

## PROJECT SUMMARY

### I. INTRODUCTION

The Illinois Environmental Protection Agency (Illinois EPA) is proposing to issue a revised lifetime general operating permit for small country grain elevators. The purpose of a general permit is to cover a large number of small facilities which have similar operations. The Grain & Feed Association of Illinois requested the Illinois EPA to develop a revised general permit for small country grain elevators. The Grain & Feed Association of Illinois believes that there are several hundred small country grain elevators that may qualify for the proposed permit.

The proposed general permit would establish limits on a small country 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 recordkeeping and reporting requirements to assure that each small country 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 revised general permit is issued, eligible sources will be able to request coverage by the permit. The revised 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 small country 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 small country 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 loading operations. These types of operations must be within the following criteria and limitations in order to apply for the lifetime general operating permit:

- 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 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 equal to or less than 2,500,000 bushels;
- Grain cleaning does not exceed 700,000 bushels per year;

- Grain drying does not exceed 2,100,000 bushels per year total in up to four 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 revised general permit will allow the construction and operation of additional emission units at an existing small country 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.

### III. EMISSIONS

The principal air contaminant emitted from a small country 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 permit limits the annual emissions of particulate matter from the small country grain elevator to less than 25 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 are below major source thresholds.

### 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 small country 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. However, due to the permanent grain storage capacity and grain throughput limitations in the lifetime general permit, the 40 CFR Part 60 Subpart DD NSPS is not applicable to the small country grain elevators.

### V. PROPOSED PERMIT

The conditions of the proposed permit contain limitations and requirements to assure that a small country grain elevator will be

operated in compliance with the applicable state and federal pollution control requirements. The conditions include inspection practices, 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 permit also sets 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 small country grain elevators meet all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit. 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 166.