

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	R14-20
EMERGENCY RULEMAKING)	(Rulemaking-Air/Land/Water)
REGARDING REGULATIONS OF)	
COKE/BULK TERMINALS: NEW 35 ILL.)	
ADM. CODE 213)	

CERTIFICATE OF SERVICE

I, the undersigned, an attorney, state that I have electronically served the attached STATEMENT OF REASONS, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S REPLY TO RESPONSES TO EMERGENCY RULEMAKING, and NOAA ATLAS 14 (incorporated by referenced into the proposed regulations) of the Illinois Environmental Protection Agency upon the following persons:

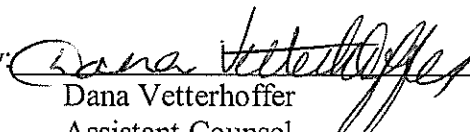
John Therriault, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601-3218

Marie Tipsord
Hearing Officer
Illinois Pollution Control Board
100 W. Randolph St., Suite 11-500
Chicago, IL 60601

and that I am mailing it by first-class mail from Springfield, Illinois, with sufficient postage affixed, to the following persons:

SEE ATTACHED SERVICE LIST

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: 
Dana Vetterhoffer
Assistant Counsel
Division of Legal Counsel

DATED: January 22, 2014
1021 N. Grand Ave. East
P.O. Box 19276
Springfield, IL 62794-9276
(217) 782-5544

Service List R14-20

Scott W. Fowkes
Caitlin A. Kovacs
Kirkland & Ellis
300 N. La Salle Drive
Suite 3500
Chicago, IL 60654

Matthew J. Dunn
Office of the Attorney General
69 West Washington Street
Suite 1800
Chicago, IL 60602

Katherine D. Hodge
Matthew C. Read
Hodge Dwyer & Driver
3150 Roland Avenue
P.O. Box 5776
Springfield, IL 62705-5776

Office of Legal Services
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, IL 62702-1271

Susan M. Franzetti
Kristen Laughridge Gale
Nijman Franzetti LLP
10 South LaSalle Street
Suite 3600
Chicago, IL 60603

Valerie Corr Hanserd
BP Products North America, Inc.
150 W. Warrenville Rd.
Naperville, IL 60563

Mark Goldenberg
Holly Reese
Goldenberg Heller Antognoli & Rowland, P.C.
2227 S. State Route 157
Edwardsville, IL 62025

Darren Hunter
Rooney Rippie & Ratnaswamy LLP
350 W. Hubbard
Suite 600
Chicago, IL 60654

David Long
American Electric Power Service Corp.
1 Riverside Plaza
Columbus, OH 43215

Greg Stiltner
American Electric Power Service Corp.
01/3316 North US 45
Metropolis, IL 62960

L. Elizabeth Gunter
American Electric Power Service Corp.
400 West 15th Street
Austin, TX 78731

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STATEMENT OF REASONS

I. INTRODUCTION

The Illinois Environmental Protection Agency (“Illinois EPA” or “Agency”) submits this Statement of Reasons to the Illinois Pollution Control Board (“Board”) in support of its Proposal and Motion for Emergency Rulemaking, pursuant to the Hearing Officer Order issued on January 17, 2014, in the above proceeding.¹

Several bulk terminals located in Cook County and statewide process, transport, and handle coke and/or coal, and store such materials in outdoor storage areas. Emissions of fugitive particulate matter (“PM”) from these and similar operations are inadequately controlled, to such an extent that they cause or threaten to cause a public nuisance as well as violations of the Illinois Environmental Protection Act (“Act”) and Board regulations. These emissions reasonably constitute a threat to the public interest, safety, or welfare, necessitating adoption of the emergency amendments proposed by the Illinois EPA. Additionally, the discharge of runoff from uncovered coke and coal piles into waters of the State is a violation of the Act and Board

¹ Subsection (c) of Section 27 of the Illinois Environmental Protection Act (415 ILCS 5/27(c)) directs the Board to comply with Section 5-45 of the Illinois Administrative Procedure Act (“Illinois APA”) when adopting an emergency rulemaking. It contains no requirement that the Agency, or the Board for that matter, present a statement of reasons in support of emergency rulemakings conducted pursuant to that Section, and it clearly distinguishes between general rulemakings and emergency rulemakings. Further, the Board’s regulations regarding the required procedures for, and contents of, proposals for emergency rulemakings are unclear and do not appear to be tailored to the purpose and intent of an emergency rulemaking. The single section dedicated to emergency rulemakings simply references the Board’s statutory authority to adopt such rules. *See* 35 Ill. Adm. Code 102.612.

regulations and reasonably constitutes a threat to the public interest or welfare, necessitating adoption of the Agency's proposal.

