

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Earthgrains Baking Companies, Inc.
Attn: Kelly Clausen
435 - 34th Avenue
Rock Island, Illinois 61201

Application No.: 01010058

I.D. No.: 161065AGU

Applicant's Designation:

Date Received: January 24, 2001

Subject: Bread and Bun Baking Operation

Date Issued:

Expiration Date:

Location: 435 - 34th Avenue, Rock Island

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

- 2 Boilers (4.2 and 3.4 mmBtu/Hr)
- Bread Baking Oven (4.4 mmBtu/Hr)
- Bun Baking Oven (3 mmBtu/Hr)
- 3 Air Make-Up Units (6.2 mmBtu/Hr, Total)
- Flour Storage Silos
- Cold Cleaning Degreaser
- 3 Storage Silos with Dust Collection
- 3 Flour Sifting Systems with Dust Collection
- 3 Mixers
- Dusting Flour Hopper
- Soybean Oil Storage Tank

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 to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/yr of volatile organic materials (VOM)). 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.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- 2. Emissions and operation of the natural gas fired units shall not exceed the following limits:

<u>Process</u>	<u>Natural Gas Usage</u>		<u>Pollutant</u>	<u>Emission Factor (Lb/mmscf)</u>	<u>Emissions</u>	
	<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>			<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
Natural Gas Combustion	16	183	NO _x	100	1,600	9.15
			CO	84	1,344	7.69
			PM	7.6	122	0.70
			VOM	5.5	88	0.51
			SO ₂	0.6	10	0.06

These limits are based on standard AP-42 emission factors, natural gas as the only fuel fired in the units, and information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

3. Emissions and operation of the Bread and Bun baking shall not exceed the following limits:

<u>Process</u>	<u>Throughput</u>		<u>Pollutant</u>	<u>Maximum Emission Factor (Lb/Ton) *</u>	<u>Emissions</u>	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>			<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>
Bread Production	2,840	28,400	VOM	4.72	13,405	67.03
Bun Production	1,450	14,500	VOM	3.56	5,162	25.81

$$* \quad E = (0.95 \times Y_i) + (0.195 \times T_i) - (0.51 \times S) - (0.86 \times T_s) + 1.90$$

E = VOM emission Factor (lb/ton of product)

Y_i = Initial bakers percent of yeast

T_i = Total yeast action time (hours)

S = Final spike yeast percent

T_s = Spiking time (hours)

These limits are based on standard AP-42 emission factors and information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. This permit is issued based on the degreaser not being subject to 40 CFR part 63, Subpart T - National Emission Standards for Halogenated Solvent Cleaning, based on the solvent not containing 5% or more of a Halogenated solvent listed in the subpart.

- 5a. Emissions and operation of the Cold Cleaning Degreaser shall not exceed the following limits:

<u>Equipment</u>	<u>VOM Usage*</u>		<u>VOM Emissions*</u>	
	<u>(Lb/Mo)</u>	<u>(Lb/Yr)</u>	<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>
Degreaser	66	660	66	0.33

$$* \quad U = [V - W] \times D \times C$$

U = Solvent VOM usage and emissions for compliance determinations (lb).

V = Virgin solvent^A added to the solvent cleaning machines (gallons), as determined by daily addition log sheets (gallons).

W = Waste solvent^B reclaimed from the solvent cleaning machines, as determined by monthly manifests from the solvent reclamation services (gallons).

D = Density of Solvent (lb/gal)

C = VOM content of Solvent (% wt.)

^A For purposes of this permit, virgin solvent is defined as unused solvent.

^B For purposes of this permit, waste solvent is defined as used solvent.

