217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT
NSPS SOURCE - REVISED

PERMITTEE

Cadbury Adams USA, LLC
Attn: Robin Sullivan
5500 Forest Hills Road
Post Office Box 1205
Rockford, Illinois 61105-1205

Application No.: 72110048
I.D. No.: 201808ACJ
Applicant's Designation: ELGIN1
Date Received: October 1, 2007
Subject: Confectionary Equipment
Date Issued: March 13, 2008
Expiration Date: May 15, 2012
Location: 5500 Forest Hills Road, Rockford, Winnebago County

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of:

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 Pre-Grind Rubber/Talc Conveying with Dust Collector (E-47)
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)
2 Bag Dump Stations with Dust Collector (E-64, E-68)
1 Dical/Talc Conveying with Dust Collector (E-69)
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/Mantinol 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-Gum 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)

pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year volatile organic material, 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs, 100 tons/year for PM_{10}, 100

tons/year nitrogen oxides, and 100 tons/year carbon monoxide). As a result, the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.

b. Prior to initial issuance, a draft of this permit has undergone a public notice and comment period.

c. This permit supersedes all operating permit(s) for this location.

2a. The gas turbine is subject to a New Source Performance Standard (NSPS) for Stationary Gas Turbines, 40 CFR 60, Subparts A and GG. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

b. The sulfur dioxide (SO_2) emissions from the gas turbine shall not exceed the applicable standards of the NSPS, 40 CFR 60.332 and 60.333 respectively.

c. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

3a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

b. Pursuant to 35 Ill. Adm. Code 212.206, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period to exceed 0.15 kg of particulate matter per MW-hour of actual heat input from any fuel combustion emission unit using liquid fuel exclusively (0.10 lbs/mmBtu).

c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.

d. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the

wind speed is greater than 40.2 km/hour (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.

e. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rate specified in 35 Ill. Adm. Code 212.321(c).

4a. Pursuant to 35 Ill. Adm. Code 214.122(b)(2), no person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any new fuel combustion source with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hour), burning liquid fuel exclusively to exceed 0.46 kg of sulfur dioxide per MW-hour of actual heat input when distillate fuel oil is burned (0.3 lbs/mmBtu).

b. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm.

5. Pursuant to 35 Ill. Adm. Code 216.121, no person shall allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hour) to exceed 200 ppm, corrected to 50 percent excess air.

6. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K: Use of Organic Material, shall apply only to photochemically reactive material.

7a. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.

b. All emission sources equipped with a pollution control device shall only be operated in conjunction with the operation of the associated air pollution control device(s).

c. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the dust

collectors covered under this permit such that the dust collectors be kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.

c. Natural gas shall be the only fuel fired in the gas turbine.

d. At the above location, the Permittee shall not keep, store, or utilize in the boilers and generators at this source:

i. Distillate fuel oil (Grades No. 1 and 2) with a sulfur content greater than the larger of the following two values:

A. 0.28 weight percent, and

B. The Weight percent given by the formula: Maximum Weight percent sulfur = (0.000015) x (Gross heating value of oil, Btu/lbs).

ii. Organic liquid by-products or waste materials shall not be used in these fuel combustion emission sources without written approval from the Illinois EPA.

iii. The Illinois EPA shall be allowed to sample all fuels stored at the above location.

8a. The total tons of finished product shall not exceed the following limits:

Gum Processing (Stick and Non-Stick)		160,000 tons/year
Candies/Other		42,477 tons/year
	Total	202,477 tons/year

b. Emissions from production equipment shall not exceed the following limits:

Item of Equipment	Particulate Matter (lbs/Hour)	Particulate Matter (Tons/Year)
Gum Processing	13.46	58.94
Candies/Other	1.65	7.22

These limits are based on 8,760 hours per year.

c. Aggregate Nitrogen Oxide (NO_x) emissions from the co-generation system, the boilers, and reciprocating engines shall not exceed 94.0 tons per 12 month running total. Aggregate emissions shall be calculated monthly using a 12 month running total to verify the 94.0 ton limit.

