 15.26 tons/year while the minimum required overall control efficiency of the catalytic oxidizer has been increased from 92% to 95%, the VOM limits for the glaze polishing has been decreased from 11.9 tons/year to 4.67 tons/year, and the VOM limits for the candy printing operation has been decreased from 5.84 ton/year to 3.99 tons/year.

- v. Compliance with the annual limits of Condition 5(a) shall be determined on a daily basis from the sum of the data for the current day plus the preceding 364 days (running 365 day total).
- b. Operations of the starch molding, bagged sugar, and bulk sugar processing shall not exceed the following limits:

<u>Process/Material</u>	<u>Throughput</u>		<u>Emission Factor (lbs/Ton)</u>	<u>PM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>		<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Starch Molding	312.5	2,500	8	1.25	10.0
Bagged Sugar	500.0	4,000	1	0.25	2.0
Bulk Sugar	4,375.0	35,000	6.37 lb/hr	2.48	<u>19.9</u>
			Total		<u>31.9</u>

These limits are based on maximum throughput and standard emission factors. The bulk sugar emission factor is based on the allowable emissions from 35 Ill. Adm. Code 212.321 and 5.61 tons/hour throughput.

- c. This permit is issued based on negligible emissions of particulate matter from the panning operations. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- d. This permit is issued based on negligible emissions of particulate matter from the printing operations. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- e. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements of Section 112(g) of the Clean Air Act.
- f. Compliance with the annual limits of Conditions 5(b) through 5(e) of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

- 6a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
    - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
    - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
  - b. Testing required by Conditions 7 and 8 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 7a Pursuant to 35 Ill. Adm. Code 212.107, for both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR part 60, Appendix A, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. 35 Ill. Adm. Code 212 Subpart A shall not apply to 35 Ill. Adm. Code 212.301.
- b. Pursuant to 35 Ill. Adm. Code 212.109, except as otherwise provided in 35 Ill. Adm. Code Part 212, and except for the methods of data reduction when applied to 35 Ill. Adm. Code 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same

point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged.

- c. Pursuant to 35 Ill. Adm. Code 212.110(a), measurement of particulate matter emissions from stationary emission units subject to 35 Ill. Adm. Code Part 212 shall be conducted in accordance with 40 CFR Part 60, Appendix A, Methods 5, 5A, 5D, or 5E.
  - d. Pursuant to 35 Ill. Adm. Code 212.110(b), the volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4.
  - e. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
8. Pursuant to 35 Ill. Adm. Code 218.988(a), when in the opinion of the Illinois EPA it is necessary to conduct testing to demonstrate compliance with 35 Ill. Adm. Code 218.986, the owner or operator of a VOM emission unit subject to the requirements of 35 Ill. Adm. Code 218 Subpart TT shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105.
- 9a. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(A)(ii), an owner or operator that uses an afterburner to comply with any Section of 35 Ill. Adm. Code Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. The continuous monitoring equipment must monitor for each afterburner which has a catalyst bed, commonly known as a catalytic afterburner, the temperature rise across each catalytic afterburner bed or VOM concentration of exhaust.
- b. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(B), an owner or operator must install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device, such as a strip chart, recorder or computer, having an accuracy of  $\pm 1$  percent of the temperature measured in degrees Celsius or  $\pm 0.5^\circ$  C, whichever is greater.
10. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f)

of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

11. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 12a. Pursuant to 35 Ill. Adm. Code 218.411(a)(2), an owner or operator of lithographic printing line(s) exempt from the limitations of 35 Ill. Adm. Code 218.407 because of the criteria in 35 Ill. Adm. Code 218.405(d) shall collect and record either the information specified in 35 Ill. Adm. Code 218.411(a)(2)(A) or (a)(2)(B) for all lithographic printing lines at the source, as follows:
  - i. Standard recordkeeping, including the following:
    - A. The name and identification of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;
    - B. A daily record, which shows whether a lithographic printing line at the source was in operation on that day;
    - C. The VOM content and the volume of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;

- D. The total VOM emissions at the source each month, determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated each month; and
- E. The VOM emissions in lbs/day for the month, calculated in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B);
- ii. Purchase and inventory recordkeeping, including the following:
  - A. The name, identification, and VOM content of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;
  - B. Inventory records from the beginning and end of each month indicating the total volume of each fountain solution additive, lithographic ink, and cleaning solvent to be used on any lithographic printing line at the source;
  - C. Monthly purchase records for each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line at the source;
  - D. A daily record, which shows whether a lithographic printing line at the source was in operation on that day;
  - E. The total VOM emissions at the source each month, determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated each month based on the monthly inventory and purchase records required to be maintained pursuant to 35 Ill. Adm. Code 218.411(a)(2)(B)(i), (a)(2)(B)(ii) and (a)(2)(B)(iii); and
  - F. The VOM emissions in lbs/day for the month, calculated in accordance with 35 Ill. Adm. Code 218.411(a)(1)(B).
- b. Pursuant to 35 Ill. Adm. Code 218.991(a)(2), any owner or operator of a VOM emission unit subject to the requirements of 35 Ill. Adm. Code 218 Subpart PP, QQ, RR or TT and complying by the use of emission capture and control equipment shall collect and record all of the following information each day and maintain the information at the source for a period of three years:
  - i. Control device monitoring data.
  - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated emission source.

- iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- c. Pursuant to 35 Ill. Adm. Code 218.991(b)(2), any owner or operator of a coating line which is subject to the requirements of 35 Ill. Adm. Code 218 Subpart PP or TT and complying by means of the daily-weighted average VOM content limitation shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
  - i. The name and identification number of each coating as applied on each coating line;
  - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line; and
  - iii. The daily-weighted average VOM content of all coatings as applied on each coating line as defined in 35 Ill. Adm. Code 218.104.
- 13a. The Permittee shall maintain records of the following items demonstrate compliance with the conditions of this permit:
  - i. Records addressing use of good operating practices for the catalytic oxidizer:
    - A. Records for periodic inspection of the catalytic oxidizer with date, individual performing the inspection, and nature of inspection; and
    - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
  - ii. The name and identification number, usage, and VOM content (minus water and any compounds which are specifically exempted from the definition of VOM) of each VOM containing material used (lbs/month and tons/year, weight %;
  - iii. The throughput of starch molding, bagged sugar, and bulk sugar (tons/month and tons/year);
  - iv. Natural gas fuel usage (mmscf/month and mmscf/year); and
  - v. Monthly and Annual emissions of CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM and HAP from the source with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and

copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

14. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
- 15a. Pursuant to 35 Ill. Adm. Code 218.411(a)(1), an owner or operator of lithographic printing line(s) exempt from the limitations of 35 Ill. Adm. Code 218.407 because of the criteria in 35 Ill. Adm. Code 218.405(d) shall upon modification of a lithographic printing line, submit a certification to the Illinois EPA that includes:
  - i. A declaration that the source is exempt from the control requirements in 35 Ill. Adm. Code 218.407 because of the criteria in 35 Ill. Adm. Code 218.405(d);
  - ii. Calculations which demonstrate that combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source never exceed 45.5 kg/day (100 lbs/day) before the use of capture systems and control devices, as follows:
    - A. To calculate daily emissions of VOM, the owner or operator shall determine the monthly emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) and divide this amount by the number of days during that calendar month that lithographic printing lines at the source were in operation;
    - B. To determine the VOM content of the inks, fountain solution additives and cleaning solvents, the tests methods and procedures set forth in 35 Ill. Adm. Code 218.409(c) shall be used;
    - C. To determine VOM emissions from inks used on lithographic printing line(s) at the source, an ink emission adjustment factor of 0.05 shall be used in calculating emissions from all non-heatset inks except when using an impervious substrate, and a factor of 0.80 shall be used in calculating emissions from all heatset inks to account for VOM retention in the substrate except when using an impervious substrate. For impervious substrates such as

metal or plastic, no emission adjustment factor is used. The VOM content of the ink, as used, shall be multiplied by this factor to determine the amount of VOM emissions from the use of ink on the printing line(s); and

- D. To determine VOM emissions from fountain solutions and cleaning solvents used on lithographic printing line(s) at the source, no retention factor is used;
- iii. Either a declaration that the source, through federally enforceable permit conditions, has limited its maximum theoretical emissions of VOM from all heatset web offset lithographic printing lines (including solvents used for cleanup operations associated with heatset web offset printing lines) at the source to no more than 90.7 Mg (100 tons) per calendar year before the application of capture systems and control devices or calculations which demonstrate that the source's total maximum theoretical emissions of VOM do not exceed 90.7 Mg/yr (100 TPY). To determine the source's total maximum theoretical emissions for the purposes of this subsection, the owner or operator shall use the calculations set forth in 35 Ill. Adm. Code 218.406(b)(1)(A)(ii); and
- iv. A description and the results of all tests used to determine the VOM content of inks, fountain solution additives, and cleaning solvents, and a declaration that all such tests have been properly conducted in accordance with 35 Ill. Adm. Code 218.409(c)(1);
- b. Pursuant to 35 Ill. Adm. Code 218.411(a)(3), an owner or operator of lithographic printing line(s) exempt from the limitations of 35 Ill. Adm. Code 218.407 because of the criteria in 35 Ill. Adm. Code 218.405(d) shall on and after March 15, 1996, notify the Illinois EPA in writing if the combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source ever exceed 45.5 kg/day (100 lbs/day), before the use of capture systems and control devices, within 30 days after the event occurs. Such notification shall include a copy of all records of such event.
- c. Pursuant to 35 Ill. Adm. Code 218.991(a)(3), any owner or operator of a VOM emission unit subject to the requirements of 35 Ill. Adm. Code 218 Subpart PP, QQ, RR or TT and complying by the use of emission capture and control equipment shall notify the Illinois EPA in the following instances:
  - i. Of any record showing a violation of the requirements of 35 Ill. Adm. Code 218 Subpart PP, QQ, RR or TT shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.

