



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NESHAP SOURCE -- RENEWAL

PERMITTEE

Tootsie Roll Industries, LLC
Attn: Kyle Ferguson
7401 South Cicero Avenue
Chicago, Illinois 60629

Application No.: 74010025

I.D. No.: 031600EKR

Applicant's Designation:

Date Received: November 14, 2011

Subject: Candy Manufacturing

Date Issued: June 8, 2022

Expiration Date: June 8, 2032

Location: 7401 South Cicero Avenue, Chicago, Cook County, 60629

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

Three (3) 25 mmBtu/hour Natural Gas-Fired Boilers;
Two (2) 400 HP (19.5 mmBtu/hour) Natural Gas-Fired Boilers;
Two (2) 500 HP (21 mmBtu/hour) Natural Gas-Fired Boilers;
One (1) Mixing Kettle Operation;
One (1) Flavor Addition Operation;
One (1) Reclaim Melting Kettle Operation;
One (1) Starch Gumdrop Deposition Operation with Integrated Dust Collectors and Baghouse Filters; and
Five (5) Diesel-Powered Non-Emergency Generators Sets each controlled by a Diesel Oxidation Catalyst (Set #1: 890 hp, Set #2: 1,482 hp, Set #3: 1,066 hp, Set #4: 1,066 hp, and Set #5: 1,066 hp)

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 (FESOP) is issued:
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 50 tons/year for Nitrogen Oxides (NO_x) and Volatile Organic Material (VOM)). 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.
 - ii. To establish federally enforceable production and operating limitations, which restrict the potential to emit for NO_x to less than 100 tons per year so that the source is not subject to the

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requirements of 35 Ill. Adm. Code Part 217 Subpart E (Industrial Boilers), 35 Ill. Adm. Code Part 217 Subpart F (Process Heaters), and 35 Ill. Adm. Code Part 217 Subpart Q (Stationary Reciprocating Internal Combustion Engines And Turbines).

- iii. To establish federally enforceable production and operating limitations, which restrict the potential to emit for VOM to less than 25 tons per year so that the source is not subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart TT (Other Emission Units).
 - b. Prior to 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. Generator Sets #1 - #5 are subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63 Subparts A and ZZZZ. The Illinois EPA is administering the NESHAP in Illinois on behalf of the United States Environmental Protection Agency (USEPA) under a delegation agreement. Pursuant to 40 CFR 63.6590(a), an affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.
- b. Pursuant to 40 CFR 63.6590(a)(1)(iii), for stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.
 - c. Pursuant to 40 CFR 63.6595(a)(1), if you have an existing stationary RICE, excluding existing non-emergency CI stationary RICE, with a site rating of more than 500 brake HP located at a major source of HAP emissions, you must comply with the applicable emission limitations, operating limitations and other requirements no later than June 15, 2007. If you have an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary CI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations, operating limitations, and other requirements no later than May 3, 2013. If you have an existing stationary SI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations, operating limitations, and other requirements no later than October 19, 2013.
 - d. Pursuant to 40 CFR 63.6603(a), compliance with the numerical emission limitations established in 40 CFR 63 Subpart ZZZZ is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in 40 CFR 63.6620 and Table 4 to 40 CFR 63 Subpart ZZZZ (see Attachment B).

If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to 40 CFR 63 Subpart ZZZZ and the operating limitations in Table 2b to 40 CFR 63 Subpart ZZZZ that apply to you.

Table 2b to 40 CFR 63 Subpart ZZZZ of Part 63—Operating Limitations for New and Reconstructed 2SLB and CI Stationary RICE >500 HP Located at a Major Source of HAP Emissions, New and Reconstructed 4SLB Stationary RICE ≥250 HP Located at a Major Source of HAP Emissions, Existing CI Stationary RICE >500 HP

As stated in 40 CFR 63.6600, 63.6601, 63.6603, 63.6630, and 63.6640, you must comply with the following operating limitations for new and reconstructed 2SLB and CI stationary RICE >500 HP located at a major source of HAP emissions; new and reconstructed 4SLB stationary RICE ≥250 HP located at a major source of HAP emissions; and existing CI stationary RICE >500 HP:

| For each . . . | You must meet the following operating limitation, except during periods of startup. . . |
|---|--|
| 2. Existing CI stationary RICE >500 HP complying with the requirement to limit or reduce the concentration of CO in the stationary RICE exhaust and using an oxidation catalyst | a. maintain your catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water from the pressure drop across the catalyst that was measured during the initial performance test; and |
| | b. maintain the temperature of your stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 450 °F and less than or equal to 1350 °F. ¹ |

¹Sources can petition the Illinois EPA or USEPA pursuant to the requirements of 40 CFR 63.8(f) for a different temperature range.

Table 2d to 40 CFR 63 Subpart ZZZZ of Part 63— Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

As stated in 40 CFR 63.6603 and 63.6640, you must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:

| For each . . . | You must meet the following requirement, except during periods of startup . . . | During periods of startup you must . . . |
|--|---|---|
| 3. Non-Emergency, non-black start CI stationary RICE >500 HP | a. Limit concentration of CO in the stationary RICE exhaust to 23 ppmvd at 15 percent O ₂ ; or | Minimize the time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. |
| | b. Reduce CO emissions by 70 percent or more. | |

| For each . . . | You must meet the following requirement, except during periods of startup . . . | During periods of startup you must . . . |
|--|---|--|
| 4. Emergency stationary CI RICE and black start stationary CI RICE. ² | a. Change oil and filter every 500 hours of operation or annually, whichever comes first; ¹ | |
| | b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and | |
| | c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. | |

¹Sources have the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) in order to extend the specified oil change requirement in Table 2d of 40 CFR 63 Subpart ZZZZ.

²If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of 40 CFR 63 Subpart ZZZZ, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

- 3a. The Boilers, Mixing Kettle Operation, Reclaim Operation, Starch Gumdrop Deposition Operation, and Generator Sets #1 - #5 are subject to 35 Ill. Adm. Code Part 212 Subpart B (Visible Emissions). 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 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. This source is subject to 35 Ill. Adm. Code Part 212 Subpart K (Fugitive Particulate Matter). 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 212.302(a), 35 Ill. Adm. Code 212.304 through 212.310 and 212.312 shall apply to all mining operations (SIC major groups 10 through 14), manufacturing operations (SIC major groups 20 through 39 except for those operations subject to 35 Ill. Adm. Code Part 212 Subpart S (Grain-Handling and Grain-Drying Operations) that are outside the areas defined in 35 Ill. Adm. Code 212.324(a)(1)), and electric generating operations (SIC group 491), which are located in the areas defined by the boundaries of the following townships, notwithstanding any political subdivisions contained therein, as the township boundaries were defined on October 1, 1979, in the following counties:

Cook: All townships

- e. The Mixing Kettle Operation, Reclaim Operation, and Starch Gumdrop Deposition Operation are subject to 35 Ill. Adm. Code Part 212 Subpart L (Particulate Matter Emissions from Process Emission Units). Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, 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 rates specified in 35 Ill. Adm. Code 212.321(c).
- f. Pursuant to 35 Ill. Adm. Code 212.321(b), interpolated and extrapolated values of the data in 35 Ill. Adm. Code 212.321(c) shall be determined by using the equation:

$$E = A(P)^B$$

where:

P = Process weight rate; and
 E = Allowable emission rate; and,

- i. Up to process weight rates of 408 Mg/hr (450 T/hr):

| | Metric | English |
|---|--------|---------|
| P | Mg/hr | T/hr |
| E | kg/hr | lbs/hr |
| A | 1.214 | 2.54 |
| B | 0.534 | 0.534 |

