February 5, 2016

ATTN: Compliance Tracker AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

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U.S. EPA REGION 5

RE: Section 114(a) Request for Information
Ferrara Candy Company

To Whom it May Concern:

Per your request, Ferrara Candy Company, located at 7301 West Harrison Street in Forest Park, Illinois (the facility) is providing the following information:

1A. The date the catalytic oxidizer was installed and the date it started operating.
The Illinois EPA issued a construction permit for the installation of the catalytic oxidizer on July 24, 2000. The catalytic oxidizer was installed and began operation in August 2000. Since these activities occurred more than 15 years ago, Ferrara was unable locate actual documentation to determine the exact date in which the oxidizer installation occurred but, based upon construction permit issuance date (July 24, 2000) and initial stack testing date (September 22, 2000), this time frame should be accurate.

Prepared by: Britt E. Wenzel, Mostardi Platt/Craig Caswell, Ferrara Candy Company

1B. An explanation of the process units that vent to the oxidizer.
The facility exhausts volatile organic material (VOM) emissions from the facility's chocolate and soft candy piece polishing pans to the catalytic oxidizer. There are 81 polishing pans currently operating and exhausting to the oxidizer.

These pans are operated within four (4) permanent enclosures/rooms that are maintained at a negative pressure to ensure 100% capture of VOM emissions from both compliant and non-compliant confectioner's glazes.

The candy polishing process is a batch process in which candy centers are placed into ovate rotating pans where the pans are filled with a pre-weighed amount of centers. The typical batch process from center addition to pan unloading takes approximately one hour. After the centers

are added, the chocolate or other "grossing" raw materials are added by hand and until the desired size of the candy pieces is obtained. Once the candy is sized properly, a pre-measured amount of confectioner's glaze is added by hand. Once added, the pans rotate until the glaze is dried and the batch is then finished and ready for packaging.

The glazes are either vegetable/mineral oil or solvent-based. The solvent-based glazes consist mainly of solids dissolved in ethanol, ethyl acetate, or other minor food grade solvents that evaporate to leave a hardy, shiny coating on the candy. Vegetable/mineral oil-based glazes act in a similar fashion but dry more slowly.

Candies polished include chocolate, jelly beans, and other soft candies as described below:

Chocolate Panning/Polishing usually starts with almond, peanut, or raisin centers rather than sugar centers as is used for the jelly beans and soft candy panning process. Steam heated chocolate is sprayed or poured onto the centers as the pans rotate and conditioned air solidifies the chocolate as the centers are covered and increased in size. After the correct amount of chocolate is applied, a confectioner's glaze, which may contain VOCs, is hand poured in pre-measured amounts once per batch onto the candy pieces. The solvent portion of the glaze evaporates and leaves a hard, glossy shine (e.g., polish) to the candy pieces. The chocolate panning/polishing process in conducted in permanent total enclosures (PTEs) and VOC emissions are collected and routed to a catalytic oxidizer for destruction.

Once the candy glaze solidifies, the batch is complete and the candy pieces are removed from the pans, placed onto trays and transferred to packaging.

Soft Candy Panning/Polishing usually starts with "grossed" candy centers and other ingredients such as sugar, colors, and flavors which are added to build up a shell around the centers. As a final step, a confectioner's glaze, which may or may not contain VOCs, is added once per batch by hand in pre-measured amounts as a protective coating and decorative layer. The soft candy panning/polishing process in conducted in a PTE and VOC emissions are collected and routed to a catalytic oxidizer for destruction.

As with the chocolate polishing process, once the glaze solidifies the batch is completed and the candy pieces are removed from the pans, placed onto trays and transferred to packaging.

Per Title 35 of the Illinois Administrative Code, Part 218, Subpart TT (35 IAC 218, Subpart TT), the facility is required to either use compliant glazes with a VOM content of </= to 3.5 lbs VOM/gallon (minus water and exempt compounds) or operate emission capture and control equipment which achieves an overall reduction in uncontrolled VOM emissions of at least 81 percent from these emission units.

All VOM emissions from all confectioner's glaze use, whether in compliance with the 3.5 lbs VOM/gallon limitation or not, are controlled by the facility's catalytic oxidizer.