- ii. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218 Subpart PP or TT from the use of capture systems and control devices to the use of complying coatings, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.991(b)(1). Upon changing the method of compliance with 35 Ill. Adm. Code 218 Subpart PP or TT from the use of capture systems and control devices to the use of complying coatings, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.991(b).
  - d. Pursuant to 35 Ill. Adm. Code 218.991(b)(3), any owner or operator of a coating line which is subject to the requirements of 35 Ill. Adm. Code 218 Subpart PP or TT and complying by means of the daily-weighted average VOM content limitation shall notify the Illinois EPA:
    - i. Of a violation of the requirements of 35 Ill. Adm. Code 218 Subpart PP or TT by sending a copy of any record showing a violation to the Illinois EPA within 30 days following the occurrence of the violation;
    - ii. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218 Subpart PP or TT from the use of complying coatings to the use capture systems and control devices, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.991(a)(1). Upon changing the method of compliance with 35 Ill. Adm. Code 218 Subpart PP or TT from the use of complying coatings to the use capture systems and control devices, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.991(a).
16. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

It should be noted that the FESOP has been revised to incorporate the modification in Construction Permit number 08030048.

Page 14

If you have any questions on this, please call David Hulskotter at 217/782-2113.

Edwin C. Bakowski, P.E.  
Acting Manager, Permit Section  
Division of Air Pollution Control

Date Signed: \_\_\_\_\_

ECB:DWH:jws

cc: Region 1

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the candy manufacturing facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 100 tons per year of VOM, 100 ton per year of particulate matter less than 10 microns in diameter (PM<sub>10</sub>), 10 tons per year for a single HAP, and 25 tons per year for totaled HAP at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)					Single	Total
	<u>CO</u>	<u>NOx</u>	<u>PM</u>	<u>SO2</u>	<u>VOM</u>	<u>HAP</u>	<u>HAPs</u>
Candy			0.44		14.87		
Panning/Glazing			0.44		3.99		
Candy Printing			31.9		5.06		
Starch molding, bagged sugar, and bulk sugar processing							
Fuel Combustion	<u>12.6</u>	<u>15.0</u>	<u>1.1</u>	<u>0.1</u>	<u>0.8</u>		
Totals	12.6	15.0	33.88	0.1	24.72	9.0	22.5

DWH:jws

## Attachment B

### Equipment Listing:

1. Sugar and starch storage, unloading, and distribution:
  - a. Silo #1 and #2 (600,000 lb each).
  - b. Bucket and screw conveyors.
  - c. 7 sugar use bins (10,000 lb each).
  - d. Wheelabrator dust collector.
  - e. Bagged starch.
  - f. Bagged sugar.
  
2. Hard candy process:
  - a. 10 gas candy forming hot pans (0.10 mmBtu/hr each).
  - b. 205 candy forming cold pans.
  - c. 82 polishing pans.
  - d. 2 vacuum cookers.
  - e. 2 slab cooling tables.
  - f. 5 forming and sizing machines.
  - g. 5 cooling conveyors.
  - h. 4 sanding machines.
  
3. Starch molding process:
  - a. 4 mogal kitchens.
  - b. 3 slurry mixing stations.
  - c. 4 flavor and color addition lines.
  - d. 4 starch bucks with baghouses.
  - e. 4 candy depositors.
  - f. 4 rework starch machines with 2 baghouses.
  - g. 4 drying rooms.
  - h. 4 sanding operations.
  - i. 4 oiling operations.
  - j. 4 air laser cleaners vented to baghouse.
  - k. 4 scrap candy remelt kettles.
  
4. Roasted candy process:
  - a. Old gas roasting oven with cyclone (0.40 mmBtu/hr).
  - b. New gas roasting oven with cyclone (0.40 mmBtu/hr).
  - c. 16 polishing pans with filter.
  - d. 16 cold pans with filter.
  - e. 14 gas hot glazing pans (0.10 mmBtu/hr each)
  - f. 6 cold glazing pans
  - g. Processing room with steam vents.
  
5. Candy Printing

- a. 2 offset candy printing units
6. Steam generation and heating equipment:
- a. 2 gas water heaters (1.2 and 4.72 mmBtu/hr)
  - b. 6 gas boilers (10.0, 14.6, 14.6, 5.2, 4.2, and 1.2 mmBtu/hr)
7. Miscellaneous Equipment:
- a. Sugar grinding room with wheelabrator dust collector.
  - b. Flavor and color mixing room.
  - c. Ventilation fans for cold panning and mogal kitchen area.