

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
ConAgra Food Ingredients Company-Alton for a new  
Federally Enforceable State Operating Permit (FESOP) for  
Its grain flour milling facility in Alton, Illinois

Site Identification No.: 119010ABK  
Application No.: 10090023

Schedule

Public Comment Period Begins: February 2, 2011  
Public Comment Period Closes: March 4, 2011

Illinois EPA Contacts

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**I. INTRODUCTION**

ConAgra Food Ingredients Company-Alton has applied for a Federally Enforceable State Operating Permit (FESOP) for its grain elevator and flour milling facility that receives, transfer, storage, of grain for its flour milling operation. This facility is located at 145 West Broadway, Alton, Madison County, IL 62002. This facility requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the permit that it would propose to issue for the facility. However, before issuing 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**

ConAgra Food Ingredients Company operates a grain elevator and flour facility comprised of the following emission units and/or pollution control equipment: wheat receiving dump pits via truck and rail dump pits controlled by baghouse, wheat receiving via barge, precleaners controlled by baghouse, grain storage (<1,000,000 bushel capacity) grain shipping via truck, railcar, and barge, cleaning house separators controlled by baghouse, wheat milling controlled by baghouse, animal feed hammermill controlled by baghouse, and flour shipping via truck and railcar.

**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.

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

The FESOP limits the operation and annual emissions of the facility to below the major-source-thresholds of 100 tons for Particulate Matter (PM<sub>10</sub>).

**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. Illinois has specific regulations 35 Ill. Adm. Code 212.461 prescribes equipment and operating requirements; 35 Ill. Adm. Code 212.321, which limits particulate emissions. The application shows that the facility is in compliance with applicable state emission standards.

**V. CONTENTS OF THE PERMIT**

The FESOP permit that the Illinois EPA is proposing to issue would identify specific emission standards that apply to the emission units at the facility. 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 facility is operated as a non-major source. The permit would limit the operation and annual emissions of the facility to below the major-source-thresholds of 100 tons for PM<sub>10</sub>. Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.

The permit would also 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 facility is being operated within the limitations set by the permit and the facility'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 this permit. The Illinois EPA is therefore proposing to issue 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.