

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

West Central FS, Inc.-Adair)
(Property Identification Number) PCB No. 21-
14-000-184-05) (Tax Certification)
)

NOTICE

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board an APPEARANCE and RECOMMENDATION OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, copies of which are herewith served upon you.

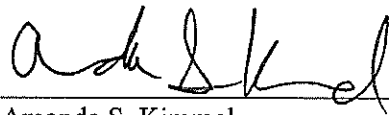
West Central FS, Inc.
Jim McNelly
1445 Monmouth Blvd.
Galesburg, Illinois 61401

Don Brown, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601

Copies also provided electronically as follows:

Illinois Department of Revenue
via email at REV.PropTaxApp@illinois.gov
101 West Jefferson
P.O. Box 19033
Springfield, Illinois 62794

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: 
Amanda S. Kimmel
Assistant Counsel
Division of Legal Counsel

DATED: January 8, 2021

Illinois Environmental Protection Agency
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

THIS FILING IS SUBMITTED ON RECYCLED PAPER

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

**West Central FS, Inc.-Adair
(Property Identification Number
14-000-184-05)**

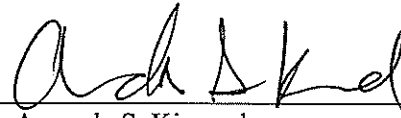
)
) **PCB No. 21-**
) **(Tax Certification)**
)

A P P E A R A N C E

The undersigned, as one of its attorneys, hereby enters an APPEARANCE on behalf of Respondent,
Illinois Environmental Protection Agency.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: _____



Amanda S. Kimmel
Assistant Counsel
Division of Legal Counsel

DATED: January 8, 2021

Illinois Environmental Protection Agency
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
(217)782-5544

THIS FILING IS SUBMITTED ON RECYCLED PAPER

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

West Central FS, Inc.-Adair)
(Property Identification Number) PCB No. 21-
14-000-184-05) (Tax Certification)
)

**RECOMMENDATION OF THE ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY**

The Illinois Environmental Protection Agency ("Illinois EPA") hereby files its Recommendation pursuant to Section 125.204 of the regulations of the Illinois Pollution Control Board ("Board"), 35 Ill. Adm. Code 125.204.

1. On December 24, 2018 and supplemented on September 22, 2020, the Illinois EPA received a request from West Central FS, Inc. (log number TC-140748, Exhibit A) for an Illinois EPA recommendation regarding the tax certification of water pollution control facilities pursuant to 35 Ill. Adm. Code 125.204.
2. The facility's address is: West Central FS, Inc.-Adair
8606 E 2250th St.
Adair, Illinois 61411

The proposed water pollution control facilities in this request are located in the NE ¼ of Section 23, T5N, R1W of the 4th P.M. in McDonough County, at the above street address and consist of the following:

Agrichemical containment structures consisting of two (2) reinforced concrete operational containment pads (approximately 35 ft. x 52.75 ft., and 141.25 ft. x 30 ft.), and the portion of the building over the pads as approved under the Agency endorsed Agrichemical Facility Permit No. AC92051432 (Log No. 17092474 issued on December 29, 2017).

These agrichemical containment structures facilities are used to collect, transport, and/or store agrichemical rinsates, residues, or washwaters prior to reuse or disposal, and are further described in Exhibit A.


3. Section 11-10 of the Property Tax Code, 35 ILCS 200/11-10 (2018), and Section 125.200(a) of the Board's regulations, 35 Ill. Adm. Code 125.200(a), define "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: eliminating, preventing, or reducing air or water pollution ...or treating, pretreating, modifying or disposing of any potential solid, liquid or 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.

4. In order to receive preferential tax treatment as pursuant to 35 ILCS 200/11-5 (2018), pollution control facilities must be certified as such by the Board, 35 ILCS 200/11-20 (2018) and 35 Ill. Adm. Code 125.200(a).
5. Upon receipt of a tax certification application, the Illinois EPA must file a recommendation on the application with the Board, 35 Ill Adm. Code 125.204(a).
6. Based on the information in the application and the purpose of the facility, it is the Illinois EPA's engineering judgment that the described facilities may be considered "pollution control facilities," pursuant to 35 Ill. Adm. Code 125.200(a), with the primary purpose of eliminating, preventing, or reducing water pollution, or as otherwise provided in 35 Ill. Adm. Code 125.200, and are eligible for tax certification from the Board.

WHEREFORE, the Illinois EPA recommends that the Board issue the requested tax certification.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: 
Amanda S. Kimmel
Assistant Counsel
Division of Legal Counsel

Dated: January 8, 2021

Illinois Environmental Protection Agency
1021 North Grand Ave. E.
P.O. Box 19276
Springfield, Illinois 62794-9276
217/782-5544



Memorandum

To: Mike Roubitchek, Division of Legal Counsel

From: Darin LeCrone, Manager, Industrial Unit, Permit Section *DSL*

Date: November 20, 2020

Re: West Central FS, Inc. – Adair
Recommendation of Tax Certification
Log # TC-140748
Property Identification # 14-000-184-05

The Bureau of Water received a request on December 24, 2018 from Jim McNelly for an Illinois EPA recommendation regarding the tax certification of water pollution control facilities pursuant to 35 Il. Adm. Code 125.204. We offer the following recommendation.

