

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT  
NSPS SOURCE - RENEWAL

PERMITTEE

Cadbury Adams USA, LLC  
Attn: Anita Vaughan  
5500 Forest Hills Road  
Post Office Box 1205  
Rockford, Illinois 61105-1205

Application No.: 72110048  
Applicant's Designation: 1994SUBAC1  
Subject: Confectionary Equipment  
Date Issued: DRAFT  
Location: 5500 Forest Hills Road, Rockford

I.D. No.: 201808ACJ  
Date Received: April 24, 2001  
Expiration Date:

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

- 2 Boilers (E-2, E-3)
- 1 Sugar Mill (E-7)
- 18 Gum Mixing Kettles
- 5 Kettles at E-19 with Dust Collector
- 9 Kettles at E-21 with Optiflow Dust Collector
- 4 Kettles at E-9 with Dust Collector
- 2 Storage silos (E-11, E-12)
- 1 Sugar Conveying Hopper (E-13)
- 2 Sugar Pulverizers (E-14)
- 5 Gum Melters (E-15)
- 1 Blending Operation (E-15)
- 1 Dispensing Operation (E-15)
- 1 Rubber Resin Mixing Tank UK-15 (E-25)
- 1 Vistanex Operation (E-20)
- 4 Rolling & Scoring Operations (E-9, E-22, E-48)
- 1 Flavoring Vault general exhaust (E-36)
- 1 20,000 gallon #2 Fuel Oil Tank (E-34)
- 1 Sugar Hopper with Dust Collector (E-21)
- 1 Sandblasting Operation (E-40)
- 1 Welding Operation/With Swing Arm (E-39)
- 1 Welding Operation (E-30)
- 1 Grinding Room Exhaust with Dust Collector (E-38)
- 1 Citric Acid System (E-19)
- 5 Bubblicious Wrapping Operations (E-44, E-45, E-46, E-47, E-81)
- 1 Wrapped Salvage Recovery (E-49)
- 1 Raw Material Dump Stations (E-50)
- 1 Extruder Fume Exhaust (E-52)
- 2 Process Filter Receivers (E-53, E-54)
- 1 General Dust Collection Unit (E-55)
- 1 Trident Packaging Line (E-35)
- 1 Super Sack Handling System with Dust Collector (E-57)

- 1 Super Sack Handling Area with Central Vac System (E-58)
- 1 Trident Packaging Area with Vac System (E-59)
- 2 Rubber Conveyance Systems with Dust Collectors (E-60, E-61)
- 1 Material Conveyance System with Dust Collector (E-63)
- 1 Bag Dump Station with Dust Collector (E-64)
- 1 Dentyne Packaging Line with Dust Collector (E-32)
- 1 Co-Generation System (E-43A and B)
- 1 Pulverizing Conveyance Line with Baghouse (E-65)
- 5 Raw Material Storage Tanks (E-66, E-67, E-70, E-71 & E-72)
- 1 Sweetner Pellet Conveyance System (E-74)
- 1 Talc Feed Dump Station (E-75)
- 1 Granular Sweetner Feed System (E-76)
- 1 Citric Acid Feed System (E-77)
- 1 Salvage Feed System (E-78)
- 1 Sweetner Material Recovery with Dust Collectors (E-82)
- 1 Burst Gum Packaging with Dust Collector (E-83)
- 1 Tri-Bubb Area Talc/Mantinel Blending with Dust Collector (E-84)
- 8 Gum Coating Pans with Dust Collector (E-22)
- 2 Polishing Pans and Solution Prep with Dust Collector (E-33)
- 1 Pellet Gum Tumbling, Solution Prep and Coating Pan with Dust Collectors (E-86 and E-87)
- 1 Bag Dump Station with Dust Collector (E-88)
- 1 Coating Pan with Dust Collector (E-89)
- 2 Generators (E-90, E-91)
- 1 Chiller (E-92)
- 2 Dumoulin Coating Pans Controlled by Dust Collectors (E-93 and E-95)
- 1 Pellet Tumbler Controlled by Dust Collector (E-94)
- 1 Gum-Tray Dump-Station Controlled by Dust Collector (E-96)
- 1 Gum Processing House Vacuum (E-1)
- 1-Gum Processing Rolling & Scoring Operation w/Dust Collection (E-4)
- 1-Bum Processing Extrusion w/Dust Collection (E-5)
- 1-Extrusion Process Dust Collection System (E-55)
- 1-Sweetner Pellet Conveyor (E-73)
- 1-Maltitol Sifting Operation (E-97)
- 1-Dumolin Pellet coating Pan "A" (E-98)
- 1-Pellet Bum Tumbler "A" & Gum Tray Dump (E-99)
- 1-Pellet Bum Tumbler #3& Gum Tray Dump (E-100)
- 1-Pellet Bum Coating Pan #5 (E-101)
- 1-Atomite Dump Station (E-102)
- 1-Dumolin Pellet Coating Pan "B" (E-103)

