



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590



REPLY TO THE ATTENTION OF:

Robert Bernoteit  
Acting Permit Chief  
Bureau of Air  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

Dear Mr. Bernoteit:

Thank you for the opportunity to provide the Illinois Environmental Protection Agency (IEPA) comments on the draft construction permit for Archer Daniels Midland Company Decatur Complex BioProducts (Permit number 11020016). Below are our comments:

- 1) The AERMOD atmospheric dispersion modeling system version referenced in the project summary is not the current regulatory version. The modeling used AERMOD version number (09292), while the current regulatory version is AERMOD (12345). While the U.S. Environmental Protection Agency understands that IEPA conducting this modeling during the original draft permitting period, IEPA should reevaluate its modeling to ensure that the newer AERMOD version and meteorological data changes, as described in comment 2, will not result in any significant concentration differences to the ambient air.
- 2) The project summary does not mention if 2-minute average meteorological data was used in the modeling. Over the last couple years, EPA has recommended use of the 2-minute average data because it results in a better hourly average data set, and typically includes less calm and missing hours.
- 3) The project summary does not discuss how the Nitrogen Dioxide (NO<sub>2</sub>) impacts were estimated from the AERMOD modeling. Options include an assumption of 100% NO<sub>2</sub>/Nitrogen Oxides (NO<sub>x</sub>) ratio (Tier 1), 80% NO<sub>2</sub>/NO<sub>x</sub> ratio (Tier 2), or the use of the PVMRM or OLM approach (Tier 3). The project summary does not mention an analysis of secondary Particulate Matter less than 2.5 microns in size (PM<sub>2.5</sub>). Although the project is not significant for PM<sub>2.5</sub> emissions, they do have significant emissions of NO<sub>x</sub> and Sulfur Dioxide, and should conduct an analysis of the secondary PM<sub>2.5</sub> impacts. This analysis can be a qualitative and/or quantitative analysis. EPA recommends that IEPA evaluate the NO<sub>2</sub> and PM<sub>2.5</sub> impacts in its modeling analysis.

- 4) On page 7 of the draft permit, permit condition 1.7 b requires the permittee to keep records of the actual emissions from the units in *tons per year on a calendar year basis*. EPA's guidance on limiting potential to emit does not allow the use of annual emission limits to avoid applicable requirements due to practical unenforceability concerns. The emission limit and record keeping requirement for the actual emissions should be on a calendar year basis that is rolled on a 30 day monthly average.

We would like to thank you again for working with us in making sure that these issues are resolved in a timely manner and the opportunity to provide public comments. If you have any further questions, please feel free to contact Constantine Blathras, of my staff, at (312) 886-0671.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in black ink and is positioned above the typed name.

Genevieve Damico  
Chief  
Air Permits Section