

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS**

WESTERN GRAIN MARKETING, LLC)	
Cyclone Baghouses,)	
Rushville Grain Elevator)	PCB 14-
)	(Tax Certification - Air)
)	
PROPERTY/PARCEL IDENTIFICATION)	
NUMBERS 14-000-017-00 or portion thereof)	

NOTICE

TO: *[Electronic filing]*
 John Therriault, Clerk
 Illinois Pollution Control Board
 State of Illinois Center
 100 W. Randolph Street, Suite 11-500
 Chicago, Illinois 60601

[Service by mail]
 Gordon Miller
 550 Macomb Road
 P.O. Box 79
 Rushville, Illinois 62681

[Service by mail]
 Steve Santarelli
 Illinois Department of Revenue
 101 West Jefferson
 P.O. Box 19033
 Springfield, Illinois 62794

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Pollution Control Board the **APPEARANCE** and **RECOMMENDATION** of the Illinois Environmental Protection Agency, a paper copy of which is herewith served upon the applicant and a representative of the Illinois Department of Revenue.

Respectfully submitted by,

/s/ Robb H. Layman
 Robb H. Layman
 Assistant Counsel

Date: December 6, 2013

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
 1021 North Grand Avenue East
 P.O. Box 19276
 Springfield, IL 62794-9276
 Telephone: (217) 524-9137

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS**

WESTERN GRAIN MARKETING, LLC)	
Cyclone Baghouses,)	
Rushville Grain Elevator)	PCB 14-
)	(Tax Certification - Air)
)	
PROPERTY/PARCEL IDENTIFICATION)	
NUMBERS 14-000-017-00 or portion thereof)	

APPEARANCE

I hereby file my Appearance in this proceeding on behalf of the Illinois Environmental Protection Agency.

Respectfully submitted by,

/s/ Robb H. Layman
 Robb H. Layman
 Assistant Counsel

Date: December 6, 2013

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
 1021 North Grand Avenue East
 P.O. Box 19276
 Springfield, Illinois 62794-9276
 Telephone: (217) 524-9137

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS**

WESTERN GRAIN MARKETING, LLC)	
Cyclone Baghouses,)	
Rushville Grain Elevator)	PCB 14-
)	(Tax Certification - Air)
)	
PROPERTY/PARCEL IDENTIFICATION)	
NUMBERS 14-000-017-00 or portion thereof)	

RECOMMENDATION

NOW COMES the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY (“Illinois EPA”), through its attorneys, and pursuant to 35 Ill. Adm. Code 125.204 of the ILLINOIS POLLUTION CONTROL BOARD’S (“Board”) procedural regulations, files the Illinois EPA’s Recommendation in the above-referenced request for tax certification of pollution control facilities. The Illinois EPA recommends **issuance** of a tax certification covering the subject matter of the request. In support thereof, the Illinois EPA states as follows:

1. On or about December 21, 2010, the Illinois EPA received an application and supporting information from WESTERN GRAIN MARKETING, INC., (“Western Grain”) concerning the proposed tax certification of certain air emission sources and/or equipment located at its Rushville grain elevator in McDonough County, Illinois. A copy of the application is attached hereto. **[Exhibit A]**.

2. The applicant’s business address is as follows:

Western Grain Marketing, LLC
550 Macomb Road, P.O. Box 79
Rushville, Illinois 62681

3. The facility address is as follows:

Western Grain Marketing, LLC
21050 US Highway 136
Rushville, Illinois 62681

4. The subject matter of this request consists of three Cyclone Baghouses, which were constructed and installed by Western Grain at its Rushville grain elevator. According to the application, the Cyclone Baghouses were placed on the receiving pits, on the shipping leg and spout, and on the wet and dry legs of the elevator to effectively “collect grain dust” from the point sources. *See*, Exhibit A, page 1 at Section C. The grain dust is deposited back into the grain further down-stream of the process. *Id.* As generally recognized in the field of air pollution control technology, each of the systems and/or devices is a type of air pollution control that acts to prevent or reduce particulate matter emissions that would otherwise be emitted by the affected grain elevator operations.

5. Section 11-10 of the Property Tax Code, 35 ILCS 200/11-10 (2002), defines “pollution control facilities” as:

“any system, method, construction, device or appliance appurtenant thereto, or any portion of any building or equipment, that is designed, constructed, installed or operated for the primary purpose of: (a) eliminating, preventing, or reducing air or water pollution... or (b) treating, pretreating, modifying or disposing of any potential solid, liquid, gaseous pollutant which if released without treatment, pretreatment, modification or disposal might be harmful, detrimental or offensive to human, plant or animal life, or to property.”

