

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NSPS SOURCE - REVISED

PERMITTEE

Global Clay Marseilles, LLC
Attn: Charles Laird
1401 Broadway
Marseilles, Illinois 61341

Application No.: 89010009
Applicant's Designation: BH-1
Subject: Brick Plant
Date Issued: September 28, 2001
Location: 1401 Broadway, Marseilles

I.D. No.: 099050AAK
Date Received: August 9, 2001
Expiration Date: August 26, 2003

Permit is hereby granted to the above-designated Permittee to OPERATE emission units(s) and/or air pollution control equipment consisting of a clay brick plant with baghouse controls 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 issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year of sulfur dioxide, 100 tons/year of nitrogen oxides, and 100 tons/year of particulate matter (PM-10)). As a result the source is excluded from requirement to obtain a Clean Air Act Permit Program Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits for this location.
- 2a. The clay grinder and associated equipment in the clay preparation building are subject to New Source Performance Standards (NSPS) for Nonmetallic Mineral Processing Plants, 40 CFR 60, Subparts A and 000. The Illinois EPA is administrating these standards in Illinois on behalf of the United States EPA under a delegation agreement.
- b. The emissions from clay preparation building shall comply with the following requirements (except emissions from truck dumping):
 - i. No visible emission is allowed to be discharged into the atmosphere from building enclosure except from a vent; and
 - ii. Particulate matter emissions from any vent shall not exceed 0.05 g/dscm and exhibit greater than 7% opacity.

- c. At all times the Permittee shall also maintain and operate this equipment, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.
3. Operation of the Clay Brick Plant shall not exceed the following limits:
 - a. Brick Production Rate:
 - i. 95 tons of fired brick/hour and 845,000 tons of fired brick/year. The hourly rate shall be determined by dividing the daily total by 24 hours.
 - ii. Green brick production is limited to 345 hours per month.
 - b. Compliance with annual limits shall be determined on a monthly basis from the data for the preceding 12 months.
 4. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
 - 5a. The Permittee shall in accordance with the manufacturer(s) and/or vendors recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
 - b. The Permittee shall maintain daily records of the following items:
 - i. Brick production (tons/day).
 - ii. Operating hours (hours/day).
 - c. The Permittee shall maintain monthly records of the following items:
 - i. Brick production (tons/month and tons/year).
 - ii. Operating hours (hours/month and hours/year).
 - iii. Green brick operating hours (hours/month and hours per year).

- d. The Permittee shall maintain monthly test results (one test per month) for the half brick sulfur compound content monitor:
 - i. One half fired brick and one half unfired brick (from the same brick) are to be tested for total sulfur compounds.
 - ii. A continuing written record of the total sulfur test results for the past 2 years shall be maintained and available for viewing.
6. The Permittee shall keep a maintenance log for the clay brick plant control system, including maintenance activities, with date and description of inspections, repair actions, and equipment or filter bag replacements, etc.
7. 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 or USEPA 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 or USEPA request for records during the course of a source inspection.
8. 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 the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
9. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a 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 (1) 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
5415 North University
Peoria, Illinois 61614

10. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including material handling or storage activity, beyond the property line of the emission source, pursuant to 35 Ill Adm. Code 212.301.
11. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
 - a. Clay brick production (tons/year).
 - b. If there have been no exceedances during the prior calendar year the Annual Emissions Report shall include a statement to that effect.

It should be noted that this permit has been revised to exempt truck dumping emission from emission standard. This revision does not relax monitoring, recordkeeping, or reporting requirements contained in federally enforceable conditions of this permit. These permit conditions assure that this source would not be a major source for purpose of CAAPP.

It also should be noted that your request to exempt a clay grinder from NSPS applicability cannot be satisfied. An exemption provision of 40 CFR 60.670(d)(1) is applicable "when an existing facility is replaced by a piece of equipment of equal or smaller size". Per definition in Section 60.7 "existing facility means ... any apparatus ... the construction or modification or which is commenced before the date of proposal of that standard". Since original grinder was a subject to NSPS the replacement equipment also shall be classified as NSPS source.

If you have any questions on this, please call Valeriy Brodsky at 217/782-2113.

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

DES:VJB:psj

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the clay brick plant, 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. This is the handling and processing of 845,000 tons per year of brick production which includes 8760 hours of kiln operation and 3,800 hours per year of green brick production. The resulting maximum emissions are well below the levels, (e.g., 100 tons per year of SO₂, 100 tons per year of NO_x, and 100 tons per year of PM₁₀) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. The actual emission from this source will be less than predicted in this summary to the extent that less material is handled (e.g., various larger sizes of brick are produced at slower rates, lime addition rates to the green brick extrusion process can be increased) and control measures are more effective than required in this permit.

<u>Throughput</u>	<u>Emission Unit</u>	<u>Emission Rate</u>	<u>Emissions</u>
845,000 ton/yr	Tunnel Kiln	Stack Test	80.0 ton/yr PM
845,000 ton/yr	Tunnel Kiln	Stack Test	50.37 ton/yr SO ₂
845,000 ton/yr	Tunnel Kiln	Stack test	22.0 ton/yr NO _x
845,000 ton/yr	Tunnel Kiln	Stack Test	8.76 ton/yr VOM
150,000 lb/hr	Material Preparation	0.040 lb/ton and	1.600 ton/yr PM
66,000 lb/hr	Sand Silo	0.33 lb/ton	1.36 ton/yr PM ₁₀
150,000 lb/hr	Mixer with Baghouse	Negative	Negative Wet Material

This table defines the potential emission limits of the plant and is based on emissions determined from maximum emissions and productivity. Emissions for the sand silo, material preparation, and the mixer with baghouse were determined using standard emission factors and standard procedures. Stack test conditions were supplied with the permit application.

This permit is issued based on negligible emissions of particulate matter from the clay grinder. For this purpose, emission shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

VJB:psj