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/year volatile organic material, 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs, 100 tons/year for PM<sub>10</sub>, 100 tons/year nitrogen oxides, and 100 tons/year carbon monoxide). 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.
  - c. This permit supersedes all operating permit(s) for this location.
- 2a. The gas turbine is subject to a New Source Performance Standard (NSPS) for Stationary Gas Turbines, 40 CFR 60, Subparts A and GG. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- b. The sulfur dioxide (SO<sub>2</sub>) emissions from the gas turbine shall not exceed the applicable standards of the NSPS, 40 CFR 60.332 and 60.333 respectively.
  - c. 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.
- 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 the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.
- b. Pursuant to 35 Ill. Adm. Code 212.206, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period to exceed 0.15 kg of particulate matter per MW-hour of actual heat input from any fuel combustion emission unit using liquid fuel exclusively (0.10 lbs/mmBtu).
  - c. 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 (that is, looking at the sky directly overhead) from a point beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301, except as exempted by 35 Ill. Adm. Code 212.314.
  - 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 rate specified in 35 Ill. Adm. Code 212.321(c).

- 4a. Pursuant to 35 Ill. Adm. Code 214.122(b)(2), no person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any new fuel combustion source with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hour), burning liquid fuel exclusively to exceed 0.46 kg of sulfur dioxide per MW-hour of actual heat input when distillate fuel oil is burned (0.3 lbs/mmBtu).
- b. 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.
5. Pursuant to 35 Ill. Adm. Code 216.121, no person shall 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.
- 6a. Pursuant to 35 Ill. Adm. Code 215.301, 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 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K: Use of Organic Material, shall apply only to photochemically reactive material.
- b. 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.
- 7a. All emission sources equipped with a pollution control device shall only be operated in conjunction with the operation of the associated air pollution control device(s).
- b. Natural gas shall be the only fuel fired in the gas turbine.
- c. At the above location, the Permittee shall not keep, store, or utilize in the boilers and generators at this source:
  - i. Distillate fuel oil (Grades No. 1 and 2) with a sulfur content greater than the larger of the following two values:
    - A. 0.28 weight percent, and
    - B. The Weight percent given by the formula: Maximum Weight percent sulfur =  $(0.000015) \times (\text{Gross heating value of oil, Btu/lbs})$ .

- ii. Organic liquid by-products or waste materials shall not be used in these fuel combustion emission sources without written approval from the Illinois EPA.
- iii. The Illinois EPA shall be allowed to sample all fuels stored at the above location.

8a. The total tons of finished product shall not exceed the following limits:

Gum Processing (Stick and Non-Stick)	160,000 tons/year
Candies/Other	<u>42,477 tons/year</u>
Total	202,477 tons/year

b. Emissions from production equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Particulate Matter</u>	
	<u>(Lbs/Hour)</u>	<u>(Tons/Year)</u>
Gum Processing	13.46	58.94
Candies/Other	1.65	7.22

These limits are based on 8,760 hours per year.

c. Aggregate Nitrogen Oxide (NO<sub>x</sub>) emissions from the co-generation system, the boilers, and reciprocating engines shall not exceed 94 tons per 12 month running total. Aggregate emissions shall be calculated monthly using a 12 month running total to verify the 94 ton limit.