II. STATEMENT OF FACTS

A. Emissions and Discharges from Coke or Coal Bulk Terminals

Generally, "coke" refers to solid, carbonaceous material derived from the distillation of coal (including metallurgical coke or "metcoke") or from oil refinery coker units or other cracking processes (including petroleum coke or "petcoke"). Along with high amounts of carbon, petcoke contains sulfur and can contain a variety of metals, including vanadium, nickel, chromium, and lead. It is primarily utilized as a replacement fuel or fuel blend for coal-fired power plants and cement kilns, and in other industrial processes. Metcoke is generally used as a fuel and as a reducing agent in smelting iron ore.

Dust from both coke and coal is a type of fugitive PM, subject to National Ambient Air Quality Standards. Exposure to PM can have serious health consequences, such as cardiovascular and respiratory effects and increased mortality. *See Proposed National Ambient Air Quality Standards for Particulate Matter, 77 Fed. Reg. 38890, 38947 (June 29, 2012)*, attached as Exhibit A. Specific adverse effects include aggravated asthma, decreased lung function, increased respiratory symptoms such as difficulty breathing, irregular heartbeat, and nonfatal heart attacks. Several at-risk populations may be especially susceptible to PM-related effects, including those with preexisting heart or lung diseases and those with certain genetic disorders, as well as children and the elderly. *See Final National Ambient Air Quality Standards for Particulate Matter, 78 Fed. Reg. 3086, 3167 (Jan. 15, 2013)*, attached as Exhibit B.

Coke and coal dust can be emitted into the environment during loading, unloading, transferring, handling, and transport of coke and coal, and when wind acts upon these operations,

particularly open storage piles of such materials. The dust can be carried by the wind into surrounding areas, where it may be inhaled or deposited on persons and property, or in bodies of water.

Stormwater and wastewater associated with runoff from open storage piles of coke and coal can be discharged to waters of the State, including surface water and groundwater. As many coke and coal bulk terminal facilities, particularly larger facilities, are located near larger waterways, the potential threat of a release of contaminants into such waterways increases. Inadequately controlled discharges into surface waters can lead to excessive floating debris or bottom deposits that could adversely affect aquatic life. Additionally, unlined sedimentation ponds at coke and coal storage sites pose a threat to groundwater contamination due to leaching of metals and other constituents associated with these large storage piles.

Several large bulk storage terminals are located in Cook County. Generally, these facilities unload coal and coke from trucks, barges, and/or railcars, convey the materials to storage piles (where the materials remain for varying lengths of time), transfer the materials on site, convey the materials to loading operations, and load the materials for transport to end users. Outdoor storage piles of coke and coal vary in size by facility, but have been found to be 75 or more feet high and several hundreds of feet long and wide. Similar coke or coal bulk terminals may be operating in, or may come into operation in, other areas of the State as well.

Regarding bulk terminals located in Cook County, the Illinois EPA has become aware of complaints or observed that:

- a) Large clouds of black dust travel beyond facilities' property boundaries and into nearby neighborhoods, school yards, etc.;

- b) Coke/coal dust is deposited upon, and blown into, residences, schools, and businesses on a daily basis;
- c) Coke/coal dust accumulates on residents' lawns, pools, vehicles, residential siding and brick, and outdoor and indoor furniture;
- d) Residents are forced to avoid opening their windows or engaging in outdoor activities;
- e) Residents have respiratory conditions that have been aggravated by coke/coal dust emissions;
- f) Large, uncovered piles of coke/coal are being stored directly adjacent to water bodies;
- g) Through the use of inadequate berms and/or unlined sedimentation ponds, runoff from these coke and coal storage sites is being contained in a manner that allows stormwater and/or wastewater into waters of the State;
- h) Coke/coal has been deposited into off-site storm sewers, which ultimately discharge to waters of the State.

B. Standard for Adoption of Emergency Regulations

Section 27(c) of the Act authorizes the Board to adopt emergency regulations pursuant to and in accordance with Section 5-45 of the Illinois Administrative Procedure Act ("Illinois APA") when the Board "finds that a situation exists which reasonably constitutes a threat to the public interest, safety or welfare." 415 ILCS 5/27(c).

