



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

SEP 06 2016

REPLY TO THE ATTENTION OF

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Jon Pederson  
Director of Operations  
DaBecca Natural Foods, Inc.  
700 East 107<sup>th</sup> Street  
Chicago, Illinois 60628

Re: Notice of Violation  
DaBecca Natural Foods, Inc.  
Chicago, Illinois

Dear Mr. Pederson:

The U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) to DaBecca Natural Foods, Inc. (DaBecca or you) under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). We find that you are violating the Illinois State Implementation Plan at your Chicago, Illinois facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the NOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Molly Smith. You may call her at (312) 353-8773 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward Nam". The signature is fluid and cursive, with the first name "Edward" and last name "Nam" clearly distinguishable.

Edward Nam  
Acting Director  
Air and Radiation Division

Enclosure

cc: Yasmine Keppner-Bauman, Acting Manager, Illinois Environmental Protection Agency  
(via email)



source of air pollution equipment, without first obtaining a construction permit from the Illinois Environmental Protection Agency (IEPA).

5. On October 29, 2009, the IEPA issued DaBecca a construction permit under identification number 031600GRH (Construction Permit). The Construction Permit allows DaBecca to operate smokehouses and associated scrubber systems at the facility.

### **Finding of Facts**

6. DaBecca owns and operates four smokehouses that burn sawdust, wood, and liquid smoke at 700 East 107<sup>th</sup> Street, Chicago, Illinois (facility).
7. DaBecca's Construction Permit at Condition 1 lists operating limits for the facility's smokehouse scrubbers in order to control particulate matter (PM) and volatile organic matter (VOM). Emission from the four smokehouses are permitted with combined limits.
8. Construction Permit Condition 1.a. requires that emissions and operations of the four scrubbers (combined), when burning sawdust or wood, not exceed 1.71 tons per year (tpy) PM and 1.42 tpy VOM.
9. EPA issued DaBecca a Section 114 Information Request (Information Request) on September 20, 2015.
10. EPA received a complete response to the Information Request from DaBecca in an email dated January 28, 2016.
11. Request #2 in EPA's Information Request required DaBecca to calculate the total annual emissions at the facility for 2008 to 2014. As a part of DaBecca's January 28, 2016, response to the Information Request, DaBecca provided an Excel workbook with total annual PM and VOM emissions from 2013 and 2014. A copy of the total annual emissions reports submitted by DaBecca are attached as Appendix A.
12. A summary of the total annual emissions reported by DaBecca is listed below in Table A.

**Table A: DaBecca Total Annual Emissions Reported in January 28, 2016, Information Request Response**

<b>Year</b>	<b>Pollutant</b>	<b>Emissions Reported (tpy)</b>	<b>Permit Limit (tpy)</b>
2013	PM	2.18	1.71
2013	VOM	1.81	1.42
2014	PM	3.41	1.71
2014	VOM	2.83	1.42

Violations

13. DaBecca has violated Construction Permit Condition 1.a. for failing to maintain PM and VOM emissions below permitted limits in 2013 and 2014. Table A lists the individual violations.

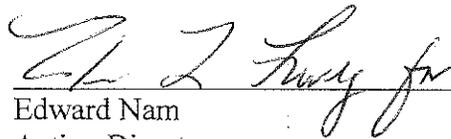
Environmental Impact of Violations

14. These violations have caused excess emissions of VOMs which are directly related to ozone pollution. Breathing ozone contributes to a variety of health problems including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level ozone also can reduce lung function and inflame lung tissue. Repeated exposure may permanently scar lung tissue.
15. Excess emissions of particulate matter contain microscopic solids or liquid droplets, which may get deep into the lungs and cause serious health problems. Particulate matter exposure contributes to:
- irritation of the airways, coughing, and difficulty breathing;
  - decreased lung function;
  - aggravated asthma;
  - chronic bronchitis;
  - irregular heartbeat;
  - nonfatal heart attacks; and
  - premature death in people with heart or lung disease.

9/6/16

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Date



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Edward Nam  
Acting Director  
Air and Radiation Division

## Appendix A

Total annual emissions reports submitted by DaBecca in January 28, 2016 response to EPA's  
Information Request