- ii. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

| | Metric | English |
|---|--------|---------|
| P | Mg/hr | T/hr |
| E | kg/hr | lbs/hr |

| | | |
|---|-------|------|
| A | 11.42 | 24.8 |
| B | 0.16 | 0.16 |

- g. Pursuant to 35 Ill. Adm. Code 212.321(c), Limits for Process Emission Units for Which Construction or Modification Commenced on or After April 14, 1972:

| Metric | | English | |
|--------|-------|---------|--------|
| P | E | P | E |
| Mg/hr | kg/hr | T/hr | lbs/hr |
| 0.05 | 0.25 | 0.05 | 0.55 |
| 0.1 | 0.29 | 0.10 | 0.77 |
| 0.2 | 0.42 | 0.20 | 1.10 |
| 0.3 | 0.64 | 0.30 | 1.35 |
| 0.4 | 0.74 | 0.40 | 1.58 |
| 0.5 | 0.84 | 0.50 | 1.75 |
| 0.7 | 1.00 | 0.75 | 2.40 |
| 0.9 | 1.15 | 1.00 | 2.60 |
| 1.8 | 1.66 | 2.00 | 3.70 |
| 2.7 | 2.1 | 3.00 | 4.60 |
| 3.6 | 2.4 | 4.00 | 5.35 |
| 4.5 | 2.7 | 5.00 | 6.00 |
| 9. | 3.9 | 10.00 | 8.70 |
| 13. | 4.8 | 15.00 | 10.80 |
| 18. | 5.7 | 20.00 | 12.50 |
| 23. | 6.5 | 25.00 | 14.00 |
| 27. | 7.1 | 30.00 | 15.60 |
| 32. | 7.7 | 35.00 | 17.00 |
| 36. | 8.2 | 40.00 | 18.20 |
| 41. | 8.8 | 45.00 | 19.20 |
| 45. | 9.3 | 50.00 | 20.50 |
| 90. | 13.4 | 100.00 | 29.50 |
| 140. | 17.0 | 150.00 | 37.00 |
| 180. | 19.4 | 200.00 | 43.00 |
| 230. | 22. | 250.00 | 48.50 |
| 270. | 24. | 300.00 | 53.00 |
| 320. | 26. | 350.00 | 58.00 |
| 360. | 28. | 400.00 | 62.00 |
| 408. | 30.1 | 450.00 | 66.00 |
| 454. | 30.4 | 500.00 | 67.00 |

where:

P = Process weight rate in metric or T/hr, and
 E = Allowable emission rate in kg/hr or lbs/hr.

- 4a. The Generator Sets #1 - #5 are subject to 35 Ill. Adm. Code Part 214 Subpart K (Process Emission Sources). Pursuant to 35 Ill. Adm. Code 214.301, except as further provided by 35 Ill. Adm. Code Part 214, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.
- b. Pursuant to 35 Ill. Adm. Code 214.305(a)(2), except as provided in 35 Ill. Adm. Code 214.305(b), (c), and (d), on and after January 1, 2017, the owner or operator of a process emission source must comply with the following:
 The sulfur content of all distillate fuel oil used by the process emission source must not exceed 15 ppm;

5. The Boilers are subject to 35 Ill. Adm. Code Part 216 Subpart B (Fuel Combustion Emission Sources). Pursuant to 35 Ill. Adm. Code 216.121, no person shall cause or 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. The Flavor Addition Operation with Reclaim Operation and Generator Sets #1 - #5 are subject to 35 Ill. Adm. Code Part 218 Subpart G (Use of Organic Material). Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code Part 218 Subpart G shall only apply to photochemically reactive material.
 - 7a. This permit is issued based on the Boilers at this source not being subject to the NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63 Subpart DDDDD because this source is not or is part of, a major source of Hazardous Air Pollutant (HAP) emissions as defined in 40 CFR 63.2.
 - b. This permit is issued based on the Boilers at this source not being subject to the requirements of the NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63 Subpart JJJJJJ. Pursuant to 40 CFR 63.11195(e), gas-fired boilers are not subject to 40 CFR 63 Subpart JJJJJJ. Pursuant to 40 CFR 63.11237, gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels, burns liquid fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.
8. 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/hr (25 mph). Determination of wind speed for the purposes of 35 Ill. Adm. Code 212.314 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 35 Ill. Adm. Code 212.314 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.
- 9a. This permit is issued based on the Boilers at this source not being subject to 35 Ill. Adm. Code Part 217 Subpart E (Industrial Boilers) because the potential to emit for NO_x from the source is less than 100 tons per year. This is a result of the federally enforceable production and operating limitations, established in this permit, which restrict the potential to emit for NO_x to less than 100 tons per year.
 - b. This permit is issued based on Generator Sets #1 - #5 at this source not being subject to 35 Ill. Adm. Code Part 217 Subpart Q (Stationary

Reciprocating Internal Combustion Engines And Turbines) because the potential to emit for NO_x from the source is less than 100 tons per year. This is a result of the federally enforceable production and operating limitations, established in this permit, which restrict the potential to emit for NO_x to less than 100 tons per year.

- 10a. This permit is issued based on the use of cleaning solvents associated with the Flavor Addition Operation with Reclaim Operation at this source not being subject to the material and control requirements under 35 Ill. Adm. Code 218.187 (Other Industrial Solvent Cleaning Operations). Pursuant to 35 Ill. Adm. Code 218.187(a)(1), on and after January 1, 2012: Except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall apply to all cleaning operations that use organic materials at sources that emit a total of 226.8 kg per calendar month (500 lbs per calendar month) or more of VOM, in the absence of air pollution control equipment, from cleaning operations at the source other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2). For purposes of 35 Ill. Adm. Code 218.187, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units.
- b. This permit is issued based on the Flavor Addition Operation with Reclaim Operation at this source not being subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart TT (Other Emission Units) because the potential to emit for VOM is less than 25 tons/year. This is a result of the federally enforceable production and operating limitations established in this permit.
- 11a. Pursuant to 40 CFR 63.6595(c), if you own or operate an affected source, you must meet the applicable notification requirements in 40 CFR 63.6645 and in 40 CFR Part 63, subpart A.
- b. Pursuant to 40 CFR 63.6604(a), if you own or operate an existing non-emergency, non-black start CI stationary RICE with a site rating of more than 300 brake HP with a displacement of less than 30 liters per cylinder that uses diesel fuel, you must use diesel fuel that meets the requirements in 40 CFR 80.510(b) for non-road diesel fuel.
- c. Pursuant to 40 CFR 63.6605(a), you must be in compliance with the emission limitations, operating limitations, and other requirements in 40 CFR 63 Subpart ZZZZ that apply to you at all times.
- d. Pursuant to 40 CFR 63.6605(b), at all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by 40 CFR 63 Subpart ZZZZ have been achieved. Determination of whether such operation 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, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

- e. Pursuant to 40 CFR 63.6625(g), if you own or operate an existing non-emergency, non-black start CI engine greater than or equal to 300 HP that is not equipped with a closed crankcase ventilation system, you must comply with either 63.6625(g)(1) or 63.6625(2). Owners and operators must follow the manufacturer's specified maintenance requirements for operating and maintaining the open or closed crankcase ventilation systems and replacing the crankcase filters or can request the Illinois EPA or USEPA to approve different maintenance requirements that are as protective as manufacturer requirements. Existing CI engines located at area sources in areas of Alaska that meet either 40 CFR 63.6603(b)(1) or 40 CFR 63.6603(b)(2) do not have to meet the requirements of this 40 CFR 63.6625(g). Existing CI engines located on offshore vessels that meet 40 CFR 63.6603(c) do not have to meet the requirements of this 40 CFR 63.6625(g).
 - i. Install a closed crankcase ventilation system that prevents crankcase emissions from being emitted to the atmosphere, or
 - ii. Install an open crankcase filtration emission control system that reduces emissions from the crankcase by filtering the exhaust stream to remove oil mist, particulates and metals.
- f. Pursuant to 40 CFR 63.6625(h), if you operate a new, reconstructed, or existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to 40 CFR 63 Subpart ZZZZ apply.
- g. Pursuant to 40 CFR 63.6625(i), if you own or operate a stationary CI engine that is subject to the work, operation or management practices in items 1 or 2 of Table 2c to 40 CFR 63 Subpart ZZZZ or in items 1 or 4 of Table 2d to 40 CFR 63 Subpart ZZZZ, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to 40 CFR 63 Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to 40 CFR 63 Subpart ZZZZ. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil

within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

- h. Pursuant to 40 CFR 63.6630(a), you must demonstrate initial compliance with each emission limitation, operating limitation, and other requirement that applies to you according to Table 5 of 40 CFR 63 Subpart ZZZZ.

Table 5 to Subpart ZZZZ of Part 63—Initial Compliance With Emission Limitations, Operating Limitations, and Other Requirements

As stated in 40 CFR 63.6612, 63.6625 and 63.6630, you must initially comply with the emission and operating limitations as required by the following:

| For each . . . | Complying with the requirement to . . . | You have demonstrated initial compliance if . . . |
|--|--|---|
| 1. New or reconstructed non-emergency 2SLB stationary RICE >500 HP located at a major source of HAP, new or reconstructed non-emergency 4SLB stationary RICE ≥250 HP located at a major source of HAP, non-emergency stationary CI RICE >500 HP located at a major source of HAP, and existing non-emergency stationary CI RICE >500 HP located at an area source of HAP | a. Reduce CO emissions and using oxidation catalyst, and using a CPMS | i. The average reduction of emissions of CO determined from the initial performance test achieves the required CO percent reduction; and ii. You have installed a CPMS to continuously monitor catalyst inlet temperature according to the requirements in 40 CFR 63.6625(b); and iii. You have recorded the catalyst pressure drop and catalyst inlet temperature during the initial performance test. |
| 2. Non-emergency stationary CI RICE >500 HP located at a major source of HAP, and existing non-emergency stationary CI RICE >500 HP located at an area source of HAP | a. Limit the concentration of CO, using oxidation catalyst, and using a CPMS | i. The average CO concentration determined from the initial performance test is less than or equal to CO emission limitation; and |
| | | ii. You have installed a CPMS to continuously monitor catalyst inlet temperature according to the requirements in 40 CFR 63.6625(b), and |
| | | iii. You have recorded the catalyst pressure drop and catalyst inlet temperature during the initial performance test. |

- i. Pursuant to 40 CFR 63.6630(b), during the initial performance test, you must establish each operating limitation in Tables 1b and 2b of 40 CFR 63 Subpart ZZZZ that applies to you.
- j. Pursuant to 40 CFR 63.6630(c), you must submit the Notification of

Compliance Status containing the results of the initial compliance demonstration according to the requirements in 40 CFR 63.6645.