The monthly NO_x compliance calculation using a 12 month running total shall use the following:

$$\text{Total Ton, } NO_x = \text{Co-Gen Ton, } NO_x + \text{Boiler Ton, } NO_x + \text{Reciprocating Engine Ton, } NO_x$$

$$\text{Co} - \text{Gen Ton, } NO_X = \text{Therms x } \frac{1.845 \text{ x } 10^{-5} \text{ Ton} - NO_X}{\text{Therm}}$$

This is based on the maximum rate of NO_x emission of 23.3 lbs/hour at 100% turbine loading, and natural gas usage at 100% turbine loading of 61,760 scfm.

$$\text{Boiler Ton, } NO_X = \text{Ton, } NO_X \text{ (Gas)} + \text{Ton, } NO_X \text{ (Oil)}$$

$$\text{Ton, } NO_x \text{ (Gas)} = \frac{\sum_{12}^{m=1} \left(\text{MMCF} * 100 \frac{\text{lb} - NO_x}{\text{MMCF}} \right)}{2000 \text{ lb / ton}}$$

$$\text{Ton, } NO_x \text{ (Oil)} = \frac{\sum_{12}^{m=1} \left(B_m * 5.0 \frac{\text{lb} - NO_x}{\text{Hr}} \right)}{2000 \text{ lb / ton}}$$

B_m = Total Boiler Operating Hours in Month m, for all boilers when fuel oil fired.

$$\text{Reciprocating Engine Ton, } NO_x = \text{Ton, } NO_x \text{ (Generator E-90)} + \text{Ton, } NO_x \text{ (Generator E-91)} + \text{Ton, } NO_x \text{ (Chiller E-92)}$$

$$\text{Ton, } NO_X \text{ (Generator E} - 90) = \sum_{12}^{m=1} (1.66 \text{ lb / hr}) \text{ x Hours} / (2{,}000 \text{ lb / ton})$$

$$\text{Ton, } NO_X \text{ (Generator E} - 91) = \sum_{12}^{m=1} 7.96 \text{ lb / hr x Hours} / (2{,}000 \text{ lb / ton})$$

$$\text{Ton, } NO_X \text{ (Chiller E} - 92) = \sum_{12}^{m=1} 11.79 \text{ lb / hr x Hours} / (2{,}000 \text{ lb / ton})$$

d. A custom schedule for monitoring sulfur content of the fuel is allowed in accordance with 40 CFR 60.334(b)(2). The Permittee shall record the sulfur contents of the fuel on at least a monthly basis. This may be based on the analysis by the fuel supplier. The Permittee shall receive any changes in the sulfur content from the suppliers, noting the date of any change.

e. Aggregate carbon monoxide emissions from the co-generation system, the boilers and reciprocating engines shall not exceed 89.0 tons (178,000 lbs) per 12 month running total. Aggregate emissions shall be

calculated monthly using a 12 month running total to verify the 89.0 ton limit.

$$CO = \sum_{12}^{m=1}\left(H_{1_m} * E_1\right) + \sum_{12}^{m=1}\left(H_{2_m} * E_2\right) + \sum_{12}^{m=1}\left(B_m * E_3\right) + \sum_{12}^{m=1}\left(B_{mo} * E_4\right) +$$

$$\sum_{12}^{m=1}\left(R_m * E_5\right) + \sum_{12}^{m=1}\left(G_{1_m} * E_6\right) + \sum_{12}^{m=1}\left(G_{2_m} * E_7\right)$$

CO	=	CO emission in pounds for last 12 months
m	=	Month
H_{1m}	=	Co-Generation System Hours of operation in month m between 0% and 30% loading
H_{2m}	=	Co-Generation System Hours of operation in month m greater than 30% loading
E_1	=	Co-Generation System 28.3 pounds CO emission per hour between 0% and 30% loading
E_2	=	Co-Generation System 8.2 pounds CO emission per hour greater than 30% loading
E_3	=	84 pounds CO per mmcf natural gas used in boilers
E_4	=	1.25 pounds CO emission per hour per boiler for all firing rates of fuel oil
B_m	=	MMCF of natural gas used by all boilers in month m
B_{mo}	=	Sum of hours of fuel oil operation in month m for all boilers
R_m	=	Hours/month for Chiller in month m
E_5	=	1.29 lbs/hour CO for Chiller
G_{1m}	=	Hours/month for Generator E-90 in month m
E_6	=	0.58 lbs/hour CO for Generator E-90
G_{2m}	=	Hours/month for Generator E-91 in month m
E_7	=	2.77 lbs/hour CO for Generator E-91

f. The actual annual aggregate emissions of particulate matter from non-production sources shall not exceed 14.52 tons/year.

