BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

Conserv FS, Inc. - Caledonia	)
(Property Identification Number	) **PCB No. 24 -**
02-23-200-001)	) **(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.

Conserv FS, Inc. - Caledonia
David Swigart
1110 McConnell Road
Woodstock, Illinois 60098

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: _____
Joshua Leopold
Assistant Counsel
Division of Legal Counsel

DATED: January 10, 2024

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

Conserv FS, Inc. - Caledonia	)
(Property Identification Number	) **PCB No. 24-**
02-23-200-001)	) **(Tax Certification)**
	)

APPEARANCE

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

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: _____

Joshua Leopold
Assistant Counsel
Division of Legal Counsel

DATED: January 10, 2024

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

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

Conserv FS, Inc. - Caledonia	**)**
(Property Identification Number	**) PCB No. 24-**
02-23-200-001)	**) (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 12, 2022, the Illinois EPA received a request from Conserv FS, Inc. - Caledonia (Log number TC-147221, 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: Conserv FS, Inc. - Caledonia
14937 IL RT 76
Caledonia, IL 61011

The proposed water pollution control facilities in this request are located in the NE ¼, Township 45-North, Range 3-East of the East 3rd PM in Boone County, at the above street address and consist of the following agrichemical containment structures:

A concrete liquid agrichemical operational containment structure [OC-1] measuring approximately 57 ft. (length) x 61.83 ft. (width) x 0.33 ft. (height) and the portion of the building over this operational containment structure.

A concrete liquid agrichemical operational containment structure [OC-2] measuring approximately 31 ft. (length) x 62.66 ft. (width) x 0.33 ft. (height) and the portion of the building over this operational containment structure.

A concrete liquid agrichemical operational containment structure [OC-3] measuring approximately 28 ft. (length) x 80 ft. (width) x 0.33 ft. (height) and the portion of the building over this operational containment structure.

A concrete liquid agrichemical secondary containment structure [SC-1] measuring approximately 28.42 ft. (length) x 69.33 ft. (width) x 0.833 ft. (height) and the portion of the building over this secondary containment structure.

A concrete liquid agrichemical secondary containment structure [SC-2] measuring approximately 44 ft. (length) x 58 ft. (width) x 3.5 ft. (height) and the portion of the building over this secondary containment structure.

A concrete liquid agrichemical secondary containment structure [SC-4] measuring approximately 50 ft. (length) x 32.5 ft. (width) x 0.5 ft. (height) and the additional 27 ft. (length) x 28 ft. (width) x 0.5 ft. (height) area for containment of liquid fertilizer.

A concrete liquid agrichemical secondary containment structure [SC-5] measuring approximately 50 ft. (length) x 80 ft. (width) x 0.5 ft. (height) and the portion of the building over this secondary containment structure.

One (1) synthetic membrane liner installed and operated within the mild steel bulk liquid fertilizer tank with storage capacity of 1,000,000 gallons.

A concrete bulk dry agrichemical operational containment structure for loader operations measuring approximately 178 ft. (length) x 36 ft. (width) and the portion of the building over this operational containment structure.

A concrete bulk dry agrichemical operational containment structure for mixing, blending and loading operations measuring approximately 178 ft. (length) x 49.4 ft. (width) and the portion of the building over this operational containment structure.

A concrete bulk dry agrichemical operational containment structure for tractor trailer unloading operations measuring approximately 80 ft. (length) x 22 ft. (width) and the portion of the building over this operational containment structure.

A concrete bulk dry agrichemical secondary containment structure measuring approximately 178 ft. (length) x 54 ft. (width) and the portion of the building over this operational containment structure.

These agrichemical facilities collect, store, or prevent the comingling of precipitation with agrichemical rinsates, residues, or washwaters prior to reuse or disposal as approved under the Agency endorsed Agrichemical Facility Permit No. 94123326 (Log No. 22053643 and 22053644 issued on October 17, 2023) and prevent stormwater runoff from agrichemical affected areas.

3. Section 11-10 of the Property Tax Code, 35 ILCS 200/11-10 (2022), 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 (2022), pollution control facilities must be certified as such by the Board, 35 ILCS 200/11-20 (2022) 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: _____
Joshua Leopold
Assistant Counsel
Division of Legal Counsel

Dated: January 10, 2024

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

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

Memorandum

To: Mike Roubitchek, Division of Legal Counsel

From: Darin E. LeCrone, P.E., Manager, Permit Section, Division of Water Pollution Control, Illinois Environmental Protection Agency

Date: JAN - 9 2024

Re: Conserv FS, Inc. - Caledonia
Recommendation of Tax Certification
Log No.: TC-147221
BOW ID No.: W0078070004
Property Index Number: 02-23-200-001

The Bureau of Water received a request on December 12, 2022 from Conserv FS, Inc., having a principal place of business at 1110 McConnell Road, Woodstock, IL 60098, 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:

Conserv FS, Inc.
14937 IL RT 76
Caledonia, IL 61011

NE 1/4, Township 45-North, Range 3-East of the East 3rd PM in Boone County.

Agrichemical containment facilities consisting of:

A concrete liquid agrichemical operational containment structure [OC-1] measuring approximately 57 ft. (length) x 61.83 ft. (width) x 0.33 ft. (height) and the portion of the building over this operational containment structure.

A concrete liquid agrichemical operational containment structure [OC-2] measuring approximately 31 ft. (length) x 62.66 ft. (width) x 0.33 ft. (height) and the portion of the building over this operational containment structure.

A concrete liquid agrichemical operational containment structure [OC-3] measuring approximately 28 ft. (length) x 80 ft. (width) x 0.33 ft. (height) and the portion of the building over this operational containment structure.

A concrete liquid agrichemical secondary containment structure [SC-1] measuring approximately 28.42 ft. (length) x 69.33 ft. (width) x 0.833 ft. (height) and the portion of the building over this secondary containment structure.

A concrete liquid agrichemical secondary containment structure [SC-2] measuring approximately 44 ft. (length) x 58 ft. (width) x 3.5 ft. (height) and the portion of the building over this secondary containment structure.

A concrete liquid agrichemical secondary containment structure [SC-4] measuring approximately 50 ft. (length) x 32.5 ft. (width) x 0.5 ft. (height) and the additional 27 ft. (length) x 28 ft. (width) x 0.5 ft. (height) area for containment of liquid fertilizer.

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A concrete bulk dry agrichemical operational containment structure for mixing, blending and loading operations measuring approximately 178 ft. (length) x 49.4 ft. (width) and the portion of the building over this operational containment structure.

A concrete bulk dry agrichemical operational containment structure for tractor trailer unloading operations measuring approximately 80 ft. (length) x 22 ft. (width) and the portion of the building over this operational containment structure.

A concrete bulk dry agrichemical secondary containment structure measuring approximately 178 ft. (length) x 54 ft. (width) and the portion of the building over this operational containment structure.

These agrichemical facilities collect, store, or prevent the comingling of precipitation with agrichemical rinsates, residues, or washwaters prior to reuse or disposal as approved under the Agency endorsed Agrichemical Facility Permit No. 94123326 (Log No. 22053643 and 22053644 issued on October 17, 2023) and prevent stormwater runoff from agrichemical affected areas.

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 Darren Gove at 217/782-0610.

DRG:TC-147221_Tax Cert Recommendation_12Dec22.docx

cc: Tax Cert File

Illinois EPA - Bureau of Water - Division of Pollution Control
Title 35 Subtitle A Part 125 Tax Certifications
Illinois EPA Review Notes for:

Agency Recommendation of Pollution Control Facilities.

BOW ID #: W0078070004

Project Name: Conserv FS, Inc.

Pollution Control Facility Type: Agrichemical Facility

Date application received: 12/12/2022

Property ID: 02-23-200-001

Reviewer: DRG

Applicant: Conserv FS, Inc.
1110 McConnell Road
Woodstock, IL 60098

Log number: TC-147221

Legal Description:
NE 1/4 Twp: 45-North Range: 3-East PM: East 3rd

Facility: Conserv FS, Inc.
14937 IL RT 76
Caledonia, IL 61011

County: Boone

Date Control Devices installed: March 2022

Facility Contact:

Application Signature by: David Swigart

Phone: _217 248-5930

Title: Manager

Contents of Application: 3-page (2021) form, index of application, Addendum to the application (2 pages), Exhibits A, B, and C (9, 6, and 7 pages respectively, Agchem draft permit 3 pages. AIR Response included supplemental information includes response letter dated June 30, 2023 and several attachments including Exhibits A through F.

Is there a pollutant control flow diagram? **No Ok, Not needed.**

Is there sufficient diagrams showing the pollution control facilities? **Yes**

This facility generates the following pollutants and prevents their discharge as indicated:
Bulk agrichemical fertilizer and or pesticide rinsate and spillage is recylced at the facility and/or land applied to crop land.

This facility, an agrichemical facility, is subject to requirements of Title 8 Ill. Admin. Code Part 255.

The application requests tax certification of:
Three (3)- concrete operational containment structures, which are described as: (see diagram in Exhibit A)

- OC-1 measuring 57' x 61.83' x 0.33' deep for containment of liquid fertilizer and the portion of the building over the structure which prevents rain from washing off the structure thereby maintaining the integrity of the structure.
- OC-2 measuring 31' x 62.66' x 0.33' deep for containment of liquid fertilizer and the portion of the building over the structure which prevents rain from washing off the structure thereby maintaining the integrity of the structure.

OC-3 measuring 28' x 80' x 0.33' deep for containment of liquid fertilizer and the portion of the building over the structure which prevents rain from washing off the structure thereby maintaining the integrity of the structure

Discussion:

Each of the concrete operational containment structures for liquid agrichemicals listed above are designed / constructed to meet requirements of Title 8 Ill Admin. Code Part 255. Specifically, the application describes activities which are all considered an "Operational activity" for which an "Operational area containment structure or system" meaning: "any structure or system used to intercept, prevent runoff or leaching, and contain spills and residues containing agrichemicals from operational activities such as loading, unloading, mixing, and equipment washing and rinsing." must be provided.

In each case the dimensions provided entails the greatest dimensions of the containment area including perimeter berm, if constructed, or rim level elevation at which the designated volume/ or required capacity is satisfied. The dimensions are consistent with issued or draft Department of Agriculture Agrichemical Facility Permits. Although OC-3 is not included into the DoA Permit, such inclusion does not exclusively qualify for status as a pollution control facility. Therefore, the concrete structures are consistent with the definition of Pollution Control Facility and should be recommended for certification as a pollution control facility.

Also, in each above case the applicant requests pollution control facility status for the portion of roof over the concrete operational containment structure. In each case the applicant claims that the roof prevents rain from washing off the structure and thereby maintaining the integrity of the collection device. In Part 255, there is no explicit requirements to protect the containment device from precipitation, but there are requirements to provide additional storage capacity for secondary containment and for loading operational containment. Part 255 prescribes certain conditions under which collected rainwater may be discharges from containment structures. Therefore, the roofing structures fail to meet the "required by law" test as do the containment structures themselves.

Therefore, additional analysis is needed to determine if the roofing structures over the concrete containment structures should qualify as pollution control facilities per Part 125 and specifically meet the "primary purpose" test. For this analysis, the current application proposes an answer that is unsatisfactory, that is the application indicates that "In prior endorsements … the building covering the operational containment have been included in the certifications." Because this is not substantial evidence needed to justify the applicable claim, the applicant needs to provide additional information and as of current, the roof structures are not recommended for certification as a pollution control facility.

Response to AIR

Additional information on these devices was provided that explains the nature of these structures with respect to the applicable regulations. In addition, data was provided that serves as evidence that the existing structures are not adequate to provide for the 6 inch storm event volume required under Part 255 (8 Ill Adm. Code). The additional stormwater capacity needed for the three OCs would far exceed what is provided by the existing structures, therefore the roofing cover serves as the only viable form of compliance with rules. The roof cover over these areas known as OC1 OC2 and OC3 can be considered a pollution control device based on the established evidence that they are primarily used for pollution control purposes.

Four (4) – concrete secondary containment structures, (See diagram in Exhibit B)

SC-1 measuring 28.42' x 69.33' x 0.833' for containment of liquid fertilizer
SC-2 measuring 44' x 58' x 3.5' deep for containment of liquid fertilizer
SC-4 measuring 50' x 32.5' x 0.5' deep, with additional 27' x 28' x 0.5' area for containment of liquid fertilizer.
SC-5 measuring 50' x 80' x 0.5' deep for containment of liquid fertilizer

Discussion:

The concrete secondary containment structures identified as SC-1, SC-2, SC-3 and SC-4 for storage of bulk liquid agrichemicals are designed / constructed to meet requirements of Title 8 Ill. Admin. Code Part 255. Specifically, Section 255.80 requires that "All agrichemical non-mobile storage containers for liquid pesticides and liquid fertilizer shall be located within a secondary containment structure"

In each case, the dimensions provided entails the greatest dimensions of the containment area including height of perimeter curb or wall to provide the required capacity of storage volume. The dimensions specified are consistent with issued or draft Department of Agriculture Agrichemical Facility Permits. Therefore, the concrete structures are consistent with the definition of Pollution Control Facility and should be recommended for certification as a pollution control facility.

For the cases of SC-4 and SC-5, the areas claimed to provide storage consistent with Part 255 do not appear to be permitted, or even need a permit. They are described in the application as: storage areas for packaged liquid, dry, and new mini-bulk agrichemicals. From figures depicting SC-4 and SC-5 in Exhibit B, it appears that the subject areas are used to store packaged material and mini-bulk containers. Because there does not appear to be occurring any operational activity, as defined by Part 255, and there are no non-mobile containers stored, neither operational nor secondary containment is required.

Obtain confirmation of the need to obtain permit for the activities conducted.

If a permit is not required, the structures fail the "required by law" test. Therefore, additional analysis is needed to determine if the warehouse floor spaces described as SC-4 and SC-5 should qualify as pollution control facilities per Part 125 and specifically meet the "primary purpose" test. For this analysis, the current application proposes an answer that is unsatisfactory. The application indicates that "strong evidence suggests these two concrete containment areas situated within the agrichemical building structure also qualify for certification as pollution control facilities." The application does not explain this statement or provide further evidence for the claim. Because this is not substantial evidence needed to justify that SC-4 and SC-5 have the primary purpose of pollution control, the applicant needs to provide additional information and as of current, the areas identified as SC-4 and SC-5 are not recommended for certification as a pollution control facility.

Primary Purpose Hypothesis: SC-4 and SC-5 have a primary purpose of warehousing /storage for packaged chemicals nearby the repackaging area and within a climate controlled area, not subject to precipitation, and therefore beneficial to the integrity of the product packaging and appearance.

Response to AIR
The submitted information indicates that minibulk containers are indeed stored on these surfaces which the response explains were built with a three inch curb and sloping floors for just the purpose of meeting Section 255.80(3)(d). Similar to the operational containment structures discussed above, the evidence provided sufficiently demonstrates that the primary purpose of the roof structure over the SC4 and SC5 areas is that of pollution control and therefore should be considered as such on an Agency certification.

Two (2) – dry fertilizer concrete operational area containment structures (See figure 3)
OC-1 measuring (has multiple structures as listed below)
178'x 36' for loader operations
49.4'x 178' for mixing, blending and loading of field applicators
And the portion of the building over these containment structures which prevents stormwater contact and prevent wind from blowing product and protects integrity of structure.
OC-2 measuring 22' x 80' for tractor unloading - And the portion of the building over these containment structures which prevents stormwater contact and prevent wind from blowing product and protects integrity of structure

Discussion:

Operational Containment for dry fertilizer handling, such as loading, unloading, and mixing is regulated under Title 8 Ill. Admin. Code Section 255.140. 255.140 is an exception to the operational containment requirements of 255.90. This rule states that all dry fertilizer operations: "shall be done using a containment method, device or structure." Appropriate containment devices and structures are listed in 255.140(d)

In the case of OC-1, two separate areas within the same building, the applicant is applying for recommendation of multiple containment methods, devices or structures (e.g. flooring and roofing) for the operational activities where only one is called for in the regulations (see emphasis above). The application does not provide justification other than to reference historical actions taken by the Agency. One argument the Agency may present is that the roofing above floor structures is not necessary and 255 compliance can be assured with daily cleanup of the exposed areas when in use; however, the roof and walls do constitute an enclosure which does afford protection from stormwater runoff of all these structures and appears to provide no other significant purpose other than to facilitate an all-weather facility. There is no evidence provided in the application other than a declarative statement to this end. **Ask for additional justification.**

In the case of OC-2, a truck unload structure that includes both the concrete floor and wall and roof enclosure, protection from wind and rain is provided to prevent pollution, however, given the protective nature of the enclosure, (i.e. rain and wind) and the commercial nature of the floor, to collect product from transportation vehicles. OC-2 should be treated as follows, the walls and the roof of OC are recommended for tax certification and the floor is denied because its primary purpose is to collect product for marketability purposes.

Response toAIR

In the case of both dry fertilizer OC1 and OC2, the supplemental application information indicate that the enclosing nature of the roof structures provides prevention of contact of stormwater with 11,004 square feet of operational area. If the areas were not enclosed a 6 inch storm event would produce over 41,155 gallons of potentially contaminated runoff. Additionally regarding OC2, it is an open ending building thusly allowing rain to be blown in on the open ends. The concrete floor allows for efficient collection of dry fertilizer after each operation. Without the floor, the response contends, the fertilizer would be available within the surface and may readily be mixed with stormwater runoff from the blown in precipitation. This reasoning is sound and serves as adequate evidence that the primary purpose of the concrete floor OC2 is also for pollution control.