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

West Central FS, Inc.
8606 E 2250th St.
Adair, IL 61411

NE ¼ of Section 23, Township 5N, Range 1W of the 4th PM in McDonough County

Agrichemical containment structures consisting of two (2) reinforced concrete operational containment pads (approximately 35 ft. x 52.75 ft. and 141.25 ft. x 30 ft.), and the portion of the building over the pads as approved under the Agency endorsed Agrichemical Facility Permit No. AC92051432 (Log No. 17092474 issued on December 29, 2017).

These facilities collect, transport and store agrichemical rinsates, residues, or washwaters prior to reuse or disposal.

These facilities are further described in the enclosed applications and supporting documents.

Based on the information included in this submittal, it is our engineering judgment that the above proposed facilities may be considered "Pollution Control Facilities" under 35 IAC 125.200(a), with the primary purpose of eliminating, preventing, or reducing water pollution, or as otherwise provided in this section, and therefore eligible for tax certification from the Illinois Pollution Control Board. The Bureau of Water therefore recommends that the Board issue the requested tax certification for these facilities.

If you have any questions regarding the above, please contact Wei Han at 217/782-0610.

DEL:WH:TCert.docx
cc: Tax Cert File

Electronic Filing: Received, Clerk's Office 1/8/2021 **PCB 2021-054**
Watershed Unit Tax Certification Review Sheet

Project Name: West Central FS, Inc.

Reviewer: WH

Log number: TC-140748

Applicant: Jim McNelly
1445 Monmouth Blvd.
Galesburg, IL 61401

Facility: West Central FS, Inc.
8606 E. 2250th St.
Adair, IL 61411

Legal Description:
NE of Section: 23 Twp: 5N R: 1W PM: 4th

Date Control Devices installed: 08/25/2017

Date: October 9, 2020

Type: Agchem
 Livestock

Contact: Same

Phone: 309-343-1600

Property Index#: 14-000-184-05

Parcel#:

County: McDonough

Signature: Jim McNelly

Title: CEO

Wastes: Livestock waste is applied to cropland.
 Agrichemical rinsate and spillage is recycled through the facility and/or land applied.
 Other: _____

Physical Description of Pollution Control Devices:

The agrichemical containment facility consists:

One reinforced concrete operational containment pad for blending of bulk dry fertilizer: 35' x 52.75'
One reinforced concrete operational containment pad for loading and unloading of bulk dry fertilizer: 141.25' x 30'

The facility utilize mini bulks or portable tanks for rinsate management. All rinsate is applied to the field.

Recommended Action: Issue tax certification.

TC-140748

WH



Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

Application for Certification (Property Tax Treatment) Pollution Control Facility

FOR AGENCY USE ONLY

File Number: _____	Date Rec'd: _____
Certification Number: _____	Date: _____

Facility Type (check one): Air Water

This form is to be used for any application for certification of property tax treatment for a pollution control facility for air or water from the Illinois EPA. Separate applications must be completed for each control facility claimed. Do not mix types (air and water). Where both air and water operations are related, file two applications.

If attachments are needed, record them consecutively on an index sheet.

You may complete this form online, save a copy locally, print, sign and submit it to:

Illinois EPA
 Attention: Al Keller, Permit Section
 Division of Water Pollution Control
 1021 North Grand Avenue East, P.O. Box 19276
 Springfield, IL 62794-9276

RECEIVED
 DEC 24 2018

IEPA
 BOW/WPC/PERMIT SECTIC

I. Applicant Information:

Company Name: <u>West Central FS, Inc.</u>	Person to Contact for Additional Details <u>Jim McNelly</u>
Person Authorized to Receive Certification <u>Jim McNelly</u>	Street Address: <u>1445 Monmouth Blvd.</u>
Street Address: <u>1445 Monmouth Blvd.</u>	City: <u>Galesburg</u> State: <u>IL</u>
City: <u>Galesburg</u> State: <u>IL</u>	Zip: <u>61401</u> Phone: <u>309-343-1600</u>
Zip: <u>61401</u> Phone: <u>309-343-1600</u>	Email Address: <u>jmcnelly@westcentralfs.com</u>
Email Address: <u>jmcnelly@westcentralfs.com</u>	

II. Facility Information:

Facility Location: Quarter Section: NE Township: 5 Range: 1W
 Municipality: Adair Township: New Salem

Note: A plat map location is requested for facilities located outside of municipal boundaries.

Address: 8606 E 2250th St. City: Adair
 State: IL Zip Code: 61411 County: McDonough Book Number: _____

Property Index Number: 14-000-184-05

Note: The Property Index Number is the numerical reference used to identify a parcel of real property for assessment and taxation purposes.

Manufacturing Operations Information:

Nature of Operations Conducted at the Above Location:

This is not a manufacturing facility, it is an Agrichemical Facility. The IL Dept of Ag has permitted this facility, our permit # is: AC92051432. Copy of permit is attached.

Permit Information:

WPC Construction Permit Number: _____	Date Issued: _____
NPDES Permit Number: _____	Date Issued: _____ Exp. Date: _____
APC Construction Permit Number: _____	Date Issued: _____
APC Operating Permit Number: _____	Date Issued: _____ Exp. Date: _____

Note: Submit copies of all relevant permits issued by local pollution control agencies. (e.g. MSD Construction Permit)

This Agency is authorized to request this information under 415 ILCS 5/4(b)(2012). Disclosure of this information is voluntary and no penalties will result from the failure to provide the information. However, the absence of the information could prevent your application from being processed or could result in denial of your application.

