

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Keebler Company for
Federally Enforceable State Operating Permit (FESOP) for
Candy Production Plant
Chicago, Illinois

Site Identification No.: 031600CAC
Application No.: 07080078

Schedule

Public Comment Period Begins: March 15, 2012
Public Comment Period Closes: April 14, 2012

Illinois EPA Contacts

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I. INTRODUCTION

An application has been voluntarily submitted by the Keebler Company for their Candy Production Plant facility in order to voluntarily incorporate federally enforceable limits. These limits would prevent the above facility from being a major source of emissions so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. The proposed limits would be accompanied by recordkeeping requirements to assure that the plant is operated as a non-major source. Unlike the site's current operating permit(s), these conditions would be enforceable by both the State of Illinois and USEPA.

II. SOURCE DESCRIPTION

Keebler Company located at 2945 West 31st Street, Chicago manufactures fruit snacks and fruit rolls. Raw materials include sugar which is stored in a sugar silo and moved via a delivery hopper to the bin and bag dump. The facility

Two (2) Fruit Roll Lines (Lines 1 and 2);
Sugar pneumatic Conveying System;
Equipment and Working Areas Cleaning Operations;
Equipment and Working Areas Sanitizing Operations;
Sugar Bin Controlled by a Baghouse;
Sugar Bag Dump Controlled by a Baghouse;
Makat Mogul Controlled by a Baghouse;
Makat Dryer Controlled by a Baghouse;
Makat Cooler Controlled by a Filter;
NID1 Mogul Controlled by a Filter;
NID1 Dryer with Cooler Controlled by a Baghouse;
NID2 Mogul and Dryer with Cooler Controlled by Baghouse;
Unloading Hopper Controlled by a Dust Collector;
Sugar Storage Silo Controlled by a Dust Collector;
Delivery Hopper Controlled by a Dust Collector;
Two (2) Natural Gas Fired Boilers (22.5 & 24.5 mmBtu/hr)

The emissions from candy production activities emitted to the atmosphere during the production process are classified as volatile organic material (VOM). Also 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.

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 Illinois Pollution Control Board has specific standards for units emitting volatile organic material (VOM) in the Greater Chicago Area. These regulations limit the amount of VOM emitted from the production process. This source has emission limits in its permit that keep the amount of hazardous air pollutants below major levels therefore the NESHAP regulations do not apply. The application shows that the plant is in compliance with applicable state and federal emission standards.

The principal air contaminant of concern is volatile organic material (VOM) which is created by the Candy Production. The facility has limited their throughput that will keep the VOM emissions below the major source threshold level of 100 tons per year for VOM.

Other emissions of hazardous air pollutants (HAP) are also emitted; however, their levels are also depended on the amount of VOM and will remain below the major source threshold level of 10 ton per year for single HAP and 25 ton per year for combined total HAPs.

V. CONTENTS OF THE PERMIT

This 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 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 tons major source threshold.)

The permit sets limitations on candy production emissions. These limitations are consistent with the historical operation and capacity of the facility.

The permit conditions 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 issuance of 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.