One (1) – concrete dry fertilizer secondary containment structure (See exhibit D)
SC-1 measuring 54'x 178' dry fertilizer storage containment area

Discussion:

Storage requirements for dry fertilizer is regulated under Title 8 Ill. Admin. Code Section 255.140. Specifically, 255.140(b) states: "Nonliquid fertilizers shall be stored inside a sound structure or device having a **cover or rooftop, sidewalls and base sufficient to prevent contact with precipitation and surface waters.**" This requirement explicitly means that the floor, sidewalls, and rooftop should be construed as pollution control devices. Regardless of alternative purposes these structures might hold, it is undeniable they are constructed for the purpose of complying with environmental protection regulations. Therefore, everything except the internal sidewalls used to segregate product is recommended for tax certification.

One (1) – Experimental secondary containment structure liner (See exhibit C)
Synthetic liner for a 1,000,000 gallon liquid fertilizer storage tank

Discussion:

The synthetic liner secondary containment device is structurally unnecessary for storage of bulk liquid agrichemicals; but is necessary to meet requirements of Title 8 Ill. Admin. Code Part 255. Specifically, Section

255.80 requires that "All agrichemical non-mobile storage containers for liquid pesticides and liquid fertilizer shall be located within a secondary containment structure. In the arrangement concerning large steel bulk tanks, liners are considered an experimental measure to meet Part 255 requirements. As such the Agency considers the synthetic liner to qualify for status of pollution control facility.

Physical description of pollution control facilities that ARE recommended:

Agrichemical containment facilities consisting of:

A concrete liquid agrichemical operational containment structure [OC-1] measuring approximately 57 ft. (length) x 61.83 ft. (width) x 0.33 ft. (height) and the portion of the building over this operational containment structure.

A concrete liquid agrichemical operational containment structure [OC-2] measuring approximately 31 ft. (length) x 62.66 ft. (width) x 0.33 ft. (height) and the portion of the building over this operational containment structure.

A concrete liquid agrichemical operational containment structure [OC-3] measuring approximately 28 ft. (length) x 80 ft. (width) x 0.33 ft. (height) and the portion of the building over this operational containment structure.

A concrete liquid agrichemical secondary containment structure [SC-1] measuring approximately 28.42 ft. (length) x 69.33 ft. (width) x 0.833 ft. (height) and the portion of the building over this secondary containment structure.

A concrete liquid agrichemical secondary containment structure [SC-2] measuring approximately 44 ft. (length) x 58 ft. (width) x 3.5 ft. (height) and the portion of the building over this secondary containment structure.

A concrete liquid agrichemical secondary containment structure [SC-4] measuring approximately 50 ft. (length) x 32.5 ft. (width) x 0.5 ft. (height) and the additional 27 ft. (length) x 28 ft. (width) x 0.5 ft. (height) area for containment of liquid fertilizer.

A concrete liquid agrichemical secondary containment structure [SC-5] measuring approximately 50 ft. (length) x 80 ft. (width) x 0.5 ft. (height) and the portion of the building over this secondary containment structure.

One (1) synthetic membrane liner installed and operated within the mild steel bulk liquid fertilizer tank with storage capacity of 1,000,000 gallons.

A concrete bulk dry agrichemical operational containment structure for loader operations measuring approximately 178 ft. (length) x 36 ft. (width) and the portion of the building over this operational containment structure.

A concrete bulk dry agrichemical operational containment structure for mixing, blending and loading operations measuring approximately 178 ft. (length) x 49.4 ft. (width) and the portion of the building over this operational containment structure.

A concrete bulk dry agrichemical operational containment structure for tractor trailer unloading operations measuring approximately 80 ft. (length) x 22 ft. (width) and the portion of the building over this operational containment structure.

A concrete bulk dry agrichemical secondary containment structure measuring approximately 178 ft. (length) x 54 ft. (width) and the portion of the building over this operational containment structure.

These agrichemical facilities collect, store, or prevent the comingling of precipitation with agrichemical rinsates, residues, or washwaters prior to reuse or disposal as approved under the Agency endorsed Agrichemical Facility Permit No. 94123326 (Log No. 22053643 and 22053644 issued on October 17, 2023) and prevent stormwater runoff from agrichemical affected areas.

Click or tap here to enter text..

Notes:

Response to AIR provided November 29, 2023.

AIR – Ask for new submittal of Fig 1, 2 and 3 that is more clear easier to read. Most writing on the diagrams, especially dimension, is unreadable. Send a PDF that the Agency can use. For OC-1, OC-2 and OC-3 provide evidence to justify the claim that the roof structures have a primary purpose of pollution control.

Nothing follows – DRG - (January 9, 2024)

TC- 147221

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 pollution control facility claimed. Send the application only to the appropriate address listed below. Do not mix types (air and water). Where both air and water operations are related, send applications to each of the addresses.

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

Note: This form should be completed within Acrobat before being saved, printed, signed, and submitted.

Air: Illinois EPA
Attention: William D. Marr, Permit Section
Bureau of Air
1021 North Grand Avenue East, P.O. Box 19276
Springfield, IL 62794-9276

Water: Illinois EPA
Attention: Darin LeCrone, Permit Section
Bureau of Water
1021 North Grand Avenue East, P.O. Box 19276
Springfield, IL 62794-9276

I. Applicant Information

Company Name: Conserv FS, Inc.

Person Authorized to Receive Certification		Person to Contact for Additional Information	
Name:	David Swigart	Name:	SAME
Street Addr:	1110 McConnell Road	Street Addr:	
City:	Woodstock	City:	
State:	IL	State:	
ZIP:	60098	ZIP:	
Phone:	217-248-5930	Phone:	
Email:	dswigart@conservfs.com	Email:	

RECEIVED
DEC 27 2022
IEPA
BOW/WPC/PERMIT SECTION

II. Facility Information

Facility Location: Quarter Section: NE Township: 45N Range: 3
Municipality: Caledonia Township: Poplar Grove

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

Address: 14937 IL RT76 City: Caledonia
State: IL Zip Code: 61011 County: Boone Book Number:

Property Index Number: 02-23-200-001

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

Loading, unloading, mixing and storage of liquid and dry fertilizer and agrichemicals

Permit Information

WPC Construction Permit Number: AC94123326 Date Issued: 05/25/2022
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).

SEE ATTACHED ADDENDUM

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

The operational containment areas are designed to eliminate, prevent or reduce surface runoff of agrichemicals and fertilizer by covering exposed operational areas to prevent exterior elements from coming into contact with residue that spills during normal operations of handling agricultural fertilizers and chemicals from storage areas to field applicators, support equipment and customer trucks.

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).

Title 8 IL Administrative Code Chapter I: Subchapter i: Pesticide Control: Part 255 Agrichemical Facilities

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.

Material Retained, Captured or Recovered		
Contaminant or Pollutant	Description	Disposal or Use
Agrichemicals	Spilled Products	Reduce, Recycle and Reuse
Liquid Fertilizer	Spilled Products	Reduce, Recycle and Reuse
Dry Fertilizer	Spilled Products	Reduce, Recycle and Reuse

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: NOT COMPLETED

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

NOT OPERATIONAL

Status of installation on date of application

50% COMPLETED

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))

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

DAVID C. SWIGART — Printed Name

CEO - General Manager — Title

David C. Swigart — Signature

12/20/2022 — Date

Document Index

Conserv FS, Inc. Application for Certification (Caledonia Facility)

1) Application (3 pages)
2) Application Index (1 page)
3) Addendum to Application (2 pages)
4) Exhibit A – Liquid Fertilizer / Agrichemical Operational Containment Areas (4 pages)
5) Exhibit B – Liquid Fertilizer / Agrichemical Secondary Containment Areas (4 pages)
6) Exhibit C - Experimental Secondary Containment (2 page)
7) Exhibit D - Dry Fertilizer Operational and Secondary Containment areas (6 pages)
8) Application for Permit & Construction Approval: Permit No. AC94123326 Modification Application submitted May 6, 2022 – Caledonia Facility (38 pages)

Addendum:

Pollution Control Facility Information:

Liquid Fertilizer/Agrichemical Facility:

Agrichemical containment structures consisting of:

1) Three operational area containment structures **(See building floor diagram details in Exhibit A)**
The three operational containment structures outlined in **Figure 1** that are included in this certification application are shown as OC-1, OC-2 and OC-3. Two of the three containment structures, (OC-1 and OC-2) included in this certification application, are called out and described in the Agrichemical Facility Permit Modification Application Permit# AC94123326 submitted May 6, 2022. OC-3 also qualifies as an operational containment area under 8 Illinois Administrative Code, Title 8: Chapter I: Subchapter i: Part 255: Section: 255.90

   a. Concrete Operational Containment Structure (COCS) OC-1 **Figure 1:** 57'-0" x 61'-10"x 0'-4" and the portion of the building over the containment structure which prevents rain water from washing off COCS thereby maintaining the integrity of the collection device as approved under the Agency endorsed Agrichemical Facility permit.

   b. Concrete Operational Containment Structure OC-2 **Figure 1:** 31'-0" x 62'-8" x 0'-4" and the portion of the building over the containment structure which prevents rain water from washing off COCS thereby maintaining the integrity of the collection device as approved under the Agency endorsed Agrichemical Facility permit.

   c. Concrete Operational Containment Structure OC-3 **Figure 1:** 28'-0" x 80'-0" x .4" and the portion of the building over the containment structure which prevents rain water from washing off of COCS thereby maintaining the integrity of the collection device as approved under the Agency endorsed Agrichemical Facility permit.

2) Four secondary containment Structures (CSCS) **(See building floor diagram details in Exhibit B)**
The four secondary containment structures that are included in this certification application are outlined in **Figure 2** as SC-1, SC-2, SC-4, and SC-5. Two of the four secondary containment structures, SC-1 and SC-2, are called out in the Agrichemical Facility Permit Modification Application Permit# AC94123326 submitted May 6, 2022. SC-4, and SC-5 also qualify as secondary containment structures under 8 Illinois Administrative Code, Title 8: Chapter I: Subchapter i: Part 255: Section: 255.80.
   a. Concrete Secondary Containment Structure SC-1 **Figure 2**: 28'-5" x 69'-4" x 0'-10"
   b. Concrete Secondary Containment Structure (SC-2 **Figure 2**: 44'-0" x 58'-0" x 3'-6"
   c. Concrete Secondary Containment Structure SC-4 **Figure 2)**: (50'-0" x 32' x 6") + (27'-0" x 28'-0" x 0'-6")
   d. Concrete Secondary Containment Structure **Figure 2:** 50'-0" x 80'-0" x 0'-6" deep

Experimental Secondary Containment Structure:
Agrichemical containment structures consisting of synthetic liner in 1,000,000 gallon fertilizer storage tank.

Dry Fertilizer/Agrichemical Facility:
Agrichemical containment structures consisting of:

1) Two operational area containment structures **(See details in Exhibit E)**
    a. Concrete Operational Containment Structure (COCS): (OC-1 **Figure 3)**
    178' x 36' – Loader Operations
    178'-0" x 49'-4 3/4" mixing, blending and loading of dry fertilizer into field applicators and application equipment.
    The portion of the building over containment structures which prevents rain water from washing off the COCS, and also prevents wind from blowing fertilizer and chemical dust while keeping the dust mostly confined to the building interior thereby maintaining the integrity of the collection device as approved under the Agency endorsed Draft Agrichemical Facility Permit #AC94123326.

    b. Concrete Operational Containment Structure (COCS): (OC-2 **Figure 3)**
    80' x 22' – Tractor trailer unloading of dry fertilizer into storage building
    The portion of the building over containment structure which prevents rain water from washing off the COCS, and also prevents wind from blowing fertilizer dust while keeping the dust mostly confined to the building interior thereby maintaining the integrity of the collection device as approved under the Agency endorsed Agrichemical Facility permit.

2) One Secondary Containment Structure **(See details in Exhibit C)**
    a. Concrete Secondary Containment Structure (CSCS): (SC-1 **Figure 3)**
    54'-0" x 178'-0" concrete dry fertilizer storage containment area

Exhibit A

Liquid Fertilizer / Agrichemical Operational Containment Areas

Liquid Fertilizer and Chemical Operational Containment Areas

Figure 1

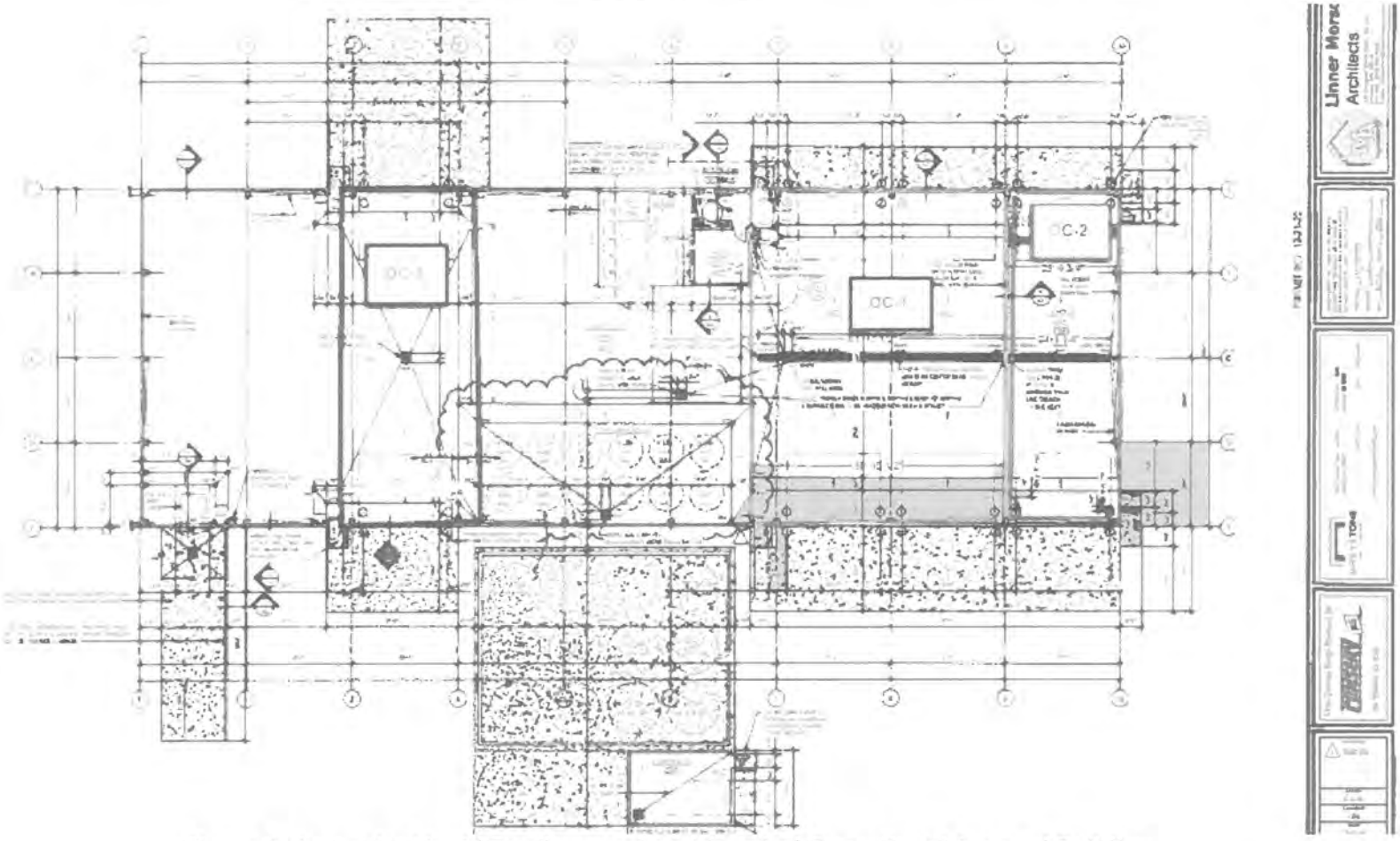


Figure 1 shows the Liquid Fertilizer and Agrichemical Operational Areas of Building

and OC-2 designations match up with the Agrichemical Facility Permit Modification Application Permit # AC94123326 submitted May 6, 2022). OC-3 is not called out on the Draft Permit.

Liquid Fertilzer and Chemical Containment Building

Liquid Fertilizer and Chemical Building Construction as of 12/20/2022

OC-1 Operational Area

Approximately 57'-0" x 61'-10" x 0'-4" Denoted in Orange Outline in Figure 1

This operational area is a double truck bay 57' wide and running the width of the building where the loading, unloading and washing of field application and support vehicles is performed. The containment area has a total storage volume of 5,878 gallons.

OC-2 Operational Area

Approximately 31'-0' x 62'-8" x 0'-.4" depicted in in Figure 1

This operational containment area is a closed off bay of the building and is for the purpose of loading and unloading tractor trailer liquid transport vehicles and application equipment. This containment area can also be used for the storing of reusable mini-bulk containers.

OC-3 Operational Area

This area is approximately 28' x 80' and is shown in the blue outline **in Figure 1** and in the following **two photographs.**

This operational containment area is not called out on the Agrichemical Facility Permit Modification Application Permit # AC94123326 submitted May 6, 2022 but qualifies for certification under 8 Illinois Administrative Code, Title 8: Chapter I: Subchapter i: Part 255: Section: 255.90. "... All transfer of agrichemicals between containers, including loading, unloading, repackaging, and mixing, and equipment cleaning performed at an agrichemical facility or non-commercial agrichemical facility, shall be done with a containment system designed to intercept, retain, and recover operational and accidental spillage, leakage, wash water, and agrichemical residues. ...".

This operational containment area is a truck bay 28'-0" wide that runs lengthwise within the 80'-0" width of the building. The Operational containment area's designated use is for the repackaging of reusable mini-bulk pesticide containers.