Manufacturing Process Information:

Please provide information on the manufacturing process and materials on which pollution control facility is used, including each major piece of equipment associated with the pollution control facility (or low sulfur dioxide emission coal fueled device).

Description of the Process:

Not applicable

Materials Used in the Process:

Not applicable

Pollution Control Facility Information:

Please provide a narrative description of the pollution control facility (or low sulfur dioxide emission coal fueled device), and an explanation of why its primary purpose is to eliminate, prevent or reduce pollution. State the type of control facility, as well as a narrative description and a process flow diagram describing the pollution control facility. Include an average analysis of the influent and effluent of the control facility stating the collection efficiency, if applicable.

Describe the Pollution Control Facility (or Low Sulfur Dioxide Emission Coal Fueled Device):

The structure is a building and containment system designed to ensure safe storage, handling and transfer of bulk dry fertilizer.

Describe the Primary Purpose of the Pollution Control Facility (or Low Sulfur Dioxide Emission Coal Fueled Device):

The pollution control structures in this building are designed to keep precipitation and wind from contact with dry fertilizer, thus assuring that run-off of nutrients to the environment caused by rain or wind events will not occur. This includes the concrete floors and the materials used to construct ceiling and walls in the building to fully contain and protect the dry fertilizer from rain or wind. Additionally, a concrete pad is located outside the facility to capture any fertilizer material during loading or unloading activities to or from transport vehicles so that it can be easily collected and returned to transport vehicle or storage area.

Identify the statute or regulation (federal or state), or local ordinance, if any, requiring the installation of the subject pollution control facility (or low sulfur dioxide emission coal fueled device).

Illinois Pesticide Act (415 ILCS 60/1 et seq.) and 8 Illinois Administrative Code 255

Nature of Contaminants or Pollutants:

List air contaminants or water pollution substances released as effluents to the manufacturing processes. Also list the final disposal of any contaminants removed from the manufacturing processes.

Contaminant or Pollutant	Material Retained, Captured or Recovered	
	Description	Disposal or Use
NA	NA	NA

Note: Contaminant or pollutant means that which is removed from the process by the pollution control facility.

Point(s) of Waste Water Discharge:

Identify the location of the discharge to the receiving stream. This will typically refer to a source of water pollution but can include water-carried wastes from air pollution control facilities.

Plans and Specifications Attached Yes No

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.

Are contaminants (or residues) collected by the control facility? Yes No

Note: If the collected contaminants are disposed of other than as wastes, state the disposition of the materials, and the value dollars reclaimed by the sale or reuse of the collected substances. State the cost of reclamation and related expense.

Project Status:

Date Installation Completed: Aug 25, 2017

Provide the date the pollution control facility was first placed into service and operated. If not, explain.

Complete September 25, 2017

Status of installation on date of application:

In service performing fertilizer storage, handling, mixing and transfer.

III. Verification and Signature:

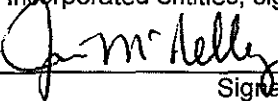
The following information is submitted in accordance with the Illinois Property Tax Code, as amended, and to the best of my knowledge is true and correct.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