Similarly, Section 102.612 of the Board's regulations provides:

- a) *When the Board finds that a situation exists which reasonably constitutes a threat to the public interest, safety, or welfare, the Board may adopt regulations pursuant to and in accordance with Section 5-45 of the IAPA [415 ILCS 27(c)].*

- b) *When the Board finds that a severe public health emergency exists, the Board may, in relation to any proposed regulation, order that such regulation shall take effect without delay [415 ILCS 5/27(c)].* The Board will proceed with any required hearings while the regulation continues in effect.

35 Ill. Adm. Code 102.612.

Section 5-45 of the Illinois APA provides, in pertinent part:

- (a) "Emergency" means the existence of any situation that any agency finds reasonably constitutes a threat to the public interest, safety, or welfare.
- (b) If any agency finds that an emergency exists that requires adoption of a rule upon fewer days than is required by Section 5-40 and states in writing its reasons for that finding, the agency may adopt an emergency rule without prior notice or hearing upon filing a notice of emergency rulemaking with the Secretary of State under Section 5-70. The notice shall include the text of the emergency rule and shall be published in the Illinois Register. . . Subject to applicable constitutional or statutory provisions, an emergency rule becomes effective immediately upon filing under Section 5-65 or at a stated date less than 10 days thereafter. The agency's finding and a statement of the specific reasons for the finding shall be filed with the rule. The agency shall take reasonable and appropriate measures to make emergency rules known to the persons who may be affected by them.
- (c) An emergency rule may be effective for a period of not longer than 150 days, but the agency's authority to adopt an identical rule under Section 5-40 is not precluded.

5 ILCS 100/5-45.

III. PURPOSE AND EFFECT OF THE PROPOSAL

The Agency's proposal is intended to address inadequately controlled fugitive PM emissions, along with inadequately controlled discharges of stormwater and wastewater to waters of the State, from handling, processing, transport, and storage operations at coke or coal bulk terminals. Emissions of fugitive PM from coke or coal bulk terminals are inadequately controlled, and cannot be adequately controlled unless certain operations at the facilities are enclosed within a building or other structure. As enclosures may take a year or more to design and construct, they are incapable of providing immediate protection against the threats posed by

these operations. The proposed emergency amendments therefore require immediate measures, including road paving, use of dust suppression systems, setback requirements for storage piles from facilities' property lines and nearby water bodies, containment of contaminated stormwater and/or wastewater, and disposal of coke and coal that has been on-site for more than a year.

Other statewide coke or coal bulk terminals could encounter problems similar to those at Cook County bulk terminals. Statewide application of the proposed emergency regulations is therefore necessary to ensure consistent regulation throughout Illinois and to prevent a localized problem from simply relocating to otherwise unregulated parts of the State. It is also key that the proposed amendments are in place before the Agency is compelled to take action on any new permit applications for coke or coal bulk terminals.

While the Board's current regulations generally address fugitive PM emissions and stormwater and wastewater runoff, the proposed emergency regulations are necessary to establish more detailed control requirements specific to emissions and discharges from coke and coal bulk terminal operations.

IV. GEOGRAPHIC REGIONS AND SOURCES AFFECTED

The proposed emergency regulations apply state-wide, and are generally expected to affect both new and existing coke or coal bulk terminals. A list of sources potentially impacted by the proposed rule is attached as Exhibit C, although other sources may be impacted as well. The list was created by searching the Bureau of Air's ("BOA") database for all sources that have an SCC code related to coal or coke and then reviewing the permits, emission unit descriptions, and readily available field and compliance data. The entire list was manually searched to remove sources that were clearly not coke or coal bulk terminals (such as refineries, coal mines, coal

combustion sources, etc.). The list was then manually evaluated once again by multiple BOA engineers to determine which sources were likely to be affected.

There are instances, however, where the emission inventory, permit, and permit application simply do not contain the necessary (or correct) detailed information to identify what products a permitted source is processing. In addition, there may be sources that have not obtained any permits – or may be transferring coke or coal without being permitted to do so – and thus the Agency does not have the information necessary to evaluate whether such sources should be included on this list.

