BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

Wabash Valley Service Company	)
(Property Identification Number	) **PCB No.**
03-23-024-002)	) **(Tax Certification)**
	)

NOTICE

Steve Santarelli
Illinois Department of Revenue
101 West Jefferson
Post Office Box 19033
Springfield, Illinois 62794

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

Kent Ochs
Wabash Valley Service Company
909 N. Court Street
Grayville, Illinois 62844

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

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: Christine M Zeivel

Christine M. Zeivel
Assistant Counsel
Division of Legal Counsel

DATED: June 11, 2018

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

Wabash Valley Service Company	)
(Property Identification Number	) **PCB No.**
03-23-024-002)	) **(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: Christine M Zeivel

Christine M. Zeivel
Assistant Counsel
Division of Legal Counsel

DATED: June 11, 2018

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

Wabash Valley Service Company	)
(Property Identification Number	) **PCB No.**
05-1-34-161-07)	) **(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 September 5, 2017, the Illinois EPA received a request from Kent Ochs of Wabash Valley Service Company (log number TC-138602, 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:

Wabash Valley Service Company
1724 US Highway 45
Cisne, IL 62823

The proposed water pollution control facilities in this request are located at Section 23, T1N, R7E of the 3rd P.M. in Wayne County, at the above street address and consist of the following:

> Agrichemical containment structures consisting of one dry fertilizer operational containment structure (greatest dimensions 58 ft. x 192.5 ft.); one dry fertilizer operational containment structure (14 ft. x 32.33 ft.); one dry fertilizer operational containment structure (17 ft. x 17 ft); one dry fertilizer operational containment structure (12 ft. x 30.92 ft.); one dry fertilizer operational containment structure (greatest dimensions 48.58 ft. x 60 ft.); one dry fertilizer blending operational containment structure (12.83 x 94 ft.); and the portion of the building over the operational containment structures as approved under the Agency endorsed

Agrichemical Facility Permit No. 93032063 (Log No. 16011887 issued on February 23, 2016).

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

3. Section 11-10 of the Property Tax Code, 35 ILCS 200/11-10 (2016), 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 (2016), pollution control facilities must be certified as such by the Board, 35 ILCS 200/11-20 (2016) 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: Christine M Zeivel

Christine M. Zeivel
Assistant Counsel
Division of Legal Counsel

Dated: June 11, 2018
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

BRUCE RAUNER, GOVERNOR ALEC MESSINA, DIRECTOR

Memorandum

To: Charles Gunnarson, Division of Legal Counsel

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

Date: May 31, 2018

Re: Wabash Valley Service Company – Cisne
Recommendation of Tax Certification
Log # TC-138602
Property Identification # 03-23-024-002

The Bureau of Water received a request on September 5, 2017 from Wabash Valley Service Company 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:

Wabash Valley Service Company
1724 US Highway 45
Cisne, IL 62823

Section 23, Township 1N, Range 7E of the 3rd PM in Wayne County.

Agrichemical containment structures consisting of one dry fertilizer operational containment structure (greatest dimensions 58 ft. x 192.5 ft.); one dry fertilizer operational containment structure (14 ft. x 32.33 ft.); one dry fertilizer operational containment structure (17 ft. x 17 ft.); one dry fertilizer operational containment structure (12 ft. x 30.92 ft.); one dry fertilizer operational containment structure (greatest dimensions 48.58 ft. x 60 ft.); and one dry fertilizer blending operational containment structure (12.83 ft. x 94 ft.); and the portion of the building over the operational containment structures as approved under the Agency endorsed Agrichemical Facility Permit No. 93032063 (Log No. 16011887 issued on February 23, 2016).

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

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

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

If you have any questions regarding the above, please contact Thaddeus Faught at 217 782-0610.

DEL:TJF:TC-138602(2).docx

cc: Tax Cert File

EXHIBIT A

Supplemental Notes for TC-138602
Wabash Valley Service – Cisne
Agrichemical Storage Area (Dry Fertilizer)
Reviewed by: TJF

Previous recommendation memo was approved 2/09/2018. NO CHANGES are proposed to the structures recommended for certification. Below (and attached) is clarification of the different structures since some that were withdrawn are within the same buildings as approvable structures.

In the application box entitled "Describe the Pollution Control Facility (or Low Sulfur Dioxide Emission Coal Fueled Device):" (page 2) the applicant listed each structure (1-7) in the same order they are listed in the Department of Agriculture Permit AC93032063 issued February 23, 2016. See attached marked-up copy of Permit AC93032063 for clarification.

Structure 1) 120' x 192.5 dry fertilizer and operations building includes the "dry fertilizer storage bin area" withdrawn by the applicant in their February 6, 2018 letter. The storage bins have a primary purpose to store product and protect the integrity (avoid caking) of the dry fertilizer.

Structures 2, 3, 5, 6 and 7 are the operational containment structures that are eligible for certification and listed as such in the recommendation memo.

Structure 4 is the dry fertilizer blending operational containment structure (12.83ft x 94ft x 2.5ft) that is eligible for certification and listed as such in the recommendation memo.

