

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - NSPS SOURCE  
RENEWAL

PERMITTEE

Ferrara Pan Candy Company  
Attn: Craig Caswell, Process Engineer  
7301 West Harrison  
Forest Park, Illinois 60130

Application No.: 73010040

I.D. No.: 031090AAY

Applicant's Designation:

Date Received: April 13, 2011

Subject: Candy Manufacturing

Date Issued: April 27, 2012

Expiration Date: April 27, 2022

Location: 7301 West Harrison Street, Forest Park, Cook County, 60130

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of:

Sugar and Starch Storage, Unloading, and Distribution:

Silo #1 and #2 (600,000 lbs each);  
Bucket and Screw Conveyors;  
Seven (7) Sugar Use Bins (10,000 lbs each);  
Wheelabrator Dust Collector;  
Bagged Starch;  
Bagged Sugar;

Hard Candy Process:

Ten (10) Natural Gas-Fired Candy Forming Hot Pans (0.10 mmBtu/hour each);  
205 Candy Forming Cold Pans;  
Eighty-two (82) Polishing Pans;  
Two (2) Vacuum Cookers;  
Two (2) Slab Cooling Tables;  
Five (5) Forming and Sizing Machines;  
Five (5) Cooling Conveyors;  
Four (4) Sanding Machines;

Starch Molding Process:

Four (4) Mogal Kitchens;  
Three (3) Slurry Mixing Stations;  
Four (4) Flavor and Color Addition Lines;  
Four (4) Starch Bucks with Baghouses;  
Four (4) Candy Depositors;  
Four (4) Rework Starch Machines with Two (2) Baghouses;  
Four (4) Drying Rooms;  
Four (4) Sanding Operations;  
Four (4) Oiling Operations;  
Four (4) Air Laser Cleaners Vented to Baghouse;  
Four (4) Scrap Candy Remelt Kettles;

Roasted Candy Process:

Old Natural Gas-Fired Roasting Oven with Cyclone (0.40 mmBtu/hour);  
New Natural Gas-Fired Roasting Oven with Cyclone (0.40 mmBtu/hour);  
Sixteen (16) Polishing Pans with Filter;  
Sixteen (16) Cold Pans with Filter;  
Fourteen (14) Natural Gas-Fired Hot Glazing Pans (0.10 mmBtu/hour each)  
Controlled by a Catalytic Oxidizer;  
Six (6) Cold Glazing Pans Controlled by a Catalytic Oxidizer;  
Processing Room with Steam Vents;

Candy Printing:

Four (4) Adjustable Ramp Printers (1, 2, 3, and 4);

Steam Generation and Heating Equipment:

Two (2) Natural Gas-Fired Water Heaters (1.2 and 4.72 mmBtu/hour);  
Seven (7) Natural Gas Fired Boilers (10.0, 14.6, 14.6, 5.2, 4.2, 1.2  
and 15.1 mmBtu/hour);

Miscellaneous Equipment:

Sugar Grinding Room with Wheelabrator Dust Collector;  
Flavor and Color Mixing Room; and  
Ventilation Fans for Cold Panning and Mogal Kitchen Area.

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 tons/year for Particulate Matter less than 10 microns in diameter (PM<sub>10</sub>) and Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutant (HAP), and 25 tons/year for 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.
2. Boiler NB1 (15.1 mmBtu/hour) is subject to New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subparts A and Dc. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 60.40c(a), Except as provided in 40 CFR 60.40c(d), (e), (f), and (g), the affected facility to which 40 CFR 60 Subpart Dc applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (mmBtu/hr)) or less, but greater than or equal to 2.9 MW (10 mmBtu/hr).
- 3a. Pursuant to 35 Ill. Adm. Code 212.123(a), 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 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
  - c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
  - d. 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).