6. Pollution control facilities are entitled to preferential tax treatment, as provided by 35 ILCS 200/11-5 (2002).

7. Based on information in the application and the primary purpose of the Cyclone Baghouses to prevent or reduce air pollution, it is the Illinois EPA’s engineering judgment that the systems/devices and related appurtenances may be considered as “pollution control facilities” in accordance with the statutory definition and consistent with the Board’s regulations at 35 Ill. Adm. Code 125.200. **[Exhibit B]**.

8. Because the information in the application demonstrates that the Cyclone Baghouses satisfy the aforementioned statutory and regulatory criteria, the Illinois EPA recommends that the Board **issue** the applicant's requested tax certification.

Respectfully submitted by,

/s/ Robb H. Layman

Robb H. Layman
Assistant Counsel

DATED: December 6, 2013

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
Telephone: (217) 524-9137

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of December, 2013, I electronically filed the following instruments entitled **NOTICE, APPEARANCE** and **RECOMMENDATION** with:

John Therriault, Clerk
Illinois Pollution Control Board
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

and, further, that I did send a true and correct paper copy of the same foregoing instruments, by First Class Mail with postage thereon fully paid and deposited into the possession of the United States Postal Service, to:

Steve Santarelli
Illinois Department of Revenue
101 West Jefferson
P.O. Box 19033
Springfield, Illinois 62794

Western Grain Marketing, LLC
Gordon Miller
550 Macomb Road, P.O. Box 79
Rushville, Illinois 62681

/s/ Robb H. Layman
Robb H. Layman
Assistant Counsel

APPLICATION FOR CERTIFICATION (PROPERTY TAX TREATMENT)
 POLLUTION CONTROL FACILITY
 AIR WATER

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
 P. O. Box 19276, Springfield, IL 62794-9276

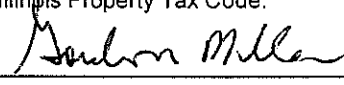
This Agency is authorized to request this information under Illinois Revised Statutes, 1979, Chapter. 120, Section 502a-5. Disclosure of this information is voluntary. However, failure to comply could prevent your application from being processed or could result in denial of your application for certification.

FOR AGENCY USE

File No.	Date Received	Certification No.	Date	
Sec. A APPLICANT	Company Name Western Grain Marketing, LLC			
	Person Authorized to Receive Certification Gordon Miller		Person to Contact for Additional Details Gordon Miller	
	Street Address 550 Macomb Rd. PO Box 79		Street Address 550 Macomb Rd. PO Box 79	
	Municipality, State & Zip Code Rushville, Illinois 62681		Municipality, State & Zip Code Rushville, Illinois 62681	
	Telephone Number (217) 322-3306		Telephone Number (217) 322-7616	
	Location of Facility	Municipality		Township
	Quarter Section NW 3	Township 5N	Range 1W	5N
	Street Address 21050 US Hwy 136	County McDonough	Book Number 98-6613 98-6624	
	Property Identification Number 14-000-017-00	Parcel Number 14-000-017-00		
Sec. B MANUFACTURING OPERATIONS	Nature of Operations Conducted at the Above Location Receiving truck grain, conditioning grain, shipping grain via truck and rail.			
	Water Pollution Control Construction Permit No. ILR10J556	Date Issued 05/30/03		
	NPDES PERMIT No. ILR10J556	Date Issued 05/30/03	Expiration Date 05/31/08	
	Air Pollution Control Construction Permit No. 07120045	Date Issued 03/23/10		
	Air Pollution Control Operating Permit No. 07120045	Date Issued 03/23/10		
Sec. C MANUFACTURING PROCESS	Describe Unit Process Three cyclone bag houses (1 each on the receiving pits, shipping leg and spout and the wet and dry legs) collect grain dust from the point source. After it is collected it is then discharged back into the down stream of grain.			
	Materials Used in Process None			
Sec. D POLLUTION CONTROL FACILITY DESCRIPTION	Describe Pollution Abatement Control Facility 3 cyclone bag houses (1 each on the receiving pits, shipping leg and spout and the wet and dry legs)			