Used mini-bulk containers are emptied, cleaned and rinsed in this operational area (OC-3) prior to refilling. The containers are then refilled from the agrichemical storage tanks from SC-1 (figure 2). The repackaging of agrichemicals must be performed on an operational containment structure.

After repackaging the mini-bulk containers will be stored in either OC-3 **or** [illegible] operational areas until customer pickup.

The containment area of OC-3 slopes to a central self-contained stainless steel sump. A 2'-0" x 2'-0"x 2'-0" collection sump is in the center of the containment.

Operational containment areas as described in 255.90 of the Agrichemical Facilities Administrative Code have been historically recognized and approved by the Illinois EPA as certified pollution control facilities. In prior endorsements the concrete portion of the operational containment and the building covering the operational containment have been included in the certifications.

Conclusions:

It is therefore concluded that [illegible], OC-3 operational areas do qualify for certification as pollution control facilities.

The square foot areas of the operational containment structures of the subject agrichemical building are:

- 3524 sq. ft. (57'-0" x 61'-10")
- 1,943 sq. ft. (31'-0" x 62-8")

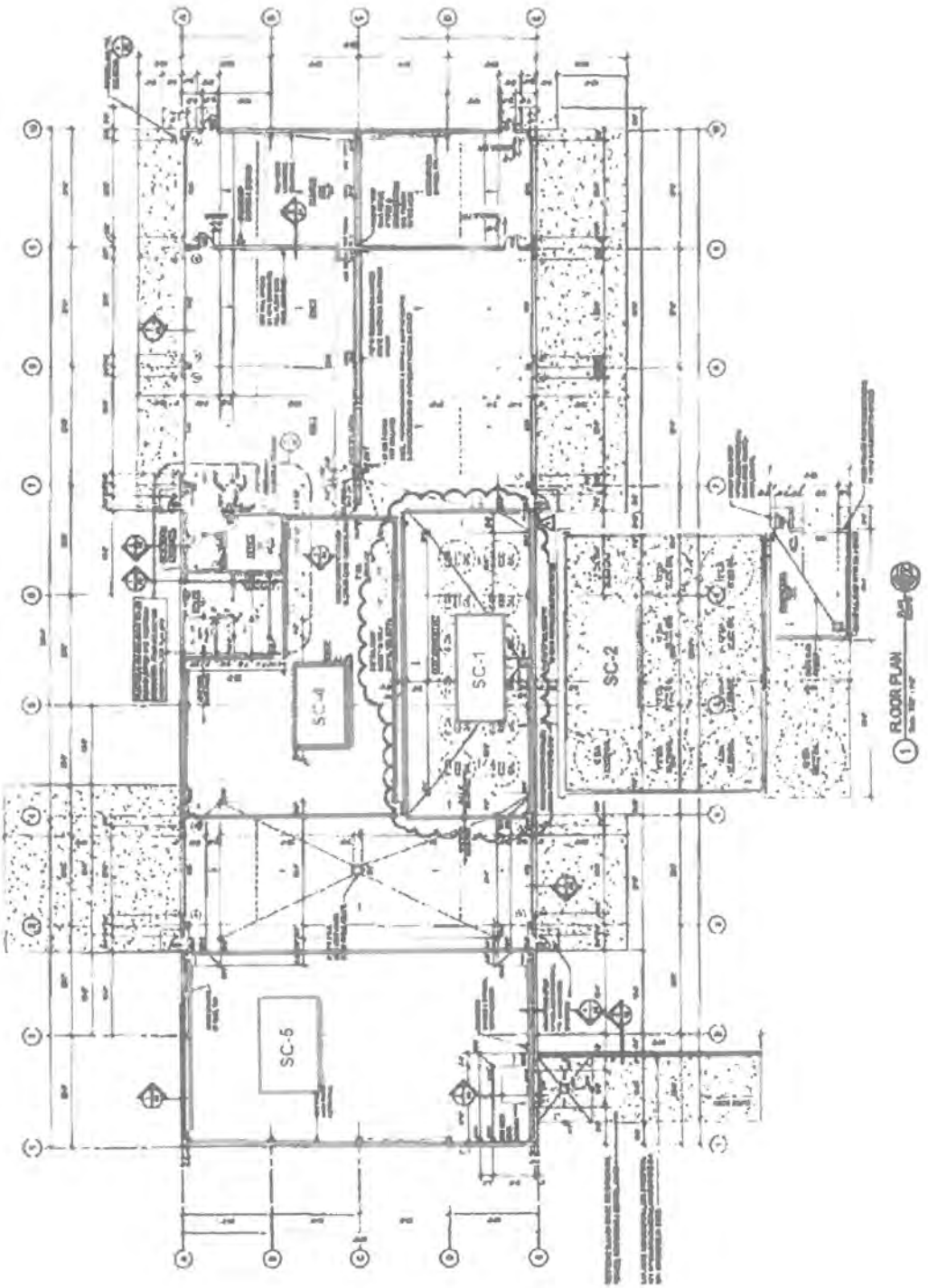
OC-3 – 2,240 sq. ft. (28'-0" x 80'-0")

Total 7,707 sq. ft.

Exhibit B

Liquid Fertilizer / Agrichemical Secondary Containment Areas

Secondary Containment Areas Figure 2



Secondary Containment Areas (SC-1; SC-2; SC-4; SC-5)

Two of concrete secondary containment structures providing containment protection around fertilizer and agrichemical tanks are identified as SC-1 and **SC-2** in Figure 2 and are "called out" in the Agrichemical Facility Permit Modification Application Permit # AC94123326 submitted May 6, 2022. SC-4 and SC-5 are not "called out" in the above Facility Permit application however strong evidence suggests these two concrete containment areas situated within the agrichemical building structure also qualify for certification as pollution control facilities. **SC-3** is described in Exhibit C.

SC-1 **Secondary Containment Area** (outlined in red) **in Figure 2**

Approximately 28'-5" Wide x 69'-4" long x 0'-10" deep

This concrete secondary containment is located inside the agrichemical building. The containment area contains twelve 6,100 gallon (94" diameter cone-bottom, stainless steel tanks elevated on 24" legs.

Section 255.80 of the Agrichemical Facilities Administrative Code pertains to secondary Containment.

Paragraph a) States: "All agrichemical non-mobile storage containers for liquid pesticides and liquid fertilizer shall be located within a secondary containment structure."

255.80 paragraph b) 1 describes the containment specifications when the containment is located outside and not protected from receiving precipitation. Paragraph b) 2 describes the containment specifications when the containment is located inside and is protected from receiving precipitation.

SC-1 is located within the agrichemical building and is subject to the requirements of paragraph b) 2):

"When protected from receiving precipitation, the containment shall have a minimum containment volume of 100% of the capacity of the largest tank, plus the volume displaced by the bases of the other tanks located within the secondary containment structure."

C-2 Secondary Containment Area (outlined in yellow) in **Figure 2**

Approximately 44' -0" Wide x 58'- 0" long x 3'-6" Deep

SC-2 is a secondary containment area surrounding six - 30,000 gallon fiberglass tanks and four - 20,000 gallon fiberglass tanks.

SC-2 is an outside containment structure. Paragraph b) 1) states: "When not protected from receiving precipitation, the containment shall have a minimum containment volume of a 6-inch rain storm (a 25 year, 24 hour rain), the capacity of the largest tank, and the volume displaced by the bases of the other tanks located within the containment structure."

SC-4 and SC-5 **Secondary Containment Area shown in Blue and Green in Figure 2**

SC-4 and SC-5 are packaged goods warehouse concrete containment areas located within the agrichemical building warehouse. These two areas are designated as storage areas for packaged liquid, dry, and new mini-bulk agrichemicals. The two storage areas are contained by a 6" raised exterior foundation. The warehouse areas of SC-4 and SC-5 are further protected by collection sumps located in adjacent and previously described OC-1 and OC-3 operational containment areas.

SC-4 measures approximately 50'-0" long x 32'-0" wide = 1,600 sq. feet; plus 28'-0" long x 27'-0" wide = 756 sq. ft. for a total of 2,356 sq. feet. Both adjacent operational containment areas have sump collection point capabilities for spilled product.

SC-3 secondary containment area measures approximately 50'-0" wide x 80'-0" long for a total of 4,000 sq. feet. SC-3 is outlined in green in Figure 2. The OC-3 adjacent operational containment area has a sump collection point for spilled product.

For the reasons detailed above it is shown that the packaged goods warehouse areas of SC-3 and SC-4 are fully contained and qualify for certification as pollution control devices.

Conclusions:

The square foot areas of the secondary containment structures of the subject agrichemical building are:

SC-1 – 1,976 sq. ft. (28'-6"' x 69'-4")

SC-4 – 2,356 sq. ft. (50' x 32') + (28'-0" x 27'-0")

SC-3 – 4,000 sq. ft. (50' x 80')

Total 8,332 sq. ft.

Outside Containment:

SC-2 - 2,552 sq. ft. (44'-0" x 58-0")

Exhibit C

Experimental Tank Liner / Secondary Containment Structure

Experimental Secondary Containment Structure SC-3

One Million Gallon Steel Liquid Fertilzer Tank with a Synthetic Membrane Liner

The synthetic membrane liner of the above tank is called out in Schedule C of th Agrichemical Facility Permit Modification Application Permit # AC94123326 submitted May 6, 2022 and serves as the primary containment within the tank. Functionally, the exterior steel tank is the secondary containment structure. Although the liner is the primary containment, it has been the policy of the Illinois EPA to treat the liner as the material that allows the steel tank to be approved as a contained liquid fertilizer storage device. The structural integrity for containing the liquid fertilizer within the liner would not be possible without the physical strength of the steel tank. The Illinois EPA has therefore concluded that even though the synthetic liner acts as a primary containment device it is treated as a secondary containment device for certification purposes. It is therefore concluded that the synthetic liner of the above tank should be certified as a pollution containment facility.

Exhibit D

Dry Fertilizer Operational and Secondary Containment Areas

Floor Diagram of Dry Fertilizer Building

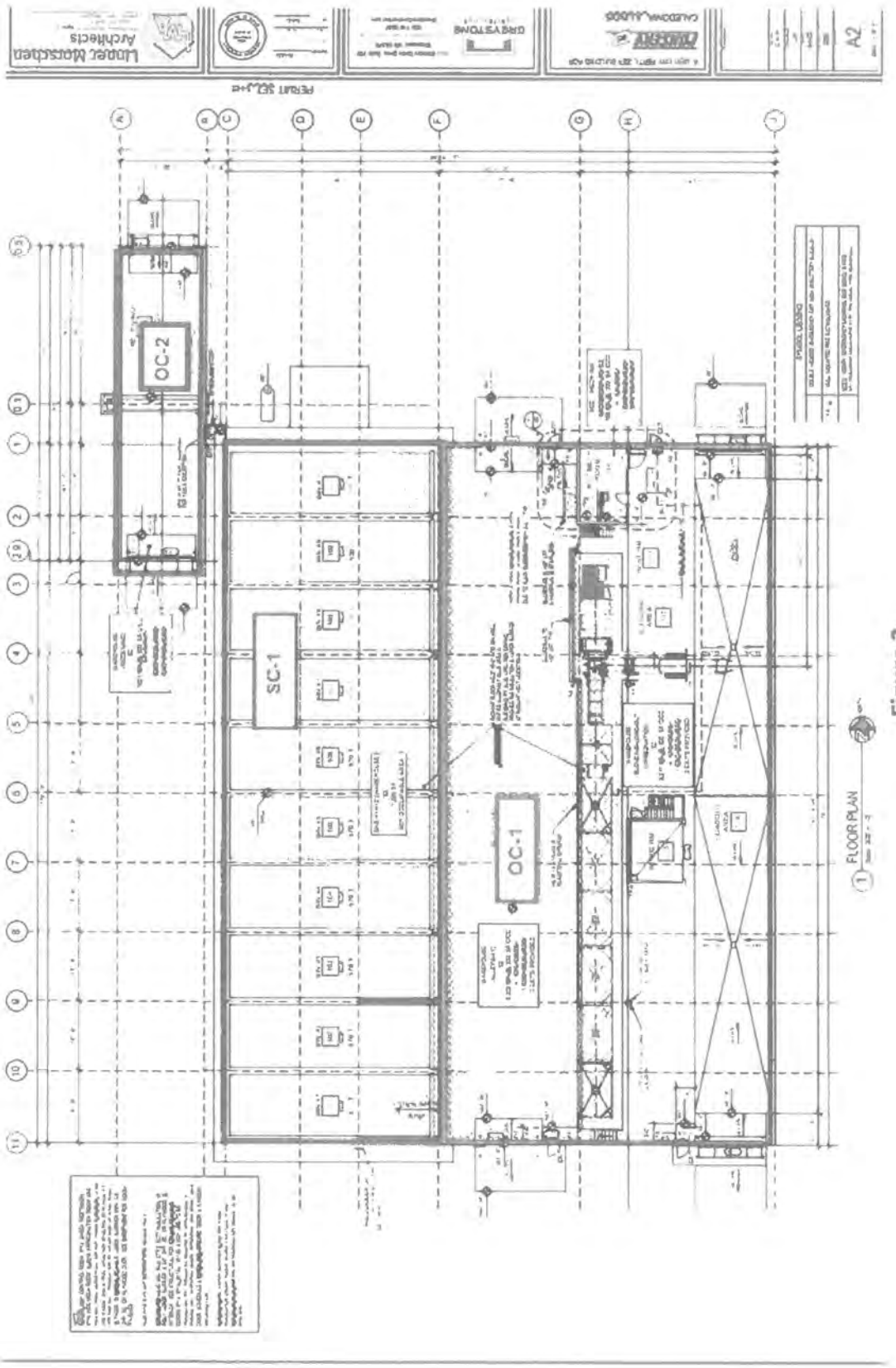
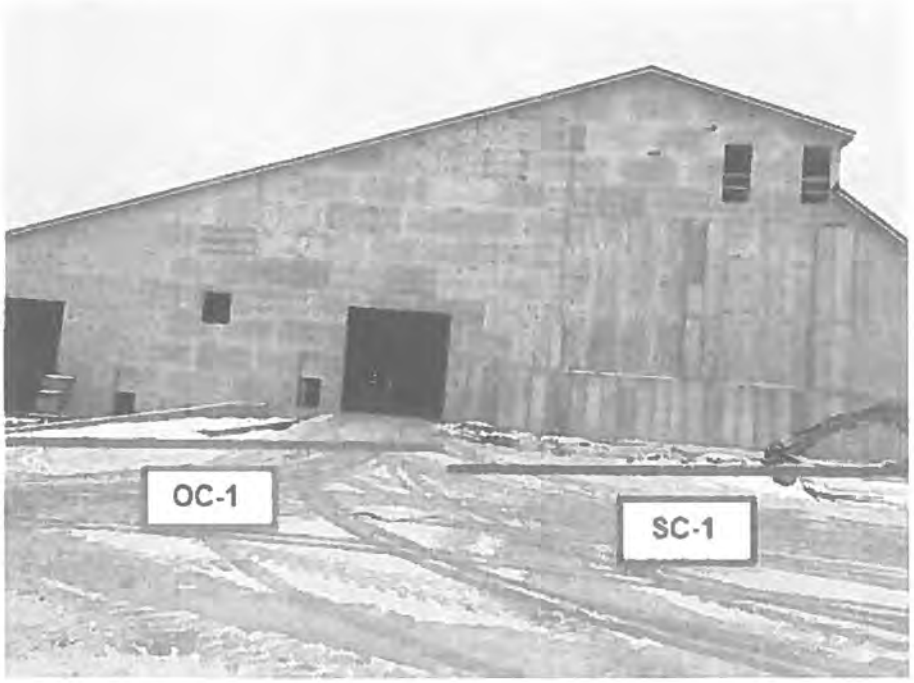


Figure 3

Dry Fertilzer Storage and Containment:



North Side of Dry Fertilizer building Looking South as of 12/20/2022

To the right side of the dry fertilizer building will be an associated operational containment building, depicted as (OC-2) in **figure 3,** that will be used for the purpose of unloading dry fertilizer from transport tractor trailers into the dry fertilizer storage area of the building.

Operational Containment Areas:

The right overhead door in the picture above leads into the front end loader operational area for moving dry fertilizer from the storage bins to the blender and mixer. This operational area runs the length of the building and is 178' long by 32' wide for a total of 5,696 square feet and is part of OC-1 depicted in blue in Figure 3. This area is called out as a concrete operational area in the Agrichemical Facility Permit Modification Application Permit # AC94123326 submitted May 6, 2022.

South Side of Dry Fertilizer Building Looking North as of 12/20/2022

The area of the building between and including the two overhead doors (OC-1) is the operational portion of the building where the end loader operates, the fertilizer is blended and mixed and the fertilizer is moved by conveyor to the application and transport equipment. The area referred to above comprises the outline of OC-1 in Figure 3 and measures approximately 85.5' x 178'. This general area is called out as a dry fertilizer operational containment area. The entire dry fertilizer building is curbed.

All of the building and concrete containment operational area of OC-1 qualifies for certification as pollution containment improvements.

OC-1 **Operation Containment Area**

An endloader collects the dry fertilizer from the storage bins of SC-1. The endloader moves the dry fertilizer from the storage bins via the driveway area of the building and deposits the fertilizer into the blender. The blender moves the material via a covered conveyor to a hopper and then by covered coveyor from the hopper to the mixer. After the fertilizer is mixed it is discharged to the covered loadout conveyor which fills the field applicators and/or support vehicles.

