

217-782-2113

JOINT CONSTRUCTION AND OPERATING PERMIT

PERMITTEE

Robbins Resource Recovery Partners, L.P.
c/o Foster Wheeler Illinois, Inc.
Attn: Dave Consalvo, General Manager
13400 South Kedzie Avenue
Robbins, Illinois 60472

Application No.: 98090029

I.D. No.: 031270AAA

Applicant's Designation:

Date Received: October 19, 1998

Subject: Dry Flyash Loadout System

Date Issued: October 15, 1999

Operating Permit Expiration

Date: October 14, 2004

Location: 13400 South Kedzie Avenue, Robbins

This Permit is hereby granted to the above-designated Permittee to CONSTRUCT and OPERATE emission source(s) and air pollution control equipment consisting of a dry flyash loadout system including two telescopic spouts, two spout positioners, two rotary screw augers and two dual tipping valves with dust controlled by two filters (F-309A, F-309B), as described in the above-referenced application. This construction permit is granted based upon the findings and subject to the attached Standard Conditions and the conditions which follow:

FINDINGS

1. Description of Equipment

The proposed dry loadout system provides an alternative to the existing wet system for transferring flyash from the two existing storage silos to tank trucks for off site disposal. The proposed system would be enclosed to contain dust and allow it to be collected in the two new fabric filters and returned to storage.

Robbins plans to use the dry flyash loadout system in place of the wet flyash system except during periods of time when the dry flyash is not operational.

2. Emissions

The proposed dry system will operate in place of the existing wet system so it should not increase particulate matter emissions. Enclosed transfer with control of dust by the two new pulse jet fabric filters provides a comparable performance to the existing system.

CONDITIONS

1. Operation of the emission source(s) included in this permit shall not begin until all associated air pollution control equipment has been constructed and is operational.

2. Visible emissions to the atmosphere from the dry ash conveying system (including conveyor transfer points) shall not exceed more than 9 minutes in any 3-hour period except as provided in 40 CFR 60.55b(b) and (c), with compliance determined in accordance with 40 CFR 60.58b(k).
- 3a. The dry ash loadout system shall only be used to load ash into hopper trucks, tank trucks or other fully enclosed transport containers.
 - b. Ash shall only be transferred by the dry ash system when the enclosures, connection fittings, and the filters are functioning properly.
- 4a. Particulate matter emission into the atmosphere from the filters shall not exceed a concentration greater than 0.02 gr/dscf.
 - b. The air pollution control system, including loadout spouts, enclosure and the fabric filter, shall be operated and maintained in accordance with written procedures maintained on site, that incorporate good air pollution procedures to minimize emissions of particulate matter. At a minimum, these procedures shall incorporate the manufacturer recommendations for inspection and maintenance practices, a copy of which shall be kept at the facility.
5. This construction permit is issued based on no increase in emissions from the facility with the dry ash loadout system. This is because the dry ash loadout system will be an alternative to the existing wet ash loadout system and will provide comparable control of emissions.
 - a.
 - i. The particulate matter emissions of the dry ash loadout system shall not exceed the following:

<u>Equipment</u>	<u>Particulate Matter Emissions</u> <u>(Lb/Hr)</u>
Filter (F-309A)	0.171
Filter (F-309B)	0.171

Compliance with the above limitations shall be demonstrated by maintaining the enclosures and the fabric filters in good operating condition.

- ii. Annual emissions of particulate matter from the dry flyash loadout (including both wet and dry loadout systems) shall not exceed 0.338 tons/yr.

Compliance with this limitation shall be determined on a monthly basis, calculating annual particulate matter emissions as the product of the maximum hourly emissions rate for a unit and the number of hours a unit operated in the preceding 12 months.

6. The Permittee shall provide the Agency written notice of the following:
 - a. Commencement of construction within 10 days.
 - b. Anticipated date of completion at least 10 days in advance.
 - c. Actual construction completion date, within 3 days.
- 7a. The Permittee shall conduct observations for visible emissions from the dry ash system, including the filters, in accordance with 40 CFR 60.58b(k) under representative operating conditions with 30 days of initial startup of such system and within 10 days of written request for the Illinois EPA. Notwithstanding, if the dry ash handling is not used during this period, such observations shall be conducted the first time that the dry ash system is used and repeated again for representative operation conditions if such conditions were not present for the first observations.
- b. At least 30 days prior to the actual date of observations, the Permittee shall submit a written test plan to the Illinois EPA for review and comment. This plan shall include as a minimum:
 - i. The names of the individuals who may be conducting observations and their experience with similar observations;
 - ii. The specific locations or points for which observations will be conducted;
 - iii. The specific conditions under which observations will be conducted, including a discussion of why these conditions will be representative the values of operating parameters for the emission unit, including associated control equipment, and the means by which the operating parameters will be determined;
- c. The Permittee shall provide the Illinois EPA with notice in advance of the observations to allow the Illinois EPA to witness the Permittee's observations and simultaneously conduct its own observations.
 - i. The Permittee shall provide the Illinois EPA with written notification at least 15 days prior to making observations to enable the Illinois EPA to have an observer present.

- ii. If observations are delayed, the Permittee shall promptly notify the Illinois by facsimile, at least 5 days prior to the scheduled date of observations or immediately, if the delay occurs in the 5 days prior to the scheduled date.
- d. The Permittee shall submit the Report for these observations, accompanied by a cover letter stating whether or not compliance was shown, to the Illinois EPA, within 10 days after the results are compiled, but no later than 30 days after the date of observations. The Report shall include as a minimum:
 - i. General information describing the observations, including the name and identification of the emission units which were observed, names of observers, and Illinois EPA witnesses;
 - ii. Summary of results;
 - iii. Description of observation procedures, including descriptions of observation points and observation schedule;
 - iv. Detailed description of observation conditions, including:
 - A. Process information, i.e. mode(s) of operation and process rate; and
 - B. Control equipment information, i.e. operating parameters during observations.
 - v. Data and calculations, including copies of all raw data sheets.
- 8a. The Permittee shall keep inspection, maintenance and repair log(s) for the air pollution control system. These logs shall include as a minimum:
 - i. Date of each inspection, maintenance and or repair activity;
 - ii. Significant findings of each inspection;
 - iii. Description of maintenance or repair activities if not routine preventative maintenance; and
 - iv. Probable cause for requiring maintenance or repair if not routine or preventative.
- b. The Permittee shall keep an operating log(s) for the ash loadout that includes the following information as a minimum for each shipment of ash:
 - i. Date and time.

- ii. Type of loadout, i.e., wet or dry.
 - iii. Identification of receiving vehicles.
 - iv. Identity of individual overseeing ash loadout.
 - v. Any unusual events during loadout, e.g. broken fittings, leaks, or interruption of filter control.
- c. The Permittee shall keep records of the hours of operation of each unit in the dry flyash loadout system, which records shall be compiled on at least a monthly basis.
- d. The Permittee shall keep records of the annual particulate matter emissions from the ash loadout systems, with copies of supporting records and calculations.
9. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) 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 request for records during the course of a source inspection.
10. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to Illinois EPA within 30 days after the exceedance. The report shall include the emissions released in accordance with the description of the exceedance or violation and efforts to reduce emissions and future occurrences.
11. Two copies of required reports and notifications concerning equipment operation or repairs, performance testing or continuous monitoring system shall be sent to:

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

and one copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

Page 6

If you have an question on this permit, please call Jim Cobb at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:JDC:jar

cc: Region 1