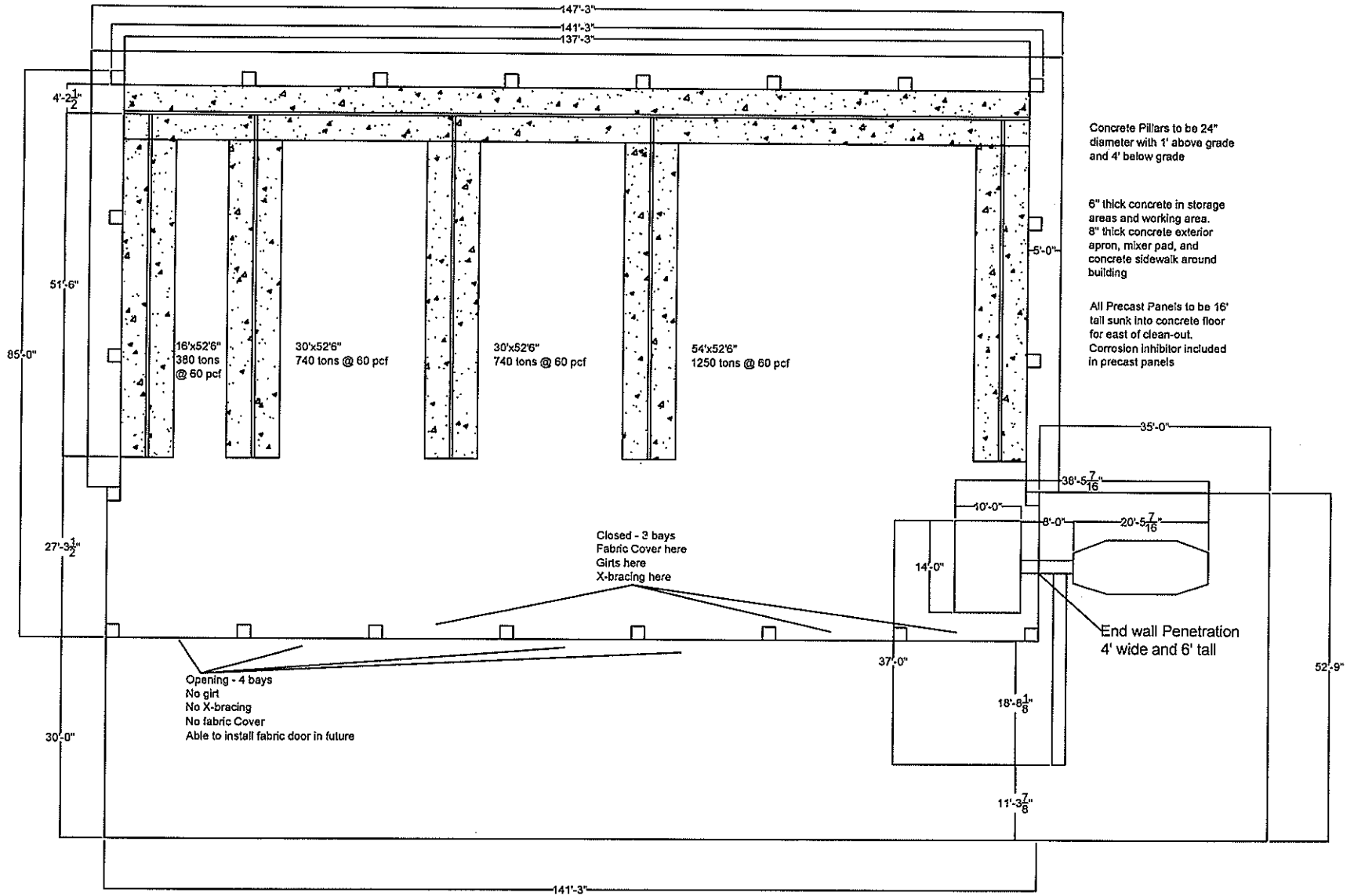
Jim McNelly
Printed Name:

General Manager/CEO
Title:

For incorporated entities, signature should be from an authorized corporate representative.


Signature:

12-19-2018
Date:



Concrete Pillars to be 24" diameter with 1' above grade and 4' below grade

6" thick concrete in storage areas and working area.
8" thick concrete exterior apron, mixer pad, and concrete sidewalk around building

All Precast Panels to be 16' tall sunk into concrete floor for east of clean-out.
Corrosion inhibitor included in precast panels



BUILDING YOUR FUTURE

NO. REVISION		DATE
DRAWN	CHECK	SCALE
MJB		9/32":1'

WEST_CENTRALFS_ADAIR_ILLINOIS

84'X140'

LAYOUT_DRAWING

DATE	DRAWING NO.	REVISION
12-15-2016	001-001 SHEET 1 OF 2	0



Bureau of Environmental Programs

State Fairgrounds • P.O. Box 19281 • Springfield, IL 62794-9281 • 217/785-2427 (voice/TDD) • Fax 217/524-4882
Pesticide Misuse Hotline 1-800-641-3934 (voice) • 1-866-287-2999 (TDD/TTY)

November 13, 2017

West Central FS, Inc.
P.O. Box 445
Macomb, IL 61455

Dear Agrichemical Facility Permit Applicant:

Enclosed is the construction and/or operating permit as approved by the Illinois Department of Agriculture and endorsed by the Illinois Environmental Protection Agency. Please carefully review and follow the Standard and Special Conditions of the Permit and Endorsement.

Prior to construction, the Department and the Agency caution you to carefully evaluate past operational practices at the site. Should you suspect environmental (soil, surface or groundwater) contamination, it is advisable to determine the extent and severity of such contamination prior to construction and remediate these areas as required.

We appreciate your cooperation with the Department in this process. Should you have any questions or comments regarding your Agrichemical Facility Permit, please contact the Agrichemical Containment Program at (217) 785-2427.

ILLINOIS DEPARTMENT OF AGRICULTURE

Handwritten signature of Douglas C. Owens in black ink.

Douglas C. Owens, Chief
Bureau of Environmental Programs

Handwritten signature of Brad A. Beaver in black ink.

Brad A. Beaver, Manager
Permits and Downstate Field Operations

file
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State of Illinois

Department of Agriculture

AGRICHEMICAL CONTAINMENT PERMIT

Permittee:	West Central FS, Inc. P.O. Box 445 Macomb, IL 61455	Facility ID Number:	AC1093050000
Facility Location:	Adair	Log Number:	16002474
Permit #:	AC92051432	Date Received:	September 19, 2017
Facility Type:	Commercial Retail Dealer	Expiration Date:	December 29, 2022
Date Issued:	December 29, 2017		

Permit is hereby granted to the above designated permittee to construct and operate an agrichemical containment facility as follows:

OPERATIONAL CONTAINMENT STRUCTURES

Operation of an existing reinforced concrete operational containment structure measuring 20' (width) x 40' (length) x 0.5' (depth) with a total design capacity of 295 cubic feet (ft.³). The floor shall slope to a single sump measuring 1.5' (width) x 1' (length) x 1' (depth) to facilitate the collection and recovery of all escaped product and/or agrichemical wastewater. All recovered effluent shall be transferred to one (1) of two (2) 1,000 gallon recovery tanks with a manually activated sump pump. Segregation shall be performed based upon the applicable target crop and label use. All loading, unloading, and washing of bulk liquid agrichemical transportation and application equipment shall be performed upon the herein permitted structure. This structure shall be referred to as OC-1.

