

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
Cadbury Adams USA, LLC for Renewal of the  
Federally Enforceable State Operating Permit (FESOP) for  
Cadbury Adams USA, LLC  
Rockford, Illinois

Site Identification No.: 201808ACJ  
Application No.: 72110048

Schedule

Public Comment Period Begins: March 12, 2007

Public Comment Period Closes: April 11, 2007

Illinois EPA Contacts

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## **I. INTRODUCTION**

Cadbury Adams USA, LLC has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its gum manufacturing plant located at 5500 Forest Hills Road in Rockford. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the renewed permit that it would propose to issue for the plant. However, before renewing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

## **II. SOURCE DESCRIPTION**

Cadbury Adams USA manufactures gum and other confectionaries. The emission units at this plant that require an operating permit include:

- 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 (E66, 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/Mantitol 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)

These units are sources of emissions because the flavors and glaze contain organic solvents, which are emitted to the atmosphere during the panning process as volatile organic material (VOM).

### **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, particulate matter less than 10 microns in diameter (PM<sub>10</sub>), carbon monoxide (CO), and nitrogen oxides (NO<sub>x</sub>); 10 tons for an individual HAP and 25 tons for combined HAPs.

#### **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 gas turbine at this plant is subject to a federal New Source Performance Standard (NSPS), which sets emission limits on sulfur dioxide (SO<sub>2</sub>) from this unit. The application shows that the plant is in compliance with applicable state and federal emission standards.

#### **V. CONTENTS OF THE PERMIT**

The renewed 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. As explained, the gas turbine is subject to 40 CFR 60 Subpart GG (the NSPS for Gas Turbines), which specifies an emission limit for SO<sub>2</sub> emissions and monitoring for the sulfur content of the fuel. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

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, PM<sub>10</sub>, CO, and NO<sub>x</sub>; 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 the amount of gum processed and the amount of fuel combusted in the gas turbine, the boilers, and the co-generation system. These limitations are consistent with the historical operation of emission units at the plant.

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 renewal of its permit. The Illinois EPA is therefore proposing to renew 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.