

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
S & B Industrial Minerals, Inc. for Renewal of the  
Federally Enforceable State Operating Permit (FESOP) for  
Foundry Aggregate Plant  
Cicero, Illinois

Site Identification No.: 031051AAI  
Application No.: 72110216

Schedule

Public Comment Period Begins: January 2, 2008  
Public Comment Period Closes: February 1, 2008

Illinois EPA Contacts

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## **I. INTRODUCTION**

S & B Industrial Minerals, Inc. has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its Foundry Aggregate Plant. 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**

Coal and Bentonite are received and processed through a series of hoppers, grinders, storage silos, etc., and sold in varying sizes to off-site customers.

## **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 proposed permit limits the potential annual emissions of particulate matter less than 10 microns in mean spherical diameter (PM<sub>10</sub>) from the facility to less than 100 tons per year. thereby exempting this source from the requirements of the Clean Air Act Permit Program.

## **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 board has standards for sources of Particulate Matter (PM) and Nitrogen Oxides (NO<sub>x</sub>) emission. The application shows that the plant is in compliance with applicable state and federal emission standards.

The Principal air contaminant emitted from the facility is Particulate Matter (PM), which is generated when the coal and bentonite are received and process through a series of hoppers, grinders, storage silos, etc. Emissions from the natural gas combustion equipment are predominantly represented by Nitrogen Oxides (NO<sub>x</sub>) and Carbon Monoxide (CO) emissions.

## **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. The Permittee shall, in accordance with the manufacturer and/or vendor recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein. For each fabric filter, the Permittee shall, at a minimum, perform internal and external inspections, twice each year. Permittee shall inspect for leaks, holes, seals, wear, and other problems, and promptly repair all problems found. These 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 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.