The building area of OC-1 is protected from the elements by the building structure area covering OC-1. OC-1 has a new concrete surface area which allows for periodic cleaning and brooming of the operational area. The covered OC-1 eliminates weather as a factor in washing away or blowing away dust and residual fertilizer that escapes the moving, handling and processing equipment thereby preventing soil contamination of the area surrounding the dry fertilizer builiding. OC-1 encompasses sllightly over one-half of the total area of the dry fertilizer building. The dimension of the building area of OC-1 is 178'-0" x 85'-4 3/4".

OC-2 **Operation Containment Area**

The OC-2 operational containment area will be a 1,760 square foot "drive through" building that is open on both ends so tractor trailer trucks can pull into the structure and unload dry fertilizer into a covered conveyor that delivers it to the storage area (SC-1) of the dry fertilizer building.

This structure prevents rain water from washing away residual fertilizer dust and dry fertilizer that may escape the transfer of the fertilizer from the truck to the covered conveyor system. The building structure also acts as a wind break to prevent dust particles from blowing away.

This building is an operational area where tractor trailer transport trucks unload dry fertilizer into a dump pit and into a conveyor which in turn delivers product to the dry fertilizer storage area of the fertilizer building. This truck unloading building structure protects the dry fertilizer from the elements during the transfer between the truck and the receiving conveyor. This operational area is approximately 80' x 22' for a total of 1760 square feet and is shown as OC-2 outlined in blue in Figure 3.

View of what the future tractor trailer unloading building (OC-2) adjacent to dry fertilizer building will look like when completed

SC-1 **Secondary Containment Area**

The portion of the building denoted as SC-1 in **Figure 3** is the dry fertilizer storage area of the building. This portion of the building has a concrete floor that prevents any dry fertilizer residue from penetrating into the ground and contaminating the soil or ground water. The building area of SC-1 is 9,612 square feet (54' x 178'). The concrete floor portion of the dry fertilizer storage area of the building qualifies for certification as a pollution control device.

Conclusions:

Operational containment areas as described in 255.90 of the Agrichemical Facilities Administrative Code have been historically recognized and approved by the Illinois EPA as certified pollution control facilities. In prior endorsements the concrete portion of the operational containment and the building covering the operational containment have been included in the certifications.

It is concluded that the operational containment portion of the dry fertilizer facility is as follows:

OC-1

1) End loader operational area: 36' x 178'-0" = 6,408 sq. ft.
2) Blending and mixing area: 12'-6" x 178'-0" = 2,225 sq. ft.
3) Application and transport loadout area 36'-10 3/4" x 178'-0" = 6,567 sq. ft.

Totals of OC-1 15,200 sq. ft.

OC-2 Tractor trailer unloading 80' x 22' 1,760 sq. ft.

Total Operating Square Footage of Building 16,960 sq. ft.

Secondary containment portion of dry fertilizer building:

SC-1 **Fertilizer Storage portion of Dry Fertilizer Building 54' x 178' = 9,612 sq. ft.**

Exhibit E

Application for Permit & Construction Approval: Permit No. AC94123326
Modification Application Submitted May 6, 2022 – Caledonia Facility

Kimmel, Jeff (Conserv FS)

From: Kimmel, Jeff (Conserv FS)
Sent: Tuesday, May 10, 2022 4:50 PM
To: Swigart, David (CONSERV FS); Day, Adam (CONSERV FS); Colt Herndon; Karlson, Ben (CONSERV FS)
Subject: I.D.o.A. State Permits

All –

Just a quick F.Y.I. to all know the state permits have been sent to Springfield today.

Jeff Kimmel

Facility Project Manager
Conserv FS, Inc.
815-568-7211 **office**
815-482-6450 **cell**
jkimmel@conservfs.com

GREYSTONE
CONSTRUCTION

May 6, 2022

Agrichemical Facility Permit, Illinois Department of Agriculture
Bureau of Environmental Programs
P.O. Box 19281 – State Fairgrounds
Springfield, Illinois 62794-9281

Subject: Permit Modification
Conserv FS, Inc.
Caledonia, Illinois
Our Project No. GC22-4690
Permit No. AC94123326

To Whom It May Concern:

Attached are two (2) copies of Conserv FS's application for permit modification and construction approval at their existing location in Caledonia, Illinois. The new construction will include a secondary containment structure and the construction of a building around the existing operational containment structure.

1. Application for Permit & Construction Approval
2. Schedule A – Agrichemical Facility Permit
3. Location Area Map
4. Plot Plan of Facility
5. Flow Diagram Water System Protection
6. Best Management Practices
7. Spill Response Plan
8. Schedule B – Operational Area Containment: OC-1
9. Schedule B – Operational Area Containment: OC-2
10. Flow Diagram – Collection and Recovery System
11. Schedule C Secondary Containment Plan: SC-1
12. Schedule C Secondary Containment Plan: SC-2
13. Chemical Warehouse Plans
14. Exterior Secondary Containment Exhibit
15. Containment Calculations
16. Schedule D – Dry Fertilizer Storage, Handling and Blending

2995 Winners Circle Drive, Shakopee, MN 55379 | Phone: 952-496-2227 | Toll Free: 888-742-6837 | Fax: 952-445-4191
GreystoneConstruction.com Equal Opportunity Emp oyer/Contractor

GREYSTONE
CONSTRUCTION

17. Dry Fertilizer Building Plan
18. Schedule E – Permit Modification

Thank you if you have any questions contact me at (612) 709-2589.

Yours very truly,

Colt Herndon
Greystone Construction Company
612-709-2589
May 6, 2022

Illinois Department of Agriculture
Springfield, Illinois

INSTRUCTIONS
Application for Permit & Construction Approval – Agrichemical Facility

The Application for Permit & Construction Approval form and Schedule A must be submitted by all applicants. Other Schedules that are applicable to the operations at each agrichemical facility must also be submitted. The Schedules that may be required are:

Schedule B – Operational Area Containment
Schedule C – Secondary Containment
Schedule D – Dry Fertilizer Storage, Handling, and Blending
Schedule E – Permit Modification
Schedule F – Experimental Secondary Containment
Schedule G – Trust Disclosure

Two sets of the complete application must be submitted. Approval signatures on at least one submittal must be original. The application should be submitted by cover letter on a company letterhead. All data and information should be typed or legibly printed in ink. All pages should be numbered and organized in the following sequence:

1. Submittal cover letter
2. Application for Permit & Construction Approval
3. Schedule A – Agrichemical Facility Permit
4. Location Area Map
5. Plot Plan of Facility
6. Flow Diagram – Water System Protection
7. Operational and Management Practices Plan
8. Schedule B – Operational Area Containment – OC
9. Engineering Plans and Specifications – OC
10. Flow Diagram – Collection and Recovery System
11. Schedule C – Secondary Containment – SC
12. Additional Schedule C Summaries
13. Engineering Plans and Specifications – SC
14. Schedule D – Dry Fertilizer Storage, Handling and Blending
15. Process Flow Diagram – Dry Fertilizer Operations
16. Other Schedules (E, F, and/or G)

Engineering Drawing 5, 9 and 13 may be more conveniently grouped as the last section. These drawings are often applicable to more than one schedule. In some cases one plan view may cover both operational and secondary containment systems. In this situation reference the drawing number on the schedules.

Application Delay for Specific Schedules: If you are not submitting plans for a specific schedule with your application, this should be clearly stated in your cover letter and noted in the comment section of the application form. Estimate the date that a permit modification will be submitted to cover the schedule.

Each permit application must provide sufficient information to allow the Department to conduct an independent engineering review to determine if the containment systems, structures, and operational practices planned will result in compliance with the applicable rules of Part 255. The information requested on each schedule is required for a reliable review of your plans.

Please be advised that, pursuant to Public Act 096-130 effective July 28, 2010, "*A permit fee of $100.00 shall be submitted to the Department with each permit application or permit renewal application*." Please submit the aforementioned permit fee and remittance form (if applicable) with the application to the address indicated below. The check or money order should be made payable to the Illinois Department of Agriculture.

As with any contemplated construction project, local units of government such as the county zoning commission should be contacted concerning local laws and regulations, especially flood plain requirements, so that plans might be adjusted as necessary.

These instructions and those on each schedule should allow you to prepare the permit application. Contact the Department of Agriculture at 217/785-2427, if you have questions. Submit the permit application to:

Agrichemical Facility Permit, Illinois Department of Agriculture
Bureau of Environmental Programs
P.O. Box 19281 – State Fairgrounds
Springfield, Illinois 62794-9281

For Department Use Only:
Log No.

Operator:

Date Received IDOA:

Illinois Department of Agriculture
Springfield, Illinois

APPLICATION FOR PERMIT & CONSTRUCTION APPROVAL
Agrichemical Facility

Registration Number

Name Conserv FS, Inc. Telephone (815) 334-9590

Mailing Address 1110 McConnell Rd Woodstock IL 60098
Street and or P O Box City, State, Zip Code

Facility Location Northeast
City State ZIP Code

Quarter	Section	Township	Range	P.M
Northeast	23	45 North	3	East of 3rd

Manager/Operator's: Name Ben Karlson

Facility Owner(s): Name Conserv FS Inc.

Mailing Address 14937 IL Route 76 Caledonia IL 61011

This Application for Permit and Construction Approval is to verify that proposed plans conform to the requirements of the rules 8 ILLINOIS ADMINISTRATIVE CODE, Part 255 Agrichemical Facilities. Please check the appropriate boxes to fully describe the nature of the project.

- ✓ New Application
- ✓ Existing Facility
- Innovative Design Permit
- Renewal Application for Permit No.
- New Facility
- Modification to Permit No. AC94123326
- Experimental Permit

DESCRIPTION OF PROJECT Documents submitted as a part of this application cover the agrichemical facility items checked below: Complete Schedule A and all other applicable Schedules along with the associated requirements for each as an attachment to the permit application.

- ✓ Schedule A. Site Plot Plan & Area Map, Operational and Management Practices Plan, Water Supply Well Protection Plan
- Schedule B. Operational Area Containment and Recovery System Plan Schedule
- ✓ Schedule C. Secondary Containment Plan Schedule
- ✓ Schedule D. Dry Fertilizer Storage, Handling, and Blending Plan Schedule
- Schedule E. Permit Modification Schedule
- ✓ Schedule F. Experimental Permit or Other.
- Schedule G Trust Disclosure

COMMENTS (If additional space is needed, attach a separate sheet

IMPORTANT NOTICE: This state agency is requesting disclosure of information that is necessary to accomplish the statutory purpose as outlined under the Illinois Pesticide Act (415 ILCS 60/1 et seq.). Failure to provide this information shall prevent this form from being processed. This form has been approved by the State Forms Management Center

IL406-1389 (rev. 3/03)

APPROVALS OF APPLICATION FOR PERMIT

1. Certification of Engineering Plans and Specifications:

a) Certificate by Applicant or Employee of Applicant

I hereby certify that I am familiar with the information contained in this application, the attached schedules, and that to the best of my knowledge and belief such information is true, complete, and accurate, and the engineering plans and specifications were prepared by me or a permanent employee under my direction.

Name Jeff Kimmel Title Operations Manager

Signature [signature] Date 5/6/2022

b) Certificate by Design Engineer

I hereby certify that I am familiar with the contents of this application and the rules Part 255 Agrichemical Facilities, that the design of facility containment systems conforms to the requirements of the rules, and the engineering plans and specifications were prepared by me or under my direction.

Engineer Nick Moore (Name) 081-008656 (Registration No.)

Firm Sandman Structural Engineers

Address 1587 30th Ave S, Moorhead, MN 56560 Telephone No. 2182270022

Signature [signature] Date 5/6/2022

Seal/Stamp

Expires: 11/30/2022

2. Certification of Application for Agrichemical Facility Permit: Certificate by Applicant(s)

I/We hereby certify that I/We are familiar with the contents of this application, the attached schedules, and am/are authorized to sign this application in accordance with Section 255.50(b) of the rules. I/We agree and understand that conditions of Permit Approval are that I/we construct and operate the containment system(s) as submitted in this application and conform to all requirements of Part 255.

Authorized Applicant:

Name Jeff Kimmel Title Operations Manager

Signature [signature] Date 5/6/2022

Company Name Conserv FS Inc.

Schedule A – AGRICHEMICAL FACILITY PERMIT

Facility Name: Conserv FS, Inc. Caledonia Service Center

Project Location: 14937 iL Route 76 Caledonia IL Boone County

City | Street Address | County

This information is required for all Agrichemical Facility Permit Applications. The summary of specific parts of this information is requested on the back of this form.

1. LOCATION AREA MAP – Provide a location map of the area surrounding the facility. Identify the relative locations of the following on the map, or by notations, the distance and direction: a) All community wells within 1,000 feet and all private wells within 200 feet of the facility boundary; b) Surface water flow path to area lakes, streams or storm water drains; c) Residences, institutions, commercial businesses, and nearest city boundary; d) Notation of soil type and approximate groundwater depth at facility location. Preferably, this location map should be done on a copy from the U.S. Geological Survey Quadrangle Map, or the County Plat Book with adequate scale to show required details. NOTE: Setback requirements can be found in the Illinois Environmental Protection Act.

2. PLOT PLAN – Provide a plot plan showing all facility structures, storage tanks, facility well, connections to public water systems, storm sewers and drainage tile within property boundaries and use of adjacent property. Identify all containment structures and operational areas, including unloading, loading, mixing, repackaging, and equipment washing. Topography of property can be shown by contour lines or notation and arrows depicting surface water flow across and from facility. The plot plan should be drawn to a reasonable scale or adequately dimensioned.

3. WATER SUPPLY/WELL PROTECTION PLAN – Provide a schematic flow diagram of the facility water distribution system between facility well and/or public water system connection and all process or operational use points. Identify backflow protection (break-tank, fixed air gap, reduced pressure principle backflow valves) on the diagram.

4. OPERATIONAL AND MANAGEMENT PRACTICES PLAN – This requires a narrative description of the practices that will be employed at the facility for handling recovered materials, accumulated precipitation, and to minimize the volume of recovered materials generated. The following should be included:

    a) List of types and amounts of agrichemicals handled and stored at the facility.
    b) Methods of storage, reuse, or disposal and estimated quantity of solutions and solids recovered in the operational area containment and recovery system(s).
    c) Methods for handling storm water collected in operational area and secondary containment systems. This may include practices to keep containment systems clean to prevent storm water contamination and special precaution taken to ensure contaminated storm water is not discharged. Define differences in practices employed off-season such as by-pass of operational area collection systems.
    d) Methods utilized to minimize the collection or contamination of collected storm water, quantity of rinsates, solutions, and solids. These practices include use of pressure washers, rinsing and washing application equipment in the field, reducing operational spillage, containers to catch predictable spillage, diversion of roof and surface water flow, buildings or covers over containment systems, and management practices to minimize contamination of collected storm water.

Schedule A – AGRICHEMICAL FACILITY PERMIT

Facility Name Conserv FS, Inc. Caledonia Service Center

Project Location 14937 IL Route 76 Caledonia IL Boone County

City Street Address County

This information is required for all Agrichemical Facility Permit Applications. The summary of specific parts of this information is requested on the back of this form.

1. LOCATION AREA MAP – Provide a location map of the area surrounding the facility. Identify the relative locations of the following on the map, or by notations, the distance and direction: a) All community wells within 1,000 feet and all private wells within 200 feet of the facility boundary; b) Surface water flow path to area lakes, streams or storm water drains; c) Residences, institutions, commercial businesses, and nearest city boundary; d) Notation of soil type and approximate groundwater depth at facility location. Preferably, this location map should be done on a copy from the U.S. Geological Survey Quadrangle Map, or the County Plat Book with adequate scale to show required details. NOTE: Setback requirements can be found in the Illinois Environmental Protection Act.

2. PLOT PLAN – Provide a plot plan showing all facility structures, storage tanks, facility well, connections to public water systems, storm sewers and drainage tile within property boundaries and use of adjacent property. Identify all containment structures and operational areas, including unloading, loading, mixing, repackaging, and equipment washing. Topography of property can be shown by contour lines or notation and arrows depicting surface water flow across and from facility. The plot plan should be drawn to a reasonable scale or adequately dimensioned.

3. WATER SUPPLY/WELL PROTECTION PLAN – Provide a schematic flow diagram of the facility water distribution system between facility well and/or public water system connection and all process or operational use points. Identify backflow protection (break-tank, fixed air gap, reduced pressure principle backflow valves) on the diagram.

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   a) List of types and amounts of agrichemicals handled and stored at the facility.
   b) Methods of storage, reuse, or disposal and estimated quantity of solutions and solids recovered in the operational area containment and recovery system(s).
   c) Methods for handling storm water collected in operational area and secondary containment systems. This may include practices to keep containment systems clean to prevent storm water contamination and special precaution taken to ensure contaminated storm water is not discharged. Define differences in practices employed off-season such as by-pass of operational area collection systems.
   d) Methods utilized to minimize the collection or contamination of collected storm water, quantity of rinsates, solutions, and solids. These practices include use of pressure washers, rinsing and washing application equipment in the field, reducing operational spillage, containers to catch predictable spillage, diversion of roof and surface water flow, buildings or covers over containment systems, and management practices to minimize contamination of collected storm water.