It should be noted that structures 1, 2 and 4 are all within the same building, thus the language in the memo stating "...the portion of the building over the operational containment structures..." This is meant to include the building over operational containment structures 2 and 4 BUT NOT the building over storage structure 1 (the "dry fertilizer storage bin area" that was withdrawn). Also see marked-up plot plans for clarification.

ACTION → Draft a new memo that clearly identifies the dimensions of the structures being approved.

In both the attached marked up Department of Agriculture Permit and on page 2 of the application in the "Describe the Pollution Control Facility (or Low Sulfur Dioxide Emission Coal Fueled Device):" box, structures 2 through 7 <u>are</u> eligible and recommended for tax certification. Structure 1 is <u>not</u> eligible and was withdrawn by the applicant on February 6, 2018.

3/23/18

State of Illinois
Department of Agriculture

AGRICHEMICAL CONTAINMENT PERMIT

AGRICHEMICAL FACILITY PERMIT MODIFICATION

Permittee:		**Facility ID Number:**	AC1913150000
		Facility Location:	Cisne
Wabash Valley Service Company 909 N. Court St. Grayville, IL 62844			
Permit #:	AC93032063	**Log Number:**	16011887
Facility Type:	Commercial: Retail Dealer	**Date Received:**	January 4, 2016
Date Issued:	February 23, 2016	**Expiration Date:**	May 24, 2018

A permit modification is hereby granted to the above designated permittee to construct and/or operate an agrichemical facility which was previously approved under the above referenced permit number. The facility and associated permit has been modified as follows:

DRY FERTILIZER STRUCTURES

Installation and operation of an existing bulk dry fertilizer storage building with the greatest dimensions measuring 120' (width) x 192.5' (length) with an estimated total storage capacity of 7,700 tons. The structure is composed of six (6) storage bins (two (2) bins, each measuring 24.67' (width) x 40' (length) with an estimated storage capacity of 250 tons, one (1) bin measuring 58' (width) x 65.42' (length) with an estimated storage capacity of 2,400 tons, one (1) bin measuring 58' (width) x 65.42' (length) with an estimated storage capacity of 3,000 tons, one (1) bin measuring 30.5' (width) x 58' (length) with an estimated storage capacity of 700 tons, and one (1) bin measuring 30.5' (width) x 58' (length) with an estimated storage capacity of 1,100 tons).

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

2. Installation and operation of a reinforced concrete operational containment structure with the greatest dimensions measuring 58' (width) x 192.5' (length). All end loader transfer of bulk dry fertilizer between storage and the blenders shall be performed upon the herein permitted structure.

3. Installation and operation of a reinforced concrete operational containment structure measuring 14' (width) x 32.33' (length). The unloading of bulk dry fertilizer transportation and application equipment shall be performed upon the herein permitted structure.

4. Installation and operation of a reinforced concrete operational containment structure measuring 12.83' (width) x 94' (length) x 2.5' (depth). All blending of bulk dry fertilizer shall be performed upon the herein permitted structure.

5. Installation and operation of a reinforced concrete operational containment structure measuring 17' (width) x 17' (length). The bulk dry fertilizer elevation tower shall be located upon the herein permitted structure.

State of Illinois
Department of Agriculture
AGRICHEMICAL CONTAINMENT PERMIT

(16) Installation and operation of a reinforced concrete operational containment structure measuring 12' (width) x 30.92' (length). The bulk dry fertilizer unloading conveyor shall be located upon the herein permitted structure.

(17) Installation and operation of a reinforced concrete operational containment structure with the greatest dimensions measuring 48.58' (width) x 60' (length). All loading of bulk dry fertilizer transportation and application equipment shall be performed upon the herein permitted structure.

This permit modification has also been reviewed and approved by the Illinois Environmental Protection Agency per the attached permit modification endorsement. The expiration date of this permit modification shall remain the same as issued on the original permit.

All Special Conditions on the original permit issued are also applicable to this permit unless specifically deleted or revised in this permit.