2013		Emissions Calculations										DaBecca Natural Foods, Inc./B&B Pullman			
Boilers		CO	NH3	NOx	PART	PM-10	PM-2.5	SO2	VOM	CO2	CH4	N2O			
Pollutant	Emission Factors														
56.4079	AP-42 lb/mmcf	84	3.2	100	7.6	7.6	7.6	0.6	5.5	120,000	2.3	2.2			
0.0064393	mmcf														
	Pounds	4738.2649	180.50533	5640.7916	428.7002	428.7002	428.7002	33.8447	310.24354	6,768,949.92	129.7362	124.097			
	lbs/hr	0.5408978	0.0206056	0.643926	0.048938	0.048938	0.048938	0.00386	0.0354159	772.7111781	0.01481	0.01417			
	Smokehouses														
	PART				4365.8750	4365.8750	4365.8750								
	VOM				0.6997	0.6997	0.6997		3624.5000						
	0.0132011								0.5808						
	82.375														
	PART				0.1948	0.1948	0.1948								
	VOM				0.000031	0.000031	0.000031		0.5649						
	0.001561								0.000091						
	9.7405														
	Totals, pounds	4738.8058	180.5259	5641.4355	4795.5186	4795.5186	4795.5186	33.8486	3935.9248	6769722.63	129.76	124.116			
	Totals, tons	2.3694	0.0903	2.8207	2.3978	2.3978	2.3978	0.0169	1.9680	3384.8613	0.0649	0.0621			
	SUMMARY Tons														
	Emissions, tons/yr														
	Boilers	2.3691		2.8204	0.2144				0.1551	3384.4750	0.0649	0.0570			
	Smokehouses														
	Wood				2.1829				1.8123						
	Liquid				0.0001				0.0003						
	Permit limits, tons/yr														
	Boilers	23.86		28.40	2.16				1.56						
	Smokehouses														
	Wood				1.71				1.42						
	Liquid				0.51				1.48						

2014 Boilers		Emissions Calculations										DaBecca Natural Foods, Inc./B&B Pullman									
		CO	NH3	NOx	PART	PM-10	PM-2.5	SO2	VOM	CO2	CH4	N2O	CO	CH4	N2O	CO2	CH4	N2O			
Emission Factors																					
AP-42 lb/mmcf		84	3.2	100	7.6	7.6	7.6	0.6	5.5	120,000	2.3	2.2									
54.4635 mmcf																					
0.0062173 Pounds		4574.934	174.2632	5446.35	413.9226	413.9226	413.9226	32.6781	299.54925	6.535.620.00	125.2661	119.82									
mmcf/hr		0.5222527	0.0198953	0.6217295	0.047251	0.047251	0.047251	0.00373	0.0341951	746.0753425	0.0143	0.01368									
Smokehouses																					
PART		6815.8000	6815.8000	6815.8000	6815.8000	6815.8000	6815.8000	1.0923	1.0923	5658.4000	0.9068										
53 lb/ton wood																					
lb/hr		1.0923	1.0923	1.0923	1.0923	1.0923	1.0923	1.0923	1.0923	1.0923	1.0923	1.0923									
VOM																					
44 lb/ton wood																					
ton/hr wood																					
0.020609																					
128.6																					
tons wood used																					
PART		0.1528	0.1528	0.1528	0.1528	0.1528	0.1528	0.000024	0.000024	0.4431	0.000071										
0.02 lb/ton liquid																					
lb/hr																					
VOM																					
0.58 lb/ton liquid																					
ton/hr liquid																					
0.0012244																					
7.64																					
tons liquid used																					
Totals, pounds		4575.4553	174.3031	5446.9717	7231.0150	7231.0150	7231.0150	32.6818	5969.3334	6536366.08	125.28	119.8334									
Totals, tons		2.2877	0.0872	2.7235	3.6155	3.6155	3.6155	0.0163	2.9797	3268.1830	0.0626	0.0599									
SUMMARY Tons																					
Emissions, tons/yr																					
Boilers		2.2875		2.7232	0.2070				0.1498	3257.8100	0.0626	0.0599									
Smokehouses																					
Wood					3.4079				2.8292												
Liquid					0.0001				0.0002												
Permit limits, tons/yr																					
Boilers		23.86		28.40	2.16				1.56												
Smokehouses																					
Wood					1.71				1.42												
Liquid					0.51				1.48												
Natural Gas Usage: ccf																					
Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec										
Sawdust	257200 lbs																				
Liquid Smo	15,280 lbs	128.6 tons	7.64																544635	therms	

CERTIFICATE OF MAILING

I certify that I sent a Notice of Violation, No. EPA-5-16-IL-07 by Certified Mail, Return

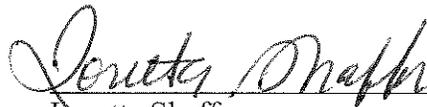
Receipt Requested, to:

Jon Pederson  
Director of Operations  
DaBecca Natural Foods, Inc.  
700 East 107<sup>th</sup> Street  
Chicago, Illinois 60628

I also certify that I sent copies of the Notice of Violation by first-class mail to:

Jasmine Keppner-Bauman  
Acting Manager  
Compliance Section  
Bureau of Air  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, Illinois 62794-9276

On the 8 day of September 2016.



Loretta Shaffer  
Program Technician  
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7674 0852