

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
1021 N. Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

Project Summary for an Application from
KCBX Terminals Company for Renewal of the
Federally Enforceable State Operating Permit (FESOP) for
KCBX Terminals Company
Chicago, Illinois

Site Identification No.: 031600AHI
Application No.: 95050167

Schedule

Public Comment Period Begins: November 22, 2011
Public Comment Period Closes: December 21, 2011

Illinois EPA Contacts

Permit Analyst: Robert Bernoteit
Community Relations Coordinator: Brad Frost

I. INTRODUCTION

KCBX Terminals Company has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its Bulk Solid Materials Terminal in Chicago. 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

KCBX Terminals Company operates a bulk solid materials terminal. The emission units at this plant that require an operating permit include:

Texmarc Box Hopper;
555' Barge Line Conveyor;
35' Box Hopper;
300' Conveyor;
Shaker Building with Receiving Hoppers for Railcars and 300' Conveyor;
South Collector Belt #1;
South Incline Belt #2;
30' Shuttle Conveyor;
Crossover Conveyor and Rock Chute;
South Highline Belt #3;
South Shiploader Tripper and Belt #4;
South Shiploader Pan, Spout and Trimmer;
Carter Box Hopper (portable);
Ten (10) Portable Conveyors;
Stacker – American Bin;
Kolberg Screen Plant;
Stacker/Conveyor on Screen Plant;
760 hp Diesel-Powered Generator;
750 hp Diesel-Powered Generator;
Thirteen (13) Gasoline/Diesel-Powered Engines (each less than 35 hp); and
Nineteen (19) Diesel/Kerosene-Fired Heaters (each less than or equal to 0.6 mmBtu/hour).

The principal air contaminant emitted from the bulk solid materials terminal is Particulate Matter (PM), generated by the conveying, screening, or transfer of the bulk solid materials as well as that emitted from storage piles and plant roads. Emissions from the screening, and conveying operation may be controlled by the use of water spray bars to provide moisture that will reduce emissions of particulate matter. Fugitive dust is also controlled by water as required to keep emissions to a minimum.

Nitrogen Oxide (NO_x) will also be emitted from the burning of fuels in the diesel-powered generators, gasoline-powered engines, and heaters. NO_x is formed thermally by the combination of oxygen and nitrogen in the air at the temperatures at which fuel is burned. Thermal NO_x is formed during all common high temperature combustion processes.

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 to 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 NO_x and Particulate Matter with an aerodynamic diameter less than or equal to 10 micrometers (PM₁₀).

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.

A coal screening plant and its associated stacker/conveyor at this site are subject the federal New Source Performance Standards (NSPS) for Coal Preparation and Processing Plants, 40 CFR 60 Subpart Y. This draft permit addresses compliance with the USEPA's standard for Coal Preparation and Processing Plants.

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 coal screening plant and its associated stacker/conveyor are subject to the NSPS for Coal Preparation and Processing Plants, which requires the opacity of PM emissions be limited to 20% from the affected emission units. 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 NO_x and PM₁₀. Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.

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.