Schedule A SUMMARY

Facility Name: Conserv FS, Inc. Caledonia IL

1. LOCATION AREA MAP included in application: (✓) Yes ( ) No

   Community Well(s) within 1,000 feet? (✓) No ( ) Yes, _____ Feet

   Private Well(s) within 200 feet? (✓) No ( ) Yes, _____ Feet

   Approximate Groundwater depth 8.5-13 Ft. Soil Type Silty Clay

   Nearest Down Gradient Surface Water – Name of lake or stream and approximate distance
   Discharge to SE into drainage ditch

   Distance in feet to nearest: Residence 1400 ft, Municipality Popular Grove,

   Hospital 16.2 miles, Institution 1.6, Commercial Business 300 ft

2. PLOT PLAN is included in application: (✓) Yes ( ) No.

   Approximate size of facility property: 900 x 700 Feet

3. WATER SYSTEM PROTECTION Flow Diagram attached: (✓) Yes ( ) No

   Facility well at location? ( ) No (✓) Yes, Depth 125 Feet

   Connection to public water system? (✓) No ( ) Yes

   Indicate Backflow Protection type, E = existing or P = planned, and Installation date(s):

   _____ Break Tank (___/___/___)

   _____ Fixed Air Gap (___/___/___)

   P Reduced Pressure Principle Backflow Valve(s) (07/15/22)

4. OPERATIONAL & MANAGEMENT PRACTICES PLAN attached: (✓) Yes ( ) No

   List agrichemicals and approximate quantities handled and stored at facility:
   Package, mini bulk, and bulk chemicals labeled for use with corn and soybeans

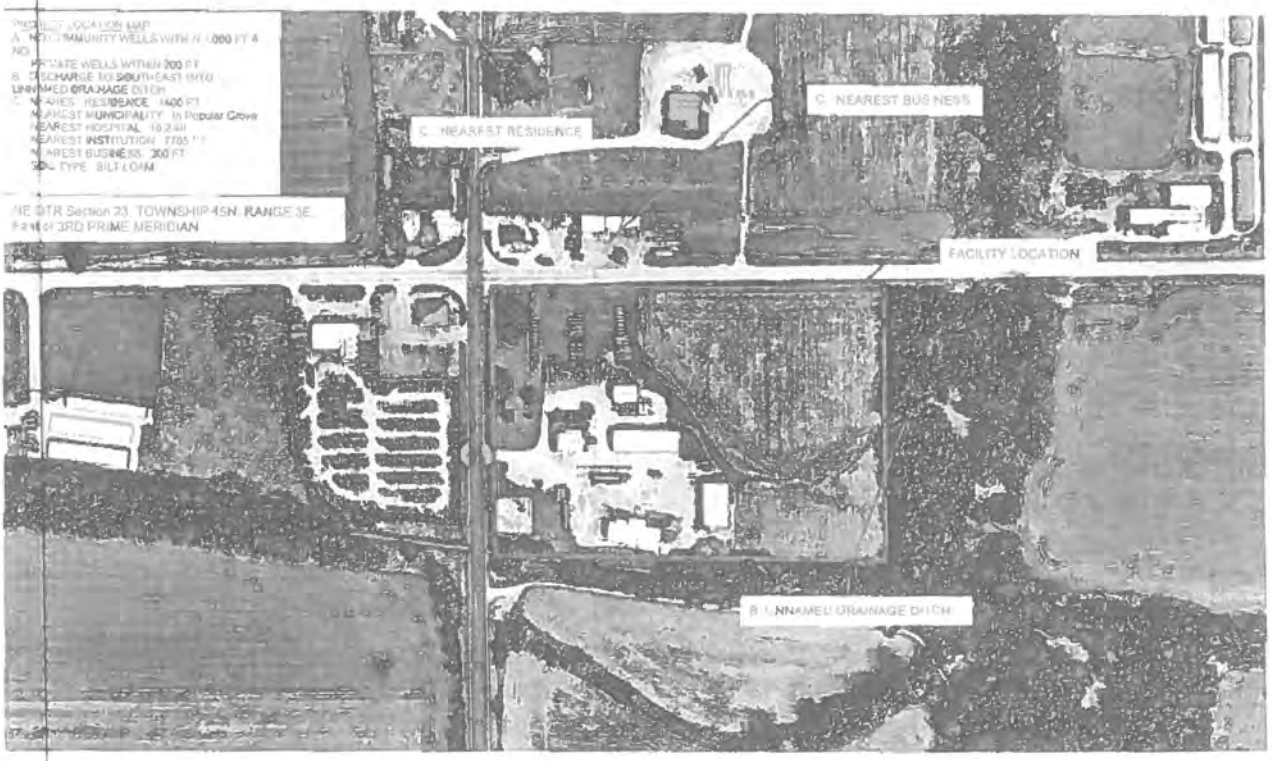
   Is your plan to reuse all recovered agrichemical materials for their original intended purpose and in accordance with the pesticide label when applicable? (✓) Yes ( ) No

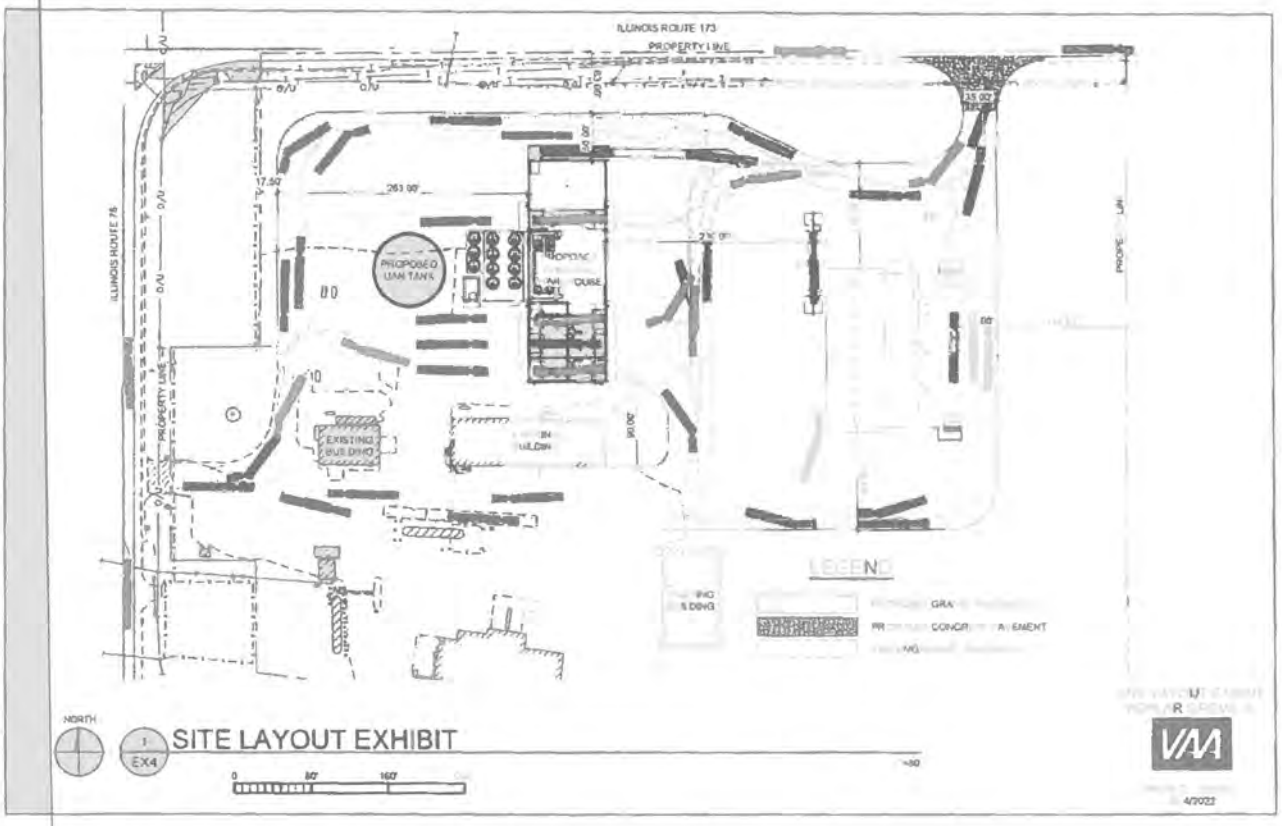
   If no, please explain: N/A

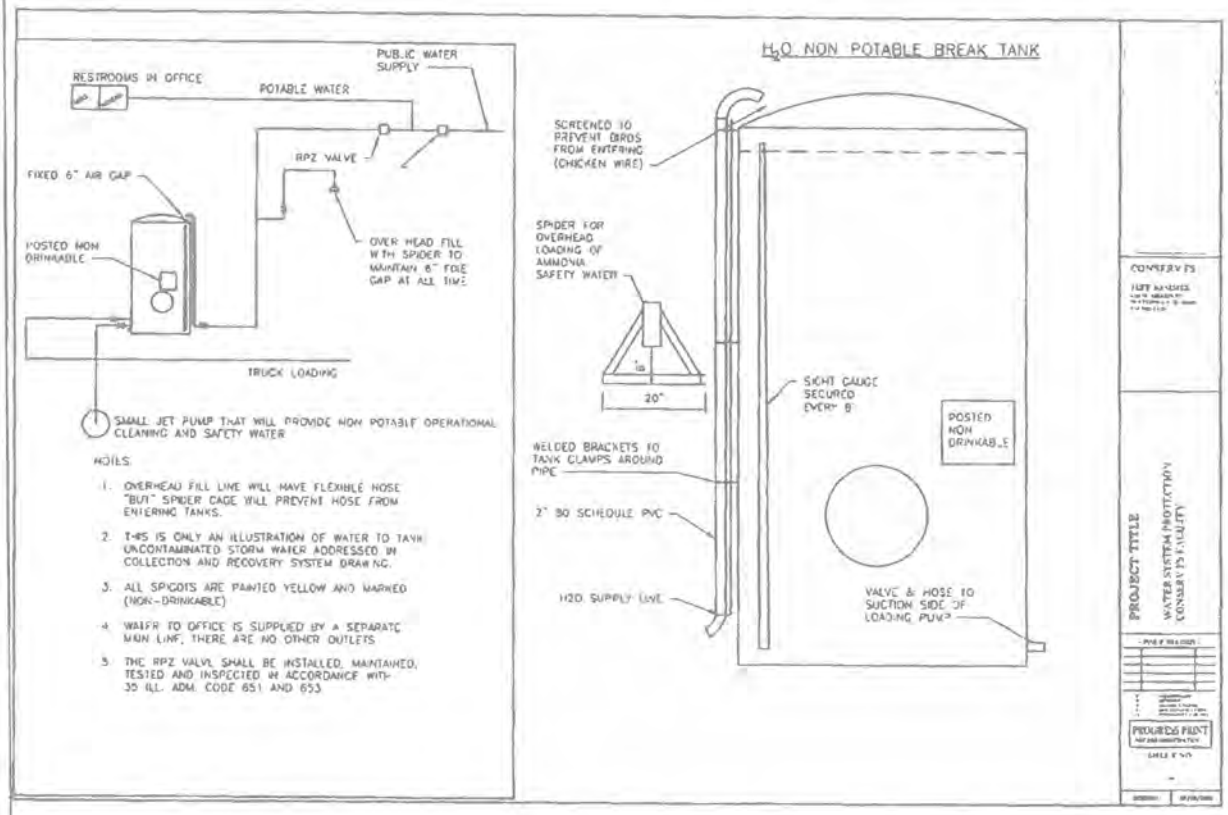
   Do you wash application vehicles at the agrichemical facility site? ( ) Yes (✓) No

   Is a stormwater by pass arrangement used or planned for your operational area containment? (✓) Yes ( ) No

   If no, please explain. N/A


PROJECT LOCATION MAP
A. NO COMMUNITY WELLS WITHIN 1,000 FT &
NO
B. PRIVATE WELLS WITHIN 200 FT
B. DISCHARGE TO SOUTHEAST INTO
UNNAMED DRAINAGE DITCH
C. NEAREST RESIDENCE 1400 FT
NEAREST MUNICIPALITY In Popular Grove
NEAREST HOSPITAL 18.2 MI
NEAREST INSTITUTION 7785 FT
NEAREST BUSINESS 300 FT
SOIL TYPE SILT LOAM
NE QTR Section 23, TOWNSHIP 4SN, RANGE 3E,
Fourth 3RD PRIME MERIDIAN
C. NEAREST RESIDENCE
C. NEAREST BUSINESS
FACILITY LOCATION
B. UNNAMED DRAINAGE DITCH


ILLINOIS ROUTE 173
PROPERTY LINE
ILLINOIS ROUTE 78
PROPOSED LIAN TANK
EXISTING BUILDING
LEGEND
NORTH
SITE LAYOUT EXHIBIT
EX4
0
80'
160'


PUBLIC WATER SUPPLY
RESTROOMS IN OFFICE
POTABLE WATER
RPZ VALVE
FIXED 6" AIR GAP
POSTED NON DRINKABLE
OVER HEAD FILL WITH SPIDER TO MAINTAIN 6" FOLE GAP AT ALL TIME
TRUCK LOADING
SMALL JET PUMP THAT WILL PROVIDE NON POTABLE OPERATIONAL CLEANING AND SAFETY WATER
NOTES:
1. OVERHEAD FILL LINE WILL HAVE FLEXIBLE HOSE "BUT" SPIDER CAGE WILL PREVENT HOSE FROM ENTERING TANKS.
2. THIS IS ONLY AN ILLUSTRATION OF WATER TO TANK UNCONTAMINATED STORM WATER ADDRESSED IN COLLECTION AND RECOVERY SYSTEM DRAWING.
3. ALL SPIGOTS ARE PAINTED YELLOW AND MARKED (NON-DRINKABLE)
4. WATER TO OFFICE IS SUPPLIED BY A SEPARATE MAIN LINE, THERE ARE NO OTHER OUTLETS
5. THE RPZ VALVE SHALL BE INSTALLED, MAINTAINED, TESTED AND INSPECTED IN ACCORDANCE WITH 35 ILL. ADM. CODE 651 AND 653
H_2O NON POTABLE BREAK TANK
SCREENED TO PREVENT BIRDS FROM ENTERING (CHICKEN WIRE)
SPIDER FOR OVERHEAD LOADING OF AMMONIA SAFETY WATER
20"
SIGHT GAUGE SECURED EVERY 8'
POSTED NON DRINKABLE
WELDED BRACKETS TO TANK CLAMPS AROUND PIPE
2" SO SCHEDULE PVC
H2O SUPPLY LINE
VALVE & HOSE TO SUCTION SIDE OF LOADING PUMP
CONSERVTS
PROJECT TITLE
WATER SYSTEM PROTECTION
PROGRESS PRINT

Operational Containment

OC-1

OC-1 is an operational containment area consisting of loading/unloading bays enclosed in the chemical warehouse. The loading/unloading bays are constructed of reinforced concrete incorporated into the chemical warehouse floor plan. All cold joints are constructed with water stops and any saw cuts are sealed with polyurethane sealant. The overall inside dimensions of the operational containment are 61'-10" wide x 57'-0" long x 0'-4" deep with a total storage volume of 5,878 gallons. The bay has a trench style sump located at the center of the operational containment area.

OC-2

OC-2 is an operational containment area consisting of an operational bay enclosed in the chemical warehouse. The operational bay is constructed of reinforced concrete incorporated into the chemical warehouse floor plan. All cold joints are constructed with water stops and any saw cuts are sealed with polyurethane sealant. The overall inside dimensions of the operational containment are 31'-0" wide x 62'-8" long x 0'-4" deep with a total storage volume of 2,325 gallons. The bay has a sump located at the center of the operational containment area.

Secondary Containment

SC-1

SC-1 is a secondary containment structure for the storage of bulk liquid chemicals enclosed in the chemical warehouse. The secondary containment is constructed of reinforced concrete incorporated into the chemical warehouse floor plan. All cold joints are constructed with water stops and any saw cuts are sealed with polyurethane sealant. The inside dimensions of the secondary containment structure are 28'-5" wide x 69'-4" long x 0'-10" deep. There is one drainless sump located in the structure. SC-1 will contain twelve 6,100-gallon (94" diameter), cone-bottom, stainless steel tanks that are elevated 24" on legs.

All chemical bulk tanks will be equipped with stainless steel fittings from the tank to the stainless-steel lockable valve. Bulk chemical tanks will not be equipped with sight gauges. The chemical containment will be inspected daily and documented weekly for condition. Bulk chemicals will be repackaged into shuttle/mini-bulk tanks in the loading area and then can be stored in the chemical warehouse for customer pickup. All chemical tanks will be labeled with their contents.

SC-2

SC-2 is a secondary containment area for the exterior storage of bulk liquid fertilizers. The secondary containment is constructed of reinforced concrete adjacent to the south foundation wall of the chemical warehouse. All cold joints are constructed with water stops and any saw cuts are sealed with polyurethane sealant. The inside dimensions of the secondary containment are 44'-0" wide x 58'-0" long x 3'-6" deep. There are two drainless sumps located at the southwest and

southeast corners of the secondary containment. SC-2 will contain six 30,000-gallon (12' diameter) fiberglass tanks and four 20,000-gallon (12' diameter) fiberglass tanks.

All fertilizer bulk tanks will be equipped with stainless steel fittings from the tank to the stainless-steel lockable valve. Where piping goes from the secondary containment through the building wall to the loading/unloading pads, the piping will pass through a secondary containment pipe between the containment and the load pads. There will be no penetrations through containment walls; piping will go over the top of containment walls. The fertilizer dike is to be inspected daily and documented weekly for condition. The fertilizer storage tanks are anchored to the concrete floor to prevent flotation. All fertilizer tanks will be labeled with their contents.

Operations

Bulk Liquid Pesticides

Bulk liquid pesticide is delivered to the facility by semi transports and unloaded in the enclosed operational containment area (OC-1). Liquid pesticide is pumped from OC-1 through plumbing to the interior secondary containment (SC-1). Catch pans and buckets are to be utilized at all connections during unloading activities. Catch pans and buckets will also be utilized under the valves of the storage tanks.

Any spilled product will be retrieved with a portable sump pump and added to either an outgoing load of the same product not to exceed label requirements or added to shuttle tanks to be used later as makeup solution. Bulk pesticides will be repackaged into shuttle/mini-bulk tanks in the loading area and then can be stored in the chemical warehouse for customer pickup.