V. TECHNICAL FEASIBILITY AND ECONOMIC REASONABLENESS

The control measures required in the proposed emergency regulations are believed to be technically feasible and economically reasonable, particularly in light of the threat to the public interest, safety, or welfare posed by uncontrolled emissions and discharges from coke or coal bulk terminals. As noted above, emissions of fugitive PM from coke or coal bulk terminals are inadequately controlled, and cannot be adequately controlled unless certain measures are taken, including the enclosure of certain operations at the facilities within a building or other structure. While total enclosure will take more time to implement, the immediate measures contained in the Agency's proposal can be technically and economically accomplished within the timeframes provided.

A. Fugitive Dust Controls

The proposed emergency rule requires that applicable sources begin moving toward total enclosure of their operations. Within forty-five days of the effective date of the rule, sources must provide a plan to the Agency to accomplish such enclosure as quickly as possible. The creation of such a plan is reasonable from both a technical and economic standpoint, and serves

to ensure that sources timely evaluate the proper technical steps to eventually reach total enclosure.

Other than submittal of plans, control measures required by the proposed rule include road paving, truck cleaning, street sweeping, use of dust suppression systems, use of vehicle covers, maintenance of railways such that they are free of loose material, pile height limits, setback limits, and other dust-minimization techniques. All of these requirements are technically feasible and most are in fact already in place in some fashion at different facilities in Illinois and across the country, as none of them require special technology. The only provision that may require technology that is not necessarily commonplace is the requirement that sources implement measures ensuring that dust suppression continues when temperatures fall below freezing; however, the Agency is aware of at least one source, through discussions with that source, that such measures are available and can be technically accomplished. Regarding setback requirements, the Agency believes that until such operations can be enclosed, operations in populated areas need to be a sufficient distance from the property line in order to minimize offsite impacts.

Nothing within this proposed emergency rule pushes the boundaries of technical feasibility. The Agency was careful to ensure that the included measures could be accomplished within the timeframes provided. Indeed, several control measures that have been recommended by outside parties, such as complete enclosures, are not included in the Agency's proposal, as the Agency recognizes that such measures will almost certainly take a greater amount of time than is available under the emergency rulemaking provisions.

The above measures are economically reasonable. As already noted, the requirements contained within this proposed emergency rule include the creation of an enclosure plan as well

as various dust-minimization techniques. None of these would exceed the cost threshold of economic reasonableness. Indeed, most of these requirements are expected to create little economic impact on the sources. The remaining requirements may pose a limited cost to sources and must be considered in light of the mitigation of coke and coal dust pollution. As noted above, the majority of requirements set forth in the proposal are currently implemented in some fashion at coke or coal bulk terminals across the country, and many within the State of Illinois as part of facilities' efforts to comply with existing regulations. As such, the proposed emergency rule is economically reasonable.

B. Water Pollution Controls

The proposed emergency rule requirement that coke or coal bulk terminals locate coke and coal piles at a distance greater than or equal to 200 feet from waters of the United States, public water supply reservoirs and intakes, and potable wells, is both technically feasible and economically reasonable. The piles can be easily moved to prescribed distances within 60 days after the effective date of the rule with the help of existing equipment and manpower at these facilities. The rule also requires that these piles be located on impermeable bases or pads. Construction of such surfaces is both technically feasible and economically reasonable within the sixty day timeframe provided in the rule.

The rule requires that these facilities implement certain controls that will protect waters of the State, stormwater collection systems, and minimize onsite and offsite migration of pollutants. These proposed controls to a great degree consist of typical housekeeping or sediment control measures currently being utilized at construction sites as well as sites that handle coal-related material. Given the common nature of many of these controls, the Agency

believes they can be technically implemented within the forty-five day timeframe allowed in the rule. Also, the cost of implementing these controls should not be prohibitive.

The proposed rule requires that applications for necessary permits be prepared and submitted to the Agency within forty-five days after the effective date. This is a reasonable timeframe for development and submittal of such plans.

The potential threat posed to major streams and groundwater by the location of the materials at these coke or coal bulk terminals justifies utilization of a 100-year, 24-hour precipitation event for design of sedimentation ponds. Similar design requirements have been required, imposed, and utilized at various coal- and coal refuse-related facilities in Illinois. In addition, synthetic and/or compacted clay liner requirements have been imposed at numerous facilities in Illinois that store or otherwise handle coke/coal-related materials. These requirements at coke or coal bulk terminals are both technically feasible and economically reasonable considering the potential threat posed to Illinois streams and groundwater resources.