- k. Pursuant to 40 CFR 63.6640(a), you must demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to 40 CFR 63 Subpart ZZZZ that apply to you according to methods specified in Table 6 to 40 CFR 63 Subpart ZZZZ.

Table 6 to Subpart ZZZZ of Part 63—Continuous Compliance With Emission Limitations, and Other Requirements

As stated in 40 CFR 63.6640, you must continuously comply with the emissions and operating limitations and work or management practices as required by the following:

| For each . . . | Complying with the requirement to . . . | You must demonstrate continuous compliance by . . . |
|--|---|---|
| 10. Existing stationary CI RICE >500 HP that are not limited use stationary RICE | a. Reduce CO emissions, or limit the concentration of CO in the stationary RICE exhaust, and using oxidation catalyst | i. Conducting performance tests every 8,760 hours or 3 years, whichever comes first, for CO or formaldehyde, as appropriate, to demonstrate that the required CO or formaldehyde, as appropriate, percent reduction is achieved or that your emissions remain at or below the CO or formaldehyde concentration limit; and |
| | | ii. Collecting the catalyst inlet temperature data according to 40 CFR 63.6625(b); and |
| | | iii. Reducing these data to 4-hour rolling averages; and |
| | | iv. Maintaining the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature; and |
| | | v. Measuring the pressure drop across the catalyst once per month and demonstrating that the pressure drop across the catalyst is within the operating limitation established during the performance test. |

- 1. Pursuant to 40 CFR 63.6665, Table 8 to 40 CFR 63 Subpart ZZZZ (see Attachment C) shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to you. If you own or operate a new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions (except new or reconstructed 4SLB engines greater than or equal to 250 and less than or equal to 500 brake HP), a new or reconstructed stationary RICE located at an area source of HAP emissions, or any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with any of the requirements of the General Provisions specified in Table 8: An

existing 2SLB stationary RICE, an existing 4SLB stationary RICE, an existing stationary RICE that combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, an existing emergency stationary RICE, or an existing limited use stationary RICE. If you own or operate any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in the General Provisions specified in Table 8 except for the initial notification requirements: A new stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, a new emergency stationary RICE, or a new limited use stationary RICE.

- 12a. Pursuant to 40 CFR 80.510(b), beginning June 1, 2010. Except as otherwise specifically provided in 40 CFR 80 Subpart I, all nonroad (NR) and locomotive (LM) diesel fuel is subject to the following per-gallon standards:
 - i. Sulfur content 15 ppm maximum for NR diesel fuel.
 - ii. Cetane index or aromatic content, as follows:
 - A. A minimum cetane index of 40; or
 - B. A maximum aromatic content of 35 volume percent.
- 13a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
 - b. Pursuant to 35 Ill. Adm. Code 212.307, all unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods.
 - c. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
 - d. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
 - i. The name and address of the source;

- ii. The name and address of the owner or operator responsible for execution of the operating program;
 - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
 - iv. Location of unloading and transporting operations with pollution control equipment;
 - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code Part 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
 - vi. Estimated frequency of application of dust suppressants by location of materials; and
 - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- e. The Fugitive Particulate Operating Program, as submitted by the Permittee pursuant to 35 Ill. Adm. Code 212.309 on April 11, 2022, is incorporated herein by reference. The source shall be operated under and shall comply with the provisions of this Fugitive Particulate Operating Program and any amendments to the Fugitive Particulate Operating Program submitted pursuant to Condition 10(d).
- f. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code Part 212 Subpart K and shall be submitted to the Illinois EPA within thirty (30) days of such amendment. Any future revision to the Fugitive Particulate Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the Illinois EPA. In the event that the Illinois EPA notifies the Permittee of a deficiency with any revision to the Fugitive Particulate Operating Program, the Permittee shall be required to revise and resubmit the Fugitive Particulate Operating Program within thirty (30) days of receipt of notification to address the deficiency.
- 14a. In the event that the operation of this source 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. The Griffin baghouse shall be operated at all times in which the Makat Starch-Gumdrop Deposition equipment is operated.
- c. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the Dust

Collectors and Baghouse Filters associated with the Starch Gumdrop Deposition Operations such that the dust collectors and baghouse filters are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.

- d. The Boilers shall only be operated with natural gas as the fuel, The use of any other fuel in the Boilers may require that the Permittee first obtain a construction permit from the Illinois EPA and perform stack testing to verify compliance with all applicable requirements.
 - e. Generator Sets #1 - #5 shall only be operated with distillate fuel oil (Grades No. 1 and 2) as the fuel. The use of any other fuel in any of the generator sets may require that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
 - f. Organic liquid by-products or waste materials shall not be used in any emission unit at this source without written approval from the Illinois EPA.
 - g. The Illinois EPA shall be allowed to sample all fuels stored at the above location.
- 15a. Emissions from and operation of the Makat starch-gumdrop deposition line shall not exceed the following limits:

| <u>Mould Starch Throughput</u> (Tons/Month) | <u>(Tons/Year)</u> | <u>Particulate Matter (PM) Emissions</u> (Tons/Month) | <u>(Tons/Year)</u> |
|--|--------------------|--|--------------------|
| 23,000 | 185,000 | 0.29 | 2.28 |

These limits are based on the maximum mould starch throughput rate (21.12 tons/hour), maximum operating time (8,760 hours/year), and the maximum PM emission rate (0.52 lbs/hour).

- b. Emissions from and operation of the two mixing kettles (combined) shall not exceed the following limits:

| <u>Candy Production</u> (Tons/Month) | <u>(Tons/Year)</u> | <u>Particulate Matter (PM) Emissions</u> (Tons/Month) | <u>(Tons/Year)</u> |
|---|--------------------|--|--------------------|
| 9,100 | 70,000 | 0.83 | 1.54 |

These limits are based on the maximum candy production rate (7.9 tons/hour), maximum operating time (8,760 hours/year), and the maximum PM emission rate (0.35 lbs/hour).

- c. Emissions from and operation of the natural gas-fired Boilers shall not exceed the following limits:

i. Natural Gas Usage:

| | |
|----------------------|---------------------|
| <u>(mmscf/Month)</u> | <u>(mmscf/Year)</u> |
| 50 | 400* |

* 1 mmscf = 10,200 therms

ii. Emissions from the combustion of natural gas:

| <u>Pollutant</u> | <u>Emission Factor (lbs/mmscf)</u> | <u>Emissions (Tons/Month)</u> | <u>(Tons/Year)</u> |
|------------------------------------|--|-----------------------------------|--------------------|
| Carbon Monoxide (CO) | 84.0 | 2.10 | 16.80 |
| Nitrogen Oxides (NO _x) | 100.0 | 2.50 | 20.00 |
| Particulate Matter (PM) | 7.6 | 0.19 | 1.52 |
| Sulfur Dioxide (SO ₂) | 0.6 | 0.02 | 0.12 |
| Volatile Organic Material (VOM) | 5.5 | 0.14 | 1.10 |

These limits are based on maximum natural gas usage and standard emission factors (Tables 1.4-1 and 1.4-2 AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

d. Emissions from the usage of Flavor Additives shall not exceed the following limits:

| <u>Flavor Material</u> | <u>Maximum Usage Rate (1000 lbs/Day)</u> | <u>Usage Rate (1000 lbs/Yr)</u> | <u>VOM Emission Factor (lbs VOM/Lbs Flavor)</u> | <u>VOM Emissions (lbs/Mo)</u> | <u>(Tons/Yr)</u> |
|------------------------|--|-------------------------------------|---|-----------------------------------|------------------|
| BP | 15.0 | 120 | 0.04 | 600 | 2.40 |
| RH | 27.5 | 220 | 0.15 | 4,125 | 16.50 |
| Mason | 11.3 | 90 | 0.0924 | 1,040 | 4.16 |
| | | | | Total | 23.06 |

These limits are based on the maximum usage rates, maximum operating time (8,760 hours/year), and the maximum VOM emission rates.