Bulk Liquid Fertilizer

Bulk liquid fertilizer is delivered to the facility by semi transports and unloaded in the enclosed operational containment area (OC-1). Liquid fertilizer is pumped from OC-1 through plumbing to the exterior secondary containment (SC-2). Catch pans and buckets are to be utilized at all connections during unloading activities. Catch pans and buckets will also be utilized under the valves of the storage tanks.

Any spilled material will be pumped from the sumps and added to the solution tank by means of a portable sump pump. They will be inspected and cleaned daily when in use or before precipitation occurs. Storm water from this exposed secondary containment will be tested by means of test strips. If the test reveals contamination, the storm water will be collected and stored for use as makeup solution.

Dry Fertilizer Operation

All storage of dry fertilizer is inside the dry fertilizer building. In-loading will be done at the exterior open receiving pit. The conveyor trough is raised as to not collect any precipitation. All conveying equipment has weather covers. All transferring of dry fertilizer is over concrete for easy cleaning if needed. Transfer area floors will be swept daily as good housekeeping and will be added to storage bins. Transfer from storage bins will be done with end loaders, inside the

enclosed building to mixing units. The load-out area is also an exterior open area. The load out conveyor is equipped with a dust sock to reduce any dust during loading to outgoing trucks. All areas of the dry operation will be swept daily when in use as good housekeeping practices and safety.

The entire dry fertilizer building is curbed. Any exposed conveyors or legs will have weather covers installed. There are no interior pits to collect storm water. Any rinsate collected will be pumped if needed and used as makeup solution. Any wet fertilizer will be added to outgoing loads. This building structure will be raised 1-foot above finish grade and graded for storm water to flow away from and not towards.

Water Protection

The facility accesses water from a public water system. Water from the public water system will pass through a RPZ valve for backflow prevention. Water will service the agrichemical processes, dry fertilizer building and water spigots on site.

Storm Water Best Management Practices

Operational and Secondary Containment Areas

- All loading, unloading, and transferring of products shall be done over a transfer pad of adequate capacity to meet company, state, or federal requirements.
- Storing liquid fertilizers and pesticides in the same containment is prohibited.
- All plumbing, fittings, hoses, and related appurtenances shall be within the containment system area.
- All spills, leaks, drips, or operational releases on load pads, in sumps, and other containment areas shall be cleaned up at the time of the spill or prior to a storm event and no later than the end of the work shift.

Shop/Chemical Warehouse

- Keep all indoor floors swept clean of dirt, debris and chemical/oil leaks on a regular basis
- All spills, leaks and drips shall be cleaned up immediately
- Ensure all containers are properly labeled, organized, and stored in designated areas.

Conserv FS Caledonia, IL

Spill Release Plan & Emergency Contacts

Spill Release Plan

1. Evacuate the site; sound the alarm, assemble all personnel at the rendezvous point; allow NO ONE to become exposed to the chemical.
2. Take emergency action:
   - Check the scene, secure the area to prevent entry (e.g. establish barricades, post entry) □ Call for help, notify the Facility Coordinator and person in charge.
   - For an uncontrolled release dial "911" and treat this as an Emergency Response.
3. For agricultural products except those involving high hazards (e.g. ammonia, acids, fumigants), personnel who are trained, have the proper PPE and emergency equipment may initiate a Level C emergency response.
4. If you have a spill or release greater than the RQ or above State reporting requirements call:
   - □ Boone County Fire Department 815-765-3366
   - □ Boone County LEPC 815-547-1715
   - □ IL Emergency Management Agency 800-782-7860
5. If CERLCA CHEMICAL, (check the SDS) call the National Response Center (within 15 minutes) at 800-424-8802. Have the incident information ready to provide.
6. If the spill is below a Reportable Quantity, recover the spill, store in a properly marked container. If the spill is over a Reportable Quantity, DO NOT ALLOW on-site personnel to clean up the spill unless they have had HazWoper training. Notify your General Manager and Manager, Operations Compliance.
7. Place all waste in containers/drums, label contents and complete decontamination of all equipment and personnel.

Note: Upon notification to a member of the EHS staff, an Environmental Release Notification Report will be started. A partially completed report will be sent back to you for completion and signature. A written follow-up report must be prepared and submitted to the I EPC

Conserv FS Caledonia, IL

and SERC for all events requiring National Response Center notification or CERCLA Chemical releases.

Spill Release Plan & Emergency Contacts

Emergency Contacts

Facility Coordinator:	Benjamin Karlson	815-765-2571
Fire:	Boone County Fire Department	815-765-3366
Rescue:	Boone County Fire Department	815-765-3366
Ambulance:	Boone County Fire Dept.	815-765-3366
Law Enforcement:	Boone County Sheriff	815-895-2155
	Illinois State Police District 2	847-931-2405
Reporting:	IL Emergency Management Agency	800-782-7860
	Dekalb County LEPC	815-901-3834
Additional Emergency Numbers:	National Response Center	800-424-8802
	ATF Hotline	800-800-3855
	CHEMTREC	800-424-9300
Hospital:	Northwestern Medicine Valley West Hospital	815-786-9197
Utilities:	Electric: ComEd	877-426-6331
	Communications: Frontier	800-921-8102
	Natural Gas: Nicor	800-730-6114

Conserv FS		Caledonia, IL
Call Before You Dig:	811	
Broadcast Station:	WFEN Radio Rockford	815-964-9336

Schedule B – OPERATIONAL AREA CONTAINMENT

Facility Name Conserv FS, Inc. Caledonia IL

Project Location 14937 IL Route 76 Caledonia IL Boone County

City Street Address County

Documents and information required by this schedule are to verify that the operational area containment, collection and recovery system(s) conform to the requirements of Section 255.90. Engineering drawings, flow diagrams, and descriptions must be adequate to illustrate your plans.

1. ENGINEERING PLANS AND SPECIFICATIONS: Provide plan and elevation drawings of all operational area containment structures and the collection and recovery system with overall and component dimensions and elevations referenced to a single facility bench mark. Cross-sections must show construction details, elevations, and dimensions of loading pad floor, curbs, sumps, catchment basins, and all transfer structures and piping. Identify all construction materials and specifications.

2. LOADING AREA CONTAINMENT: On the containment structure drawing, show capacity and layout of collection and recovery system, including storage tanks, pumps and piping system. Provide detailed drawing notes indicating: a) Capacity in gallons of largest vehicle tank normally loaded; b) Total surface area of containment structure exposed to collect precipitation; c) Gallons resulting from a 6" rain storm; d) Total gallon capacity of containment structure; e) Gravity or automatic transfer system tank capacity in gallons used for containment; f) capacity of largest mixing or makeup tank over pad.

3. COLLECTION AND RECOVERY SYSTEM FLOW DIAGRAM: Provide a schematic flow diagram of the collection and recovery system from the containment collection sump to recovery storage tanks and to reuse loading or mixing operation, and any provisions for storm water by-pass. Show and label all components showing pertinent features, sizes, capacities, and flow rates.

4. UNLOADING AREA CONTAINMENT: Describe methods or systems used to catch and recover spillage from unloading operations. Provide drawings of permanent structures.

5. MIXING AND REPACKAGING AREA CONTAINMENT: Describe methods or systems used to catch and recover spillage from these operations. Provide sketches or drawings if necessary to explain.

6. WASHING AREA CONTAINMENT: Provide drawing of wash pad and recovery system if a separate structure is used for this purpose.

7. TRANSFER STRUCTURES: Describe preventative maintenance practices to ensure below grade transfer structures (sumps, collection tanks, wet wells, scale pits, etc.) are sealed to prevent leakage.

8. CONSTRUCTION TIME TABLE: Provide approximate dates on summary.

9. IEPA – WPC PERMIT: Facilities holding a current Agrichemical Wastewater Collection and Recycling System Permit provide following:

   Permit No. N/A Date Issued _____

   NOTE: This permit may have covered only a portion of the operational area containment facilities. Update previous permit application drawings and provide other information required by this schedule.

OC-2

Schedule B SUMMARY

Facility Name: Conserv FS

1. ENGINEERING PLANS AND SPECIFICATIONS are provided for systems checked:

✓ Loading area containment (Bulk Liquid Pesticides &Bulk Liquid Fertilizer)

✓ Unloading area containment (Bulk Liquid Pesticides)

____ List Other Systems____

2. LOADING AREA CONTAINMENT CAPACITY – Provide gallons for each:

Capacity of largest vehicle tank loaded	5000 Gal
Volume of 6" rain storm on exposed containment area	N/A Interior
Total capacity of containment structure and sumps	8183 Gal
Available collection tank capacity with automatic transfer	250 Gallons
Capacity of largest mixing tank or make-up tank over pad	3,000 Gallons

3. COLLECTION AND RECOVERY SYSTEM FLOW DIAGRAM

Number of recovery storage tanks 3 Capacity of each 250 gallons each

Are provisions provided for stormwater by-pass? (✓) Yes ( ) No

4. UNLOADING AREA CONTAINMENT – Describe system used and note drawing number:

Three interior load out bays that are contained with the building and have sloped floor trenches with sump baskets for Containment. See enclosed construction details

5. MIXING AND REPACKAGING AREA CONTAINMENT – Describe systems and note drawing number(s):

Owner plans to utilize the interior load-out bays of the building for all mixing and repack purpose s. See enclosed construction details

6. WASHING AREA CONTAINMENT – Describe methods and note drawing number(s):

Washing of equipment will take place in the field only

7. TRANSFER STRUCTURES Are any below grade structures used for spill collection in the containment systems? ( ) No (✓) Yes, check type below and provide details including capacity and material of construction.

____ Scale Pit ____

____ Below Pad Tank ____

____ Gravity Fill Tank ____

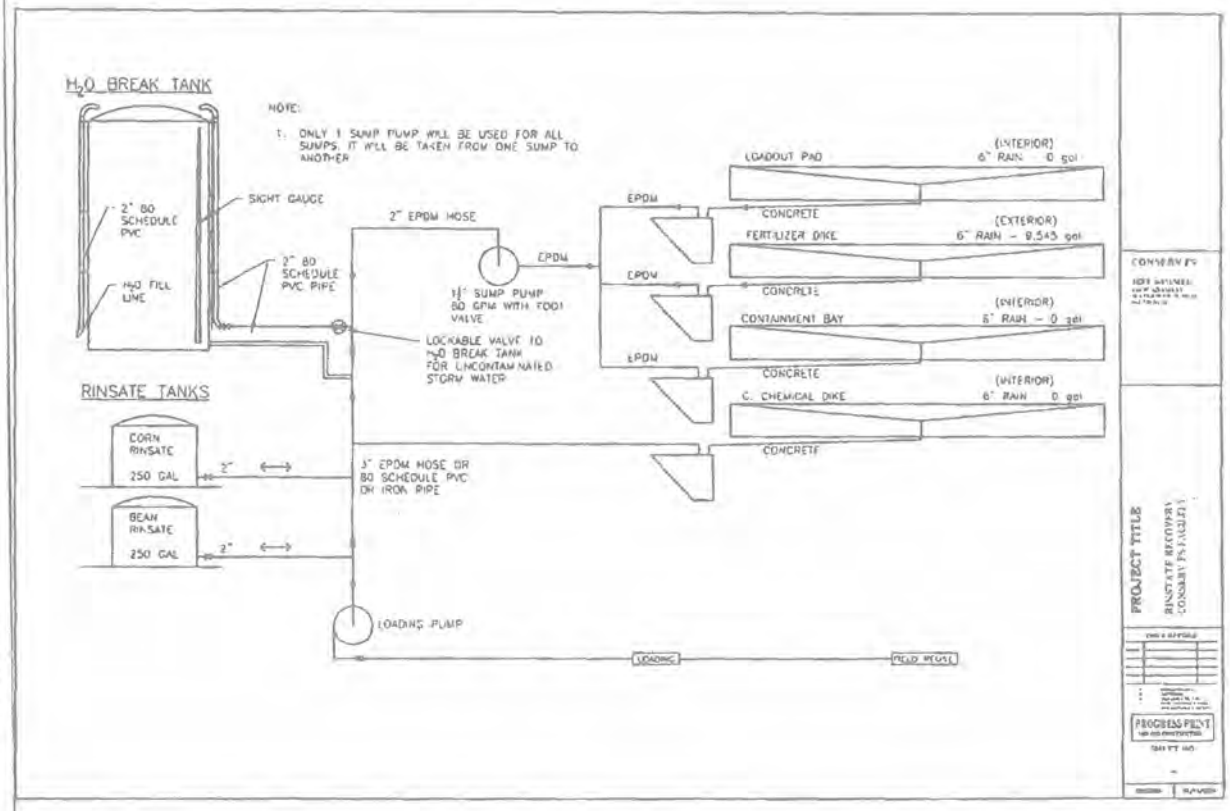
✓ Other: Sumps shown in enclosed drawings

8. CONSTRUCTION TIME SCHEDULE DATES:

Start Date: (5 / 15 / 2022)

Completion Date: (4 / 1 / 2023)

Operational Date: (3 / 1 / 2023)


H2O BREAK TANK
NOTE:
1. ONLY 1 SUMP PUMP WILL BE USED FOR ALL SUMPS. IT WILL BE TAKEN FROM ONE SUMP TO ANOTHER
2" SCHEDULE PVC
H2O FILL LINE
SIGHT GAUGE
2" 80 SCHEDULE PVC PIPE
2" EPDM HOSE
EPDM
1½" SUMP PUMP 80 GPM WITH FOOT VALVE
LOCKABLE VALVE TO H2O BREAK TANK FOR UNCONTAMINATED STORM WATER
RINSATE TANKS
CORN RINSATE
250 GAL
BEAN RINSATE
250 GAL
3" EPDM HOSE OR 80 SCHEDULE PVC OR IRON PIPE
LOADING PUMP
LOADOUT PAD
(INTERIOR)
6" RAIN - 0 gal
CONCRETE
FERTILIZER DIKE
(EXTERIOR)
6" RAIN - 8,545 gal
CONTAINMENT BAY
(INTERIOR)
6" RAIN - 0 gal
C. CHEMICAL DIKE
(INTERIOR)
6" RAIN 0 gal
PROJECT TITLE
PROGRESS PRINT

Schedule C – SECONDARY CONTAINMENT PLAN SC-1

Facility Name Conserv FS, Inc.

Project Location Caledonia 14937 IL-76 Boone
City Street Address County

Documents and information required by this schedule are to verify that the secondary containment structure and capacity conforms to the requirements of Section 255.80. Indicate the secondary containment plans submitted in this schedule by checking the agrichemical storage system(s) below:

✓ Bulk Pesticide Tanks

_____ Liquid Fertilizer Tanks less than 100,000 gallons

_____ Liquid Fertilizer Tanks 100,000 gallons or larger

✓ Pesticide Mini-Bulk Warehouses or Optional Spill Response Plan

1. ENGINEERING PLANS AND SPECIFICATIONS. Provide plan and elevation drawings with overall and component dimensions and elevations referenced to single facility bench mark. Include cross-sections to indicate construction details, elevations, and dimensions of walls, floor, sumps and all other piping and components. Identify all materials and applicable construction specifications. Note manufacturer, trade name of all synthetic liners or prefabricated materials and provide written confirmation of compatibility and estimate of life expectancy from the manufacturer. When necessary, to prevent tank flotation, show details of anchoring method.

2. STORAGE TANK SCHEDULE: Show location and assigned tank number of each storage tank within the secondary containment on the plan view. Provide tank capacity, dimensions, and the product contained in each tank on the plan view or by tank schedule referencing tank numbers. Illustrate provisions for placement of future tank(s) by broken lines.

3. SECONDARY CONTAINMENT CAPACITY: Note the following on the drawing: a) The minimum required containment capacity to satisfy Section 255.80(a) for current storage tanks; b) the actual containment volume in gallons provided; and c) Specific provisions for future tank(s) within the containment

4. MINI-BULK WAREHOUSE: A drawing of warehouse containment is required unless an optional immediate spill response plan is used. Describe containment or spill response plan on schedule summary form. Also list products currently or intended to be stored in mini-bulk containers, including the largest container size.

5. CONSTRUCTION TIME SCHEDULE: Provide approximate dates (on the summary form) that construction will begin, be completed and put in operation.

NOTE: Complete a copy of the Schedule C Summary Form on the back of this schedule for each separate secondary containment structure.

SC-1

Schedule C SUMMARY

Facility Name Conserv FS, Inc.

Secondary Containment For Bulk Liquid Fertilizer

1. ENGINEERING PLANS & SPECIFICATIONS

   Material(s) of construction Reinforced Concrete

2. STORAGE TANK SCHEDULE: Complete table below. If additional space is needed, attach a separate sheet.

Tank No.	Product	Capacity Gal.	Dimensions Dia. x Ht.	Material of Construction
1	Agrichemical	6,100	94"x264"	Stainless Steel
2	Agrichemical	6,100	94"x264"	Stainless Steel
3	Agrichemical	6,100	94"x264"	Stainless Steel
4	Agrichemical	6,100	94"x264"	Stainless Steel
5	Agrichemical	6,100	94"x264"	Stainless Steel
6	Agrichemical	6,100	94"x264"	Stainless Steel
7	Agrichemical	6,100	94"x264"	Stainless Steel
8	Agrichemical	6,100	94"x264"	Stainless Steel
9	Agrichemical	6,100	94"x264"	Stainless Steel
10	Agrichemical	6,100	94"x264"	Stainless Steel
11	Agrichemical	6,100	94"x264"	Stainless Steel
12	Agrichemical	6,100	94"x264"	Stainless Steel

3. SECONDARY CONTAINMENT CAPACITY:

   Minimum required capacity 6,100 gallons

   Facility design capacity 7489 gallons

   Containment dimensions: Length 69.33 ft.; Width 28.5 ft.; Height 0.83 ft

   Provisions for future tanks? (✓) No ( ) Yes, Number and Size? _____

4. MINI-BULK WAREHOUSE protection? ☐ Containment ☑ Spill Response

   Describe (If additional space is needed, attach a separate sheet):

   See Spill Release plan

   List Products Stored in Mini-Bulk: Changed from yield to your Ag chemicals listed as built

   Largest Container Size 250 Gallons. Product Any of above

5. CONSTRUCTION TIMETABLE DATES:

   Start Date: (11 / 01 / 22)

   Completion Date: (4 / 01 / 22)

   Operational Date: (03 / 21 / 22)

Schedule C – SECONDARY CONTAINMENT PLAN

Facility Name Conserv FS, Inc.