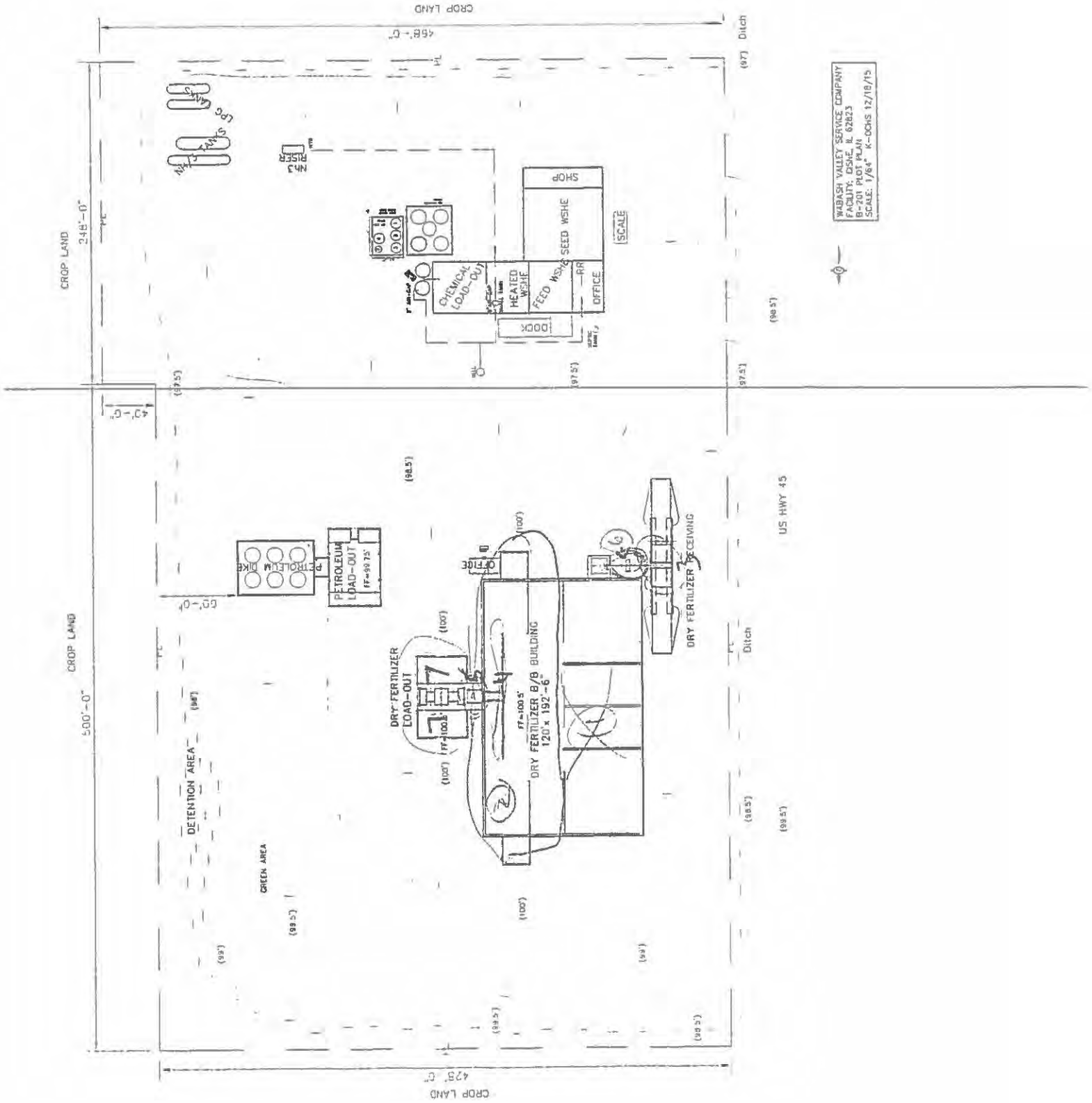
SPECIAL CONDITION 1: The permittee shall operate the exposed dry fertilizer operations pursuant to 8 Illinois Administrative Code 255.140 (a), (c) and (d).

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

John Teefey, Chief
Bureau of Environmental Programs

Brad A. Beaver, Manager
Permits and Downstate Field Operations

IEPA WPC: Permits
file
191315 pmod


CROP LAND
468'-0"
Ditch
WABASH VALLEY SERVICE COMPANY
FACILITY: OSHE # 62823
PLOT PLAN
SCALE: 1/64" K-OOHS 12/18/15
LPG TANKS
SCALE
SHOP
SEED WSHE
CHEMICAL LOAD-OUT
HEATED WSHE
FEED WSHE
AIR
OFFICE
DOCK
CROP LAND
248'-0"
(97.5')
(98.5')
40'-0"
PETROLEUM DIKE
PETROLEUM LOAD-OUT
FF=99.75'
OFFICE
(100')
US HWY 45
DRY FERTILIZER RECEIVING
DRY FERTILIZER LOAD-OUT
FF=100.5'
DRY FERTILIZER B/B BUILDING
120'x 192'-6"
FF=100.5'
DETENTION AREA
(98')
GREEN AREA
(99.5')
(99')
500'-0"
425' C.
CROP LAND

WVSC-CISNE: Dry Fertilizer Flow Diagram

1) Load-in: Transports (1A) pull across a raised reinforced concrete pad and unloads into a hopper (1B), which feeds an above ground inclined drag paddle conveyor.

2) The enclosed 66' Drag Paddle Conveyor is stainless steel constructed and rated at 120 tons/hour. It lifts the dry fertilizer up and through a spout drops the product into the tripper conveyor.

3) The 24" wide x 196'-6" Tripper Conveyor is stainless steel constructed. It runs across the top of the main product bins and out the South end on the canvas structure. This conveyor delivers the product to the appropriate bin and anywhere along its length. This is accomplished by moving the shuttle (tripper) to the desired spot, which causes the belt to twist slightly. Thus causing the product to run off the side of the conveyor. The portion of the conveyor which extends outside of the canvas structure is completely enclosed.