- 4a. 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 exceed 2000 ppm.
- b. Pursuant to 35 Ill. Adm. Code 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hour) to exceed 200 ppm, corrected to 50 percent excess air.
- 5a. Pursuant to 35 Ill. Adm. Code 218.187(a)(1), on and after January 1, 2012 except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall apply to all cleaning operations which use organic materials at sources that emit a total of 226.8 kg per calendar month (500 lbs per calendar month) or more of VOM, in the absence of air pollution control equipment, from cleaning operations at the source other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2). For purposes of 35 Ill. Adm. Code 218.187, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units;
- b. Pursuant to 35 Ill. Adm. Code 218.187(b), no owner or operator of a source subject to 35 Ill. Adm. Code 218.187, other than manufacturers of coatings, inks, adhesives, or resins, shall perform any cleaning operation subject to 35 Ill. Adm. Code 218.187 unless the owner or operator meets the requirements in 35 Ill. Adm. Code 218.187(b)(1), (b)(2), or (b)(3). No owner or operator of a source that manufactures coatings, inks, adhesives, or resins shall perform any cleaning operation subject to 35 Ill. Adm. Code 218.187 unless the owner or operator meets the requirements in at least one of the following subsections: 35 Ill. Adm. Code 218.187(b)(1), (b)(2), (b)(3), (b)(4), or (b)(5).
  - i. The VOM content of the as-used cleaning solutions does not exceed the following emissions limitations:

	<u>kg/l</u>	<u>lb/gal</u>
All other cleaning operations not subject to a specific limitation in 35 Ill. Adm. Code 218.187(b)(1)(A) through (b)(1)(D)	0.050	0.42

- ii. The VOM composite vapor pressure of each as-used cleaning solution used does not exceed 8.0 mmHg measured at 20°C (68°F);

- c. 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.
- d. The glazing operations are subject to 35 Ill. Adm. Code 218 Subpart TT (Other Emission Units). 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) below:
  - 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/liter (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.
- e. 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.
- f. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the Wheelabrator dust collectors, baghouses, cyclones, and catalytic oxidizer such that the Wheelabrator dust collectors, baghouses, cyclones, and catalytic oxidizer be kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- g. 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.
- h. The candy forming hot pans, roasting ovens, hot glazing pans, catalytic oxidizer, water heaters, and the boilers shall only be operated with natural gas as the fuel. The use of any other fuel in the candy forming hot pans, roasting ovens, hot glazing pans, catalytic oxidizer, water heaters, or the boilers 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.

6. This permit is issued based on Boiler NB1 not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63 Subpart JJJJJJ. Pursuant to 40 CFR 63.11195(e), a gas-fired boiler as defined in 40 CFR 63 Subpart JJJJJJ are not subject to 40 CFR 63 Subpart JJJJJJ and to any requirements in 40 CFR 63 Subpart JJJJJJ.
7. Pursuant to 35 Ill. Adm. Code 218.303, the provisions of 35 Ill. Adm. Code 218.301 and 218.302 (Use of Organic Material) shall not apply to fuel combustion emission units.
8. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
9. Boiler NB1 shall only be operated with natural gas as the fuel. The use of any other fuel in Boiler NB1 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.
- 10a. Emissions and operation of the candy panning rooms, starch molders, printing lines, and natural gas-fired equipment shall not exceed the following limits:

i. Glazing:

<u>Process/Material</u>	<u>VOM Usage</u>		<u>Overall Control Efficiency (%)</u>	<u>VOM Emissions</u>	
	<u>(lbs/Mo)</u>	<u>(lbs/Yr)</u>		<u>(lbs/Mo)</u>	<u>(Tons/Yr)</u>
Candy and Chocolate Panning/Glaze (Total)*	14,460	144,600	95	723	3.62
Miscellaneous Glazing (Total)*	1060	10,600	95	53	<u>0.27</u>
				Total	<u>3.89</u>

\* Controlled by catalytic oxidizer

These limits are based on catalytic oxidizer control efficiency and maximum VOM usage.

ii. Panning Flavor Addition:

<u>Process</u>	<u>Flavor Throughput</u>		<u>VOM Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Panning (Flavor Addition)	6.0	60	0.74	7.33

These limits are based on maximum material usage and VOM emission factor of 12.221%.

iii. Starch Molders:

<u>Process/Material</u>	<u>Candy Throughput</u>		<u>VOM Emission Factor</u>	<u>VOM Emissions</u>	
	<u>(Tons/mo)</u>	<u>(Tons/Yr)</u>	<u>(lbs/Ton)</u>	<u>(lbs/mo)</u>	<u>(Tons/Yr)</u>
Starch Molding (Flavor Addition)	6250	62,500.00	0.1618	1012	5.06

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 of the catalytic oxidizer.

iv. Operation of the four (4) adjustable ramp printing units shall not exceed the following limits:

<u>Process/Material</u>	<u>Material Usage</u>		<u>VOM Emissions</u>	
	<u>(lbs/Mo)</u>	<u>(lbs/Yr)</u>	<u>(lbs/Mo)</u>	<u>(Tons/Yr)</u>
Confection Ink	746	7,460	350	1.73
Dilution & Clean-Up Solvent (Total)	450	4,492	450	2.25
		Total		3.98

These limits are based on the maximum material usage, material balance and 100% VOM for dilution and clean-up solvent.

v. Operation of and the emissions from the combustion of natural gas in the candy forming hot pans, roasting ovens, hot glazing pans, catalytic oxidizer, water heaters, and the boilers shall not exceed the following limits:

<u>Natural Gas Usage</u>		<u>Pollutant</u>	<u>Factor (lbs/mmscf)</u>	<u>Emissions</u>	
<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>			<u>(lbs/Mo)</u>	<u>(Tons/Yr)</u>
35	345	CO	84	2,940	14.49
		NO <sub>x</sub>	100	3,500	17.25
		PM	7.6	266	1.31
		SO <sub>2</sub>	0.6	21	0.2
		VOM	5.5	193	0.95

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).

- 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</u>	<u>PM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>Factor</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	5,625.0	45,000	7.29 lbs/hr	2.85	<u>22.75</u>
			Total		<u>34.75</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 from all such emission units 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 candy printing operations. For this purpose, emissions from all such emission units 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 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).
- 11a. 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 12 and 13 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 12. 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.
- 13a. Pursuant to 40 CFR 60.7(b), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
- b. Pursuant to 40 CFR 60.7(f), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.
- 14a. Pursuant to 35 Ill. Adm. Code 218.187(g), Testing Requirements:
  - i. Testing to demonstrate compliance with the requirements of 35 Ill. Adm. Code 218.187 shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA, or as otherwise specified in 35 Ill. Adm. Code 218.187. Such

testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting the testing to allow the Illinois EPA to be present during the testing;

- ii. Testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 218.187(b)(1), and to determine the VOM content of cleaning solvents and cleaning solutions, shall be conducted as follows:
    - A. The applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) shall be used, provided; however, Method 24 shall be used to demonstrate compliance; or
    - B. The manufacturer's specifications for VOM content for cleaning solvents may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a); provided, however, Method 24 shall be used to determine compliance. In the event of any inconsistency between a Method 24 test and the manufacturer's specifications, the Method 24 test shall govern;
  - iii. Testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
- b. 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.
- 15a. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(A)(ii), an owner or operator that uses an afterburner or carbon adsorber 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 except as provided in 35 Ill. Adm. Code 218.105(d)(3). 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  $\pm 0.5^{\circ}\text{C}$ , whichever is greater.

16. 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.
17. 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.
- 18a.
  - i. Pursuant to 40 CFR 60.48c(g)(1), except as provided under 40 CFR 60.48c(g)(2) and (g)(3), the owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each operating day.
  - ii. Pursuant to 40 CFR 60.48c(g)(2), as an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the  $\text{SO}_2$  standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these

fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

- iii. Pursuant to 40 CFR 60.48c(g)(3), as an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to 40 CFR 60 Subpart Dc) at that property are natural gas, wood, distillate oil meeting the most current requirements in 40 CFR 60.42c to use fuel certification to demonstrate compliance with the SO<sub>2</sub> standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.
- b. Pursuant to 40 CFR 60.48c(i), all records required under 40 CFR 60.48 shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.
- 19a. Pursuant to 35 Ill. Adm. Code 218.187(e)(3), all sources complying with this Section pursuant to the requirements of 35 Ill. Adm. Code 218.187(b)(1) shall collect and record the following information for each cleaning solution used:
  - i. For each cleaning solution that is prepared at the source with automatic equipment:
    - A. The name and identification of each cleaning solution;
    - B. The VOM content of each cleaning solvent in the cleaning solution;
    - C. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);
    - D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;
    - E. The VOM content of the as-used cleaning solution, with supporting calculations; and
    - F. A calibration log for the automatic equipment, detailing periodic checks;
  - ii. For each batch of cleaning solution that is not prepared at the source with automatic equipment:

- A. The name and identification of each cleaning solution;
  - B. Date, time of preparation, and each subsequent modification of the batch;
  - C. The VOM content of each cleaning solvent in the cleaning solution;
  - D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
  - E. The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are not prepared at the site but are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a);
- b. Pursuant to 35 Ill. Adm. Code 218.187(e)(4), all sources complying with 35 Ill. Adm. Code 218.187 pursuant to the requirements of 35 Ill. Adm. Code 218.187(b)(2) shall collect and record the following information for each cleaning solution used:
- i. The name and identification of each cleaning solution;
  - ii. Date, time of preparation, and each subsequent modification of the batch;
  - iii. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
  - iv. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
  - v. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
- c. Pursuant to 35 Ill. Adm. Code 218.187(e)(10), all records required by 35 Ill. Adm. Code 218.187(e) shall be retained by the source for at least three years and shall be made available to the Illinois EPA upon request.
- d. Pursuant to 35 Ill. Adm. Code 218.991(a)(2), any owner or operator of a VOM emission unit which is 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 comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after

the initial start-up date, the owner or operator of a subject VOM source 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 comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, the owner or operator of a subject coating line 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.
- 20a. 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 Wheelabrator dust collectors, baghouses, cyclones, and catalytic oxidizer:
    - A. Records for periodic inspection of the Wheelabrator dust collectors, baghouses, cyclones, and 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. Usage of each VOM and HAP containing material used (lbs/month and tons/year);
  - iii. VOM and HAP content of the materials used (weight %);
  - iv. The throughput of starch molding, bagged sugar, and bulk sugar (tons/month and tons/year);
  - v. Natural gas fuel usage (mmscf/month and mmscf/year); and
  - vi. 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 storage device) 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.
- 21a. Pursuant to 40 CFR 60.7(a), any owner or operator subject to the provisions of 40 CFR Part 60 shall furnish the Illinois EPA or USEPA written notification or, if acceptable to both the Illinois EPA and USEPA and the owner or operator of a source, electronic notification, as follows:
- i. A notification of the date construction (or reconstruction as defined under 40 CFR 60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.
  - ii. A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.
  - iii. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Illinois EPA or USEPA may request additional relevant information subsequent to this notice.
- b. Pursuant to 40 CFR 60.48c(j), the reporting period for the reports required under 40 CFR 60 Subpart Dc is each six-month period. All

reports shall be submitted to the Illinois EPA or USEPA and shall be postmarked by the 30th day following the end of the reporting period.

22. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 23a. Pursuant to 35 Ill. Adm. Code 218.187(e)(2)(B), all sources subject to the requirements of 35 Ill. Adm. Code 218.187 shall at least 30 calendar days before changing the method of compliance between 35 Ill. Adm. Code 218.187(b)(1), (b)(2), (b)(4), or (b)(5) and 35 Ill. Adm. Code 218.187(b)(3), notify the Illinois EPA in writing of such change. The notification shall include a demonstration of compliance with the newly applicable subsection.
  - b. Pursuant to 35 Ill. Adm. Code 218.187(e)(9), all sources subject to the requirements of 35 Ill. Adm. Code 218.187(b) and (d) shall notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.187(b) or (d) by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation;
  - c. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.
  - d. Pursuant to 35 Ill. Adm. Code 218.991(a)(3), any owner or operator of a VOM emission unit which is 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 comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject VOM emission source shall notify the Illinois EPA:
    - i. Of any violation of the requirements of 35 Ill. Adm. Code 218 Subpart PP, QQ, RR or TT by sending a copy 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 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).

- e. 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 comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject coating line 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).

- 24a. If there is an exceedance of or a deviation from 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 or deviation. 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.

- b. 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

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If you have any questions on this, please call David Hulskotter at 217/785-1705.

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

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

ECB:DWH:jws

cc: Illinois EPA, FOS Region 1  
Lotus Notes

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/year for PM<sub>10</sub> and VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such HAPs) 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 <u>HAP</u>	Total <u>HAPs</u>
	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>VOM</u>			
Panning Rooms and Glazing			0.44			11.22		
Starch Molding, Bagged Sugar, and Bulk Sugar Processing			34.75			5.06		
Adjustable Ramp Printing			0.44			3.98		
Fuel Combustion	<u>12.60</u>	<u>15.00</u>	<u>1.10</u>	<u>0.10</u>	<u>0.80</u>	<u>-----</u>	<u>-----</u>	
Totals	<u>12.60</u>	<u>15.00</u>	<u>36.73</u>	<u>0.10</u>	<u>21.06</u>	<u>9.0</u>	<u>22.5</u>	