The monthly NO<sub>x</sub> compliance calculation using a 12 month running total shall use the following:

$$\text{Total Ton, NO}_x = \text{Co-Gen Ton, NO}_x + \text{Boiler Ton, NO}_x + \text{Reciprocating Engine Ton, NO}_x$$

$$\text{Co - Gen Ton, NO}_x = \text{Therms} \times \frac{1.845 \times 10^{-5} \text{ Ton} - \text{NO}_x}{\text{Therm}}$$

This is based on the maximum rate of NO<sub>x</sub> emission of 23.3 lbs/hour at 100% turbine loading, and natural gas usage at 100% turbine loading of 61,760 scfm.

$$\text{Boiler Ton, NO}_x = \text{Ton, NO}_x \text{ (Gas)} + \text{Ton, NO}_x \text{ (Oil)}$$

$$\text{Ton, NO}_x \text{ (Gas)} = \frac{\sum_{m=1}^{12} \left( \text{MMCF} * 100 \frac{\text{lb} - \text{NO}_x}{\text{MMCF}} \right)}{2000 \text{ lb / ton}}$$

$$\text{Ton, NO}_x \text{ (Oil)} = \frac{\sum_{12}^{m=1} \left( B_m * 5.0 \frac{\text{lb} - \text{NO}_x}{\text{Hr}} \right)}{2000 \text{ lb / ton}}$$

$B_m$  = Total Boiler Operating Hours in Month  $m$ , for all boilers when fuel oil fired.

Reciprocating Engine Ton,  $\text{NO}_x$  = Ton,  $\text{NO}_x$  (Generator E-90)  
 + Ton,  $\text{NO}_x$  (Generator E-91) + Ton,  $\text{NO}_x$  (Chiller E-92)

$$\text{Ton, NO}_x \text{ (Generator E - 90)} = \sum_{12}^{m=1} (1.66 \text{ lb / hr}) \times \text{Hours} / (2,000 \text{ lb / ton})$$

$$\text{Ton, NO}_x \text{ (Generator E - 91)} = \sum_{12}^{m=1} 7.96 \text{ lb / hr} \times \text{Hours} / (2,000 \text{ lb / ton})$$

$$\text{Ton, NO}_x \text{ (Chiller E - 92)} = \sum_{12}^{m=1} 11.79 \text{ lb / hr} \times \text{Hours} / (2,000 \text{ lb / ton})$$

- d. A custom schedule for monitoring sulfur content of the fuel is allowed in accordance with 40 CFR 60.334(b)(2). The Permittee shall record the sulfur contents of the fuel on at least a monthly basis. This may be based on the analysis by the fuel supplier. The Permittee shall receive any changes in the sulfur content from the suppliers, noting the date of any change.
- e. Aggregate carbon monoxide emissions from the co-generation system, the boilers and reciprocating engines shall not exceed 89 tons (178,000 lbs) per 12 month running total. Aggregate emissions shall be calculated monthly using a 12 month running total to verify the 89 ton limit.

$$\text{CO} = \sum_{12}^{m=1} (H_{1m} * E_1) + \sum_{12}^{m=1} (H_{2m} * E_2) + \sum_{12}^{m=1} (B_m * E_3) + \sum_{12}^{m=1} (B_{mo} * E_4) +$$

$$\sum_{12}^{m=1} (R_m * E_5) + \sum_{12}^{m=1} (G_{1m} * E_6) + \sum_{12}^{m=1} (G_{2m} * E_7)$$

CO = CO emission in pounds for last 12 months

$m$  = Month

$H_{1m}$  = Co-Generation System Hours of operation in month  $m$  between 0% and 30% loading

- H<sub>2m</sub> = Co-Generation System Hours of operation in month m greater than 30% loading
- E<sub>1</sub> = Co-Generation System 28.3 pounds CO emission per hour between 0% and 30% loading
- E<sub>2</sub> = Co-Generation System 8.2 pounds CO emission per hour greater than 30% loading
- E<sub>3</sub> = 84 pounds CO per mcf natural gas used in boilers
- E<sub>4</sub> = 1.25 pounds CO emission per hour per boiler for all firing rates of fuel oil
- B<sub>m</sub> = MMCF of natural gas used by all boilers in month m
- B<sub>mo</sub> = Sum of hours of fuel oil operation in month m for all boilers
- R<sub>m</sub> = Hours/month for Chiller in month m
- E<sub>5</sub> = 1.29 lbs/hour CO for Chiller
- G<sub>1m</sub> = Hours/month for Generator E-90 in month m
- E<sub>6</sub> = 0.58 lbs/hour CO for Generator E-90
- G<sub>2m</sub> = Hours/month for Generator E-91 in month m
- E<sub>7</sub> = 2.77 lbs/hour CO for Generator E-91