4) Storage: 120' wide x 192'-6" long reinforced concrete structure with 16" thick x 16' tall walls and 8" floor. "Calhoun VP Series Building" roof system consists of galvanized steel tubing- roof trusses support the canvas-like tarp material covering. This system covers and protects the entire structure from precipitation. Two overhead doors on either end of the building allow equipment access. Transports will be able to drive in and back up to the end storage bins and unload.

5) End loader: Travels between the storage bins and blender inside the building

6) RANCO Declining-Weight Volumetric Blending System: is all stainless steel constructed and consist of a series of five 12' wide x 7' deep-10 ton hoppers, two 5 5'x 5 5' bulk seed hoppers, and one micro-nutrient additive bin. Through the use of metering units located under each hopper the product is weighed out and dropped into and enclosed blending augers located directly behind the hoppers. These enclosed 16" x 44' s/s blending augers delivers the product to a common auger.

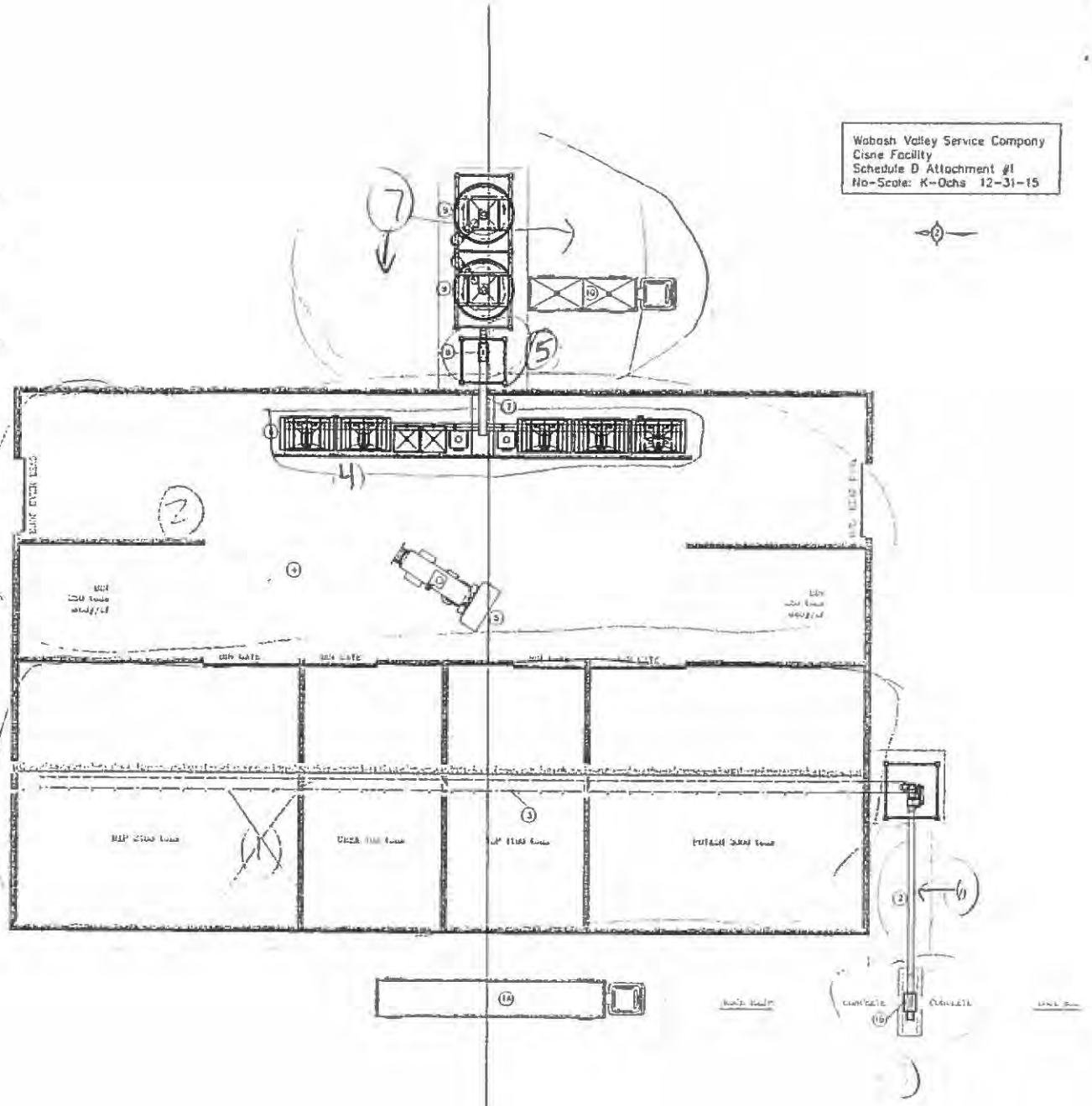
7) Common Auger: 18"x 16' s/s enclosed auger takes the blended plant food to the load-out bucket elevator.