RECEIVED
 DEC 21 2010
 ILLINOIS ENVIRONMENTAL
 PROTECTION AGENCY
 BOW/WPC/PERMIT SECTION

Exhibit A

Sec. E	(1) Nature of Contaminants or Pollutants Grain dust			
	CONTAMINANTS	Material Retained, Captured or Recovered		
		Contaminant or Pollutant	DESCRIPTION	DISPOSAL OR USE
		PART	grain dust	reclaimed
		PM10	grain dust	reclaimed
		PM2.5	grain dust	reclaimed
	ACCOUNTING DATA	(2) Point(s) of Waste Water Discharge Not applicable		
		Plans and Specifications Attached		Yes <input type="checkbox"/> No <input type="checkbox"/>
		(3)	Are contaminants (or residues) collected by the control facility?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
		(4)	Date installation completed <u>09/15/09</u> status of installation on date of application _____	
(5)		a. FAIR CASH VALUE IF CONSIDERED REAL PROPERTY:	\$ 471,622.47	
	b. NET SALVAGE VALUE IF CONSIDERED REAL PROPERTY:	\$ 0.00		
	c. PRODUCTIVE GROSS ANNUAL INCOME OF CONTROL FACILITY:	\$ 0.00		
	d. PRODUCTIVE NET ANNUAL INCOME OF CONTROL FACILITY:	\$ 0.00		
	e. PERCENTAGE CONTROL FACILITY BEARS TO WHOLE FACILITY VALUE:	% 4.72		
Sec. F	The following information is submitted in accordance with the Illinois Property Tax Code, as amended, and to the best of my knowledge, is true and correct. The facilities claimed herein are "pollution control facilities" as defined in Section 11-10 of the Illinois Property Tax Code.			
SIGNATURE	 _____ Signature		_____ Title	
Sec. G	INSTRUCTIONS FOR COMPILING AND FILING APPLICATION			
	General: Separate applications must be completed for each control facility claimed. Do not mix types (water and air). Where both air and water operations are related, file two applications. If attachments are needed, record them consecutively on an index sheet.			
INSTRUCTIONS	Sec. A	Information refers to applicant as listed in the tax records and the person to be contacted for further details or for inspection of facilities. Define facility location by street address or legal description. A plat map location is required for facilities located outside of municipal boundaries. The property identification number is required.		
	Sec. B	Self-explanatory. Submit copies of all permits issued by local pollution control agencies. (e.g. MSD Construction Permit)		
	Sec. C	Refers to manufacturing processes or materials on which pollution control facility is used.		
	Sec. D	Narrative description of the pollution control facility, indicating that its primary purpose is to eliminate, prevent or reduce pollution. State the type of control facility. State permit number, date, and agency issuing permit. A narrative description and a process flow diagram describing the <u>pollution control facility</u> . Include a listing of each major piece of equipment included in the claimed fair cash value for real property. Include an <u>average</u> analysis of the influent and effluent of the control facility stating the collection efficiency.		
	Sec. E	List air contaminants, or water pollution substances released as effluents to the manufacturing processes. List also the final disposal of any contaminants removed from the manufacturing processes. Item (1) – Refers to pollutants and contaminants removed from the process by the pollution control facility. Item (2) – Refers to water pollution but can apply to water-carried wastes from air pollution control facilities. Submit drawings, which clearly show (a) Point(s) of discharge to receiving stream, and (b) Sewers and process piping to and from the control facility. Item (3) – If the collected contaminants are disposed of other than as wastes, state the disposition of the materials, and the value in dollars reclaimed by sale or reuse of the collected substances. State the cost of reclamation and related expense. Item (4) – State the date which the pollution control facility was first placed in service and operated. If not, explain. Item (5) – This information is essential to the certification and assessment actions. This accounting data must be completed to activate project review prior to certification by this Agency.		
	Sec. F	Self-explanatory. Signature must be a corporate authorized signature.		
		Submit to: Illinois EPA P.O. Box 19276 Springfield, IL 62794-9276	Attention: Al Keller Permit Section Division of Water Pollution Control	
			Attention: Donald E. Sutton Permit Section Division of Air Pollution Control	



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

217/782-2113

LIFETIME GENERAL OPERATING PERMIT FOR GRAIN ELEVATOR - NSPS SOURCE
(With All Dump Pits Controlled by Baghouse(s) with <100 TPY total emissions)

PERMITTEE

Western Grain Marketing, LLC
Attn: Gordon Miller - General Manager
Old Macomb Road
Rushville, Illinois 62861

Application No.: 07120045

I.D. No.: 109812AAH

Applicant's Designation:

Date Received: March 1, 2010

Subject: Grain Elevator

Date Issued: March 23, 2010

Expiration Date: See Condition 1.

Location: 21050 US Highway 136, Adair, McDonough County

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

Grain elevator as specified below in Findings.

Findings

1. This permit is applicable to a grain elevator that meets all the following criteria:
 - a. The elevator is located outside a Major Population Area as defined in 35 Ill. Adm. Code 211.3610 (See Attachment B);
 - b. The elevator is not subject to 35 Ill. Adm. Code 212.462 requirements since its operation satisfies the exemptions in Section 9(f) of the Illinois Environmental Protection Act (Act);
 - c. The elevator receives no more than 45,000,000 bushels of grain per year and the dump pits are all controlled by baghouse(s);
 - d. The permanent storage capacity of the elevator as defined at 40 CFR 60.301 is greater than 2,500,000 bushels;
 - e. Grain drying does not exceed 13,500,000 bushels per year;
 - f. Grain cleaning does not exceed 4,500,000 bushels per year;
 - g. Grain is only received and shipped by road or rail vehicles, not by water; and
 - h. A petroleum bulk plant (SIC 5171), animal feed plant (SIC 2048) or other plant or operation requiring a permit from the Illinois EPA is not associated with the elevator.