These limits are based on standard AP-42 emission factors and information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. This permit is issued based on the degreaser being exempt from the requirements of 35 Ill. Adm. Code 215.182 pursuant to 35 Ill. Adm. Code 215.181. The Permittee shall continue to operate the degrease in a manner that will not exceed the VOM emission limits set forth in 35 Ill. Adm. Code 215.181 of 3 lb/hr and 15 lb/day.
6. This permit is issued based on negligible emissions of particulate matter (PM) from 3 Storage Silos with dust collection, 3 Flour Sifting systems with dust collection, 3 Mixers, and Dusting Flour Hopper. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
7. This permit is issued based on negligible emissions of volatile organic materials (VOM) from soybean oil storage tank. For this purpose emissions from soybean oil storage tank, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
8. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
9. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment is kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein. The Permittee shall maintain records of the vendor recommendations at the facility and be available for inspection and copying by the Illinois EPA.
10. 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.
11. The Permittee shall maintain the following records:
 - a. For each formulation of bread and bun the Permittee shall maintain the following:
 - i. Emission factor (lb/ton) as determined by the Equation in Condition 4 along with name/identification and supporting variables for the equation;

- ii. Total amount processed (ton/mo and ton/yr); and
 - iii. VOM emissions (lb/mo and ton/yr).
 - b. Name, usage (gal/mo and gal/yr), vapor pressure (psia), VOM and HAP contents (lb/gal or % wt.), and VOM and HAP emissions (lb/hr, lb/day, lb/mo and ton/yr) for the degreasing solvent.
 - c. Natural gas usage (mmscf/mo and mmscf/yr).
 - d. Total facility VOM emissions (lb/mo and ton/yr).
12. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA 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 request for records during the course of a source inspection.
13. 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.
14. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system 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
5415 North University
Peoria, Illinois 61614

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

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 2
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from Bread and Bun Baking Operation 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. This permit limits amount of yeast containing dough that can be baked to maintain the level of emissions below major source thresholds. The resulting maximum emissions are well below the levels, e.g., 100 Tons per year of Volatile Organic Materials (VOM) 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.

<u>Equipment/Process</u>	E M I S S I O N S				
	<u>PM</u>	<u>NO_x</u>	<u>CO</u>	<u>SO₂</u>	<u>VOM</u>
Bread and Bun Production	---	---	---	---	92.84
Natural Gas Combustion	0.70	9.15	7.69	0.06	0.51
3 Mixers (Total)	1.32	---	---	---	---
Degreaser	---	---	---	---	0.33
3 Flour Silos (Total)	1.32	---	---	---	---
3 Sifters Systems (Total)	1.32	---	---	---	---
Dusting Hopper	0.44	---	---	---	---
Soybean Storage Tank	---	---	---	---	0.44
Totals:	5.10	9.15	7.69	0.06	94.12

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Project Summary

I. INTRODUCTION

Earthgrains Baking Companies, Inc. has voluntarily submitted an application for a Federally Enforceable State Operating Permit for the baking facility. These limits would prevent the baking operation from being a major source of emissions so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. The permit would contain conditions to assure that the facility is operated as a non-major source. These conditions would be enforceable by both the USEPA and the Illinois EPA.

II. PROJECT DESCRIPTION

Earthgrains Baking Companies, Inc. bakes bread and buns in gas fired ovens. The facility uses various yeast containing breads and buns that when baked produce volatile organic materials (VOM) based on yeast content and baking times.

III. EMISSIONS

The principal air contaminant emitted from the baking operations is VOM. The VOM emission from these operations are based on emission equations that factor in yeast content, baking time and time yeast is allowed to rise.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board emission standards. The Board's emission standard represents the basic requirements for sources in Illinois. The Board has standards for sources of VOM. Earthgrains Baking Companies, Inc. complies with all applicable standards.

V. PROPOSED PERMIT

The conditions of the proposed permit contain limitations and requirements to assure that this source will be operated as a non-major source. The permits set limitations on the amount of bread and buns that are baked at the facility. These limitations are consistent with the historical operation. The VOM are based on the amount of bread and buns baked and air pollution control efficiency.

The permit conditions also establish appropriate compliance procedures, including inspection practices, recordkeeping and reporting requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the plant is operating within the limitations set by the permit.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this facility meets all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit. The Illinois EPA is therefore proposing to issue a permit with federally enforceable limits for this project.

The Illinois EPA and the proposed condition of the draft permit request comments on this proposed action. If substantial public interest is shown in

this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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