e. Emissions from and operation of the reclaim operation shall not exceed the following limits:

| <u>Equipment</u> | <u>Maximum Operating Rate (mmlbs/Mo)</u> | <u>Operating Rate (mmlbs/Yr)</u> | <u>VOM Emission Factor (lbs VOM/mmlb Remelt)</u> | <u>VOM Emissions (lbs/Mo)</u> | <u>(Tons/Yr)</u> |
|-------------------|--|--------------------------------------|--|-----------------------------------|------------------|
| Reclaim Operation | 0.75 | 6.0 | 107 | 80 | 0.32 |

These limits are based on the maximum operating rates, maximum operating time (8,760 hours/year), and the maximum VOM emission rates.

f. This permit is issued based upon negligible emissions of particulate matter emissions from the reclaim operations. For this purpose, emissions of PM shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.

g. Emissions from and operation of Generator Sets #1 - #5 shall not exceed the following limits:

- i. Hours of Operation: 60 hours/year (each generator);
- ii. Total emissions from the diesel-powered generators:

| <u>Pollutant</u> | <u>Emission Factor</u> (lbs/hp-Hour) | <u>Emissions</u> | |
|------------------------------------|---|------------------|-------------|
| | | (lbs/Hour) | (Tons/Year) |
| Carbon Monoxide (CO) | 0.0055 | 28.60 | 0.86 |
| Nitrogen Oxides (NO _x) | 0.024 | 124.85 | 3.75 |
| Particulate Matter (PM) | 0.0007 | 3.64 | 0.11 |
| Sulfur Dioxide (SO ₂) | 0.0022652 | 11.78 | 0.35 |
| Volatile Organic Material (VOM) | 0.000705 | 3.67 | 0.11 |

These limits are based on the maximum hours of operation, the total capacity of all five diesel-powered generators (5,200 hp), and standard emission factors (Table 3.4-1, AP-42, Fifth Edition, Volume I, Supplement B, October 1996).

- h. Compliance with the annual limits of this permit shall be determined on a daily basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 16. This permit is issued based on the Potential to Emit (PTE) for Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 17a. Pursuant to 40 CFR 63.6612, if you own or operate an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions you are subject to the requirements of 40 CFR 63.6612.
- b. Pursuant to 40 CFR 63.6612(a), you must conduct any initial performance test or other initial compliance demonstration according to Tables 4 and 5 to 40 CFR 63 Subpart ZZZZ that apply to you within 180 days after the compliance date that is specified for your stationary RICE in 40 CFR 63.6595 and according to the provisions in 40 CFR 63.7(a)(2).
- c. Pursuant to 40 CFR 63.6615, if you must comply with the emission limitations and operating limitations, you must conduct subsequent performance tests as specified in Table 3 of 40 CFR Subpart ZZZZ.

Table 3 to Subpart ZZZZ of Part 63-Subsequent Performance Tests

As stated in 40 CFR 63.6615 and 63.6620, you must comply with the following subsequent performance test requirements:

| For each . . . | Complying with the requirement to . . . | You must . . . |
|--|---|---|
| 4. Existing non-emergency, non-black start CI stationary RICE >500 HP that are not limited use stationary RICE | Limit or reduce CO emissions and not using a CEMS | Conduct subsequent performance tests every 8,760 hours or 3 years, whichever comes first. |

- d. Pursuant to 40 CFR 63.6620(a), you must conduct each performance test in Tables 3 and 4 of 40 CFR 63 Subpart ZZZZ that applies to you.
- e. Pursuant to 40 CFR 63.6620(b), each performance test must be conducted according to the requirements that 40 CFR 63 Subpart ZZZZ specifies in Table 4 to 40 CFR 63 Subpart ZZZZ. If you own or operate a non-operational stationary RICE that is subject to performance testing, you do not need to start up the engine solely to conduct the performance test. Owners and operators of a non-operational engine can conduct the performance test when the engine is started up again. The test must be conducted at any load condition within plus or minus 10 percent of 100 percent load for the stationary RICE listed in 40 CFR 63.6620(b) (1) through (4).
- f. Pursuant to 40 CFR 63.6620(d), you must conduct three separate test runs for each performance test required in 40 CFR 63.6620, as specified in 40 CFR 63.7(e) (3). Each test run must last at least 1 hour, unless otherwise specified in 40 CFR Part 63 Subpart ZZZZ.
- g. i. Pursuant to 40 CFR 63.6620(e) (1), you must use Equation 1 of 40 CFR 63.6620 to determine compliance with the percent reduction requirement.

$$\frac{C_i - C_o}{C_i} \times 100 = R \quad (\text{Eq. 1})$$

Where:

C_i = concentration of carbon monoxide (CO), total hydrocarbons (THC), or formaldehyde at the control device inlet,

C_o = concentration of CO, THC, or formaldehyde at the control device outlet, and

R = percent reduction of CO, THC, or formaldehyde emissions.

- ii. Pursuant to 40 CFR 63.6620(e) (2), you must normalize the CO, THC, or formaldehyde concentrations at the inlet and outlet of the control device to a dry basis and to 15 percent oxygen, or an equivalent percent carbon dioxide (CO₂). If pollutant concentrations are to be corrected to 15 percent oxygen and CO₂ concentration is measured in lieu of oxygen concentration measurement, a CO₂ correction factor is needed. Calculate the CO₂ correction factor as described in 40 CFR 63.6620(e) (2) (i) through (iii).

- A. Calculate the fuel-specific F_o value for the fuel burned during the test using values obtained from Method 19, section 5.2, and the following equation:

$$F_o = \frac{0.209 F_d}{F_c} \quad (\text{Eq. 2})$$

Where:

F_o = Fuel factor based on the ratio of oxygen volume to the ultimate CO_2 volume produced by the fuel at zero percent excess air.

0.209 = Fraction of air that is oxygen, percent/100.

F_d = Ratio of the volume of dry effluent gas to the gross calorific value of the fuel from Method 19, dsm^3/J ($\text{dscf}/10^6 \text{ Btu}$).

F_c = Ratio of the volume of CO_2 produced to the gross calorific value of the fuel from Method 19, dsm^3/J ($\text{dscf}/10^6 \text{ Btu}$).

- B. Calculate the CO_2 correction factor for correcting measurement data to 15 percent oxygen, as follows:

$$X_{\text{CO}_2} = \frac{5.9}{F_o} \quad (\text{Eq. 3})$$

Where:

X_{CO_2} = CO_2 correction factor, percent.

5.9 = 20.9 percent O_2 - 15 percent O_2 , the defined O_2 correction value, percent.

- C. Calculate the CO, THC, and formaldehyde gas concentrations adjusted to 15 percent O_2 using CO_2 as follows:

$$C_{\text{adj}} = C_d \frac{X_{\text{CO}_2}}{\% \text{CO}_2} \quad (\text{Eq. 4})$$

Where:

C_{adj} = Calculated concentration of CO, THC, or formaldehyde adjusted to 15 percent O_2 .

C_d = Measured concentration of CO, THC, or formaldehyde, uncorrected.

X_{CO_2} = CO_2 correction factor, percent.

%CO₂ = Measured CO₂ concentration measured, dry basis,
percent.

- h. Pursuant to 40 CFR 63.6620(i), the engine percent load during a performance test must be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load in a specific application. A written report of the average percent load determination must be included in the notification of compliance status. The following information must be included in the written report: the engine model number, the engine manufacturer, the year of purchase, the manufacturer's site-rated brake horsepower, the ambient temperature, pressure, and humidity during the performance test, and all assumptions that were made to estimate or calculate percent load during the performance test must be clearly explained. If measurement devices such as flow meters, kilowatt meters, beta analyzers, stain gauges, etc. are used, the model number of the measurement device, and an estimate of its accurate in percentage of true value must be provided.
- 18a. 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 19 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 19. 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.

20a. Pursuant to 40 CFR 63.6625(b), if you are required to install a continuous parameter monitoring system (CPMS) as specified in Table 5 of 40 CFR 63 Subpart ZZZZ, you must install, operate, and maintain each CPMS according to the requirements in 40 CFR 63.6625(b)(1) through (6). For an affected source that is complying with the emission limitations and operating limitations on March 9, 2011, the requirements in 40 CFR 63.6625(b) are applicable September 6, 2011.

i. You must prepare a site-specific monitoring plan that addresses the monitoring system design, data collection, and the quality assurance and quality control elements outlined in 40 CFR 63.6625(b)(1)(i) through (v) and in 40 CFR 63.8(d). As specified in 40 CFR 63.8(f)(4), you may request approval of monitoring system quality assurance and quality control procedures alternative to those specified in 40 CFR 63.6625(b)(1) through (5) in your site-specific monitoring plan.