Page 2

2. For the purposes of this permit, a grain elevator includes up to eight (8) dump pits all controlled by baghouse(s), internal transfer (e.g., totally enclosed headhouse, conveyors, legs, drags), grain storage (e.g., bins, buildings, silos, and any grain storage piles with permanent (non-portable) or portable grain-handling equipment), cleaning and separation, up to six (6) column grain dryers, and shipping/load-out.
- 3a. This permit imposes conditions on activities at a grain elevator to assure compliance with applicable requirements of 35 Ill. Adm. Code Part 212 Subparts B (Visible Emissions), K (Fugitive Particulate Matter), and S (Agriculture), and 40 CFR Part 60 Subparts A and DD.
- b. This permit does not excuse the Permittee from obtaining a Construction Permit and/or an Operating Permit for any additional emission units in excess of the maximum number of units specified in Finding 2 or for any modification or addition that will create an exceedance of any of the Criteria in Finding 1.
4. The Illinois EPA will only authorize operation pursuant to this permit if an application includes the following items:
 - a. The location of and detailed description of the grain elevator.
 - b. A statement certifying that the grain elevator meets the criteria in Findings 1 and 2.
 - c. A request for authorization to operate pursuant to this general permit.
 - d. A statement that the grain elevator is, and will be, operated to comply with the applicable portions of 35 Ill. Adm. Code Part 212 Subparts B, K and S, 40 CFR Part 60 Subparts A and DD, and the Conditions of this permit.
 - e. A signed certification by the applicant that the information contained in the application is accurate.

Conditions

- 1a. This permit shall expire 180 days after the Illinois EPA sends a written request for the renewal of this permit.
- b. This permit shall terminate if it is withdrawn or is superseded by a revised permit.
- c. This permit allows the construction and operation of additional emission units of a grain elevator such that the maximum number of units identified in Finding 2 will not be exceeded and such that the construction and/or operation of the units will not cause an exceedance of any of the Criteria in Finding 1.

Page 3

- d. This permit does not exempt the Permittee from obtaining a Construction and/or Operating Permit for any additional emission units in excess of the maximum number of units in Finding 2 or for any modification or addition that would result in an exceedance of any of the Criteria in Finding 1, unless such emission units, operations, modifications or additions are exempt from permitting requirements pursuant to 35 IAC 201.146 and does not affect the source's status with respect to the applicability of Section 39.5 of the Illinois Environmental Protection Act (Act).
- 2a. This source is a grain terminal elevator as defined in the New Source Performance Standard (NSPS) for Grain Elevators, 40 CFR Part 60 Subparts A and DD. Affected facilities under this NSPS (e.g. each truck unloading station, truck loading station, barge and ship unloading station, barge and ship loading station, railcar loading station, railcar unloading station, grain dryer, and all grain handling operations, constructed, modified or reconstructed after August 3, 1978) are subject to the requirements of 40 CFR Part 60 Subparts A and DD. Please be advised that the USEPA has not yet determined whether grain storage pile systems with non-portable grain-handling equipment and flexible/removable covers are to be considered an affected facility as defined at 40 CFR 60.300 and the associated grain storage capacity designated as permanent storage capacity as defined at 40 CFR 60.301(d). Therefore, it is not known at this time if those types of grain storage pile systems are subject to the requirements of 40 CFR Part 60 Subparts A and DD. Should it be determined that those grain storage pile systems are affected facilities subject to the requirements of 40 CFR Part 60 Subparts A and DD, the Permittee shall submit the appropriate permit application(s) and request for permit modification to the Illinois EPA within 90 days of learning of such a determination in order to implement any needed revisions/additions to the source necessary to achieve compliance with 40 CFR Part 60 Subparts A and DD, and the conditions of this permit. The Illinois EPA is administrating NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- b. Pursuant to 40 CFR 60.302(a), on and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere any gases which exhibit greater than 0 percent opacity from any:
- Column dryer with column plate perforation exceeding 2.4 mm diameter (ca. 0.094 inch) [40 CFR 60.302(a)(1)].
- c. Pursuant to 40 CFR 60.302(b), on and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, no owner or operator subject to the provisions of 40 CFR Part 60 Subpart DD shall cause to be discharged into the atmosphere from any affected facility except a grain dryer any process emission which:

Page 4

- i. Contains particulate matter in excess of 0.023 g/dscm (ca. 0.01 gr/dscf) [40 CFR 60.302(b)(1)].
 - ii. Exhibits greater than 0 percent opacity [40 CFR 60.302(b)(2)].
 - d. Pursuant to 40 CFR 60.302(c), on and after the 60th day of achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup, no owner or operator subject to the provisions of 40 CFR Part 60 Subpart DD shall cause to be discharged into the atmosphere any fugitive emission from:
 - i. Any individual truck unloading station, railcar unloading station, or railcar loading station, which exhibits greater than 5 percent opacity [40 CFR 60.302(c)(1)].
 - ii. Any grain handling operation, which exhibits greater than 0 percent opacity [40 CFR 60.302(c)(2)].
 - iii. Any truck loading station, which exhibits greater than 10 percent opacity [40 CFR 60.302(c)(3)].
 - e. Pursuant to 40 CFR 60.11(d), at all times, the Permittee shall, to the extent practicable, maintain and operate the grain terminal elevator, in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to the New Source Performance Standard.
3. The grain elevator owner or operator must apply for a revised operating permit when any of the following situations occur:
 - a. Area is presently designated as a Major Population Area (MPA) or the municipality's boundaries are changed and now the area is designated as a MPA.
 - b. An increase in annual grain throughput to greater than 45,000,000 bushels;
 - c. A modification that will increase the emissions above the emission limits permitted herein;
 - d. A change in operations that will result in the source's noncompliance with conditions in the existing permit;
 - e. A change in ownership, company name, or address, so that the application or existing permit is not longer accurate; or
 - f. The grain elevator becomes subject to 35 Ill. Adm. Code 212.462 requirements pursuant to Section 9(f) of the Act.
4. For purposes of fees pursuant to Section 9.6 of the Environmental Protection Act, annual emissions of specified air contaminants, i.e., particulate matter, carbon monoxide, nitrogen oxide, volatile organic

Page 5

material, and sulfur dioxide, shall not exceed 99.50 tons, which shall be the permitted emissions of these pollutants.

- 5a. 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 and perform the required housekeeping practices identified in 35 Ill. Adm. Code 212.461(b)(1) through (b)(5) and maintain a housekeeping check list for the grain elevator pursuant to 35 Ill. Adm. Code 212.461(b)(6). This checklist 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 facility in such a way that the opacity does not exceed the limits specified in 35 Ill. Adm. Code 212.123.
- 6a.
 - i. Grain receiving in all dump pits shall be conducted in accordance with good operating practices to minimize particulate matter emissions.
 - ii. Each dump pit shall be inspected for proper operation while receiving is occurring, at least once each week (Monday through Sunday) when grain is received.
- b.
 - i. Grain drying shall be conducted in a column 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.
- c.
 - i. Grain transfer within the elevator (internal transfer), and any cleaning shall be conducted without visible emissions to the atmosphere, pursuant to 35 Ill. Adm. Code 212.461(b).
 - ii. The grain elevator shall be inspected for presence of visible emissions from internal transfer and cleaning, while such activity is occurring, at least once each week when such activity is performed.
- d.
 - i. Grain load-out shall be conducted with socks, sleeves or equivalent devices, extending to within at least 6 inches below the sides of the receiving vehicle except for topping off. Choke load-out may be performed as an equivalent method.

Page 6

- ii. Grain load-out socks, sleeves and equivalent devices shall be inspected for proper operation while load-out is occurring, at least once each week when grain load-out is performed.
- 7a. Within 180 days of initial startup of the permitted grain handling operations structures/equipment, the emissions of particulate matter and opacity shall be measured during conditions which are representative of maximum emissions as required by 40 CFR Part 60 Subparts A and DD.
- b. The following methods and procedures shall be used for testing of process emissions from the baghouse(s), unless another method is approved by the Illinois EPA: Refer to 40 CFR Part 60, Appendix A, and 40 CFR Part 61, Appendix B, for USEPA test methods.

Location of sampling point	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Particulate Matter	USEPA Method 5
Opacity	USEPA Method 9

- c. The following methods and procedures shall be used for testing of fugitive emissions from the legs, elevators, conveyors, loading and unloading stations and other permitted grain handling operations unless another method is approved by the Illinois EPA: Refer to 40 CFR Part 60, Appendix A, and 40 CFR Part 61, Appendix B, for USEPA test methods.