Operation of an existing reinforced concrete operational containment structure measuring 6' (width) x 21.5' (length) x 0.32' (depth) with a total design capacity of 37 cubic feet (ft.³). The floor shall slope to a single sump measuring 2' (width) x 2' (length) x 0.33' (depth) to facilitate the collection and recovery of all escaped product and/or agrichemical wastewater. All recovered effluent shall be transferred to one (1) of the two (2) aforementioned 1,000 gallon recovery tanks with a manually activated sump pump. Segregation shall be performed based upon the applicable target crop and label use. All repackaging of bulk liquid agrichemicals shall be performed upon the herein permitted structure. This structure shall be referred to as OC-2.

SECONDARY CONTAINMENT STRUCTURES

Operation of an existing reinforced concrete secondary containment structure measuring 13.33' (width) x 40' (length) x 2' (height) with a total design capacity of 857 cubic feet (ft.³). The floor shall slope to a single sump measuring 2' (diameter) x 0.5' (depth) to facilitate the collection and recovery of all escaped product and/or agrichemical wastewater. All recovered effluent shall be transferred to one (1) of the two (2) aforementioned 1,000 gallon recovery tanks with a manually activated sump pump. Segregation shall be performed based upon the applicable target crop and label use. Bulk liquid pesticides shall be stored within the herein permitted structure. This structure shall be referred to as SC-1.

Operation of an existing reinforced concrete secondary containment structure measuring 30.33' (width) x 40.33' (length) x 3.5' (height) with a total design capacity of 4,040 cubic feet (ft.³). The floor shall slope to a single sump measuring 2' (width) x 2' (length) x 2' (depth) to facilitate the collection and recovery of all escaped product and/or agrichemical wastewater. All recovered effluent shall be transferred to one (1) of the two (2) aforementioned 1,000 gallon recovery tanks with a manually activated sump pump. Segregation shall be performed based upon the applicable target crop and label use. All bulk liquid fertilizer shall be stored within the herein permitted structure. This structure shall be referred to as SC-2.



State of Illinois

Department of Agriculture

AGRICHEMICAL CONTAINMENT PERMIT

Operation of an existing reinforced concrete secondary containment structure measuring 17.33' (width) x 21.33' (length) x 4.75' (height) with a total design capacity of 1,446 cubic feet (ft.³). The floor shall slope to a single sump measuring 2' (width) x 2' (length) x 1' (depth) to facilitate the collection and recovery of all escaped product and/or agrichemical wastewater. All recovered effluent shall be transferred to one (1) of the two (2) aforementioned 1,000 gallon recovery tanks with a manually activated sump pump. Segregation shall be performed based upon the applicable target crop and label use. Bulk liquid pesticides (N-Serve) shall be stored within the herein permitted structure. This structure shall be referred to as SC-3.

Operation of an existing reinforced concrete secondary containment structure measuring 50' (width) x 90' (length) x 0.16' (height) with a total design capacity of 727 cubic feet (ft.³). The floor shall slope to a single sump measuring 1' (width) x 1' (length) x 1' (depth) to facilitate the collection and recovery of all escaped product and/or agrichemical wastewater. All recovered effluent shall be transferred to one (1) of the two (2) aforementioned 1,000 gallon recovery tanks with a manually activated sump pump. Segregation shall be performed based upon the applicable target crop and label use. All mini-bulk and packaged agrichemicals shall be stored within the herein permitted structure. This structure shall be referred to as SC-4.

DRY FERTILIZER STRUCTURES

Operation of a bulk dry fertilizer storage building measuring 141.25' (width) x 85' (length) with an estimated total storage capacity of 3,110 tons. The structure is composed of four (4) storage bins (one (1) bin measuring 16' (width) x 32.5' (length) with an estimated storage capacity of 380 tons, two (2) bins, each bin measuring 30' (width) x 52.5' (length) with an estimated storage capacity of 440 tons each, and one (1) bin measuring 34' (width) x 52.5' (length) with an estimated storage capacity of 350 tons).

All bulk dry fertilizer shall be stored within the herein permitted structure.

Operation of a reinforced concrete operational containment structure measuring 35' (width) x 52.75' (length). All blending of bulk dry fertilizer shall be performed upon the herein permitted structure.

Operation of a reinforced concrete operational containment structure measuring 141.25' (width) x 30' (length). The unloading and loading of bulk dry fertilizer transportation and application equipment shall be performed upon the herein permitted structure.

There shall be no discharge of wastewater from the herein permitted facilities.

This permit has been reviewed and approved by the Illinois Environmental Protection Agency per the attached permit endorsement. This permit is subject to standard conditions on the reverse side of this document and the following special conditions:

SPECIAL CONDITION 1: The permittee shall provide backflow protection in accordance with the Illinois Department of Public Health Plumbing Code (77 Ill. Adm. Code 890) and the Illinois Environmental Protection Agency's Technical Policy Statement (35 Ill. Adm. Code 653.803(c)(4)).