8) 73' Load-out bucket elevator is stainless steel constructed and rated at 250 tons/hour. This bucket elevator lifts the blended products up and through stainless steel spouting, delivers it into either of the two-weigh hoppers

9) Weigh hoppers hold the staged blended plant food until the applicator is ready to load: two 30 ton over head weigh hoppers are cone bottom stainless steel constructed. Both are enclosed within their own s.s tank-like structure. These structures act both as a wind breaks and dust emission control devices. Other dust control devices include canvas shrouds and spouting

10) Application equipment pull under one of the two over-head weigh hoppers and onto reinforced concrete to receive its load

Note: All portions of this dry fertilizer system sit on reinforced concrete. Any spillage will be swept up daily and reused



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397
BRUCE RAUNER, GOVERNOR ALEC MESSINA, DIRECTOR

Memorandum

To: Charles Gunnarson, Division of Legal Counsel

From: Darin LeCrone, Manager, Industrial Unit, Permit Section DEL

Date: FEB 0 9 2018

Re: Wabash Valley Service Company – Cisne
Recommendation of Tax Certification
Log # TC-138602
Property Identification # 03-23-024-002

The Bureau of Water received a request on September 5, 2017 from Wabash Valley Service Company 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:

Wabash Valley Service Company
1724 US Highway 45
Cisne, IL 62823

Section 23, Township 1N, Range 7E of the 3rd PM in Wayne County.

Agrichemical containment structures consisting of five dry fertilizer operational containment structures; and one dry fertilizer blending operational containment structure; and the portion of the building over the operational containment structures as approved under the Agency endorsed Agrichemical Facility Permit No. 93032063 (Log No. 16011887 issued on February 23, 2016).

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

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

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

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

DEL:TJF:TC-138602.docx

cc: Tax Cert File

Watershed Unit Tax Certification Review Sheet

Project Name: Wabash Valley Service Company
Reviewer: Thaddeus Fraught
Log No.: TC-138602

Location: Cisne
Date: 2/7/18
Type: ☒ Agchem ☐ Livestock

Applicant: Wabash Valley Service Company
909 N. Court Street
Grayville, IL 62844
618-842-5631

Contact: Kent Ochs
Phone: 618-842-5631
kentochs@wabashvalleyfs.com

Facility: Wabash Valley Service -- Cisne
1724 US. Highway 45
Cisne, IL 62823
618-842-5631

Property ID: 03-23-024-002

Legal Description: Section 23 T1N R7E of 3rd PM

County: Wayne

Date Control Devices Installed: 8/2016

Provided Fair Cash Value: Not on new form

Signature: by kent ochs

Title: regulatory & safety coordinator

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

Physical Description of Pollution Control Devices:
Structures eligible include operational containment structures for dry fertilizer
see permit AC930037063 attached to application:

- Five (5) operational containment structures (dry)
  - 59 x 192
  - 14 x 32.33
  - 17 x 17
  - 17 x 70.92
  - 48.5 x 60
- one blending operational containment structure (dry)

primary purpose: pollution control

Structures NOT eligible:
dry fertilizer storage bins

The primary purpose of these structures is storage and to protect quality of product. ⇒ Not eligible

Other: These structures were withdrawn as eligible per from Kent Ochs.

Structures described in "Describe the pollution control facility" box in the application form and in attached permit AC930037 pg. 3.
Note: "dry storage bins were withdrawn in 2/6/18 letter from Kent Ochs.

Waste flow ⇒ any spills/rainfall precipitation is contained in structures and recycled. Described in "Evidence to support

Wabash Valley
MY COOPERATIVE
MY FUTURE

909 North Court Street · Grayville, IL 62844
Phone: (618) 375-2311 · Toll Free (888) 869-8127 · Fax: (618) 375-5351

February 6, 2018

Illinois Environmental Protection Agency
Attention: Permit Section
1021 North Grand Avenue East, P.O. Box 19276
Springfield, IL 62794-9276

Mr. Thaddeus Faught, P.E.,

Re: Pollution Control Facility (WPC Construction Permit # AC93032063)

Per our phone conversation this morning, it is my understanding that dry fertilizer storage areas are not considered under the pollution control criteria. In light of this, I would like to withdraw the dry fertilizer storage bin area from our Cisne facility application.

If you have any questions, please feel free to contact me.

Sincerely,

Kent A. Ochs
Regulatory & Safety Coordinator

TJF

TC-138602

Illinois Environmental Protection Agency

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

Application for Certification (Property Tax Treatment)
Pollution Control Facility

FOR AGENCY USE ONLY			
File Number:		Date Rec'd	
Certification Number:		Date:	

Facility Type (check one): ○ Air ⊘ Water

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

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

RECEIVED
SEP 05 2018
IEPA
BOW/WPC/PERMIT SECTION

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

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

I. Applicant Information:

Company Name: Wabash Valley Service Company

Person Authorized to Receive Certification	Kent Ochs	Person to Contact for Additional Details	Kent Ochs
Street Address:	909 N.Court Street	Street Address:	909 N. Court Street
City:	Grayville State: IL	City:	Grayville State: IL
Zip:	62844 Phone: 618-842-5631	Zip:	62844 Phone: 618-842-5631
Email Address:	kentochs@wabashvalleyfs.com	Email Address:	kentochs@wabashvalleyfs.com

