

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

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

Schedule

Public Comment Period Begins: March 24, 2007

Public Comment Period Closes: April 23, 2007

Illinois EPA Contacts

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## **I. INTRODUCTION**

Tootsie Roll Industries, Inc. has applied for a Federally Enforceable State Operating Permit (FESOP) for its Candy Manufacturing plant located at 7401 S. Cicero Avenue, in Chicago. 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 permit that it would propose to issue for the plant. However, before issuing 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 manufactures candy. The emission units at this plant that require an operating permit include:

- 3-25 mmBtu/hr boilers,
- 2-400 HP (19.5 mmbtu/hr) boilers,
- 2-500 HP (21 mmbtu/hr) boilers,
- 3-Warehouse Air Rotation units (3 mmBtu/hr each),
- 1-Mixing Kettle Operation,
- 1-Remelt Operation,
- 1-Flavor Addition Operation, and
- 2 - Starch Gumdrop Deposition Operations w/Integrated Dust Collectors and Baghouse Filters

These units are sources of emissions because the flavorings contain organic solvents, which are emitted to the atmosphere during the panning process as volatile organic material (VOM). These materials also contain components that are considered Hazardous Air Pollutants (HAPs).

## **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, 10 tons for an individual HAP and 25 tons for combined HAPs. The potential emissions of other pollutants (e.g., nitrogen oxides, carbon monoxide, sulfur dioxide, etc.) from the plant are small enough that no restrictions are needed to avoid being a major source of these pollutants.

#### **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 emission standards.

#### **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 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. (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 production of candy and chocolate, miscellaneous flavorings, and mould starch used at this plant. 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 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.