SPECIAL CONDITION 2: The permittee may discharge accumulated precipitation from the herein permitted bulk liquid fertilizer secondary containment structure (SC-2) pursuant to 8 Illinois Administrative Code 255.110 (a) (2) (A) and (B).

SPECIAL CONDITION 3: The permittee shall operate the exposed dry fertilizer operations pursuant to 8 Illinois Administrative Code 255.140 (a), (c) and (d).

SPECIAL CONDITION 4: The permittee shall employ concentric piping for the piping span from the secondary containment structure (SC-4) to the operational containment structure (OC-1).

SPECIAL CONDITION 5: The permittee shall provide means for the safe emergency access to and exit from the herein permitted bulk liquid pesticide secondary containment structure (SC-3) pursuant to 8 Illinois Administrative Code 255.110 (E).



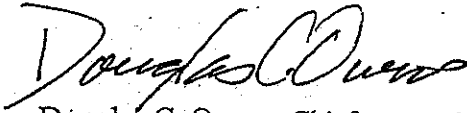
State of Illinois

Department of Agriculture

AGRICHEMICAL CONTAINMENT PERMIT

SPECIAL CONDITION 6: The permittee shall employ a totally enclosed transfer system for the transfer of bulk dry fertilizer from the unloading containment to the bulk dry fertilizer storage building.

THE STANDARD CONDITIONS OF ISSUANCE ON THE REVERSE SIDES OF THIS MUST BE COMPLIED WITH IN FULL.



Douglas C. Owens, Chief
Bureau of Environmental Programs



Brad A. Beaver, Manager
Permits and Downstate Field Operations

IEPA WPC: Permits
file
109305.pr





ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

BRUCE RAUNER, GOVERNOR

ALEC MESSINA, DIRECTOR

217/782-3362

November 6, 2017

Bureau of Environmental Programs
Illinois Department of Agriculture
State Fairgrounds
Post Office Box 19281
Springfield, Illinois 62794-9281

Re: West Central FS, Inc. – Adair -- Endorsement of Agrichemical Facility Permit
Log No. 17092474
Renewal

Gentlemen:

Based on the information included in the permit application, the subject facility may be constructed and operated so as to meet the requirements of Subtitle C: Water Pollution and Subtitle B: Air Pollution.

This Agency hereby issues endorsement pursuant to Section 39.4 of the Illinois Environmental Protection Act for the subject agrichemical facility subject to the following Special Conditions:

Special conditions in the general endorsements for previous agrichemical facility permit modifications for this facility will remain valid for the subject permit modifications regardless of subsequent modification, renewal or expiration of the general endorsements.

SPECIAL CONDITION NO. 1: The blending of pesticides onto dry fertilizer is not allowed at this facility. A revised operating permit will be required before the blending of pesticides can be added to this process.

SPECIAL CONDITION NO. 2: No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.

SPECIAL CONDITION NO. 3: Any discharge of stormwater from the containment facilities shall not cause water quality violations pursuant to 35 Ill. Adm. Code, Subtitle C or a pesticide release pursuant to the Illinois Environmental Protection Act. Stormwater analyses conducted for determination of compliance with this condition shall be performed in accordance with analytical procedures specified in 40 CFR 136.

SPECIAL CONDITION NO. 4: All points of use of the water supply and distribution system supplied by both on-site wells shall be posted as non-potable or not for human consumption.

SPECIAL CONDITION NO. 5: Well #1 use points shall not be used for agrichemical related purposes without proper backflow protection.

Page No. 2
Log # 17092474

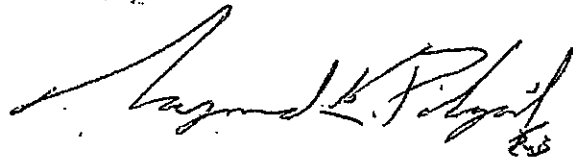
This endorsement becomes effective and is deemed to be a permit issued by the Agency pursuant to Sections 9(b) and 12(b) of the Act when the Illinois Department of Agriculture includes the above conditions as conditions of a permit issued pursuant to Section 255.50 of Subchapter i, Chapter I of Title 8: Agriculture and Animals.

This endorsement does not grant immunity from enforcement action found necessary by this Agency to meet its responsibilities in prevention, abatement, and control of water or air pollution.

