

## PROJECT SUMMARY

### I. INTRODUCTION

The Illinois Environmental Protection Agency (Illinois EPA) is proposing to issue seven (7) new lifetime general operating permits for grain elevators subject to the New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart DD. The purpose of a general permit is to cover a large number of facilities which have similar operations and emissions. The Grain & Feed Association of Illinois requested the Illinois EPA to develop the general permits for grain elevators subject to the NSPS. The Grain & Feed Association of Illinois believes that there are numerous grain elevators subject to the NSPS requirements that may qualify for one of the seven (7) proposed permits.

The proposed general permits would establish limits on a grain elevator's operations and emissions. These types of grain elevators generally have emissions that are not at the levels at which they would be classified as major sources, so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. The proposed limits would be accompanied by testing, recordkeeping, and reporting requirements to assure that each grain elevator is operated in compliance with the emission standards established by both the United States Environmental Protection Agency (USEPA) as well as the Illinois Pollution Control Board.

Once the new general permits are issued, eligible sources will be able to request coverage by one of the seven permits. The lifetime general permit eliminates the need for applying for construction permits and revised operating permits for specified equipment or operational changes, which may be currently required for some of these grain elevators. A lifetime state operating permit has no expiration date and normally does not require public notice. The Illinois EPA will maintain a listing of sources that have received these general permits and the listing will be available upon request.

### II. EMISSION UNITS AND OPERATIONAL LIMITATIONS

A grain elevator's operations include unloading in dump pits, material handling via enclosed internal transfer equipment (e.g., conveyors, legs, drags, etc.), cleaning, drying in column dryers, storage in silos, bins, buildings or piles, and vehicle (truck or rail) loading operations. These types of operations must be within the following criteria and limitations in order to apply for one of the seven (7) new lifetime general operating permits:

- The elevator is located outside a Major Population Area as defined in 35 Ill. Adm. Code 211.3610 (See Attachment B);
- The elevator is not subject to 35 Ill. Adm. Code 212.462 requirements since its operation satisfies the exemptions in Section 9(f) of the Illinois Environmental Protection Act (Act);
- The elevator receives no more than 7,000,000 to 70,000,000 bushels of grain per year total in up to eight dump pits;
- The permanent storage capacity of the elevator as defined at 40 CFR 60.301 is greater than 2,500,000 bushels;

- Grain cleaning does not exceed 700,000 to 4,500,000 bushels per year;
- Grain drying does not exceed 2,100,000 to 13,500,000 bushels per year total in up to four to six column dryers;
- Grain is only received and shipped by road or rail vehicles, not by water; and
- A petroleum bulk plant (SIC 5171), animal feed plant (SIC 2048) or other plant or operation requiring a permit from the Illinois EPA is not associated with the elevator.

The general permits will allow the construction and operation of additional emission units at an existing grain elevator such that the construction and/or operation of the additional units will not cause an exceedance of any of the criteria or limitations identified above and in the applicable general permit.

### III. EMISSIONS

The principal air contaminant emitted from a grain elevator is particulate matter (PM), generated by the handling, storage and transfer of the grain as well as that emitted from roads. Emissions from the grain handling, storage and transfer operations may be controlled by using enclosed equipment and structures that will reduce emissions of particulate matter. Fugitive dust is also controlled by good housekeeping practices or by the application of water or chemical dust suppressants as required keeping emissions to a minimum.

The proposed permits limit the annual emissions of particulate matter (PM) from a grain elevator to less than 25 or 100 tons per year. These types of grain elevators are not subject to the requirements to obtain an operating permit through the Illinois EPA's Clean Air Act Permit Program because the potential emissions of PM10 are below the major source threshold of 100 tons per year.

### IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board emission standards. The Illinois Pollution Control Board's emission standards represent the basic requirements for sources in Illinois. The Illinois Pollution Control Board has standards for sources of regulated pollutants for grain handling sources. A grain elevator would readily comply with all applicable Illinois Pollution Control Board standards.

The USEPA has also adopted standards for grain elevators, for which construction was commenced after August 3, 1978, called the New Source Performance Standards (NSPS), 40 CFR Part 60 Subpart DD, Standards of Performance for Grain Elevators. The Illinois EPA is administering the NSPS in Illinois on behalf of the USEPA under a delegation agreement. A grain elevator would readily comply with all applicable NSPS standards.

### V. PROPOSED PERMITS

The conditions of the proposed permits contain limitations and requirements to assure that a grain elevator will be operated in compliance with the applicable state and federal pollution control

requirements. The conditions include inspection practices, testing, recordkeeping, and reporting requirements that the Permittee must perform on an ongoing basis to demonstrate that the grain elevator is operating within the limitations set by the permit and is properly controlling emissions. The permits also set limitations on the amount of the grain processed by such a grain elevator.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the grain elevators subject to NSPS requirements can meet all applicable state and federal air pollution control requirements, subject to the conditions proposed in the seven (7) draft permits. The Illinois EPA is therefore proposing to issue these lifetime general operating permits for these types of operations.

Comments are requested on the proposed conditions on this draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.