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1C. A list of all chemicals used at the processes that vent to the oxidizer since October 2013.
The following confectioner's glazes are used at the processes that exhaust emissions to the oxidizer:

GLAZE DESCRIPTION	DENSITY (LBS / GAL)	VOM CONTENT (LBS / GAL)
SPARKLE GLOW SUNBRITE B6	6.90	5.47
FPC-B SUNBRITE GEN	7.17	5.86
3 LBS REFINED HER	7.53	4.69
CAPOL 265C*	7.00	3.10
CAPOL 245C GEN*	7.34	2.20
CAPOL 410 C NESTLE*	8.00	0.00
CAPOL 485C GEN*	7.09	0.71
CAPOL 217P	7.10	4.92
CAPOL 153D	7.40	4.81
MANTROSE HAEUSER LICABEE	7.17	5.88

*35 IAC 218, Subpart TT Compliant Confectioner's Glaze.

1D. Operating records for the facility since October 1, 2013.
Raw material throughput and emission records from 2013-2015 are included in the Attachment A file on the enclosed compact disc (CD). These records are organized by year and process area (e.g. panning, polishing/printing, natural gas combustion, etc.).

The facility operates 24 hours/day, seven (7) days/week with the oxidizer charts recording panning/polishing operating times.

The panning operations are batch processes and do not operate continuously. The VOM emissions occur when the confectioner's glaze is added to the candy pieces.

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1E. Charts for the oxidizer from: (1) October 1, 2013 to March 17, 2015 and (2) October 15, 2015 to the date of this information request (December 29, 2015).
The oxidizer charts for the dates requested are included in the Attachment B file on the enclosed CD. It should be noted that the oxidizer operates continuously, 24 hour per day, and is not turned off except for maintenance activities. The facility is also subject to periodic power outages at which time the oxidizer and processes are not operational.

Please note that the red line on the temperature charts indicates the temperature of the combustion/catalytic chamber at the chamber inlet and the blue line on the chart indicates the temperature at the chamber outlet. Additionally, a flat blue line adjacent to the red line indicates no operations that exhaust to the oxidizer are being conducted.

The temperature monitor is calibrated semi-annually to ensure accuracy and annual maintenance evaluations are completed on the oxidizer by a third party to assist in ensuring proper operation of the oxidizer. The calibration logs from 2010-2015 and the 2013-2015 annual maintenance reports are also provided in Attachment B on the enclosed CD.

Prepared by: Britt E. Wenzel, Mostardi Platt/Craig Caswell, Ferrara Candy Company

1F. Material Safety Data Sheets for all chemicals that have vented to the oxidizer since October 1, 2013.

Material Safety Data Sheets (MSDS) or Safety Data Sheets (SDS) for all chemicals (e.g., confectioner's glazes) that are exhausted to the oxidizer are included in Attachment C on the enclosed CD.

Prepared by: Britt E. Wenzel, Mostardi Platt/Craig Caswell, Ferrara Candy Company

1G. Copies of any stack tests or capture efficiency tests performed at the facility since three years before the catalytic oxidizer was installed to present. Of these tests, please specifically point out the tests that determined the operating temperature of the catalytic oxidizer.

Stack testing of the oxidizer was initially performed soon after installation of the oxidizer to determine the oxidizer operating temperature, demonstrate permanent total enclosures meet requirements, and determine oxidizer VOM emission control efficiency. This test was completed on September 22, 2000. The September 2000 stack test established the oxidizer operating temperature at 500 degrees Fahrenheit (500F). Subsequent testing of the oxidizer and evaluation of the polishing room enclosures was conducted in June 2003 as part of an air permit modification request in order to obtain authorization for the use of additional polishing pans within and additional enclosures to be controlled by the catalytic oxidizer. This testing program established a new oxidizer operating temperature of 525F.

It should be noted that the facility operates the oxidizer at 550F to assist in ensuring the required destruction efficiency is maintained. Additionally, to update the aging temperature chart recorder, Ferrara Candy Company is in the process installing Delta Control Logging software which will electronically record the oxidizer inlet and outlet combustion temperatures and download this data to the company's hard drive which will be backed up daily.

Copies of the catalytic oxidizer testing program reports are included in Attachment D on the enclosed CD.

Test Protocol and Notification

A copy of the Stack Testing Protocol is included in Attachment E on the attached CD and a hard copy is appended to this response. Ferrara Candy Company will provide the required notifications and conduct the requested stack testing program within 45 days of receiving approval from the U.S. EPA.

Additionally, please note that all electronic files have been scanned for viruses using Symantec Endpoint Protection software.

Should you have any questions concerning the information provided, please contact our consultant, Britt Wenzel of Mostardi Platt at (630) 993-2123.

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based upon my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

Respectfully Submitted,

Craig Caswell
Regulatory Engineer

Enclosures

Ferrara Candy Company
7301 West Harrison Street, Forest Park, Illinois
U.S. EPA Section 114 Request
Compact Disc with Requested Information
February 5, 2016