A. The performance criteria and design specifications for the monitoring system equipment, including the sample interface, detector signal analyzer, and data acquisition and calculations;

B. Sampling interface (e.g., thermocouple) location such that the monitoring system will provide representative measurements;

C. Equipment performance evaluations, system accuracy audits, or other audit procedures;

D. Ongoing operation and maintenance procedures in accordance with provisions in 40 CFR 63.8(c)(1)(ii) and (c)(3); and

E. Ongoing reporting and recordkeeping procedures in accordance with provisions in 40 CFR 63.10(c), (e)(1), and (e)(2)(i).

ii. You must install, operate, and maintain each CPMS in continuous operation according to the procedures in your site-specific monitoring plan.

iii. The CPMS must collect data at least once every 15 minutes (see also 40 CFR 63.6635).

iv. For a CPMS for measuring temperature range, the temperature sensor must have a minimum tolerance of 2.8 degrees Celsius (5 degrees Fahrenheit) or 1 percent of the measurement range, whichever is larger.

- v. You must conduct the CPMS equipment performance evaluation, system accuracy audits, or other audit procedures specified in your site-specific monitoring plan at least annually.
 - vi. You must conduct a performance evaluation of each CPMS in accordance with your site-specific monitoring plan.
- b. Pursuant to 40 CFR 63.6625(f), if you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed.
- c. Pursuant to 40 CFR 63.6635(a), if you must comply with emission and operating limitations, you must monitor and collect data according to 40 CFR 63.6635.
- d. Pursuant to 40 CFR 63.6635(b), except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities, you must monitor continuously at all times that the stationary RICE is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
- e. Pursuant to 40 CFR 63.6635(c), you may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. You must, however, use all the valid data collected during all other periods.
21. 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.

- 22a. Pursuant to 40 CFR 63.6655(a), if you must comply with the emission and operating limitations, you must keep the records described in 40 CFR 63.6655(a)(1) through (a)(5), (b)(1) through (b)(3) and (d).
- i. A copy of each notification and report that you submitted to comply with 40 CFR 63 Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv).
 - ii. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
 - iii. Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).
 - iv. Records of all required maintenance performed on the air pollution control and monitoring equipment.
 - v. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- b. Pursuant to 40 CFR 63.6655(b), for each CEMS or CPMS, you must keep the records listed in 40 CFR 63.6655(b)(1) through (3).
- i. Records described in 40 CFR 63.10(b)(2)(vi) through (xi).
 - ii. Previous (i.e., superseded) versions of the performance evaluation plan as required in 40 CFR 63.8(d)(3).
 - iii. Requests for alternatives to the relative accuracy test for CEMS or CPMS as required in 40 CFR 63.8(f)(6)(i), if applicable.
- c. Pursuant to 40 CFR 63.6655(d), you must keep the records required in Table 6 of 40 CFR 63 Subpart ZZZZ to show continuous compliance with each emission or operating limitation that applies to you.
- d. Pursuant to 40 CFR 63.6655(e)(3), you must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE;

An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to 40 CFR 63 Subpart ZZZZ.

- e. Pursuant to 40 CFR 63.6660(a), your records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1).
 - f. Pursuant to 40 CFR 63.6660(b), as specified in 40 CFR 63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
 - g. Pursuant to 40 CFR 63.6660(c), you must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1).
23. 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.
- 24a. Pursuant to 35 Ill. Adm. Code 214.305(a)(3), except as provided in 35 Ill. Adm. Code 214.305(b), (c), and (d), on and after January 1, 2017, the owner or operator of a process emission source must comply with the following:
- The owner or operator must:
- i. Maintain records demonstrating that the fuel oil used by the process emission source complies with the requirements in 35 Ill. Adm. Code 214.305(a)(1) and (a)(2), such as records from the fuel supplier indicating the sulfur content of the fuel oil; and
 - ii. Retain the records for at least 5 years, and provide copies of the records to the Illinois EPA within 30 days after receipt of a request by the Illinois EPA;
- 25a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(B), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall comply with the following: On and after January 1, 2012, collect and record the following information each month for each cleaning operation, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2):
- i. The name and identification of each VOM-containing cleaning solution as applied in each cleaning operation;
 - ii. The VOM content of each cleaning solution as applied in each cleaning operation;
 - iii. The weight of VOM per volume and the volume of each as-used cleaning solution; and

- iv. The total monthly VOM emissions from cleaning operations at the source;
 - b. Pursuant to 35 Ill. Adm. Code 218.187(e)(10), all records required by 35 Ill. Adm. Code 218.187(e) shall be retained by the source for at least three years and shall be made available to the Illinois EPA upon request.
- 26a. 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 and Baghouse Filters associated with the Starch Gumdrop Deposition Operations:
 - A. Records for periodic inspection of the dust collectors and baghouse filters 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. The Permittee shall keep a copy of the Fugitive Particulate Operating Program, any amendments or revisions to the Fugitive Particulate Operating Program, and the Permittee shall also keep a record of activities completed according to the Fugitive Particulate Operating Program.
 - iii. The name and identification number, usage, and VOM content (minus water and any compounds which are specifically exempted from the definition of VOM) of each VOM containing material used (lbs/day and tons/year, weight %);
 - iv. The throughput of the Makat Starch-Gumdrop Deposition operation, Mixing Kettle operation, and Reclaim Melt Kettle operation, (lbs/day and tons/year);
 - v. Natural gas fuel usage (mmscf/day and mmscf/year);
 - vi. Hours of operation of the diesel-powered generators (hours/month and hours/year); and
 - vii. Monthly and annual emissions of CO, NO_x, PM, SO₂, and VOM from the source with supporting calculations (tons/month and tons/year).
- b. All records and logs required by Condition 26(a) of 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 storage device) 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.

- 27a. Pursuant to 40 CFR 63.6640(b), you must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to 40 CFR 63 Subpart ZZZZ that apply to you. These instances are deviations from the emission and operating limitations in 40 CFR 63 Subpart ZZZZ. These deviations must be reported according to the requirements in 40 CFR 63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE.
- b. Pursuant to 40 CFR 63.6640(e), you must also report each instance in which you did not meet the requirements in Table 8 to 40 CFR 63 Subpart ZZZZ that apply to you. If you own or operate a new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions (except new or reconstructed 4SLB engines greater than or equal to 250 and less than or equal to 500 brake HP), a new or reconstructed stationary RICE located at an area source of HAP emissions, or any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to 40 CFR 63 Subpart ZZZZ: An existing 2SLB stationary RICE, an existing 4SLB stationary RICE, an existing emergency stationary RICE, an existing limited use stationary RICE, or an existing stationary RICE which fires landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis. If you own or operate any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to 40 CFR 63 Subpart ZZZZ, except for the initial notification requirements: a new or reconstructed stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, a new or reconstructed emergency stationary RICE, or a new or reconstructed limited use stationary RICE.
- c. Pursuant to 40 CFR 63.6645(a), you must submit all of the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f) (4) and (f) (6), 63.9(b) through (e), and (g) and (h) that apply to you by the dates specified if you own or operate any of the following;
- i. An existing stationary CI RICE located at an area source of HAP emissions.
 - ii. This requirement does not apply if you own or operate an existing stationary RICE less than 100 HP, an existing stationary emergency RICE, or an existing stationary RICE that is not subject to any numerical emission standards.
- d. Pursuant to 40 CFR 63.6645(g), if you are required to conduct a performance test, you must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in 40 CFR 63.7(b) (1).

- e. Pursuant to 40 CFR 63.6645(h), if you are required to conduct a performance test or other initial compliance demonstration as specified in Tables 4 and 5 to 40 CFR 63 Subpart ZZZZ, you must submit a Notification of Compliance Status according to 40 CFR 63.9(h)(2)(ii).
 - i. For each initial compliance demonstration required in Table 5 to 40 CFR 63 Subpart ZZZZ that does not include a performance test, you must submit the Notification of Compliance Status before the close of business on the 30th day following the completion of the initial compliance demonstration.
 - ii. For each initial compliance demonstration required in Table 5 to 40 CFR 63 Subpart ZZZZ that includes a performance test conducted according to the requirements in Table 3 to 40 CFR 63 Subpart ZZZZ, you must submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th day following the completion of the performance test according to 40 CFR 63.10(d)(2).
- f. Pursuant to 40 CFR 63.6650(a), you must submit each report in Table 7 of 40 CFR 63 Subpart ZZZZ that applies to you.