Opacity	USEPA Method 9
---------	----------------

- d. At least 30 days prior to the actual date of testing, a written test plan shall be submitted to the Compliance Section of the Division of Air Pollution Control for review. This plan shall describe the specific procedures for testing, including as a minimum:
 - i. The company/entity who will be performing sampling and analysis and their experience with similar tests.
 - ii. A detailed description of the equipment/emission units to be tested and the specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum operating practices and the means by which the operating parameters for the emission unit and any control equipment will be determined.
 - iii. The specific determinations of emissions and operation, 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, if the method can be used with different analysis methods.
 - v. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.

Page 7

- vi. Any proposed use of an alternative test method, with detailed justification.
- vii. The format and content of the Source Test Report.
- e. The Illinois EPA shall be notified in writing prior to these tests to enable the Illinois EPA to observe these tests. Notification of the expected date of testing shall be submitted a minimum of thirty (30) days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of five (5) working days prior to the actual date of the test. The Illinois EPA may at its discretion accept notifications with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe testing.
- f. Copies of the Final Source Test Report(s) for these tests shall be submitted to the Illinois EPA within 60 days after the date of the final day of testing. The Final Report shall include as a minimum:
 - i. A descriptive and table summary of results.
 - ii. General information including but not limited to the name, location and identification of the emission source(s) tested, date(s) of testing, names of personnel and entities performing the tests, and Illinois EPA observers, if any.
 - iii. Description of test procedures and method(s), including description and map of emission sources and sampling points, sampling train, testing and analysis equipment, and test schedule.
 - iv. Detailed description of test conditions, including:
 - A. List and description of the equipment (including serial numbers or other equipment specific identifiers) tested and process information, i.e., mode(s) of operation, process rate/throughput, e.g. fuel or raw material consumption;
 - B. Control equipment information, i.e., equipment condition and operating parameters during testing; and
 - C. A discussion of any preparatory actions taken, i.e., inspections, calibration, maintenance and repair.
 - v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration. Identification of the applicable regulatory standards that the testing was performed to demonstrate compliance with, a comparison of the test results to the applicable regulatory standards, and a statement whether the test(s) demonstrated compliance with the applicable standards.

Page 8

- vi. An explanation of any discrepancies among individual tests, failed tests or anomalous data.
 - vii. The results and discussion of all quality control evaluation data, including a copy of all quality control data.
 - viii. The applicable operating parameters of the pollution control device(s) during testing (temperature, pressure drop, scrubbant flow rate, etc.), if any.
8. The authorization to operate the equipment described in this operating permit shall terminate if the testing required by 40 CFR Part 60 Subparts A and DD is not performed as required or if satisfactory testing results demonstrating compliance with the applicable standards and permit conditions are not achieved and submitted to the Illinois EPA as required.
- 9a. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic inspections and maintenance on the equipment covered under this permit such that the equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
- b. Pollution control devices shall be in operation at all times when the associated emission unit(s) is in operation and emitting air contaminants.
- 10a. The amount of material handled by the elevator shall not exceed the following limits. Compliance with these annual limits shall be determined on a monthly basis from a running total of monthly data, that is, the total of the amount of material for the month and the preceding eleven months.
- i. The amount of grain received, that is, unloaded in the dump pit areas at the elevator, shall not exceed 45,000,000 bushels per year.
 - ii. The amount of grain dried shall not exceed 13,500,000 bushels per year.
 - iii. The amount of grain cleaned shall not exceed 4,500,000 bushels per year.
 - iv. The amount of grain shipped, that is, loaded into a vehicle in the load-out areas at the elevator, shall not exceed 45,000,000 bushels per year.
- b. Natural gas, liquefied petroleum gas or propane shall be the only fuels fired in grain dryers.
- 11a. The Permittee shall maintain records of the following items for the grain elevator:

Page 9

- i. Records of housekeeping check lists completed by the elevator manager;
 - ii. Records for the inspections required by Condition 5(b), 6, and 9, with date, time and observations if such information is not incorporated in the housekeeping check list; and
 - iii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
 - b. The Permittee shall maintain monthly records of the following items for the source:
 - i. Total grain received, bushels/month and bushels/year (running total of 12 months data);
 - ii. Grain dried, bushels/month and bushels/year (running total of 12 months data);
 - iii. Grain cleaned, bushels/month and bushels/year (running total of 12 months data);
 - iv. Grain shipped, bushels/month and bushels/year (running total of 12 months data); and
 - v. PM emissions (tons/month, tons/year) with supporting calculations.
 - 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.
 - d. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) 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 request for records during the course of a source inspection.
12. The Permittee shall maintain records of any repairs or maintenance to the grain elevator as related to emissions of particulate matter with date and description of activity.
13. If there is an exceedance of or 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, and to the Illinois EPA Regional

Page 10

Office within 30 days after the exceedance/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.

14. 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 appropriate Illinois EPA Regional Office at the following address unless otherwise indicated:

Illinois Environmental Protection Illinois EPA
Division of Air Pollution Control - Region 2
5415 North University
Peoria, Illinois 61614

If you have any questions concerning this permit, please contact German Barria at 217/782-2113.



Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed:

03-23-2010

ECB:GB:psj

cc: Region 2

Attachment A - Emissions Summary

This attachment provides the Illinois EPA's evaluation of the maximum particulate matter emissions of a grain elevator operating in compliance with the requirements of this permit. For the purpose of this evaluation, the Illinois EPA used the annual operating scenario which results in maximum emissions. This is receiving 45,000,000 bushels of grain by existing dump pits all controlled by baghouse(s) and drying of only 13,500,000 bushels of grain. In addition, this scenario assumes drying is performed with a column dryer, which has a higher emission rate than a dryer equipped with a cyclone or filter. Actual emissions from a grain elevator should be less than predicted for this operating scenario to the extent that less grain is handled at an elevator and other control measures are more effective than required by rule.

<u>Emission Source</u>	<u>Annual Throughput (Bushel*/Yr)</u>	<u>Emission</u>	<u>Emission</u>	<u>Emissions</u>	
		<u>Factors (Lb/Ton) PM</u>	<u>Factors (Lb/Ton) PM₁₀</u>	<u>(Tons/Year) PM</u>	<u>PM₁₀</u>
Dump Pits-Truck/Rail	45,000,000	0.18	0.059	2.27	0.74
Grain Drying (Column Dryer)	13,500,000	0.22	0.055	41.58	10.40
Truck/Rail Loadout	45,000,000	0.086	0.029	27.09	9.14
Cleaning	4,500,000	0.075	0.019	4.73	1.20
Enclosed Internal Transfer	139,500,000	0.061	0.034	1.19	0.66
Storage Bin Vents	45,000,000	0.025	0.0063	<u>15.75</u>	<u>3.97</u>
			<u>Totals</u>	<u>92.61</u>	<u>26.10</u>

* One bushel equals 56 pounds

These emissions are based on AP-42 (Section 9.9.1-2003 update) emission factors based on 99% control efficiency for enclosed internal transfer via conveyors, drags, and legs, 98% control for baghouse controlled dump pits, and 50% control efficiency for truck/rail loadouts with socks/sleeves.

Attachment B

Section 211.3610 Major Population Area (MPA)

"Major Population Area (MPA)" means areas of major population concentration in Illinois, as described below:

The area within the counties of Cook; Lake; DuPage; Will; the townships of Burton, Richmond, McHenry, Greenwood, Nunda, Door, Algonguin, Grafton and the municipality of Woodstock, plus a zone extending two miles beyond the boundary of said municipality located in McHenry County; the townships of Dundee, Rutland, Elgin, Plato, St. Charles, Campton, Geneva, Blackberry, Batavia, Sugar Creek and Aurora located in Kane County; and the municipalities of Kankakee, Bradley and Bourbonnais, plus a zone extending two miles beyond the boundaries of said municipalities in Kankakee County.

The area within the municipalities of Rockford and Loves Park, plus a zone extending two miles beyond the boundaries of said municipalities.

The area within the municipalities of Rock island, Moline, East Moline, Carbon Cliff, Milan, Oak Grove, Silvis, Hampton, Greenwood and Coal Valley, plus a zone extending two miles beyond the boundaries of said municipalities.

The area within the municipalities of Galesburg and East Galesburg, plus a zone extending two miles beyond the boundaries of said municipalities.

The area within the municipalities of Bartonville, Peoria and Peoria Heights, plus a zone extending two miles beyond the boundaries of said municipalities.

The area within the municipalities of Pekin, North Pekin, Marquette Heights, Creve Coeur and East Peoria, plus a zone extending two miles beyond the boundaries of said municipalities.

The area within the municipalities of Bloomington and Normal, plus a zone extending two miles beyond the boundaries of said municipalities.

The area within the municipalities of Champaign, Urbana and Savoy, plus a zone extending two miles beyond the boundaries of said municipalities.

The area within the municipalities of Decatur, Mt. Zion, Harristown and Forsyth, plus a zone extending two miles beyond the boundaries of said municipalities.

The area within the municipalities of Springfield, Leland Grove, Jerome, Southern View, Grandview, Sherman and Chatham, plus a zone extending two miles beyond the boundaries of said municipalities.

The area within the townships of Godfrey, Foster, Wood River, Fort Russell, Chouteau, Edwardsville, Venice, Nameoki, Alton, Granite City and Collinsville located in Madison County; and the townships of Stites, Canteen, Centreville, Caseyville, St. Clair, Sugar Loaf and Stookey located in St. Clair County.

