

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
R. A. Cullinan & Son, Inc. for Renewal of the
Federally Enforceable State Operating Permit (FESOP) for
Its Asphalt Plant Located in
Hopedale, Illinois

Site Identification No.: 179809AAD
Application No.: 75090052

Schedule

Public Comment Period Begins: June 7, 2006
Public Comment Period Closes: July 7, 2006

Illinois EPA Contacts

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I. INTRODUCTION

R.A. Cullinan & Son, Inc., has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its Highway I-155, Hopedale, Tazewell County. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the renewed permit that it would propose to issue for the plant. However, before renewing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

II. SOURCE DESCRIPTION

R.A. Cullinan & Son, Inc., is Asphalt Company. The emission units at this plant that require an operating permit include natural gas/fuel oil #2-fired, drum-mix, asphalt plant with baghouse, two 25,000-gallon liquid asphalt storage tanks, one mineral filler tank silo, and one stone crushing plant. These units are sources of emissions because The asphalt plant and associated emission units emit carbon monoxide (CO) to the atmosphere during the operation.

III. GENERAL DISCUSSION

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has been operating this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need not obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

IV. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards.

V. CONTENTS OF THE PERMIT

The renewed permit that the Illinois EPA is proposing to issue would continue to identify the specific emission standards that apply to the emission units at the plant. As explained, the Crushing Plant, Drum Mixer/Dryer ARE subject to 35 Ill. Adm. Code 214.122(b)(2), RULE, which requires no person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any new fuel combustion source (e.g., asphalt tank heaters and

boilers associated with this drum-mix asphalt plant with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hour), burning liquid fuel exclusively To exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lbs/mmBtu). The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

The permit would also set limitations on carbon monoxide (CO). These limitations are consistent with the historical operation of emission units at the plant.

The permit conditions would also continue to require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the source has met the requirements for renewal of its permit. The Illinois EPA is therefore proposing to renew the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.