Table 7 to Subpart ZZZZ of Part 63—Requirements for Reports

As stated in 40 CFR 63.6650, you must comply with the following requirements for reports:

| For each . . . | You must submit a . . . | The report must contain . . . | You must submit the report . . . |
|---|-------------------------|--|---|
| 1. Existing non-emergency, non-black start stationary RICE 100≤HP≤500 HP located at a major source of HAP; existing non-emergency, non-black start stationary CI RICE >500 HP located at a major source of HAP; existing non-emergency 4SRB stationary RICE >500 HP located at a major source of HAP; existing non-emergency, non-black start stationary CI RICE >300 HP located at an area source of HAP; new or reconstructed non-emergency stationary RICE >500 HP located at a major source of HAP; and new or reconstructed non-emergency 4SLB stationary RICE 250≤HP≤500 located at a major source of HAP | Compliance report | a. If there are no deviations from any emission limitations or operating limitations that apply to you, a statement that there were no deviations from the emission limitations or operating limitations during the reporting period. If there were no periods during which the CMS, including CEMS and CPMS, was out-of-control, as specified in 40 CFR 63.8(c)(7), a statement that there were not periods during which the CMS was out-of-control during the reporting period; or | i. Semiannually according to the requirements in 40 CFR 63.6650(b)(1)-(5) for engines that are not limited use stationary RICE subject to numerical emission limitations; ii. Annually according to the requirements in 40 CFR 63.6650(b)(6)-(9) for engines that are limited use stationary RICE subject to numerical emission limitations. |

| For each . . . | You must submit a . . . | The report must contain . . . | You must submit the report . . . |
|----------------|----------------------------|--|---|
| | | b. If you had a deviation from any emission limitation or operating limitation during the reporting period, the information in 40 CFR 63.6650(d). If there were periods during which the CMS, including CEMS and CPMS, was out-of-control, as specified in 40 CFR 63.8(c)(7), the information in 40 CFR 63.6650(e); or | i. Semiannually according to the requirements in 40 CFR 63.6650(b). |
| | | c. If you had a malfunction during the reporting period, the information in 40 CFR 63.6650(c)(4). | i. Semiannually according to the requirements in 40 CFR 63.6650(b). |

- g. Pursuant to 40 CFR 63.6650(b), unless the Illinois EPA or USEPA has approved a different schedule for submission of reports under 40 CFR 63.10(a), you must submit each report by the date in Table 7 of 40 CFR 63 Subpart ZZZZ and according to the requirements in 40 CFR 63.6650(b)(1) through (b)(9).
 - i. For semiannual Compliance reports, the first Compliance report must cover the period beginning on the compliance date that is specified for your affected source in 40 CFR 63.6595 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in 40 CFR 63.6595.
 - ii. For semiannual Compliance reports, the first Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in 40 CFR 63.6595.
 - iii. For semiannual Compliance reports, each subsequent Compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
 - iv. For semiannual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
 - v. For annual Compliance reports, the first Compliance report must cover the period beginning on the compliance date that is specified for your affected source in 40 CFR 63.6595 and ending on December 31.
 - vi. For annual Compliance reports, the first Compliance report must be postmarked or delivered no later than January 31 following the

end of the first calendar year after the compliance date that is specified for your affected source in 40 CFR 63.6595.

- vii. For annual Compliance reports, each subsequent Compliance report must cover the annual reporting period from January 1 through December 31.
- viii. For annual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than January 31.
- h. Pursuant to 40 CFR 63.6650(c), the Compliance report must contain the information in 40 CFR 63.6650(c)(1) through (6).
 - i. Company name and address.
 - ii. Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - iii. Date of report and beginning and ending dates of the reporting period.
 - iv. If you had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with 40 CFR 63.6605(b), including actions taken to correct a malfunction.
 - v. If there are no deviations from any emission or operating limitations that apply to you, a statement that there were no deviations from the emission or operating limitations during the reporting period.
 - vi. If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control, as specified in 40 CFR 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.
- i. Pursuant to 40 CFR 63.6650(d), for each deviation from an emission or operating limitation that occurs for a stationary RICE where you are not using a CMS to comply with the emission or operating limitations in 40 CFR 63 Subpart ZZZZ, the Compliance report must contain the information in 40 CFR 63.6650(c)(1) through (4) and the information in 40 CFR 63.6650(d)(1) and (2).
 - i. The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
 - ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the

corrective action taken.

- j. Pursuant to 40 CFR 63.6650(e), for each deviation from an emission or operating limitation occurring for a stationary RICE where you are using a CMS to comply with the emission and operating limitations in 40 CFR 63 Subpart ZZZZ, you must include information in 40 CFR 63.6650(c)(1) through (4) and (e)(1) through (12).
 - i. The date and time that each malfunction started and stopped.
 - ii. The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks.
 - iii. The date, time, and duration that each CMS was out-of-control, including the information in 40 CFR 63.8(c)(8).
 - iv. The date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period.
 - v. A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period.
 - vi. A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes.
 - vii. A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the stationary RICE at which the CMS downtime occurred during that reporting period.
 - viii. An identification of each parameter and pollutant (CO or formaldehyde) that was monitored at the stationary RICE.
 - ix. A brief description of the stationary RICE.
 - x. A brief description of the CMS.
 - xi. The date of the latest CMS certification or audit.
 - xii. A description of any changes in CMS, processes, or controls since the last reporting period.
- k. Pursuant to 40 CFR 63.6650(h), if you own or operate an emergency stationary RICE with a site rating of more than 100 brake HP that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in 40 CFR 63.6640(f)(4)(ii), you must submit an annual report according to the requirements in 40 CFR 63.6650(h)(1) through (3).
 - i. The report must contain the following information:

- A. Company name and address where the engine is located.
 - B. Date of the report and beginning and ending dates of the reporting period.
 - C. Engine site rating and model year.
 - D. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
 - E. Hours operated for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii).
 - F. Number of hours the engine is contractually obligated to be available for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii).
 - G. Hours spent for operation for the purpose specified in 40 CFR 63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR 63.6640(f)(4)(ii). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.
 - H. If there were no deviations from the fuel requirements in 40 CFR 63.6604 that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period.
 - I. If there were deviations from the fuel requirements in 40 CFR 63.6604 that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken.
- ii. The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.
 - iii. The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to 40 CFR 63 Subpart ZZZZ is not available in CEDRI at the time that the report is due, the written report must be submitted to the Illinois EPA or USEPA at the appropriate address listed in 40 CFR 63.13.
28. 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.

29. Pursuant to 35 Ill. Adm. Code 214.305(a)(3)(C), except as provided in 35 Ill. Adm. Code 214.305(b), (c), and (d), on and after January 1, 2017, the owner or operator of a process emission source must comply with the following:

The owner or operator must notify the Illinois EPA within 30 days after discovery of deviations from any of the requirements in this 35 Ill. Adm. Code 214.305(a). At minimum, and in addition to any permitting obligations, such notification must include a description of the deviations, a discussion of the possible cause of the deviations, any corrective actions taken, and any preventative measures taken.

- 30a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(C), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall comply with the following: Notify the Illinois EPA of any record that shows that the combined emissions of VOM from cleaning operations at the source, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2), ever equal or exceed 226.8 kg/month (500 lbs/month), in the absence of air pollution control equipment, within 30 days after the event occurs.

- b. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code Part 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.

- 31a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit or otherwise, the Permittee shall submit a report to the Illinois EPA's Bureau of Air Compliance Section in Springfield, Illinois within thirty (30) days after the exceedance or deviation. The report shall identify the duration and the emissions impact of the exceedance or deviation, a copy of the relevant records and information to resolve the exceedance or deviation, and a description of the efforts to reduce emissions from, and the duration of exceedance or deviation, and to prevent future occurrences of any such exceedance or deviation.

- b. One (1) copy of required reports and notifications shall be sent to:

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

It should be noted that the two No 2 fuel oil storage tanks are exempt from permitting pursuant to 35 Ill. Adm. Code 201.146(n)(3).

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If you have any questions on this, please call Madeleine McDonald at 217/785-1705.