Project Location Caledonia 14937 IL-76 Boone
City Street Address County

Documents and information required by this schedule are to verify that the secondary containment structure and capacity conforms to the requirements of Section 255.80. Indicate the secondary containment plans submitted in this schedule by checking the agrichemical storage system(s) below:

_____ Bulk Pesticide Tanks

✓ Liquid Fertilizer Tanks less than 100,000 gallons

_____ Liquid Fertilizer Tanks 100,000 gallons or larger

_____ Pesticide Mini-Bulk Warehouses or Optional Spill Response Plan

1. ENGINEERING PLANS AND SPECIFICATIONS: Provide plan and elevation drawings with overall and component dimensions and elevations referenced to single facility bench mark. Include cross-sections to indicate construction details, elevations, and dimensions of walls, floor, sumps and all other piping and components. Identify all materials and applicable construction specifications. Note manufacturer, trade name of all synthetic liners or prefabricated materials and provide written confirmation of compatibility and estimate of life expectancy from the manufacturer. When necessary, to prevent tank flotation, show details of anchoring method.

2. STORAGE TANK SCHEDULE: Show location and assigned tank number of each storage tank within the secondary containment on the plan view. Provide tank capacity, dimensions, and the product contained in each tank on the plan view or by tank schedule referencing tank numbers. Illustrate provisions for placement of future tank(s) by broken lines.

3. SECONDARY CONTAINMENT CAPACITY: Note the following on the drawing: a) The minimum required containment capacity to satisfy Section 255.80(a) for current storage tanks; b) the actual containment volume in gallons provided; and c) Specific provisions for future tank(s) within the containment.

4. MINI-BULK WAREHOUSE: A drawing of warehouse containment is required unless an optional immediate spill response plan is used. Describe containment or spill response plan on schedule summary form. Also list products currently or intended to be stored in mini-bulk containers, including the largest container size.

5. CONSTRUCTION TIME SCHEDULE: Provide approximate dates (on the summary form) that construction will begin, be completed and put in operation.

NOTE: Complete a copy of the Schedule C Summary Form on the back of this schedule for each separate secondary containment structure.

SC-2

Schedule C SUMMARY

Facility Name Cooserv FS, Inc.

Secondary Containment For Bulk Liquid Fertilizer

1. ENGINEERING PLANS & SPECIFICATIONS

   Material(s) of construction Reinforced Concrete

2. STORAGE TANK SCHEDULE: Complete table below. If additional space is needed, attach a separate sheet.

Tank No.	Product	Capacity Gal.	Dimensions Dia. x Ht.	Material of Construction
1	Agrichemical	30,000	12x35	Fiberglass
2	Agrichemical	30,000	12x35	Fiberglass
3	Agrichemical	30,000	12x35	Fiberglass
4	Agrichemical	30,000	12x35	Fiberglass
5	Agrichemical	30,000	12x35	Fiberglass
6	Agrichemical	30,000	12x35	Fiberglass
7	Agrichemical	20,000	12x24	Fiberglass
8	Agrichemical	20,000	12x24	Fiberglass
9	Agrichemical	20,000	12x24	Fiberglass
10	Agrichemical	20,000	12x24	Fiberglass

3. SECONDARY CONTAINMENT CAPACITY:

   Minimum required capacity 39545 gallons

   Facility design capacity 40162 gallons

   Containment dimensions: Length 55 ft.; Width 44 ft.; Height 3.5 ft.

   Provisions for future tanks? (✓) No ( ) Yes, Number and Size? _____

4. MINI-BULK WAREHOUSE protection? ☐ Containment ☑ Spill Response

   Describe (If additional space is needed, attach a separate sheet):

   See Spill Release plan

   List Products Stored in Mini-Bulk: Changes from year to year. Ag chemicals listed as bulk.

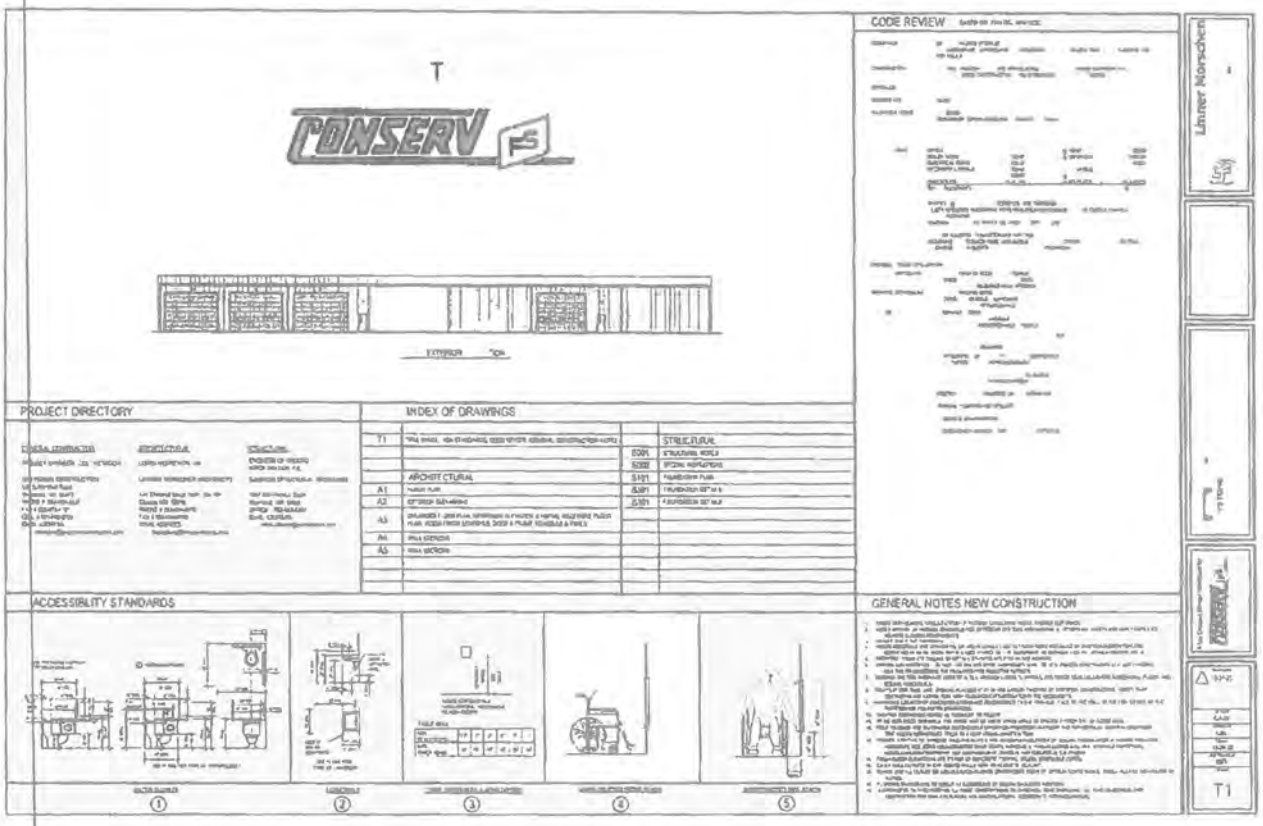
   Largest Container Size 250 Gallons. Product Any of above

5. CONSTRUCTION TIMETABLE DATES:

   Start Date: (11 / 01 / 22)

   Completion Date: (4 / 01 / 22)

   Operational Date: (03 / 21 / 22)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PROJECT DIRECTORY
INDEX OF DRAWINGS
ARCHITECTURAL
STRUCTURAL
ACCESSIBILITY STANDARDS
GENERAL NOTES NEW CONSTRUCTION
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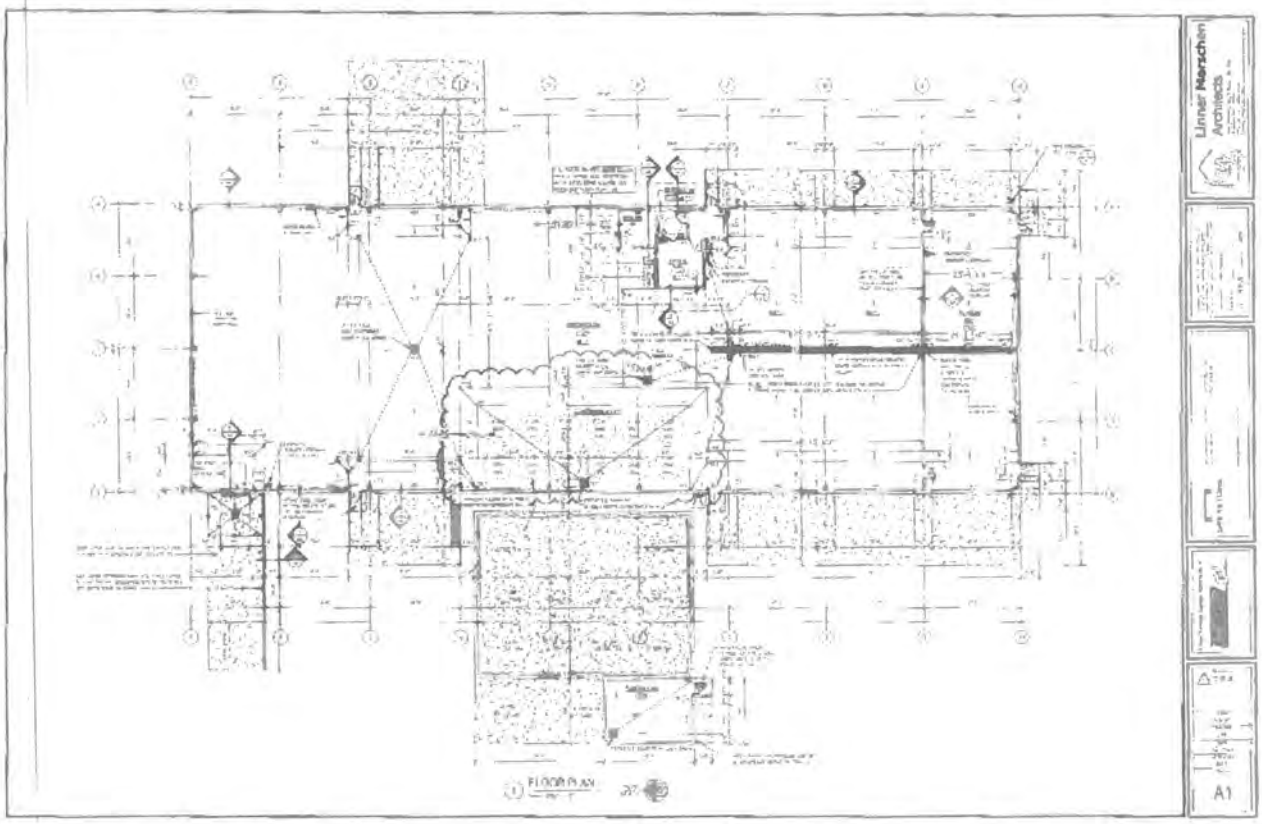
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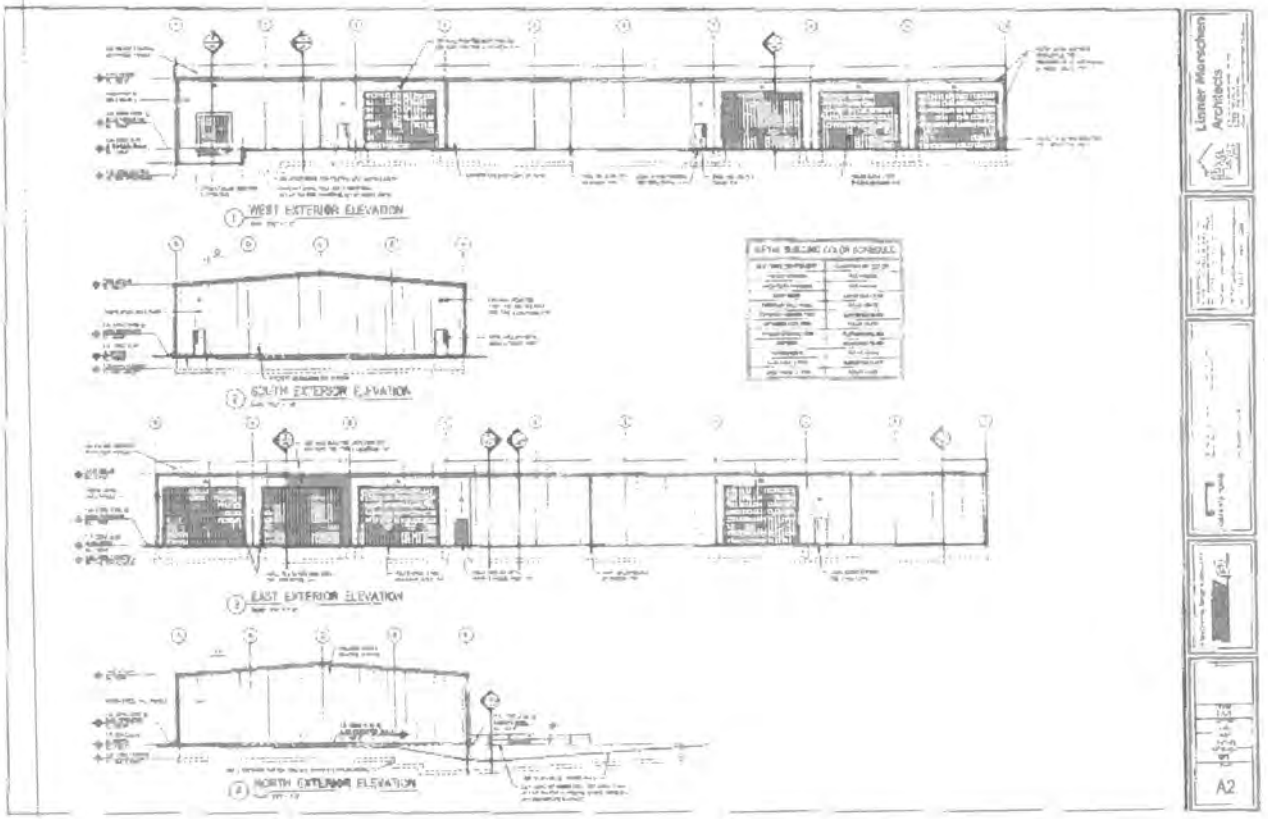
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SOUTH EXTERIOR ELEVATION
EAST EXTERIOR ELEVATION
NORTH EXTERIOR ELEVATION
Lisner Marschen Architects
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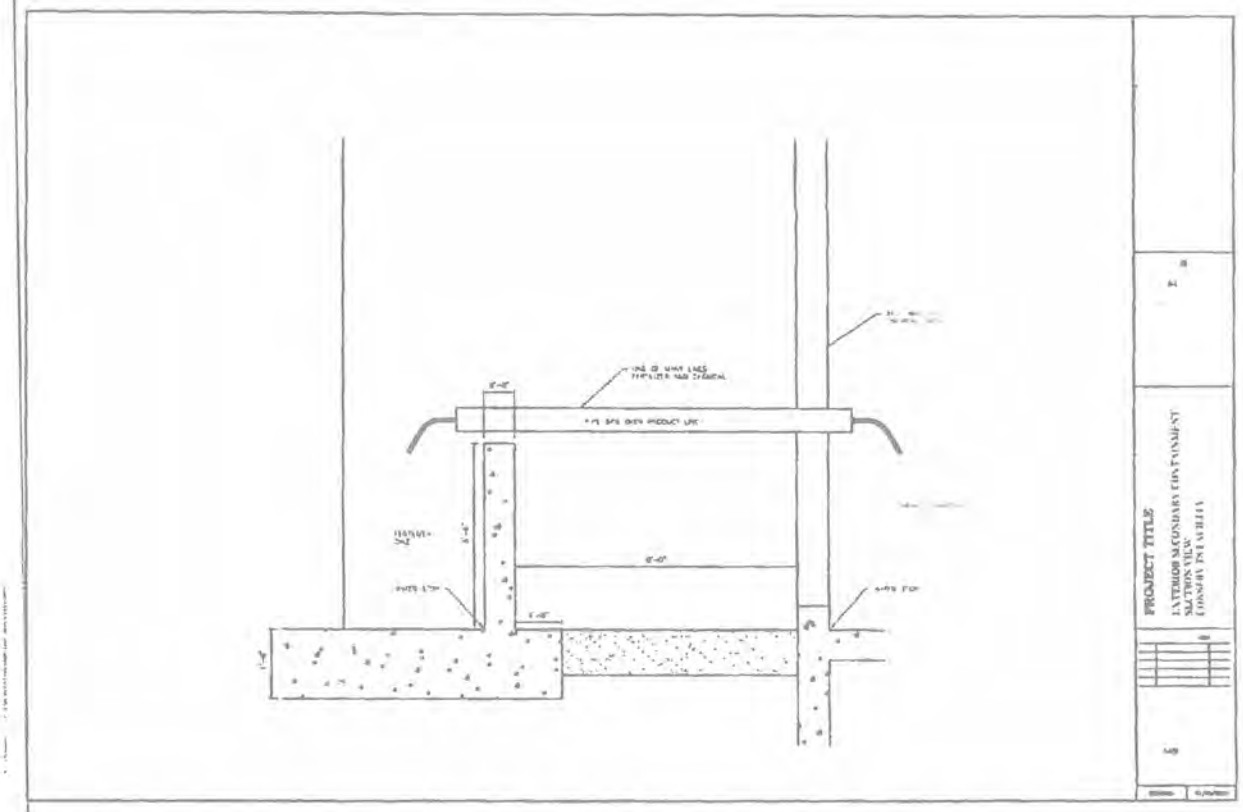