Very truly yours,



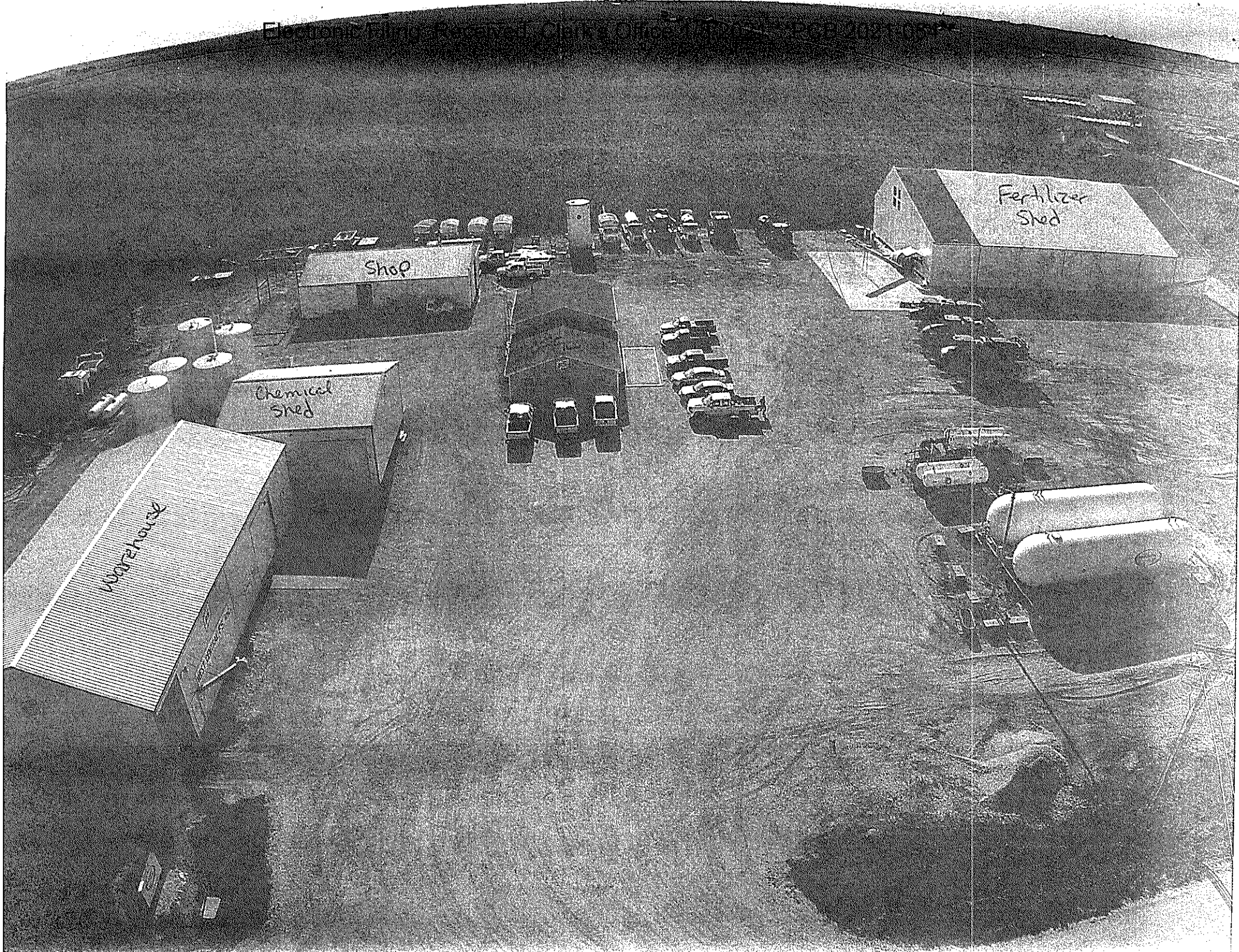
Alan Keller, P.E.
Manager, Permit Section
Division of Water Pollution Control



Raymond E. Pilapil
Manager, Permit Section
Division of Air Pollution Control

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cc: DWPC – Peoria Region
Records Unit
DAPC/Permits
DAPC – Des Plaines Region (McDonough County)





ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217-782-0610

September 14, 2020

West Central FS, Inc.
Attn: Jim McNelly
1445 Monmouth Blvd.
Galesburg, IL 61041

RE: Illinois Tax Certification Application
Dry Fertilizer Storage Building
West Central FS, Inc. – Adair
Log No. TC-140748
Bureau ID# W1098120005

Dear Mr. McNelly:

The application for Illinois Property Tax Certification received December 24, 2018 for the above listed facilities has been reviewed by the Agency. Based on review of the information included in the submittal, the facilities do not meet the definition of "Pollution Control Facilities" under 35 IAC 125.200(a), with the primary purpose of eliminating, preventing, or reducing water pollution.

On January 23, 2019, the Agency sent you a letter requesting additional information to support the application, or withdrawal of subject structures from the application for certification as pollution control facility.

Please respond to this request by either fax at (217)782-9891, email to wei.han@illinois.gov or a written letter. If response is not submitted within 45 days, the Illinois EPA will have no option other than to recommend that the Illinois Pollution Control Board deny the application. Please include the log number in all correspondence. If you have any questions, please contact Wei Han at (217)782-0610. Sincerely,

A handwritten signature in black ink, appearing to read "Wei Han".

Wei Han, P.E.
Environmental Protection Engineer
Illinois Environmental Protection Agency
Bureau of Water
Division of Water Pollution Control

Enclosure

WH: P:\Tax Certification\TC-140748 2ndDenLtr.doc
cc: Records Unit

4302 N. Main St., Rockford, IL 61103 (815)987-7760
595 S. State, Elgin, IL 60123 (847)608-3131
2125 S. First St., Champaign, IL 61820 (217)278-5800
2009 Mall St., Collinsville, IL 62234 (618)346-5120

9511 Harrison St., Des Plaines, IL 60016 (847)294-4000
5407 N. University St., Arbor 113, Peoria, IL 61614 (309)693-5462
2309 W. Main St., Suite 116, Marion, IL 62959 (618)993-7200
100 W. Randolph, Suite 10-300, Chicago, IL 60601 (312)814-6026



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, ACTING DIRECTOR

217-782-0610

JAN 23 2019

West Central FS, Inc.
Attn: Jim McNelly
1445 Monmouth Blvd.
Galesburg, IL 61041

RE: Illinois Tax Certification Application
Dry Fertilizer Storage Building
West Central FS, Inc. – Adair
Log No. TC-140748
Bureau ID# W1098120005

Dear Mr. McNelly:

The application for Illinois Property Tax Certification received December 24, 2018 for the above listed facilities has been reviewed by the Agency. Based on review of the information included in the submittal, the facilities are not considered "Pollution Control Facilities" under 35 IAC 125.200(a), with the primary purpose of eliminating, preventing, or reducing water pollution, or as otherwise provided in this section. The following grounds are offered for your consideration and appropriate action.

