



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

REPLY TO THE ATTENTION OF:

APR 10 2015

Mr. Ray Pilapil
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Dear Mr. Pilapil:

The U.S. Environmental Protection Agency has reviewed the draft Federally Enforceable State Operating Permit No. 07020086 (Draft Permit) proposed by the Illinois Environmental Protection Agency for W.L. Miller Company in Hamilton, Illinois. EPA has the following comment on the Draft Permit:

The particulate matter (PM₁₀ and PM_{2.5}) emission limits contained in the Draft Permit should apply to *both* fugitive and non-fugitive emissions from all emission units associated with the hot mix asphalt (HMA) plant, including fugitive PM₁₀ and PM_{2.5} emissions from material (aggregate) handling, truck traffic, storage piles and any crushing and screening operations associated with the HMA plant.

By rule, EPA has determined that fugitive emissions count towards the major source threshold for all sources that belong to source categories regulated under the New Source Performance Standards (NSPS) as of August 7, 1980. 66 FR 59161 (November 27, 2001). Also, *see* Sec. 39.5(2)(c)(ii) of the Illinois Environmental Protection (IEPA) Act. Because HMA plants are regulated by an NSPS (40 CFR part 60, Subpart I) which was proposed on June 11, 1973 (38 FR 15406) and promulgated on March 8, 1974 (39 FR 9308), fugitive emissions from sources that belong to the HMA source category count towards the major source threshold. For this purpose, the term "source" means "any stationary source (or any group of stationary sources) that is located on one or more contiguous or adjacent properties that are under common control of the same person (or persons under common control) and that belongs to a single major industrial grouping. Sec. 39.5(1) of the IEP Act. In this regard, if stone crushing is part of the source

belonging to the hot mix asphalt plant source category, then fugitive emissions from stone crushing operations must be included in the major source determination.

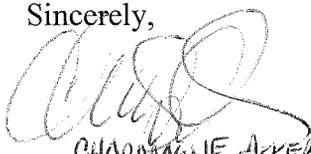
Enclosed to this letter is an example of a non-Title V operating permit recently issued by EPA Region 10 for an asphalt plant located in its permitting jurisdiction. As explained by Region 10:

The emission inventory in Appendix A [of the Technical Support Document] includes rock crushing and handling emission units because the permittee has indicated to the EPA that operation of these types of emission units occur in support of the HMA plant. As a result, Mickelsen's rock handling and crushing operation must be considered part of the HMA plant. Accordingly, the permittee will be required to account for the emissions from the rock handling and crushing operation, along with the HMA plant, to document compliance with the emission limits in this permit.

Technical Support Document at 6.

We provide these comments to help ensure that the Draft Permit meets all federal requirements, and that the record provides adequate support for the permit decision. We look forward to working with you to address our comments. If you have any questions, please feel free to contact me at (312) 353-4761 or David Ogulei, of my staff, at (312) 353-0987.

Sincerely,



CHARVAGNE ACKERMAN for

Genevieve Damico
Chief
Air Permits Section

Enclosure