William D. Marr
Manager, Permit Section
Bureau of Air

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Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the candy 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 (e.g., 50 tons per year for NO_x and VOM) 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.

| <u>Emission Unit</u> | E M I S S I O N S (Tons/Year) | | | | |
|------------------------|-------------------------------|-----------------------|-------------|-----------------------|--------------|
| | <u>CO</u> | <u>NO_x</u> | <u>PM</u> | <u>SO₂</u> | <u>VOM</u> |
| Makat Starch- | | | | | |
| Gumdrop Deposition | | | 2.28 | | |
| Two Mixing Kettles | | | 1.54 | | |
| Boilers | 16.80 | 20.00 | 1.52 | 0.12 | 1.10 |
| Flavor Additives | | | | | 23.06 |
| Reclaim Melt Kettles | | | 0.44 | | 0.32 |
| Generator Sets #1 - #5 | <u>0.86</u> | <u>3.75</u> | <u>0.11</u> | <u>0.35</u> | <u>0.11</u> |
| TOTAL | <u>17.66</u> | <u>23.75</u> | <u>5.89</u> | <u>0.47</u> | <u>24.59</u> |

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Attachment B - Table 4 to Subpart ZZZZ of Part 63-Requirements for Performance Tests

As stated in 40 CFR 63.6610, 63.6611, 63.6620, and 63.6640, you must comply with the following requirements for performance tests for stationary RICE:

| For each . . . | Complying with the requirement to . . . | You must . . . | Using . . . | According to the following requirements . . . |
|---------------------------------------|---|--|--|--|
| 1. 2SLB, 4SLB, and CI stationary RICE | a. reduce CO emissions | i. Select the sampling port location and the number/location of traverse points at the inlet and outlet of the control device; and | | (a) For CO and O ₂ measurement, ducts ≤6 inches in diameter may be sampled at a single point located at the duct centroid and ducts >6 and ≤12 inches in diameter may be sampled at 3 traverse points located at 16.7, 50.0, and 83.3% of the measurement line ('3-point long line'). If the duct is >12 inches in diameter and the sampling port location meets the two and half-diameter criterion of Section 11.1.1 of Method 1 of 40 CFR part 60, appendix A-1, the duct may be sampled at '3-point long line'; otherwise, conduct the stratification testing and select sampling points according to Section 8.1.2 of Method 7E of 40 CFR part 60, appendix A-4. |
| | | ii. Measure the O ₂ at the inlet and outlet of the control device; and | (1) Method 3 or 3A or 3B of 40 CFR part 60, appendix A-2, or ASTM Method D6522-00 (Reapproved 2005) ^{ac} (heated probe not necessary) | (b) Measurements to determine O ₂ must be made at the same time as the measurements for CO concentration |
| | | iii. Measure the CO at the inlet and the outlet of the control device | (1) ASTM D6522-00 (Reapproved 2005) ^{abc} or Method 10 of 40 CFR part 60, appendix A | (c) The CO concentration must be at 15 percent O ₂ , dry basis. |
| 3. Stationary RICE | a. limit the concentration of formaldehyde or CO in the stationary RICE exhaust | i. Select the sampling port location and the number of traverse points; and | (1) Method 1 or 1A of 40 CFR part 60, appendix A §63.7(d)(1)(i) | (a) if using a control device, the sampling site must be located at the outlet of the control device. |
| | | ii. Determine the O ₂ concentration of the stationary RICE exhaust at the sampling port location; and | (1) Method 3 or 3A or 3B of 40 CFR part 60, appendix A, or ASTM Method D6522-00 (Reapproved 2005). ^a | (a) measurements to determine O ₂ concentration must be made at the same time and location as the measurements for formaldehyde or CO concentration. |

| For each . . . | Complying with the requirement to . . . | You must . . . | Using . . . | According to the following requirements . . . |
|----------------|---|---|--|--|
| | | iii. Measure moisture content of the stationary RICE exhaust at the sampling port location; and | (1) Method 4 of 40 CFR part 60, appendix A, or Test Method 320 of 40 CFR part 63, appendix A, or ASTM D 6348-03.a | (a) measurements to determine moisture content must be made at the same time and location as the measurements for formaldehyde or CO concentration. |
| | | iv. Measure formaldehyde at the exhaust of the stationary RICE; or | (1) Method 320 or 323 of 40 CFR part 63, appendix A; or ASTM D6348-03, a provided in ASTM D6348-03 Annex A5 (Analyte Spiking Technique), the percent R must be greater than or equal to 70 and less than or equal to 130 | (a) Formaldehyde concentration must be at 15 percent O ₂ , dry basis. Results of this test consist of the average of the three 1-hour or longer runs. |
| | | v. measure CO at the exhaust of the stationary RICE. | (1) Method 10 of 40 CFR part 60, appendix A, ASTM Method D6522-00 (2005), ^a or Method 320 of 40 CFR part 63, appendix A, or ASTM D6348-03.a | (a) CO concentration must be at 15 percent O ₂ , dry basis. Results of this test consist of the average of the three 1-hour or longer runs. |

^a You may also use Methods 3A and 10 as options to ASTM-D6522-00 (2005). You may obtain a copy of ASTM-D6522-00 (2005) from at least one of the following addresses: American Society for Testing and Materials, 100 Barr Harbor Drive, West Conshohocken, PA 19428-2959, or University Microfilms International, 300 North Zeeb Road, Ann Arbor, MI 48106.

^b You may obtain a copy of ASTM-D6348-03 from at least one of the following addresses: American Society for Testing and Materials, 100 Barr Harbor Drive, West Conshohocken, PA 19428-2959, or University Microfilms International, 300 North Zeeb Road, Ann Arbor, MI 48106.

Attachment C - Table 8 to Subpart ZZZZ of Part 63—Applicability of General Provisions to Subpart ZZZZ

As stated in 40 CFR 63.6665, you must comply with the following applicable general provisions.

| General provisions citation | Subject of citation | Applies to subpart | Explanation |
|------------------------------------|---|---------------------------|---|
| §63.1 | General applicability of the General Provisions | Yes. | |
| §63.2 | Definitions | Yes | Additional terms defined in 40 CFR 63.6675. |
| §63.3 | Units and abbreviations | Yes. | |
| §63.4 | Prohibited activities and circumvention | Yes. | |
| §63.5 | Construction and reconstruction | Yes. | |
| §63.6(a) | Applicability | Yes. | |
| §63.6(b)(1)-(4) | Compliance dates for new and reconstructed sources | Yes. | |
| §63.6(b)(5) | Notification | Yes. | |
| §63.6(b)(6) | [Reserved] | | |
| §63.6(b)(7) | Compliance dates for new and reconstructed area sources that become major sources | Yes. | |
| §63.6(c)(1)-(2) | Compliance dates for existing sources | Yes. | |
| §63.6(c)(3)-(4) | [Reserved] | | |
| §63.6(c)(5) | Compliance dates for existing area sources that become major sources | Yes. | |
| §63.6(d) | [Reserved] | | |
| §63.6(e) | Operation and maintenance | No. | |
| §63.6(f)(1) | Applicability of standards | No. | |
| §63.6(f)(2) | Methods for determining compliance | Yes. | |
| §63.6(f)(3) | Finding of compliance | Yes. | |
| §63.6(g)(1)-(3) | Use of alternate standard | Yes. | |
| §63.6(h) | Opacity and visible emission standards | No | Subpart ZZZZ does not contain opacity or visible emission standards. |
| §63.6(i) | Compliance extension procedures and criteria | Yes. | |
| §63.6(j) | Presidential compliance exemption | Yes. | |
| §63.7(a)(1)-(2) | Performance test dates | Yes | Subpart ZZZZ contains performance test dates at 40 CFR 63.6610, 63.6611, and 63.6612. |
| §63.7(a)(3) | CAA section 114 authority | Yes. | |
| §63.7(b)(1) | Notification of performance test | Yes | Except that 40 CFR 63.7(b)(1) only applies as specified in 40 CFR 63.6645. |

| General provisions citation | Subject of citation | Applies to subpart | Explanation |
|------------------------------------|--|---------------------------|--|
| §63.7(b)(2) | Notification of rescheduling | Yes | Except that 40 CFR 63.7(b)(2) only applies as specified in 40 CFR 63.6645. |
| §63.7(c) | Quality assurance/test plan | Yes | Except that 40 CFR 63.7(c) only applies as specified in 40 CFR 63.6645. |
| §63.7(d) | Testing facilities | Yes. | |
| §63.7(e)(1) | Conditions for conducting performance tests | No. | Subpart ZZZZ specifies conditions for conducting performance tests at 40 CFR 63.6620. |
| §63.7(e)(2) | Conduct of performance tests and reduction of data | Yes | Subpart ZZZZ specifies test methods at 40 CFR 63.6620. |
| §63.7(e)(3) | Test run duration | Yes. | |
| §63.7(e)(4) | Administrator may require other testing under section 114 of the CAA | Yes. | |
| §63.7(f) | Alternative test method provisions | Yes. | |
| §63.7(g) | Performance test data analysis, recordkeeping, and reporting | Yes. | |
| §63.7(h) | Waiver of tests | Yes. | |
| §63.8(a)(1) | Applicability of monitoring requirements | Yes | Subpart ZZZZ contains specific requirements for monitoring at 40 CFR 63.6625. |
| §63.8(a)(2) | Performance specifications | Yes. | |
| §63.8(a)(3) | [Reserved] | | |
| §63.8(a)(4) | Monitoring for control devices | No. | |
| §63.8(b)(1) | Monitoring | Yes. | |
| §63.8(b)(2)-(3) | Multiple effluents and multiple monitoring systems | Yes. | |
| §63.8(c)(1) | Monitoring system operation and maintenance | Yes. | |
| §63.8(c)(1)(i) | Routine and predictable SSM | No | |
| §63.8(c)(1)(ii) | SSM not in Startup Shutdown Malfunction Plan | Yes. | |
| §63.8(c)(1)(iii) | Compliance with operation and maintenance requirements | No | |
| §63.8(c)(2)-(3) | Monitoring system installation | Yes. | |
| §63.8(c)(4) | Continuous monitoring system (CMS) requirements | Yes | Except that subpart ZZZZ does not require Continuous Opacity Monitoring System (COMS). |
| §63.8(c)(5) | COMS minimum procedures | No | Subpart ZZZZ does not require COMS. |
| §63.8(c)(6)-(8) | CMS requirements | Yes | Except that subpart ZZZZ does not require COMS. |
| §63.8(d) | CMS quality control | Yes. | |