- f. The actual annual aggregate emissions of particulate matter from permitted sources shall be less than 80.69 tons per year consistent with Plant Emission Summary Table presented as an attachment to this permit. It should be noted that 14.52 tons/year of the 80.69 tons/year are from particulate emissions from non-production sources.
- g. Emissions and operation of the gas turbine shall not exceed the following:
  - i. Emissions of nitrogen oxides from the gas turbine, shall not exceed 0.37 lbs/mmBtu.
  - ii. Annual consumption of natural gas in million cubic feet (MMCF) for the gas turbine shall not exceed 450.4 MMCF.
  - iii. The co-generation system shall not operate at 30% or less of full load for more than 504 hours per year.
  - iv. Total emissions of particulate matter (PM), carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>) and volatile organic material (VOM) from the

gas turbine shall not exceed the following limits (as limited in Construction Permit 94060073):

<u>% of Full Load</u>	<u>CO Emissions</u>		<u>VOM Emissions</u>	
	<u>(Lbs/Hr)</u>	<u>(Tons/Yr)</u>	<u>(Lbs/Hr)</u>	<u>(Tons/Yr)</u>
30% and Less	28.30	7.14	5.70	1.44
Greater Than 30%	8.20	<u>N/A</u>	1.40	<u>N/A</u>
Annual Total		41.00		7.22

<u>PM Emissions</u>		<u>NO<sub>x</sub> Emissions</u>	
<u>(Lbs/Hr)</u>	<u>(Tons/Yr)</u>	<u>(Lbs/Hr)</u>	<u>(Tons/Yr)</u>
2.14	9.37	24.00	85.54

The CO and NO<sub>x</sub> emission limits for the gas turbine are based on performance testing. Other emission limits are based on the standard emission factors for firing natural gas and the annual consumption rate. Annual limits are based on continuous operation (8,760 hour/year). These limits are necessary for PSD avoidance.

- h. Emissions and operation of the gum base extrusion process with dust collector (E-55) shall not exceed the following limits(as limited in Construction Permit 05100040):

<u>Process Rate</u>		<u>Particulate Matter Emissions</u>	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
1,880	22,557	0.38	4.5

These limits are based on a fly loss of 2% and a dust collector efficiency of 99%.

- i. Emissions and operation of new and existing gum coating equipment shall not exceed the following limits (as limited in Construction Permit 04090016):

<u>Item of Equipment</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Gum Coating Operations (E-22, E-33, E-87, E-89, E-93, E-95, E-98, E-101, E-103)	12.6	125.4	1.89	18.81

These limits are based on 85% of the VOM used is retained in the gum and maximum VOM usage at 8,760 hours per year.

- j. Emissions and operation of the following equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lbs/Month)</u>	<u>(Tons/Year)</u>	<u>(Lbs/Month)</u>	<u>(Tons/Year)</u>
Gum Coating Operations	2,537	15.22	2,537	15.22
Gum Mixing Operations	5,734	34.40	5,734	34.40

These limits are based on material balance at 8,760 hours per year.

- k. This Permit is issued based on negligible emissions of particulate matter from the sources as listed in following table. For this purpose, emissions shall not exceed nominal emission rates in accordance with the following table:

<u>Emission Unit(s) I.D</u>	<u>Source Description</u>	<u>PM Emission Limit</u>	
		<u>(Lbs/hour)</u>	<u>(Tons/year)</u>
E-30	Welding Station	0.1	0.44
E-36	Flavor Vault	0.1	0.44
E-38	Grinding/Sanding Operation	0.1	0.44
E-40	Sandblaster	0.1	0.44
E-49	Wrapped Salvage Machine	0.001	0.0044
E-56	Central Houskeeping Vacuum	0.001	0.0044
E-73	Sweetner Pellet Conveyor	0.001	0.0044
E-74	Sweetner Pellet Conveyance	0.001	0.0044
E-75	Talc Feed Dump Station	0.001	0.0044
E-76	Granular Sweetner Feed System	0.001	0.0044
E-77	Citric Acid Feed System	0.001	0.0044
E-78	Salvage Feed System	0.001	0.0044
E-79	Primary Sweetner Vacuum System	0.001	0.0044
E-80	Secondary Sweetner Vacuum System	0.001	0.0044
E-82	Sweetner Material Recovery	0.0005	0.0022
E-84	Tri-Bubb Blending	0.002	0.0088
E-86	Solution Prep & Coating Pan	0.0008	0.0035
E-87	Solution Prep 7 Coating Pan	0.0008	0.0035
E-89	Coating Pan #2	0.0004	0.002
E-97	Maltitol Sifting Operating	0.01	0.044
E-98	Dumolin Pellet Coating Pan #A	0.01	0.044
E-99	Pellet Bum Tumbler "A" & Tray Dump	0.01	0.044
E-100	Pellet bum Tumbler #3 & Tray Dump	0.01	0.044
E-101	Pellet Gum Coating Pan #5	0.01	0.044
E-102	Atomite Dump Station	0.001	0.0044
E-103	Dumolin Pellet Coating Pan "B"	0.001	0.0044

- l. This permit is issued based on negligible emissions of volatile organic material from the 5 raw material storage tanks (E-66, E-67, E-70, E-71, and E-72). For this purpose emissions from each emission source shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 ton/year.
- m. This Permit is issued based on negligible emissions of volatile organic material from the 20,000 gallon #2 fuel oil storage tank. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 tons/year.

- n. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- o. 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).
- 9a. Pursuant to 35 Ill. Adm. Code 212.107, 212.109, and 212.110, testing for particulate matter emissions shall be performed as follows:
  - i. 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, incorporated by reference in 35 Ill. Adm. Code 212.113, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. This Condition shall not apply to 35 Ill. Adm. Code 212.301, pursuant to 35 Ill. Adm. Code 212.107.
  - ii. 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, incorporated by reference in 35 Ill. Adm. Code 212.113, 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, pursuant to 35 Ill. Adm. Code 212.109.
  - iii. 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, pursuant to 35 Ill. Adm. Code 212.110(a).
  - iv. 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, pursuant to 35 Ill. Adm. Code 212.110(b).
  - v. 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, pursuant to 35 Ill. Adm. Code 212.110(c).

- b. Testing required by Condition 9(a) shall be performed by a qualified independent testing service.
- 10a. 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.
- b. The Permittee shall fulfill applicable notification and recordkeeping requirements pursuant to 40 CFR 60.7, 60.334 and 60.335.
  - c. 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.

- d. The Permittee shall maintain records of the following items, and such other items as may be appropriate to allow the Illinois EPA to review compliance with the requirements in this permit:
  - i. Fuel type and quality (date(s) of change(s));
  - ii. Co-Gen Fuel consumption (mcf/month);
  - iii. Monthly gas turbine operating hours (hours/month) for each % load range;
  - iv. Monthly boiler operating hours for fuel oil (hours/month);
  - v. Boiler natural gas fuel consumption (mmcf/month);
  - vi. Finished Product (tons/month), as listed in Condition 3(a);
  - vii. VOM material usage and emissions (tons/month and tons/year); and
  - viii. Monthly and annual emissions of CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM and HAPS with supporting calculations (tons/month and tons/year).
- e. 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.
- 11a. 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.
- b. 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 exceedances or deviation and efforts to reduce emissions and future occurrences.

12. 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  
5415 North University  
Peoria, Illinois 61614

It should be noted that, this permit has been revised so as to include operation of the equipment described in Construction Permits 03030073, 03060004, 03080022, 03120046, 04090016, 05100040, and 06050107.

If you have any questions on this permit, please call Ernie Kierbach at 217/782-2113.

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

ECB:ELK:psj

Attachments

cc: Illinois EPA, FOS Region 2  
Lotus Notes

Attachment A

This attachment provides a summary of the maximum emissions from the 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 well below the levels (i.e., 100 tons/year volatile organic material, 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs, 100 tons/year for PM<sub>10</sub>, 100 tons/year nitrogen oxides, and 100 tons/year carbon monoxide) 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)						<u>Total HAPs</u>
	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>VOM</u>	<u>Single HAP</u>	
Source-Wide Total	89.1	94.1	80.7	25.0	60.0	< 10	< 25

ELK:cjc