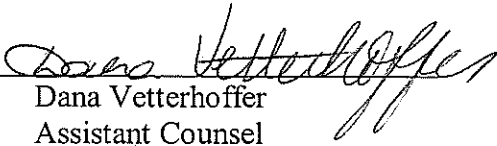
The rule's requirement to submit written documentation showing compliance with the wastewater and stormwater runoff controls will only add nominal cost to the existing cost of doing business.

C. Hazardous Waste Determinations

The Agency proposes requiring that owners and operators of coke and coal bulk terminals determine whether coke accepted for storage, handling, blending, processing, transport, or other management possesses attributes that make it similar to a hazardous waste, and prohibiting the acceptance of coke at these facilities when it does. The Agency is making this proposal to minimize threats to public health, safety, and welfare that are posed by any uncontrolled emissions or discharges of coke. Furthermore, the Agency is requiring these

determinations to ensure that coke that is stored onsite for more than one year (and therefore considered speculatively accumulated and abandoned/discarded and a waste) would not be a hazardous waste. The Agency proposes requiring documentation of these determinations to be kept onsite. This requirement simply facilitates the Agency's ability to identify whether members of the regulated community are complying with these additional requirements. Any additional costs incurred as a result of these requirements pale in comparison to the costs that the public would bear if the coke being emitted and discharged from these facilities possess attributes that make it hazardous. Furthermore, there are no anticipated issues with the technical feasibility of these requirements because the determinations required under this rule are the same well-used determinations required for all hazardous waste determinations.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: 
Dana Vetterhoffer
Assistant Counsel
Division of Legal Counsel

DATED: January 22, 2014
1021 N. Grand Ave. East
P.O. Box 19276
Springfield, IL 62794-9276
(217) 782-5544

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**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY’S REPLY
TO RESPONSES TO EMERGENCY RULEMAKING PROPOSAL**

The Illinois Environmental Protection Agency (“Illinois EPA” or “Agency”), by and through its attorneys, hereby replies to comments submitted to the Board in response to the Agency’s Proposal and Motion for Emergency Rulemaking. The Illinois EPA states as follows:

The Illinois EPA’s proposal addresses inadequately controlled fugitive particulate matter (“PM”) emissions and inadequately controlled stormwater and wastewater discharges from coke or coal bulk terminals in the State of Illinois. The Agency’s proposal is intended to address these emissions and discharges to the extent they reasonably constitute a threat to the public interest, safety, or welfare, an independent basis for an emergency rulemaking under Section 27(c) of the Illinois Environmental Protection Act (“Act”); the proposed rulemaking is not intended to address a “disaster emergency” or a “severe public health emergency” as those terms are used in Section 27(c) of the Act.

Recent events justify an emergency rulemaking for coke or coal bulk terminals statewide. Coke and/or coal storage, transfer, and handling have recently increased both in volume and in frequency to the extent that nearby residents in at least one area of the State have been significantly impacted by pollution from such operations. Further, the State has seen an increase in the number of permit applications for these facilities in recent months, indicating a possible expansion of such operations. Statewide application of the proposed control measures is

necessary to ensure regulatory consistency throughout Illinois and to prevent uncontrolled emissions from bulk terminal facilities from simply shifting within the State. Emissions and discharges from coke or coal bulk terminals may present a reasonable threat to the public interest, safety, or welfare in any area of the State, regardless of the size of the terminal; any coke or coal bulk terminal that is not utilizing the proper control measures, as outlined in the Agency's proposal, potentially poses a threat that must be addressed.

The Agency's proposal addresses both coke and coal, as bulk transfer operations often handle both materials in similar ways, store large piles of both materials, and have dust problems from both materials that can be addressed by many of the same methods. Given the large number of similarities in such operations, it is logical and proper to address both materials at the same time, in the same emergency rulemaking. The Agency does not seek to address materials other than coke and coal at this time, as no emergency situation involving other materials has been found.

As discussed in the Agency's Proposal and Motion for Emergency Rulemaking, dust from both coke and coal is a type of fugitive PM, subject to National Ambient Air Quality Standards. According to the USEPA, exposure to PM can have serious health consequences, such as cardiovascular and respiratory effects and increased mortality. Several at-risk populations may be especially susceptible to PM-related effects, including those with preexisting heart or lung diseases and those with certain genetic disorders, as well as children and the elderly.