g. Emissions and operation of the gas turbine shall not exceed the following:

i. Emissions of nitrogen oxides from the gas turbine, shall not exceed 0.37 lbs/mmBtu.

ii. Annual consumption of natural gas in million cubic feet (MMCF) for the gas turbine shall not exceed 450.4 MMCF.

iii. The co-generation system shall not operate at 30% or less of full load for more than 504 hours per year.

iv. Total emissions of particulate matter (PM), carbon monoxide (CO), nitrogen oxides (NO_x) and volatile organic material (VOM) from the gas turbine shall not exceed the following limits (as limited in Construction Permit 94060073):

	CO Emissions		VOM Emissions	
% of Full Load	(Lbs/Hr)	(Tons/Yr)	(Lbs/Hr)	(Tons/Yr)
30% and Less	28.30	7.14	5.70	1.44
Greater Than 30%	8.20	N/A	1.40	N/A
Annual Total		41.00		7.22

PM Emissions		NO_x Emissions	
(Lbs/Hr)	(Tons/Yr)	(Lbs/Hr)	(Tons/Yr)
2.14	9.37	24.00	85.54

The CO and NO_x emission limits for the gas turbine are based on performance testing. Other emission limits are based on the standard emission factors for firing natural gas and the annual consumption rate. Annual limits are based on continuous operation (8,760 hour/year). These limits are necessary for PSD avoidance.

h. Emissions and operation of the gum base extrusion process with dust collector (E-55) shall not exceed the following limits:

Process Rate		PM Emissions		PM_{10} Emissions	
(Tons/Mo)	(Tons/Yr)	(Tons/Mo)	(Tons/Yr)	(Tons/Mo)	(Tons/Yr)
3,008	30,080	2.15	21.50	1.18	11.83

These limits are based on the allowable emission rate of 4.91 lb/hour pursuant to 35 Ill. Adm. Code 212.321, determined from the maximum throughput of 6,867 lb/hour at 8,760 hours/year of operation. The PM_{10} emission rate is based on 55% of the total PM emitted is PM_{10}. The above limitations were established in Permit 07100002, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the

aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.

i. Emissions and operation of gum coating equipment shall not exceed the following limits:

Item of Equipment	VOM Usage (Tons/Month)	VOM Usage (Tons/Year)	VOM Emissions (Tons/Month)	VOM Emissions (Tons/Year)
Gum Coating Operations (E-22, E-33, E-87, E-89, E-93, E-95, E-98, E-101, E-103)	3.47	34.7	0.50	5.01

These limits are based on 85% of the VOM used is retained in the gum and maximum VOM usage at 8,760 hours per year. The above limitations were established in Permit 07100002, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.

j. Emissions and operation of the following equipment shall not exceed the following limits:

Item of Equipment	VOM Usage (Tons/Month)	VOM Usage (Tons/Year)	VOM Emissions (Tons/Month)	VOM Emissions (Tons/Year)
Gum Mixing Operations	45.53	455.30	6.81	68.13

These limits are based on 85% of the VOM used is retained in the gum and maximum VOM usage at 8,760 hours per year. The above limitations were established in Permit 07100002, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.

k. Emissions of particulate matter from the following equipment shall not exceed the following limits:

Emission Unit(s) I.D	Source Description	PM, PM_{10} Emissions (lbs/hour)	PM, PM_{10} Emissions (Tons/year)
E-30	Welding Station	0.1	0.44
E-36	Flavor Vault	0.1	0.44
E-38	Grinding/Sanding Operation	0.1	0.44

