

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Tootsie Roll Industries for a Revised
Federally Enforceable State Operating Permit (FESOP) for
7401 South Cicero Avenue
Chicago, Illinois

Site Identification No.: 031600EKR
Application No.: 74010025

Schedule

Public Comment Period Begins: November 27, 2009

Public Comment Period Closes: December 27, 2009

Illinois EPA Contacts

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I. INTRODUCTION

Tootsie Roll Industries, Inc. has applied for a revision to their Federally Enforceable State Operating Permit (FESOP) for its Chicago, Illinois location. 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 revising 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

Tootsie Roll Industries, Inc. manufactures candy. The revision covers five existing No. 2 fuel oil fired generators, and two No. 2 fuel oil storage tanks. These units are sources of emissions because of fuel combustion mainly of natural gas. These emissions include Nitrogen Oxides, Carbon Monoxide, Sulfur Dioxide, and Volatile Organic Material.

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 will continue to be 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 will continue the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for NO_x, PM, CO, VOM and SO₂.

IV. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. The standards include 35 Ill. Adm. Code 218.310 which restrict discharge of organic material in the atmosphere, and 35 Ill. Adm. Code 212.123(a) which restrict the emission of smoke or other particulate matter in the atmosphere. These emission standards represent the basic requirements for sources in Illinois. The Board limits smoke/opacity, visible emissions, NO_x, PM, CO, SO₂, and VOM. The application

shows that the plant is in compliance with applicable state emission standards.

V. CONTENTS OF THE PERMIT

The permit that the Illinois EPA is proposing to issue will 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 PM, VOM NO_x, and CO.

The permit conditions would also 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 this 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.