II. Facility Information:

Facility Location: Quarter Section: 23 Township: T1N Range: R7E

Municipality: Cisne Township: Bedford

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

Address: 1724 US Highway 45 City: Cisne

State: IL Zip Code: 62823 County: Wayne Book Number:

Property Index Number: 03-23-024-002

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:

Mixing and storing of Agrichemicals and Fertilizers

Permit Information:

WPC Construction Permit Number:	AC93032063	Date Issued:	Feb 23, 2016		
NPDES Permit Number:		Date Issued:		Exp. Date:	
APC Construction Permit Number:		Date Issued:			
APC Operating Permit Number:		Date Issued:	May 4, 2016	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:

Materials Used in the Process:

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):

Agrichemical containment structures consisting of seven operational area containment structures: 1) 120' x 192.5' dry fertilizer and operations building; 2) 58' x 192" Concrete Operational Containment Structure (COCS), 3) 14' x 32.33' COCS, 4) 12.83' x 94' x 2.5' COCS; 5) 17' x 17' COCS; 6) 12 x 30.92' COCS; & 7) 48.5' x 60' COCS. The building covering any of said structures which prevent rain water from washing off of COCSs thereby maintaining the integrity of the collection device as approved under the Agency endorsed Agrichemical Facility Permit AC93032063.

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

See attached fact sheet describing the importance of the Best Management Practices (BMPs) in controlling pollution around agrichemical operational areas.

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; Sub Chapter i; Pesticide Control Agricultural Facilities, Part 255

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

	Material Retained, Captured or Recovered	
Contaminant or Pollutant	Description	Disposal or Use
agrichemicals and Fertilizer	Spilled Products	Waste

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: August 2016

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

Status of installation on date of application:

Operational

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))

Kent Ochs — Printed Name:

Regulator and Safety Coordinator — Title:

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

Signature:

8-31-17 — Date:

Document Index for Wabash Valley Service Company Application for Certification:

Browns Dry Fertilizer Plant

1) Application (3 pages)
2) Application Index (1 page)
3) Evidence to Support Primary Purpose of Building covering Operational and Secondary Containment Structures (2 pages)
4) Drawings of Fuel Facility (2 pages)
5) Google Earth View of Facility with improvements identified with red box (1 page)
6) Agrichemical Facility Permit AC93032063 (2 pages)

Evidence to Support Primary Purpose of Buildings Covering Dry Fertilizer Storage and Operational Containment Areas

The following factual information supports the contention that the building covering the storage and operational containment areas of dry fertilizer operations is integral to the best management practices of the subject facilities to minimize exposure of storm water runoff at the product storage, mixing and transfer areas where the highest probability of a leak or spill is present.

"Best management practices (BMPs) are recognized as an important part of the National Pollution Discharge Elimination System (NPDES) permitting process to prevent the release of toxic and hazardous chemicals." "Over the years as (BMPs) for many different types of facilities have been developed, case studies have demonstrated not only the success but the flexibility of the BMP approach in controlling releases of pollutants to receiving waters."[1]

USEPA guidance documents for developing storm water pollution prevention plans mention facility runoff generated principally from rainfall on a plant site.

> "Runoff can become contaminated with harmful substances when it comes in contact with material storage areas, loading and unloading areas, in-plant transfer areas, and sludge and other waste storage/disposal sites."[1]

Part 255.140 (a) of Title 8 Illinois Administrative Code, Chapter I, Sub Chapter i, Pesticide Control Agricultural Facilities: **Dry Fertilizer Storage and Handling:**

