

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
Ferrara Pan Candy Company for a Construction Permit and to Incorporate the  
changes into the Federally Enforceable State Operating Permit (FESOP) for  
7301 West Harrison Street  
Forrest Park, Illinois 30160

Site Identification No.: 031090AAY  
Application No.: 08030048

Illinois EPA Contacts

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## **I. INTRODUCTION**

Ferrara Pan Candy Company currently operates under a federally enforceable state operating permit (FESOP). The company requested a construction permit and a FESOP modification to continue to operate as a non-major source for the purposes of the Clean Air Act Permit Program (CAAPP). Production and emission limitations, as well as monitoring and recordkeeping conditions contained in the FESOP have prevented the facility from being a major source and will assure this status in the future. These conditions would be enforceable by both the State of Illinois and USEPA.

## **II. SOURCE DESCRIPTION**

Ferrara Pan Candy Company operates candy manufacturing facility located at 7301 Harrison Street, Forrest Park. The equipment at the facility that requires air pollution control permits includes panning operations, printing, and starch molding, bagged sugar, and bulk sugar processing.

The purpose of the Construction Permit and FESOP revision request is to obtain approval for an increase in flavor usage from candy panning and starch mogul operations and an increase in bulk sugar throughput at the facility. To maintain emissions below major source threshold levels, Ferrara Pan is also proposing to decrease permitted throughput limits and emissions from other regulated emission units at the facility.

The main sources of emissions at this facility result from the panning and printing operations. These emissions primarily consist of volatile organic materials (VOM). The facility has limited their material usage such that it will keep these emissions below major source threshold levels of 100 tons per year for VOM, 10 tons per year for each individual HAP and 25 tons per year for combined HAPs. Additionally, the facility will limit particulate matter (PM) emissions from the starch molding, bagged sugar, and bulk sugar processing. These emissions primarily consist of PM. The facility has limited their material throughput such that it will keep these emissions below major source threshold levels of 100 tons per year of particulate matter less than 10 microns in diameter (PM<sub>10</sub>). All other air emissions are well below the 100 tons per year major source threshold levels.

## **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 not 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, 100 tons for particulate matter less than 10 microns in diameter, 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 application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards.

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

The permits 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 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, 10 tons for an individual HAP and 25 tons for combined HAPs. 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.

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