

217/782-2113

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CONSTRUCTION PERMIT GRANT - OPERATING PERMIT DENIAL - NSPS SOURCE

PERMITTEE

Ladd Elevator Company
Attn: James Genterf
33040 - 1800 North Avenue
Ladd, Illinois 61329

Application No.: 03010062

I.D. No.: 011809AAD

Applicant's Designation:

Date Received: January 30, 2003

Subject: GSI Dryer

Date Issued: February 13, 2003

Location: 33040 - 1800 North Avenue, Ladd

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission unit(s) and/or air pollution control equipment consisting of one (1) grain dryer as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special conditions:

- 1a. This project is subject to a New Source Performance Standard (NSPS) for grain elevator, 40 CFR 60, Subparts A and DD. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- b. At all times, the Permittee shall also, to the extent practicable, maintain and operate the grain elevator, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.
- 2. Emissions and operation of grain equipment shall not exceed the following limits:

<u>Emission Source</u>	<u>Annual Throughput (mmBushel/Year)</u>	<u>Emission Factor (Lb/T)</u>	<u>Particulate Matter (Tons/Year)</u>
GSI Dryer	3.5	0.22	10.78

These limits are based on a throughput of 3.5 million bushel per year, standard AP-42 emission factors, and an external sheeting no larger than 0.094 inches. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 3a. 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 (that is, looking at the sky directly overhead) from a point beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.

- b. The Permittee shall implement required housekeeping practices and maintain a housekeeping check list for the grain elevator, pursuant to 35 Ill. Adm. Code 212.461(b). This check list shall contain the applicable housekeeping practices described in the attached "Minimum Recommendations for Housekeeping Practices for Grain Handling Facilities."
 - c. The Permittee shall operate the equipment in such a way that the opacity does not exceed the limits specified in 35 Ill. Adm. Code 212.123.
- 4a.
- i. Grain drying with a column dryer shall be conducted in a dryer with enclosed grain inlet and outlet and perforations in the external sheeting not exceeding 0.094 inch, pursuant to 35 Ill. Adm. Code 212.463(a).
 - ii. Each such dryer shall be inspected for any leaks in enclosures and proper condition of the external sheeting, on at least an annual basis prior to the harvest season.
 - iii. The opacity from this column drying operation shall not exceed 0%, pursuant to the requirements of 40 CFR 60.302.
- b.
- i. Grain drying with a dryer other than a column dryer shall be conducted in a dryer with a particulate collection screen for all exhaust air that has a maximum opening of 50 mesh, U.S. Sieve Series and a self-cleaning mechanism ducted through a properly operating cyclone or filter particulate matter removal device, pursuant to 35 Ill. Adm. Code 212.463(b).
 - ii. Each such dryer shall be inspected for any leaks in the enclosure for and proper condition of the external sheeting, on at least an annual basis prior to the harvest season.
 - iii. The cyclone or filter associated with such dryer shall be inspected for leaks and visible emissions in the exhaust while drying is occurring, at least once each week when a dryer is operated.
- 5a. The Permittee shall maintain records of the following items for the grain elevator:
- i. Records of housekeeping check lists completed by the elevator manager.
 - ii. Records for the inspections required by Condition 3(b) and 4, with date, time and observations if such information is not incorporated in the housekeeping check list.
- b. The Permittee shall maintain monthly records of the following items for the sources listed:

- i. Total grain dried, bushels/month and bushels/year (running total of 12 months data);
 - c. The Permittee shall maintain records for any deviation or exceedance from the requirements of this permit, as determined by the above records or by other means, with date, time, duration, description, corrective action, and measures to prevent future reoccurrences.
6. The Permittee shall notify the Illinois EPA Regional Office of an exceedance of the requirements of Condition 2 within 30 days following the end of the month, with description of the exceedance.
7. The grain drying operation may be operated for a period of 180 days after completion of construction, under this construction permit.
 - a. Within 60 days after achieving the maximum production rate at which the grain dryer will be operated, but not later than 180 days after completion of its construction, the opacity shall be measured by an approved testing service.
 - b. Performance tests shall be conducted and data collected in accordance with the test methods and procedures specified in 40 CFR 60.303 and 35 Ill. Adm. Code 183.
 - c. At least thirty (30) days prior to the actual date of testing, a written test plan shall be submitted to the Illinois EPA for review and approval. This plan shall describe the specific procedures for testing including as a minimum:
 - i. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - ii. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of the maximum emissions, the levels of operating parameters at or within which compliance is intended to be shown, if applicable, and the means by which the operating parameters for the process and any control equipment will be determined.
 - iii. The specific determination of emissions and operations which are intended to be made, including sampling and monitoring locations.
 - iv. The test method(s) which will be used, with the specific analysis method.
 - v. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.
 - vi. Any proposed use of an alternative test method, with detailed justification.

- vii. The format and content of the Source Test Report prior to carrying out these tests, the Illinois EPA shall be notified a minimum of 60 days prior to the scheduled date of these tests with the exact date, time, and place of these tests, to enable the Illinois EPA to witness these tests.

If the scheduled date for the test is changed for unforeseen reasons, the Permittee shall inform the Illinois EPA within five (5) working days of the scheduled test date and must specify the date of the rescheduled test.

A copy of the Final Report(s) for these tests and compliance status shall be submitted to the Illinois EPA within fourteen (14) days after the test results are compiled and finalized, prior to or accompanying the operating permit application. Satisfactory completion of these tests and compliance with the limitations of this permit shall be prerequisite to the issuance of an operating permit.

- viii. A statement that the testing will be performed by a qualified independent testing service.

8. The Permittee shall notify the Illinois EPA as required by 40 CFR 60.7 and 60.48a, including:
 - a. Date of construction or reconstruction;
 - b. Anticipated date of initial startup; and
 - c. Actual date of initial startup.
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

13. This permit is issued based upon no change of facility throughputs, with no increase in emissions of PM into the atmosphere.

The OPERATING permit application is denied because the Illinois Environmental Protection Act, Section 9, and 35 Ill. Adm. Code 201.160 might be violated.

Pursuant to Section 201.160, an operating permit may not be issued until the equipment has been constructed or modified in accordance with applicable conditions in this construction permit. The Illinois EPA suggests that you reapply for the operating permit after the construction is completed in accordance with the construction permit. This information must be submitted in duplicate and should reference the application and I.D. number assigned above.

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

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

DES:MJD:psj

cc: Illinois EPOA, FOS, Region 2
Illinois EPA, Compliance Section
Lotus Notes