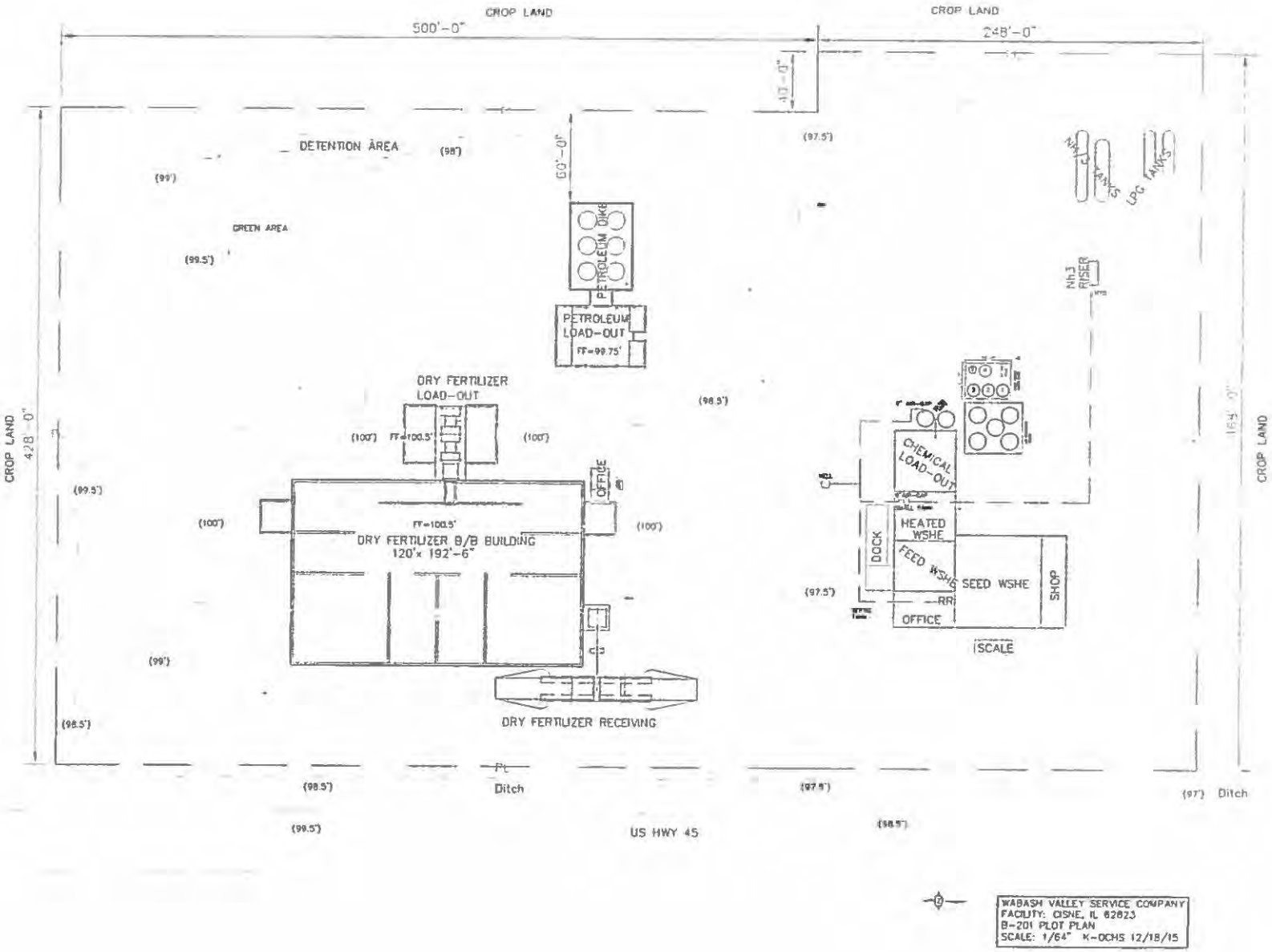
a) Dry fertilizer materials shall be stored and handled in a manner to prevent pollution by minimizing losses to the air, surface water, underground water or subsoil.
b) Non liquid fertilizers shall be stored inside a sound structure or device having a cover or rooftop, sidewalls and base sufficient to prevent contact with precipitation and surface waters.
c) All Loading, unloading, mixing and handling of dry fertilizer, unless performed in the field of application, shall be done using a containment method, device or structure. The containment method, device or structure shall be of a size and design that will contain the fertilizer and operated to minimize emission of dust and/or vapors beyond the facility boundaries. Any collected material shall be applied at agronomic fertilizer rates or otherwise recycled.
d) Containment, devices or structures may include, but are not limited to, the following methods:
    1) Paving and curbing of outdoor handling areas with materials that allow for collection and recycle or reuse of storm water, and that are sealed or otherwise maintained to provide a rate of permeability not to exceed 1 x 10 [-6] centimeters per second.
    2) Enclosing conveyors and equipping conveyors with dust control boots. Manually extendable boots may be adaptable to upright and auger type conveyors.
    3) Enclosing handling areas
    4) Collection and recycle of contaminated precipitation from rooftops of roof-filled storage structures.
    5) Daily cleanup of outside area when in use.

(Source: Amended at 26 Ill. Reg. 1038, effective July 1, 2002)

Indoor (covered) dry fertilizer storage, mixing, loading and unloading operational areas handling agriculture fertilizers and pesticides have a significantly lower potential to impact storm water because the potential for exposure to rain causing runoff is greatly reduced.

Based on the above requirement it is apparent that the storage of dry fertilizer is required to be within an enclosed structure. It is therefore concluded that the primary purpose of the building over the dry fertilizer storage area is for pollution prevention.

[1]Guideance Manual for Developing Best Management Practices, US Environmental Protection Agency, EPA 833B-93-004, October 1993.



WABASH VALLEY SERVICE COMPANY
FACILITY: OSNE, IL 62823
B-201 PLOT PLAN
SCALE: 1/64" K-OCHS 12/18/15

WVSC-CISNE: Dry Fertilizer Flow Diagram

1) Load-in: Transports (1A) pull across a raised reinforced concrete pad and unloads into a hopper (1B), which feeds an above ground inclined drag paddle conveyor

2) The enclosed 66' Drag Paddle Conveyor is stainless steel constructed and rated at 120 tons/hour. It lifts the dry fertilizer up and through a spout drops the product into the tripper conveyor.

3) The 24" wide x 196'-6" Tripper Conveyor is stainless steel constructed. It runs across the top of the main product bins and out the South end on the canvas structure. This conveyor delivers the product to the appropriate bin and anywhere along its length. This is accomplished by moving the shuttle (tripper) to the desired spot, which causes the belt to twist slightly. Thus causing the product to run off the side of the conveyor. The portion of the conveyor which extends outside of the canvas structure is completely enclosed.