E-40	Sandblaster	0.1	0.44
E-47	Pre-Grind Rubber/Talc Conveying	0.02	0.088
E-49	Wrapped Salvage Machine	0.001	0.0044
E-56	Central Housekeeping Vacuum	0.001	0.0044
E-60	Finish Grinder Rubber Conveying	0.01	0.044
E-61	Rubber Conveying	0.01	0.044
E-63	Ground Limestone Conveying	0.1	0.44
E-64	Manual Bag Dump 1	0.001	0.0044
E-68	Manual Bag Dump 2	0.001	0.0044
E-69	Dical/Talc Conveying	0.05	0.22
E-73	Sweetener Pellet Conveyor	0.001	0.0044
E-74	Sweetner Pellet Conveyance	0.001	0.0044
E-75	Talc Feed Dump Station	0.001	0.0044
E-76	Granular Sweetner Feed System	0.001	0.0044
E-77	Citric Acid Feed System	0.001	0.0044
E-78	Salvage Feed System	0.001	0.0044
E-79	Primary Sweetner Vacuum System	0.001	0.0044
E-80	Secondary Sweetner Vacuum System	0.001	0.0044
E-82	Sweetner Material Recovery	0.0005	0.0022
E-84	Tri-Bubb Blending	0.002	0.0088
E-86	Solution Prep & Coating Pan	0.0008	0.0035

Emission Unit(s) I.D	Source Description	PM, PM_{10} (lbs/hour)	Emissions (Tons/year)
E-87	Solution Prep 7 Coating Pan	0.0008	0.0035
E-89	Coating Pan #2	0.0004	0.002
E-97	Maltitol Sifting Operating	0.01	0.044
E-98	Dumolin Pellet Coating Pan #A	0.01	0.044
E-99	Pellet Gum Tumbler “A” & Tray Dump	0.01	0.044
E-100	Pellet Gum Tumbler #3 & Tray Dump	0.01	0.044
E-101	Pellet Gum Coating Pan #5	0.01	0.044
E-102	Atomite Dump Station	0.001	0.0044
E-103	Dumolin Pellet Coating Pan “B”	0.001	0.0044
		Total	2.8976

These limits are based on negligible nominal emission rates of PM and PM_{10}. The above limitations for E-47, E-60, E-61, E-63, E-64, E-68, and E-69 were established in Permit 07100002, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.

l. This permit is issued based on negligible emissions of volatile organic material from the 5 raw material storage tanks (E-66, E-67, E-70, E-71, and E-72). For this purpose emissions from each emission source shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 ton/year.

m. This Permit is issued based on negligible emissions of volatile organic material from the 20,000 gallon #2 fuel oil storage tank. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 tons/year.

n. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from the source shall not exceed 0.79 tons per month and 7.9 tons per year of any single HAP or and 1.99 tons per month and 19.9 tons per year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

o. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

9a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

b. Testing required by Condition 10 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.

10a. Pursuant to 35 Ill. Adm. Code 212.107, for both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR part 60, Appendix A, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. 35 Ill. Adm. Code 212 Subpart A shall not apply to 35 Ill. Adm. Code 212.301.

b. Pursuant to 35 Ill. Adm. Code 212.109, except as otherwise provided in 35 Ill. Adm. Code Part 212, and except for the methods of data reduction when applied to 35 Ill. Adm. Code 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, incorporated by reference in 35 Ill. Adm. Code 212.113, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged.

c. Pursuant to 35 Ill. Adm. Code 212.110(a), measurement of particulate matter emissions from stationary emission units subject to 35 Ill. Adm. Code Part 212 shall be conducted in accordance with 40 CFR part 60, Appendix A, Methods 5, 5A, 5D, or 5E.

d. Pursuant to 35 Ill. Adm. Code 212.110(b), the volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4.

e. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.

11. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source’s potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5

years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

12. The Permittee shall fulfill applicable notification and recordkeeping requirements pursuant to 40 CFR 60.7, 60.334 and 60.335.

13. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.

14a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:

i. Records addressing use of good operating practices for the dust collectors covered under this permit:

A. Records for periodic inspection of the dust collectors with date, individual performing the inspection, and nature of inspection; and

B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

ii. Fuel type and quality (date(s) of change(s));

iii. Co-Gen Fuel consumption (mcf/month);

iv. Monthly gas turbine operating hours (hours/month) for each % load range;

v. Monthly boiler operating hours for fuel oil (hours/month);

vi. Boiler natural gas fuel consumption (mmcf/month);

vi. Finished Product (tons/month), as listed in Condition 8(a);

vii. Gum base extrusion process rate (tons/month and tons/year);

viii. VOM material usage the gum coating operations and gum mixing operations (tons/month and tons/year); and

ix. Monthly and annual emissions of CO, NO_x, PM, SO_2, VOM and HAPs with supporting calculations (tons/month and tons/year).

b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

15. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.

16. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedances or deviation and efforts to reduce emissions and future occurrences.

17. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

<u>and</u> one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University
Peoria, Illinois 61614

It should be noted that, this permit has been revised so as to include operation of the equipment described in Construction Permit 07100002.

If you have any questions on this permit, please call John Blazis at 217/782-2113.

Edwin C. Bakowski, P.E. Date Signed: _____
Acting Manager, Permit Section
Division of Air Pollution Control

ECB:JPB:jws

Attachments

cc: Illinois EPA, FOS Region 2
Lotus Notes

Attachment A

This attachment provides a summary of the maximum emissions from the manufacturing facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (i.e., 100 tons/year volatile organic material, 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs, 100 tons/year for PM_{10}, 100 tons/year nitrogen oxides, and 100 tons/year carbon monoxide) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

	E M I S S I O N S (Tons/Year)							
Emission Unit	CO	NO_x	PM	PM_{10}	SO_2	VOM	Single HAP	Total HAPs
Gum Processing Equipment			58.94	58.94				
Candies/Other Equipment			7.22	7.22				
Co-generation System, Boilers, and Reciprocating engines	89.0	94.0	14.52	14.52				
Gum Base Extrusion Process			21.50	11.83				
Gum Coating Operations						5.01		
Gum Mixing Operations						68.13		
Welding Station (E-30)			0.44	0.44				
Flavor Vault (E-36)			0.44	0.44				
Grinding/Sanding Operation (E-38)			0.44	0.44				
Sandblaster (E-40)			0.44	0.44				
Pre-Grind Rubber/Talc Conveying (E-47)			0.088	0.088				
Wrapped Salvage Machine (E-49)			0.0044	0.0044				
Central Housekeeping Vacuum (E-56)			0.0044	0.0044				
Finish Grinder Rubber Conveying (E-60)			0.044	0.044				
Rubber Conveying (E-61)			0.044	0.044				
Ground Limestone Conveying (E-63)			0.44	0.44				
Manual Bag Dump 1 (E-64)			0.0044	0.0044				
Manual Bag Dump 2 (E-68)			0.0044	0.0044				
Dical/Talc Conveying (E-69)			0.22	0.22				
Sweetener Pellet Conveyor (E-73)			0.0044	0.0044				
Sweetener Pellet Conveyance (E-74)			0.0044	0.0044				

Emission Unit	CO	NO_x	PM	PM_{10}	SO_2	VOM	Single HAP	Total HAPs
Talc Feed Dump Station (E-75)			0.0044	0.0044				
Granular Sweetener Feed System (E-76)			0.0044	0.0044				
Citric Acid Feed System (E-77)			0.0044	0.0044				
Salvage Feed System (E-78)			0.0044	0.0044				
Primary Sweetener Vacuum System (E-79)			0.0044	0.0044				
Secondary Sweetener Vacuum System (E-80)			0.0044	0.0044				
Sweetener Material Recovery (E-82)			0.0022	0.0022				
Tri-Bubb Blending (E-84)			0.0088	0.0088				
Solution Prep & Coating Pan (E-86)			0.0035	0.0035				
Solution Prep 7 Coating Pan (E-87)			0.0035	0.0035				
Coating Pan #2 (E-89)			0.002	0.002				
Maltitol Sifting Operating (E-97)			0.044	0.044				
Dumolin Pellet Coating Pan #A (E-98)			0.044	0.044				
Pellet Gum Tumbler “A” & Tray Dump (E-99)			0.044	0.044				
Pellet Gum Tumbler #3 & Tray Dump (E-100)			0.044	0.044				
Pellet Gum Coating Pan #5 (E-101)			0.044	0.044				
Atomite Dump Station (E-102)			0.0044	0.0044				
Dumolin Pellet Coating Pan “B” (E-103)			0.0044	0.0044				
5 Raw Material Storage Tanks (E-66, E-67, E-70, E-71, and E-72)						2.20		
20,000 Gallon #2 Fuel Oil Storage Tank	--	--	--	--	--	0.44	--	--
Total	89.0	94.0	105.08	95.41	25.0	75.78	7.9	19.9

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