

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Highland Baking Company for
Federally Enforceable State Operating Permit (FESOP) for
Bread and Roll Bakery
Northbrook, Illinois

Site Identification No.: 031207AED
Application No.: 09050073

Schedule

Public Comment Period Begins: March 27, 2014
Public Comment Period Closes: April 26, 2014

Illinois EPA Contacts

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I. Introduction

An application has been voluntarily submitted by the Highland Baking Company for their Bread Baking company in order to voluntarily incorporate federally enforceable limits. These limits would prevent the above facility 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 proposed limits would be accompanied by recordkeeping requirements to assure that the plant is operated as a non-major source. These conditions would be enforceable by both the State of Illinois and USEPA.

II. Source Description

Highland Baking Company is located at 2301 Shermer Road, Northbrook, Illinois 60062. The facility is a bread and roll bakery that currently includes ovens, boilers, silos, and mixers. The facility produces bread loaves, buns, rolls, and french rolls. The company uses the twenty-six baking ovens to bake various bread products and the catalytic oxidizer is to be used to control volatile organic material emissions emitted from four (4) Natural Gas Tunnel Ovens (Tunnel Ovens 1, 2, 3 and 4). Their VOM emissions of ethanol are produced from the yeast in the bread baking process.

Eighteen (18) Natural Gas-Fired Rack Baking Ovens

Four (4) Natural Gas-Fired Deck Baking Ovens

Two (2) 2.2 mmBtu/hr Natural Gas-Fired Tunnel Ovens controlled by Catalytic Thermal Oxidizer

Two (2) 3.0 mmBtu/hr Natural Gas-Fired Tunnel Ovens controlled by Catalytic Thermal Oxidizer

Two (2) Silos controlled by baghouses

Twelve (12) Mixers

Two (2) 150 HP Natural Gas Boilers

The baking ovens' primary sources of emissions are VOM emitted from ethanol emitted from the bread baking. The catalytic oxidizer's emissions are generated from combustion are (NO_x) and Carbon monoxide (CO). Other contaminants formed by natural gas combustion are nitrogen oxides, carbon monoxide, and particulate matter.

III. General Discussion

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under

state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has been operating this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM.

IV. Applicable Emission Standards

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The board has standards for sources of Volatile Organic Material (VOM). The application shows that the plant is in compliance with applicable state and federal emission standards.

The principal air contaminant of concern is volatile organic material (VOM) which is created by the bread baking facility. The facility has limited their throughput that will keep the VOM emissions below the major source threshold level of 100 tons per year for VOM.

V. Contents of the Permit

The permit that the Illinois EPA is proposing to issue would continue to identify the specific emission standards that apply to the emission units at the plant.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

The permit would also set limitations on requirements to assure that this facility will be operated as a non-major source. The permit sets limitations on bread baking facility emissions. These limitations are consistent with the historical operation and capacity of the facility.

The permit conditions would also continue to require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

VI. Request for Comments

It is the Illinois EPA's preliminary determination that the source has met the requirements for issuance of its permit. The Illinois EPA is therefore proposing to issue the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.