| General provisions citation | Subject of citation | Applies to subpart | Explanation |
|-----------------------------|---|---|---|
| \$63.8(e) | CMS performance evaluation | Yes | Except for 40 CFR 63.8(e) (5) (ii), which applies to COMS. |
| | | Except that 40 CFR 63.8(e) only applies as specified in 40 CFR 63.6645. | |
| \$63.8(f) (1) - (5) | Alternative monitoring method | Yes | Except that 40 CFR 63.8(f) (4) only applies as specified in 40 CFR 63.6645. |
| \$63.8(f) (6) | Alternative to relative accuracy test | Yes | Except that 40 CFR 63.8(f) (6) only applies as specified in 40 CFR 63.6645. |
| \$63.8(g) | Data reduction | Yes | Except that provisions for COMS are not applicable. Averaging periods for demonstrating compliance are specified at 40 CFR 63.6635 and 63.6640. |
| \$63.9(a) | Applicability and State delegation of notification requirements | Yes. | |
| \$63.9(b) (1) - (5) | Initial notifications | Yes | Except that 40 CFR 63.9(b) (3) is reserved. |
| | | Except that 40 CFR 63.9(b) only applies as specified in 40 CFR 63.6645. | |
| \$63.9(c) | Request for compliance extension | Yes | Except that 40 CFR 63.9(c) only applies as specified in 40 CFR 63.6645. |
| \$63.9(d) | Notification of special compliance requirements for new sources | Yes | Except that 40 CFR 63.9(d) only applies as specified in 40 CFR 63.6645. |
| \$63.9(e) | Notification of performance test | Yes | Except that 40 CFR 63.9(e) only applies as specified in 40 CFR 63.6645. |
| \$63.9(f) | Notification of visible emission (VE)/opacity test | No | Subpart ZZZZ does not contain opacity or VE standards. |
| \$63.9(g) (1) | Notification of performance evaluation | Yes | Except that 40 CFR 63.9(g) only applies as specified in 40 CFR 63.6645. |
| \$63.9(g) (2) | Notification of use of COMS data | No | Subpart ZZZZ does not contain opacity or VE standards. |
| \$63.9(g) (3) | Notification that criterion for alternative to RATA is exceeded | Yes | If alternative is in use. |

| General provisions citation | Subject of citation | Applies to subpart | Explanation |
|-----------------------------|---|---|---|
| | | Except that 40 CFR 63.9(g) only applies as specified in 40 CFR 63.6645. | |
| §63.9(h) (1) - (6) | Notification of compliance status | Yes | Except that notifications for sources using a CEMS are due 30 days after completion of performance evaluations. 40 CFR 63.9(h) (4) is reserved. |
| | | | Except that 40 CFR 63.9(h) only applies as specified in 40 CFR 63.6645. |
| §63.9(i) | Adjustment of submittal deadlines | Yes. | |
| §63.9(j) | Change in previous information | Yes. | |
| §63.10(a) | Administrative provisions for recordkeeping/reporting | Yes. | |
| §63.10(b) (1) | Record retention | Yes | Except that the most recent 2 years of data do not have to be retained on site. |
| §63.10(b) (2) (i) - (v) | Records related to SSM | No. | |
| §63.10(b) (2) (vi) - (xi) | Records | Yes. | |
| §63.10(b) (2) (xii) | Record when under waiver | Yes. | |
| §63.10(b) (2) (xiii) | Records when using alternative to RATA | Yes | For CO standard if using RATA alternative. |
| §63.10(b) (2) (xiv) | Records of supporting documentation | Yes. | |
| §63.10(b) (3) | Records of applicability determination | Yes. | |
| §63.10(c) | Additional records for sources using CEMS | Yes | Except that 40 CFR 63.10(c) (2)-(4) and (9) are reserved. |
| §63.10(d) (1) | General reporting requirements | Yes. | |
| §63.10(d) (2) | Report of performance test results | Yes. | |
| §63.10(d) (3) | Reporting opacity or VE observations | No | Subpart ZZZZ does not contain opacity or VE standards. |
| §63.10(d) (4) | Progress reports | Yes. | |
| §63.10(d) (5) | Startup, shutdown, and malfunction reports | No. | |
| §63.10(e) (1) and (2) (i) | Additional CMS Reports | Yes. | |
| §63.10(e) (2) (ii) | COMS-related report | No | Subpart ZZZZ does not require COMS. |

| General provisions citation | Subject of citation | Applies to subpart | Explanation |
|------------------------------------|---|---------------------------|---|
| \$63.10 (e) (3) | Excess emission and parameter exceedances reports | Yes. | Except that 40 CFR 63.10 (e) (3) (i) (C) is reserved. |
| \$63.10 (e) (4) | Reporting COMS data | No | Subpart ZZZZ does not require COMS. |
| \$63.10 (f) | Waiver for recordkeeping/reporting | Yes. | |
| \$63.11 | Flares | No. | |
| \$63.12 | State authority and delegations | Yes. | |
| \$63.13 | Addresses | Yes. | |
| \$63.14 | Incorporation by reference | Yes. | |
| \$63.15 | Availability of information | Yes. | |



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
P. O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

STANDARD CONDITIONS
FOR
OPERATING PERMITS

May, 1993

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special condition(s).

1. The issuance of this permit does not release the Permittee from compliance with state and federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or with applicable local laws, ordinances and regulations.
2. The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under 35 Ill. Adm. Code 201.166.
3.
 - a. The Permittee shall not authorize, cause, direct or allow any modification, as defined in 35 Ill. Adm. Code 201.102, of equipment, operations or practices which are reflected in the permit application as submitted unless a new application or request for revision of the existing permit is filed with the Illinois EPA and unless a new permit or revision of the existing permit(s) is issued for such modification.
 - b. This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted location(s) or if all equipment is removed, notwithstanding the expiration date specified on the permit.
4. The Permittee shall allow any duly authorized agent of the Illinois EPA, upon the presentation of credentials, at reasonable times:
 - a. To enter the Permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit;
 - b. To have access to and to copy any records required to be kept under the terms and conditions of this permit;
 - c. To inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit;
 - d. To obtain and remove samples of any discharge or emission of pollutants; and
 - e. To enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring or recording any activity, discharge or emission authorized by this permit.
5. The issuance of this permit:
 - a. Shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are located;

- b. Does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the facilities;
 - c. Does not take into consideration or attest to the structural stability of any unit or part of the project; and
 - d. In no manner implies or suggests that the Illinois EPA (or its officers, agents, or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
6. The facilities covered by this permit shall be operated in such a manner that the disposal of air contaminants collected by the equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.
7. The Permittee shall maintain all equipment covered under this permit in such a manner that the performance of such equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.
8. The Permittee shall maintain a maintenance record on the premises for each item of air pollution control equipment. These records shall be made available to any agent of the Environmental Protection Agency at any time during normal working hours and/or operating hours. At a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.
9. No person shall cause or allow continued operation during malfunction, breakdown or startup of any emission source or related air pollution control equipment if such operation would cause a violation of an applicable emission standard or permit limitation. Should a malfunction, breakdown or startup occur, which results in emissions in excess of any applicable standard or permit limitation, the Permittee shall:
- a. Immediately report the incident to the Illinois EPA's Regional Field Operations Section Office by telephone, telegraph or other method as constitutes the fastest available alternative, and shall comply with all reasonable directives of the Illinois EPA with respect to the incident;
 - b. Maintain the following records for a period of no less than two (2) years:
 - i. Date and duration of malfunction, breakdown, or startup,
 - ii. Full and detailed explanation of the cause,
 - iii. Contaminants emitted and an estimate of quantity of emissions,
 - iv. Measures taken to minimize the amount of emissions during the malfunction, breakdown or startup, and
 - v. Measures taken to reduce future occurrences and frequency of incidents.
10. If the permit application contains a compliance program and project completion schedule, the Permittee shall submit a project completion status report within thirty (30) days of any date specified in the compliance program and project completion schedule or at six month intervals, whichever is more frequent.
11. The Permittee shall submit an Annual Emission Report as required by 35 Ill. Adm. Code 201.302 and 35 Ill. Adm. Code Part 254.