PROJECT TITLE

Conserv FS, Inc. - Containment Calculations

Operational Containment OC-1
Enclosed, reinforced concrete pad - 61'-10" x 57'-0" x 0'-4" sloping to center & 25'-9" x 57'-0" x 0'-4" sloping to center; bays joined by collection trench

Top area = 61.83' x 57' + 25.75' x 57' = 4887 ft^2
Bottom area = 58' x 1.5' + 24.08' x 1.5' = 123 ft^2
Depth = 0.33'

Volume (4887 + 123)/2 x 0.33' x 7.48 gal/ft^3	6,183 Gal
Total Capacity	**6,183 Gal**
Requirements	
Largest Tank Loaded	5,000 Gal
6" Rain - Enclosed so there is no rain	0 Gal
Total Requirements	**5,000 Gal**

Operational Containment OC-2
Reinforced concrete pad - 31'-0" x 62'-8" x 0'-4" sloping to center

Top area = 62.67' x 28' + 3' x 41.92 = 1880 ft^2
Bottom area = 2' x 2' = 4 ft^2
Depth = 0.33'

Volume (1880 + 4)/2 x 0.33' x 7.48 gal/ft^3	2,325 Gal
Total Capacity	**2,325 Gal**
Requirements	
Largest Tank Loaded	500 Gal
6" Rain - N/a (interior)	0 Gal
Total Requirements	**500 Gal**

Conserv FS, Inc. - Containment Calculations

Secondary Containment - SC-1
12 - 6,100 gallon (94" dia.) Tanks elevated 24"
Enclosed, reinforced concrete containments - 28'-5" x 69'-4" x 0'-10" ID

100'-0" to 99'-7"
Top area = 28.5' x 69.33' = 1976 ft^2
Mid area = 23.5' x 59.33' = 1394 ft^2
Depth = 0.42'

Volume = (1976 + 1394)/2 x 0.42' x 7.48 gal/ft^3	5,293 Gal

99'-7" to 99'-2"
Mid area = 23.5' x 59.33' = 1394 ft^2
Bottom area = 2' x 2' = 4 ft^2
Depth = 0.42'

Volume = (1394 + 4)/2 x 0.42' x 7.48 gal/ft^3	2,196 Gal
Total Capacity	**7,489 Gal**

Requirements

6" Rain - N/a (interior)	0 Gal
Displacement of Tanks - N/a (24" elevated tanks)	0 Gal
Volume Largest Tank	6,100 Gal
Total Requirements	**6,100 Gal**

Secondary Containment - SC-2
6 - 30,000 gallon, 12' dia. Flat-bottom tanks, 4 - 20,000 gallon, 12' dia. Flat-bottom tanks
Exposed, reinforced concrete containment - 44'-0" x 58'-0" x 3'-6"

Volume = 44' x 58' x 3.5' x 7.48 gal/ft^3	66,811 Gal
Displacement of Tanks 9 - 12' dia. tanks Volume 9 x 846 gal/ft x 3.5'	26,649 Gal
Total Capacity	**40,162 Gal**

Requirements

6" Rain Volume = 44' x 58' x 0.5' x 7.48 gal/ft^3	9,545 Gal
Volume Largest Tank 30,000 gal	30,000 Gal
Total Requirements	**39,545 Gal**

Schedule D – DRY FERTILIZER STORAGE, HANDLING AND BLENDING

Facility Name Conserv FS, Inc.

Project Location 14937 IL Route 76 Caledonia IL Boone County

City Street Address County

Documents and information required by this schedule are to verify that dry fertilizer storage, handling, and blending operations conform with the requirements of Sections 255.140 and 255.150. Narrative, drawings, or schematic flow diagrams may be used to describe the facility storage methods and operational processes and to illustrate your plans for containment and recovery of spillage and to minimize emissions.

1. PLOT PLAN: On the facility plot plan (Schedule A) or a separate drawing, show the storage building, blending area, unloading and loading locations, and the distance and location of nearest residence and commercial building.

2. PROCESS FLOW DIAGRAM: Provide a schematic flow diagram of all processes including: Truck/Rail Unloading, Storage, Weighing, Blending, Impregnation, Applicator/Truck Loading, and all associated conveyor and front-end loader transfer operations. Identify each function or process, show flow rates and type of conveyors, blender and other equipment. Show by graphics or notations the processes that are enclosed or under roof.

3. STORAGE FACILITIES: Describe storage buildings and, if necessary, provisions to prevent ground or surface water pollution.

4. CONTAINMENT AND RECOVERY OF SPILLAGE: Describe the containment or collection of spillage and the clean-up practices or recovery methods planned for all exposed outdoor operational processes. These may include unloading, loading, conveying, front-end loader handling, weighing, and blending. Describe the provisions for the diversion of surface water flow around the operations.

5. Describe or provide drawings of operational containment and recovery systems for pesticide impregnation operations including provisions for blender/equipment wash water collection.

6. PARTICULATE EMISSION CONTROL: Describe methods, equipment or techniques used to minimize particulate matter/dust emissions.

7. BLENDING OPERATIONS, HERBICIDE IMPREGNATION, and COMPLIANCE TIME SCHEDULE: Provide information requested in summary.

8. IEPA APC PERMIT: For facilities holding a current Division of Air Pollution Control Permit for blending operations, provide the following:

Permit No. ____ Expiration Date _____

Schedule D SUMMARY

Facility Name Conserv FS, Inc.

1. Dry fertilizer facilities, distance and location of nearest residence(s) and/or commercial building(s) shown on:
   (check) x Plot Plan _____ Separate Drawing

2. PROCESS FLOW DIAGRAM is attached: ( ) Yes ( ) No
   On each process below, place an "E" to designate enclosed, "R" to designate under-roof only, or an "O" for any exposed outdoor operation:

   E Unloading I Storage S Front End Loader Handling
   E Weighing E Blending E Loading E Conveyor
   Type and Model of Blender ..... Doyle Auto Batch

Average Blending & Loading Time	10		Min./Batch
Typical Batch size	24		Tons
Annual Blender Through-Put	8000		Tons
Annual Blender Operating Time (total)	50		Hours
Blending Rate (for actual operating time)	240		Tons/Hour
Typical Unloading Rate (receiving)	200		Tons/Hour

3. STORAGE FACILITIES: Describe (if additional space is needed, attach a separate sheet)
   Wood Framed building with concrete floors, shingled roof, gutters, and downspouts

4. CONTAINMENT AND RECOVERY OF SPILLAGE: Describe for each process exposed outdoors and note drawing number(s): (if additional space is needed, attach a separate sheet)
   All areas over new concrete slab

5. PARTICULATE EMISSION CONTROL: Describe for each process exposed outdoors:
   Loading convery is enclosed and has sock

6. BLENDING OPERATIONS, HERBICIDE IMPREGNATION, and COMPLIANCE TIME SCHEDULE
   Herbicide Impregnation process in blender? (✓) No ( ) Yes, then provide

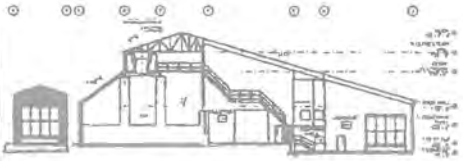
Herbicides Used	Annual Amounts

   Odor Emission Control Methods: (If additional space is needed, attach a separate sheet)

   Compliance Time Schedule: Estimated date that dry facilities will be in full compliance: (11 / 15 / 22)

A NEW DRY FERTILIZER BUILDING FOR:

CALEDONIA, ILLINOIS



1 BUILDING SECTION

CODE REVIEW

PERMIT SET

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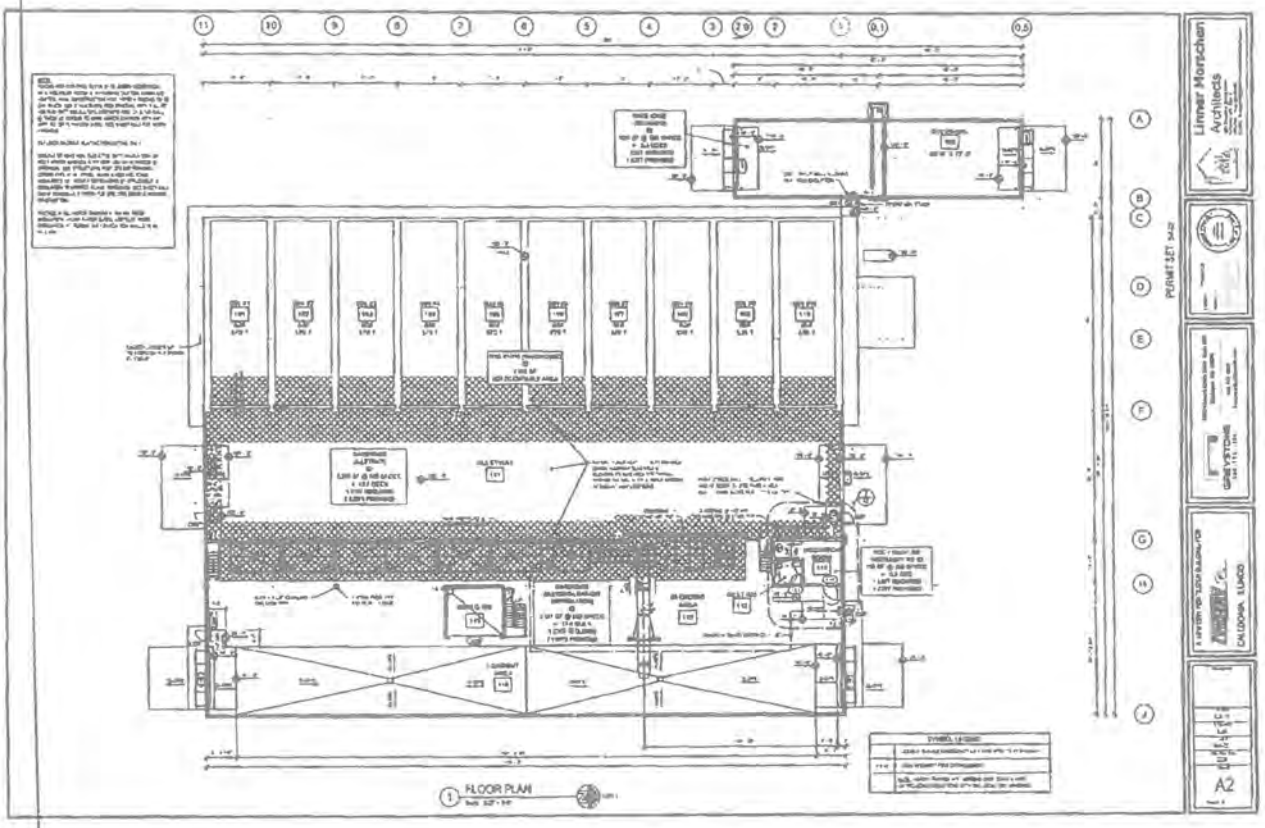
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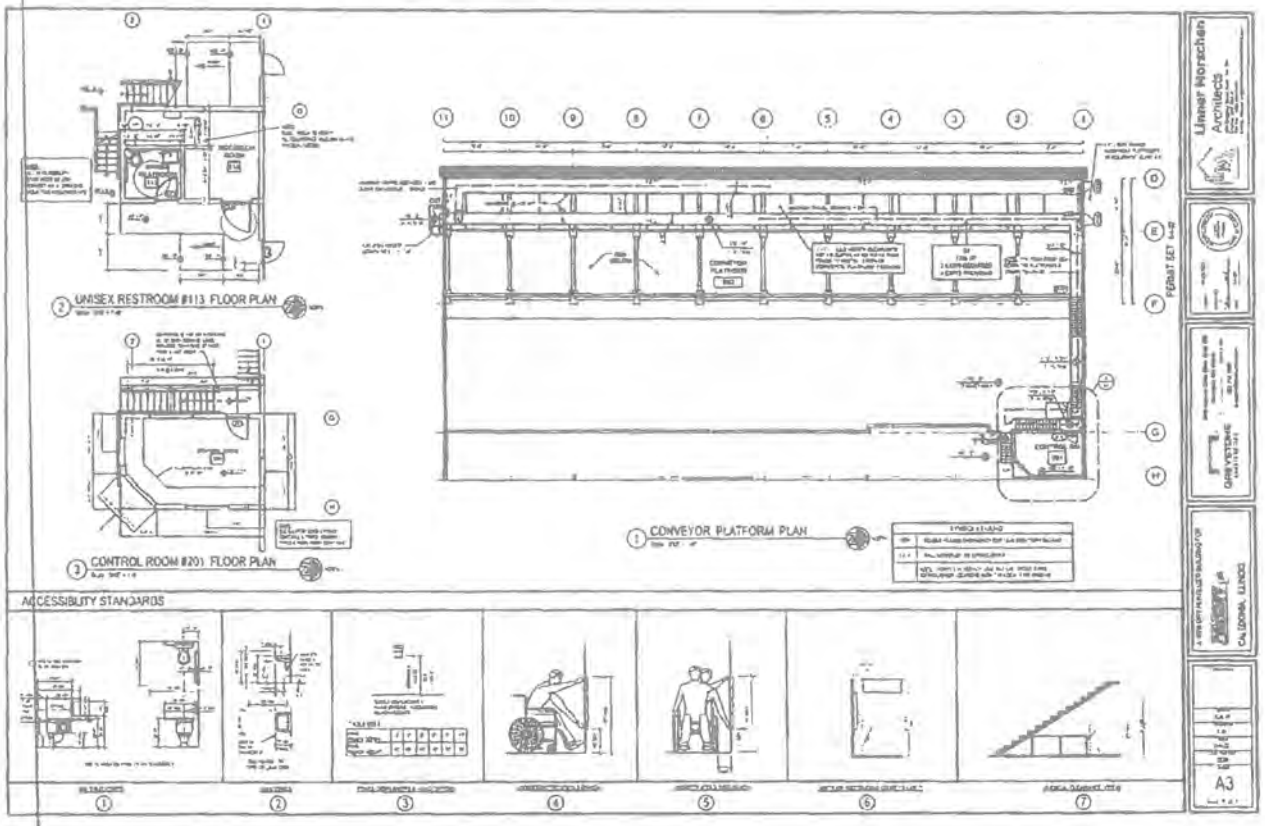
1 FLOOR PLAN


UNISEX RESTROOM #113 FLOOR PLAN
CONTROL ROOM #201 FLOOR PLAN
CONVEYOR PLATFORM PLAN
ACCESSIBILITY STANDARDS
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A3

Schedule E – PERMIT MODIFICATION SCHEDULE

Facility Name Conserv FS, Inc. Permit Number AC94123326

Project Location 14937 IL Route 76 Caledonia IL Boone County
City Street Address County

Section 255.50 requires that a Permit be amended prior to any facility modification. By definition "Modification" means changes in structures, processes, or activities at an agrichemical facility which alters the efficiency of containment structures or systems.

This includes any change that modifies the approved Permit design capability of secondary or operational area containment structures. An obvious example is a change or addition to storage tanks within the containment area resulting in increased tank base displacement volume or increased volume for the largest tank. Always check with the Department relative to the need for Permit Modification when considering changes in facility structures or activities covered by the rules in Part 255.

1. APPLICATION FOR PERMIT MODIFICATION: Complete the Application for Permit & Construction Approval form with appropriate approval signatures and submit along with this schedule. Configuration changes in containment structures may require amendment to previous drawings and/or the related schedule. In many cases the facility modification can be adequately covered on this schedule.

2. REFERENCE TO EXISTING PERMIT: Schedule N/A Drawing Number N/A

   Description of containment structure or system involved: Fertilizer building
   Construction of new liquid chemical building including operational containment areas, liquid chemical secondary containment/repackaging, two (2) 1,100,000 gallon UAN tank and new dry fertilizer building.

3. STORAGE TANK CHANGES: Describe tank change:
   Built Liquid Fertilizer, 6-30,000 gallon fiberglass tanks, 4-20,000 gallon fiberglass tanks
   Built Liquid Pesticide, 12- 6, 100-gallon elevated stainless steel tanks
   1,000,000 gallon steel UAN tank

   Containment Capacity: Existing N/A gal. Modified N/A gal.

   Minimum capacity required by Section 255.80(b) See Schedule C gal.

4. OTHER MODIFICATION: Describe the planned changes: (If additional space is needed, attach a separate sheet)

   Describe the change in structure or system efficiency: (If additional space is needed, attach a separate sheet)

STATE OF ILLINOIS)
)
COUNTY OF SANGAMON)

CERTIFICATE OF SERVICE

I, the undersigned attorney at law, hereby certify that I have served on the date of January 10, 2024, 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:

Conserv FS, Inc. - Caledonia
David Swigart
1110 McConnell Road
Woodstock, Illinois 60098

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/ Joshua Leopold
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)