The problems of agglomeration (caking) and lumping caused by the effect of uncontrolled humidity on dry fertilizer products have been well documented in the literatures (Brad and Weil, 2016; Rutland, 1991; Walker and Magee, 1998; Midwest Plan Service, 1991; Hignett, 1985; Pietsch, 1969; Havlin, et al., 2005). See attachment for references. This change on physical property prohibits the products from flowing easily through the distribution or mixing equipment and being uniformly applied in the field. Further, uncontrolled exposure to precipitation presents difficulty in the ability to maintain and provide a consistent, high quality fertilizer that is capable of meeting guaranteed analysis requirements (Brad and Weil, 2016; Havlin, et al., 2005).

Dry fertilizer storage buildings are widely used structures in the state of Illinois to protect the products from coming into contact with precipitation and moisture in the atmosphere. It seems that the primary purpose of such buildings is to conserve the physical and chemical properties, or qualities, of the products during the storage time.

Based on the Agency's finding, the dry fertilizer storage building will be recommended for denial with public notice. In order to continue with the review process, please provide additional information to address the above concern, or withdraw the building from the application for certification as pollution control facility.

Attachment

References

Brady, N. C.; Weil, R. R. *The Nature and Properties of Soils*. 15th Edition. Pearson Education, Inc., 2016.

Havlin, J. L.; Beaton, J., D.; Tisdale, S. L.; Nelson, W. L. *Soil Fertility and Fertilizers, An Introduction to Nutrient Management*. 7th Edition, Pearson Education, Inc., 2005.

Hignett, T. P. *Fertilizer Manual*. Springer-Science Business Media, B.V. 1985, 299 -304

Kammel, D. W.; Noyes, R.T.; Riskowski, G. L.; Hofman, V. L. MWPS-37: Designing Facilities for Pesticide and Fertilizer Containment. *Midwest Plan Service*. Ames. 1991.

Pietsch, W. B. Adhesion and Agglomeration of Solid During Storage, Flow and Handling – A Survey. *J. Eng. Ind.* 1969, 91(2), 435 – 448.

Rutland, D. W. Fertilizer caking: mechanisms, influential factors, and methods of prevention. *Fertilizer Research*. 1991, 30, 99 -114.

Walker, G. M.; Magee, T. R.; Holland, C. R.; Ahmad, M. N. Caking Processes in Granular NPK Fertilizer. *Ind. Eng. Chem. Res.* 1998, 37, 435-438.

Kimmel, Amanda

From: Parrish, Mark (West Central FS) <mparrish@westcentralfs.com>
Sent: Tuesday, September 22, 2020 1:46 PM
To: Han, Wei
Cc: Mcnelly, Jim (WEST CENTRAL FS)
Subject: [External] Illinois Tax Certification Application Log No. TC-140748

Dear Wei Han P.E.:

Regarding your letter dated September 14, 2020, concerning Log No. TC-140748. We would like to withdraw the dry fertilizer building from our application. We would still request the consideration of the external operational concrete structures measuring 35' (width) x 52.75' (length) used for blending of bulk dry fertilizer and 141.25' (length) x 30' (width) used in the loading and unloading bulk dry fertilizer transportation and application equipment. They are both used to capture any fertilizer material during loading or unloading activities to or from transport vehicles so that it can be easily collected and returned to transport vehicle or storage area.

If you require any more information please email me at mparrish@westcentralfs.com.

Sincerely,



Mark Parrish
Compliance/Safety
Ormonde Service Center
Cell: 309-337-1302
Office: 309-734-8391

STATE OF ILLINOIS

COUNTY OF SANGAMON

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CERTIFICATE OF SERVICE

I, the undersigned attorney at law, hereby certify that I have served on the date of January 8, 2021, the attached **NOTICE, APPEARANCE** and **RECOMMENDATION OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**, upon the following persons by causing to be mailed a true copy thereof in an envelope duly addressed, bearing proper first class postage, and deposited in the United States mail at Springfield, Illinois:

West Central FS, Inc.
Jim McNelly
1445 Monmouth Blvd.
Galesburg, Illinois 61401

Copies also provided electronically as follows:

Illinois Department of Revenue
via email at REV.PropTaxApp@illinois.gov
101 West Jefferson
P.O. Box 19033
Springfield, Illinois 62794

[Electronic Filing]

Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite. 11-500
Chicago, Illinois 60601

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

/s/ Amanda S. Kimmel
Assistant Counsel
Division of Legal Counsel
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
217.782.5544
217.782.9143 (TDD)

THIS FILING IS SUBMITTED ON RECYCLED PAPER