

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

PERMITTEE

Gavilon Fertilizer, LLC
Attn: Michael Geurts
6 Pitzman Avenue
Sauget, Illinois 62201

<u>Application No.:</u> 09040007	<u>I.D. No.:</u> 163121AAO
<u>Applicant's Designation:</u>	<u>Date Received:</u> April 3, 2009
<u>Subject:</u> Barge/Rail/Truck Terminal for Dry Bulk Materials	
<u>Date Issued:</u> December 19, 2013	<u>Expiration Date:</u> December 19, 2023
<u>Location:</u> #6 Pitzman Avenue, Sauget, St. Clair County	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of:

Clamshell and Barge Hopper
Conveyor #1
Conveyor #2
Conveyor #3
Conveyor #3 1/2
Main Conveyor
Cross Belts (two way)
West Truck Loading Belt
West Truck Loadout
East Truck Loading Belt
East Truck Loadout
Conditioner Feed Belt
Two House Rail Belts
River Rail Belt
Rail Receiving Conveyor
Rail Receiving Stacker
One Bulk Materials Flat Storage Building
Rail Loadout Conveyor
Rail Weigh Tower
Rail-Truck Transfer Unit with Conveyors

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 is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Particulate Matter less than 10 microns (PM₁₀)). As a result, the source is excluded from the requirements to obtain a Clean Air Act 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 permit(s) for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
 - c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
 - d. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
3. This permit is issued based on the source not being subject to the New Source Performance Standards (NSPS) for Coal Preparation and Processing Plants Source, 40 CFR 60 Subpart Y, because, the facility does not prepare coal by one or more of the following processes: breaking, crushing, screening, wet or dry cleaning, and thermal drying.
4. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Phosphate Fertilizers Production Plants, 40 CFR 63 Subpart BB because this source does not produce phosphate fertilizers.
5. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of

wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.

- 6a. The total amount of bulk materials received shall not exceed 1,000,000 tons per year.
- b. The total amount of bulk materials shipped shall not exceed 1,000,000 tons.
- c. For the purposes of this permit, bulk materials consist of dry fertilizer, sand, aggregates, pelleted lime, minerals excluding coal, salt, fish meal, and organic mulch.
 - i. This permit does not authorize physical changes to the facility to handle new bulk materials. Any such change shall require a construction permit; and
 - ii. This permit does not excuse the Permittee from obtaining other approvals that may be required from the IEPA, Bureau of Land, or other state or federal agencies to handle new bulk material.
- d. The Permittee is required to obtain a revised operating permit prior to receipt and handling of a new bulk material that is not listed above. The application shall include, but not limited to:
 - i. A description of the material;
 - ii. The estimated annual amount of material;
 - iii. Any additional practices to be used to control emissions;
 - iv. A copy of a Material Safety Data Sheet (MSDS) if available;
 - v. Type(s) and description of emission control method(s) to be used if any; and
 - vi. The estimated potential emissions from the receipt, storage and/or handling of the proposed new bulk material including an indication whether the receipt, storage and/or handling of the proposed new bulk material will result in an exceedance of the emission limits in Condition 6 of this permit. If the emission limits in Condition 7 will be exceeded by receipt of a new bulk material, a Construction Permit will need to be obtained prior to receipt of the new bulk material.
- 7a. Emissions and operation of the emission units shall not exceed the following limits:

Process	Throughput		E M I S S I O N S					
	(T/Mo)	(T/Yr)	(lb/T)	PM		PM ₁₀		
				(T/Mo)	(T/Yr)	(lb/T)	(T/Mo)	(T/Yr)
Clamshell								
Unloading	100,000	1,000,000	0.055	2.75	27.50	0.0275	1.38	13.75
Conveying	100,000	1,000,000	0.0021	0.11	1.05	0.00099	0.05	0.50
Rail/Truck								
Loadout	100,000	1,000,000	0.02	1.00	<u>10.00</u>	0.02	1.00	<u>10.00</u>
				Total:	38.55			24.25

These limits are based on the worst-case material handled emissions from fertilizer, specifically the development of the emission factor according to equation 1 of Section 13.2.4, AP-42, Fifth Edition, Volume I, November 2006 (using coefficients of K = 1, U = 10, and M = 0.5) for barge unloading Table 11.12-2, AP-42, Fifth Edition, Volume I, June, 2006 for conveyor transfer point, and Table 8.3-2, AP-42, Fifth Edition, Volume I, July, 1993 using ammonium nitrate for loadout.

- b. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
8. This permit is issued based on the Potential to Emit (PTE) for Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a CAAPP Permit from the Illinois EPA.
- 9a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

- ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
 - b. Testing required by Condition 10 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
10. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
11. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 12a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Records of housekeeping check lists completed by the manager.
 - ii. Bulk material received, description, and tons/month and tons/year (running total of 12 months data);
 - iii. Bulk material shipped, description, and tons/month and tons/year (running total of 12 months data); and
 - iii. Monthly and annual emissions of PM and PM₁₀ from the source with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) 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 storage device) 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.

13a. If there is an exceedance of or a deviation from 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 or deviation. 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 deviation and efforts to reduce emissions and future occurrences.

b. Two (2) copies of required reports and notifications 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
2009 Mall Street
Collinsville, Illinois 62234

If you have any questions on this permit, please contact Mike Dragovich at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

REP:MJD:psj

cc: Illinois EPA, FOS Region 3
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the Barge/Rail/Truck Terminal for Dry Bulk Materials 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. The resulting maximum emissions are below the levels, (e.g., 100 tons/year for PM₁₀) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)	
	<u>PM</u>	<u>PM₁₀</u>
Clamshell Unloading	27.50	13.75
Conveying	1.05	0.50
Rail/Truck Loadout	<u>10.00</u>	<u>10.00</u>
Totals	38.55	24.25