GB:psj



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

STANDARD CONDITIONS
FOR
LIFETIME OPERATING PERMITS

July 1, 1998

The Illinois Environmental Protection Act [415 ILCS 5/39 (formerly Illinois Revised Statutes, Chapter 111-1/2, Section 1039)] grants the Illinois Environmental Protection Agency authority to impose conditions on permits which it issues.

1. The issuance of this Permit does not release the Permittee from compliance with state and federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or with applicable local laws, ordinances and regulations.
2. The Illinois EPA has issued this Permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be ground for revocation under 35 Ill. Adm. Code 201.166.
3.
 - a. The Permittee shall not authorize, cause, direct or allow any modification, as defined in 35 Ill. Adm. Code 201.102, of equipment, operations or practices which are reflected in the permit application as submitted, until the appropriate permit is obtained from the Illinois EPA.
 - b. The Permittee shall obtain a new or revised permit under Section 39.5 of the Act, if the source no longer meets the applicability criteria of 35 Ill. Adm. Code 201.169 because of changes in emissions units or control equipment.
 - c. The Permittee shall obtain a revised permit prior to any of the following changes at the source:
 - i. An increase in emissions above the amount the emission unit or the source is permitted to emit; or
 - ii. A modification; or
 - iii. A change in operations that will result in the source's noncompliance with a condition in the existing permit; or
 - iv. A change in ownership, company name, or address, so that the application or existing permit is no longer accurate.
4.
 - a. This Permit only covers emission units and control equipment while physically present at the indicated source location. Unless the Permit specifically provides for equipment relocation, this Permit is void for an item of equipment on the day it is removed from the permitted location, or if all equipment is removed.
 - b. The Permittee shall notify the Illinois EPA in writing to withdraw the Permit if all operations the source have been permanently discontinued.

5. The Permittee shall allow any duly authorized agent of the Illinois EPA, upon the presentation of credentials, at reasonable times:
 - a. To enter the Permittee's property where actual or potential effluent, emission or noise units are located or where any activity is to be conducted, pursuant to this Permit;
 - b. To have access to and to copy any records required to be kept under the terms and conditions of this Permit;
 - c. To inspect, including during any hours of operation of equipment constructed or operated under this Permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this Permit;
 - d. To obtain and remove samples of any discharge or emission of pollutants; and
 - e. To enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring or recording any activity, discharge or emission authorized by this Permit.
6. The issuance of this Permit:
 - a. Shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located;
 - b. Does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the source;
 - c. Does not take into consideration or attest to the structural stability of any unit or part of the project; and
 - d. In no manner implies or suggests that the Illinois EPA (or its officers, agents, or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or source.
7. The Permittee shall maintain all equipment covered under this Permit in such a manner that the performance of such equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.
8. The Permittee shall maintain a maintenance record on the premises for each item of air pollution control equipment. This records shall be made available to any agent of the Illinois EPA at any time during normal working hours and/or operating hours. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.
9. No person shall cause or allow startup of any emission unit or continued operation during malfunction or breakdown of any emission unit or related air pollution control equipment if such startup or continued operation would cause a violation of an applicable emission standard or permit limitation if such operation is not allowed as a special condition of this Permit, as required by 35 Ill. Adm. Code 201.149.
10. The Permittee shall submit an Annual Emission Report as required by 35 Ill. Adm. Code 201.302 and 35 Ill. Adm. Code Part 254.
11. The Permittee shall pay the annual site fee for the source in accordance with Section 9.5 of the Act.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

PAT QUINN, GOVERNOR

LISA BONNETT, INTERIM DIRECTOR

Technical Recommendation for Tax Certification Approval

Date: December 06, 2011
To: Robb Layman
From: Edwin C. Bakowski X
Subject: Western Grain Marketing, LLC. TC-10-12-21

This Agency received a request on December 21, 2010 from Western Grain Marketing, LLC. for an Illinois EPA recommendation regarding tax certification of air pollution control facilities pursuant to 35 Ill. Adm. Code 125.204. I offer the following recommendation.

The air pollution control facilities in this request include the following:

Cyclone Bag Houses (3) which reduces particulate matter (PM) emissions by capturing the grain dust from the point source. Because the primary purpose of this system is to reduce or eliminate air pollution, it is certified as a pollution control facility.

This facility is located at 21050 U.S. Highway 136, McDonough County
The property identification number is 14-000-017-00

Based on the information included in this submittal, it is my engineering judgement that the proposed facility may be considered "Pollution Control Facilities" under 35 IAC 125.200(a), with the primary purpose of eliminating, preventing, or reducing air pollution, or as otherwise provided in this section, and therefore eligible for tax certification from the Illinois Pollution Control Board. Therefore, it is my recommendation that the Board issue the requested tax Certification for this facility.

FEM:psj

Exhibit B