The Agency's process in evaluating the current situation and developing the proposed regulations has understandably taken some time. Any perceived delay between the Agency's discovery of the inadequately controlled emissions and discharges and the filing of the Agency's

current proposal should not diminish the Agency's determination that a reasonable threat to the public interest, safety, or welfare currently exists.

The proposed regulations are not intended to negatively impact other industries via impacts upon coke or coal bulk terminals, nor does the Agency expect other industries will be negatively impacted in such a manner. The requirements placed upon these facilities are believed to be technically feasible and economically reasonable. The majority of the proposed control measures, including dust suppression systems, vehicle covers, street sweeping, and truck washing, are currently implemented in some fashion at coke or coal bulk terminals across the country, and many within the State of Illinois as part of facilities' efforts to comply with existing regulations. The economic impact upon bulk storage operations, and thus upon other industries that utilize these operations, should be limited and must be considered in light of the mitigation of coke and coal dust pollution. The proposed requirements are not intended to interfere with the transport of coke and coal from the producer or to the end user or to "shut down" existing coke or coal bulk terminals, but rather to help reduce the negative impact of these operations upon the State of Illinois.

The proposed regulations require that coke or coal bulk terminals submit a plan for total enclosure of certain operations. The proposed rule does not, however, require construction of a total enclosure, as the Illinois EPA recognizes that constructing buildings or other structures will most likely take more than 150 days. The plan submittal requirement is merely intended to ensure that sources timely evaluate the proper technical steps to eventually reach total enclosure.

Regarding the proposed hazardous waste determination provisions, on pages 29 through 31 of its comments, KCBX asks the Board to strike Subpart D of the proposed emergency rule because it creates a presumption that petroleum coke is a waste. Subpart D is not intended to

create such a presumption. The Agency recognizes that petroleum coke is a refining industry by-product with known legitimate uses when appropriately managed. The intent of Subpart D of the proposed rule is simply to have owners and operators of coke and coal bulk terminals determine whether coke accepted for storage, handling, blending, processing, transport, or other management possesses the same attributes as hazardous waste, if handled as a waste instead of as a product. In short, the Agency's proposal is intended to minimize threats to public interest, safety, and welfare posed by any uncontrolled emissions or discharges of coke at these facilities by ensuring that the coke does not have the same attributes as hazardous waste. The Agency is also requiring these determinations to ensure that coke that is stored onsite for more than one year (and therefore considered speculatively accumulated and abandoned/discarded and a waste) would not be a hazardous waste. This is important to a determination as to where such material may be disposed.

Regarding the proposed water pollution controls, it is not anticipated that KCBX would have to shut down its entire operation for several months and remove all material from the site to install an impermeable base or pad as it has alluded to on page 21 of its comments. With proper planning and coordination, a phased approach to base or pad installation would allow for materials on one side of the facility to be relocated or shipped offsite allowing for initial base construction. As this section of the base is constructed, a portion of the stockpiled material may be relocated onto the pad allowing for advancement of pad construction into the area where stockpiled material was removed and relocated.

The pooling of water is not beneficial and should not be encouraged as indicated in the approach apparently taken by KCBX. Pooled water in contact with coke or coal related material promotes the generation of acid water conditions with low pH and high iron concentrations. This

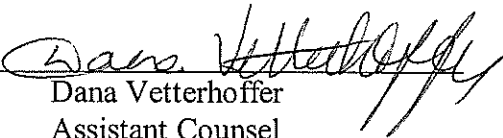
practice should not be promoted or encouraged. Maintaining positive drainage away from coke or coal stockpile areas to prevent ponding or pooling of water in contact with such material is a basic and standard Best Management Practice for coal stockpile management to prevent acid water conditions.

As the KCBX bulk materials handling facilities are located adjacent to a large waterway, the potential threat of a release of contaminants is increased, and enhanced precautions such as designing for larger storm events and providing additional stormwater containment is prudent and justified.

The Illinois EPA is filing a Statement of Reasons concurrent with the filing of this Reply.

The Illinois EPA plans to initiate a general rulemaking with the Board to further codify the protections addressed in this emergency rulemaking. The Agency will do so after conducting outreach with all affected parties in order to present the Board with a comprehensive and long-term approach to regulating coke or coal bulk terminals. Based on such outreach, the Illinois EPA may propose regulations that differ from the requirements in the Agency's current proposal.

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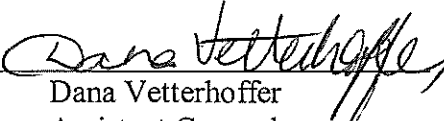
To: John Therriault, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601-3218

Marie Tipsord
Hearing Officer
Illinois Pollution Control Board
100 W. Randolph St., Suite 11-500
Chicago, IL 60601

PLEASE TAKE NOTICE that I have today filed with the Office of the Pollution Control Board the STATEMENT OF REASONS, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S REPLY TO RESPONSES TO EMERGENCY RULEMAKING, and NOAA ATLAS 14 (incorporated by referenced into the proposed regulations) of the Illinois Environmental Protection Agency, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
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By: 
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DATED: January 22, 2014

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Sources Potentially Subject to Coke or Coal Bulk Terminals Emergency Rulemaking

1. KCBX Terminals Co, 3259 East 100th Street, Chicago, Cook County
2. KCBX Terminals Company, 10730 South Burley Avenue, Chicago, Cook County
3. Calumet Transload Railroad LLC, 11400 South Burley Avenue, Chicago, Cook County
4. Geo J Beemsterboer Co Inc., 2900 East 106Street @ Calumet River, Chicago, Cook County
5. North American Stevedoring Co, 9301 S Kreiter Ave., Chicago, Cook County
6. Archer Daniels Midland Company (ADM) Foot of Brunner Street, LaSalle, LaSalle County
7. Beelman River Terminals, Inc., 210 Bremen Avenue, Venice, Madison
8. Phoenix Terminal Company, Inc. 1301 West Piasa Lane, Hartford , Madison County
9. IEI Barge Services- East Dubuque 18525 Highway 20 West, East Dubuque, Jo Daviess County
10. Kinder Morgan Cahokia Terminal, #2 Monsanto Avenue, Sauget, St. Clair County
11. Kinder Morgan Bulk Terminals 262 Cora Road, Rockwood, Jackson County
12. AEP Generating Company-Cook Coal Terminal, Cook Coal Terminal, 3316 North US 45 Road, Metropolis, Massac County
13. Lone Eagle Dock, Rural Randolph County
14. Ohio River Dock Corp, Il State Route 146, Elizabethtown, Hardin County
15. Vulcan Construction Materials LP, Job Corps Rd, Golconda, Hardin County
16. Empire Dock Inc, Rte 1 Box 110 Job Corps Rd, Golconda, Hardin County
17. Consolidated Grain & Barge Co Inc, 7305 Illinois Hwy 26, Princeton, Bureau County
18. Marine Material Handling Corporation (currently operates under Oxbow Midwest Calcining, LLC's CAAPP permit), 12308 South New Avenue, Lemont, Will County
19. County Materials Corporation, 2052 N 2753 Rd, Ottawa, La Salle County
20. Havana Dock Enterprises LLC, 17810 E Manito Rd, Havana, Mason County
21. J & L Dock Facilities Inc, 6 Sanger St, Peoria, Peoria County
22. Mosaic Crop Nutrition LLC, 8710 S Cargill Rd, Pekin, Peoria County
23. Midwest Transload LLC, 1967 Pyatt-Cutler Rd, Cutler, Peoria County
24. Consolidated Grain & Barge Co, 201 N Missouri St, Mound City, Pulaski County
25. Vermilion Transmodal LLC, 3200 E Main St, Danville, Vermilion County
26. Consolidated Grain & Barge Co, #3 Cargill Elevator Rd, Cahokia, St. Clair County
27. River Docks Inc, 2400 Water St, Peru, La Salle County
28. Growmark Inc, 520 Shipyard Rd, Seneca, La Salle County
29. US Silica Co, Dee Bennett Rd, Ottawa, La Salle County
30. Ozinga Materials Inc., Rt 26 and Gro Mark Elev Rd, Lacon, Marshall County
31. Metropolis Ready Mix, 1200 E 2nd St, Metropolis, Massac County
32. Kaskaskia Regional Port District, 10349 Riverview Dr, Baldwin, Randolph County
33. Kellogg Terminal, 3500 S Levee Rd, Modoc, Randolph County
34. Cahokia Acres LLC, 189 American Grain St, Cahokia, St Clair County
35. Kaskaskia Regional Port District, 7405 Pike Sawmill Rd, New Athens, St Clair County
36. American Milling Co, 1700 S 2nd St, Pekin, Tazewell County
37. Archer Daniels Midland Company, 300 Enterprise Street, Mound City, Pulaski County