4) Storage: 120' wide x 192'-6" long reinforced concrete structure with 16" thick x 16' tall walls and 8" floor. "Calhoun VP Series Building" roof system consists of galvanized steel tubing- roof trusses support the canvas-like tarp material covering. This system covers and protects the entire structure from precipitation. Two overhead doors on either end of the building allow equipment access. Transports will be able to drive in and back up to the end storage bins and unload.

5) End loader: Travels between the storage bins and blender inside the building

6) RANCO Declining-Weight Volumetric Blending System: is all stainless steel constructed and consist of a series of five 12' wide x 7' deep-10 ton hoppers, two 5.5'x 5.5' bulk seed hoppers, and one micro-nutrient additive bin. Through the use of metering units located under each hopper the product is weighed out and dropped into and enclosed blending augers located directly behind the hoppers. These enclosed 16" x 44' s/s blending augers delivers the product to a common auger.

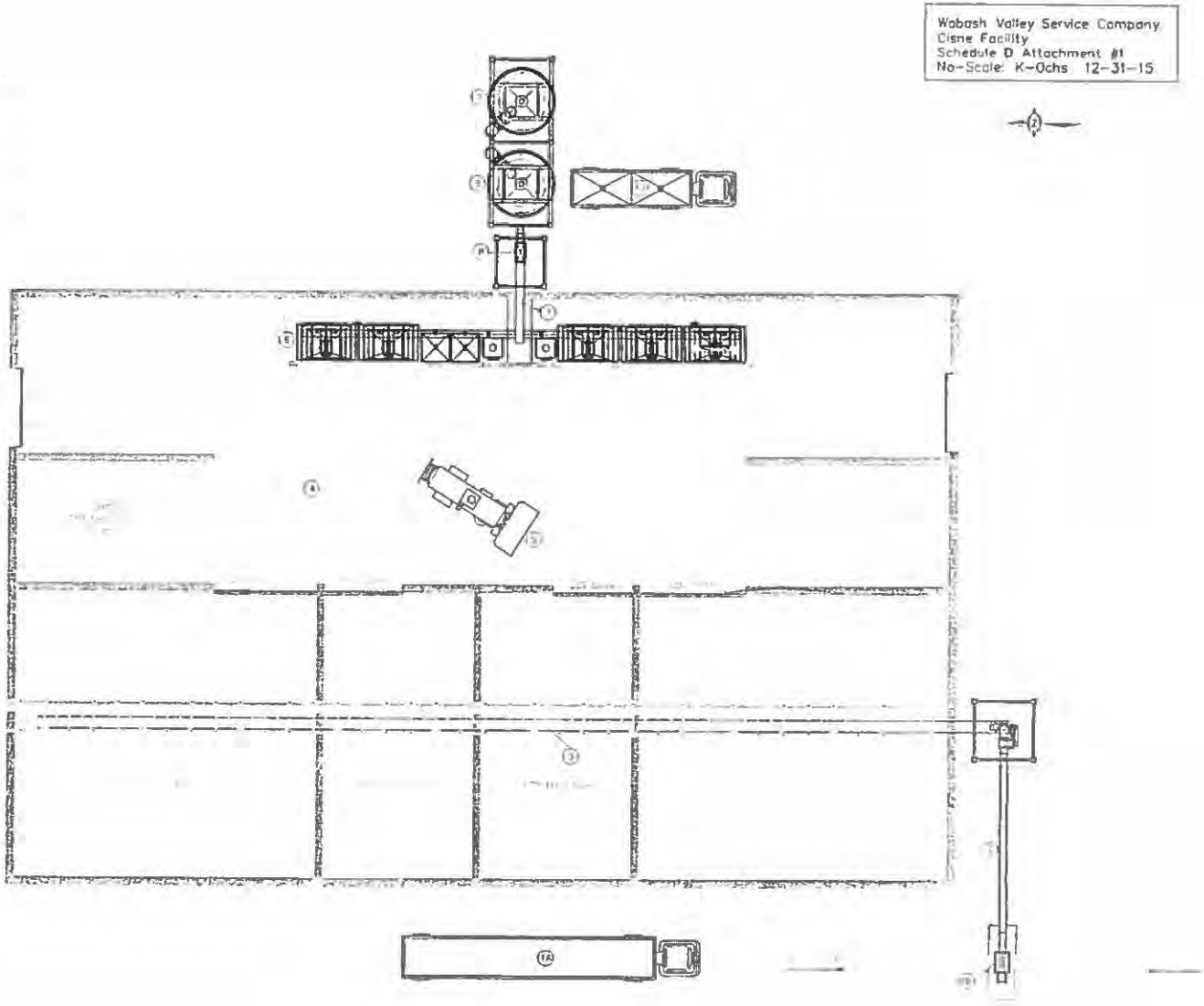
7) Common Auger: 18"x 16' s/s enclosed auger takes the blended plant food to the load-out bucket elevator.

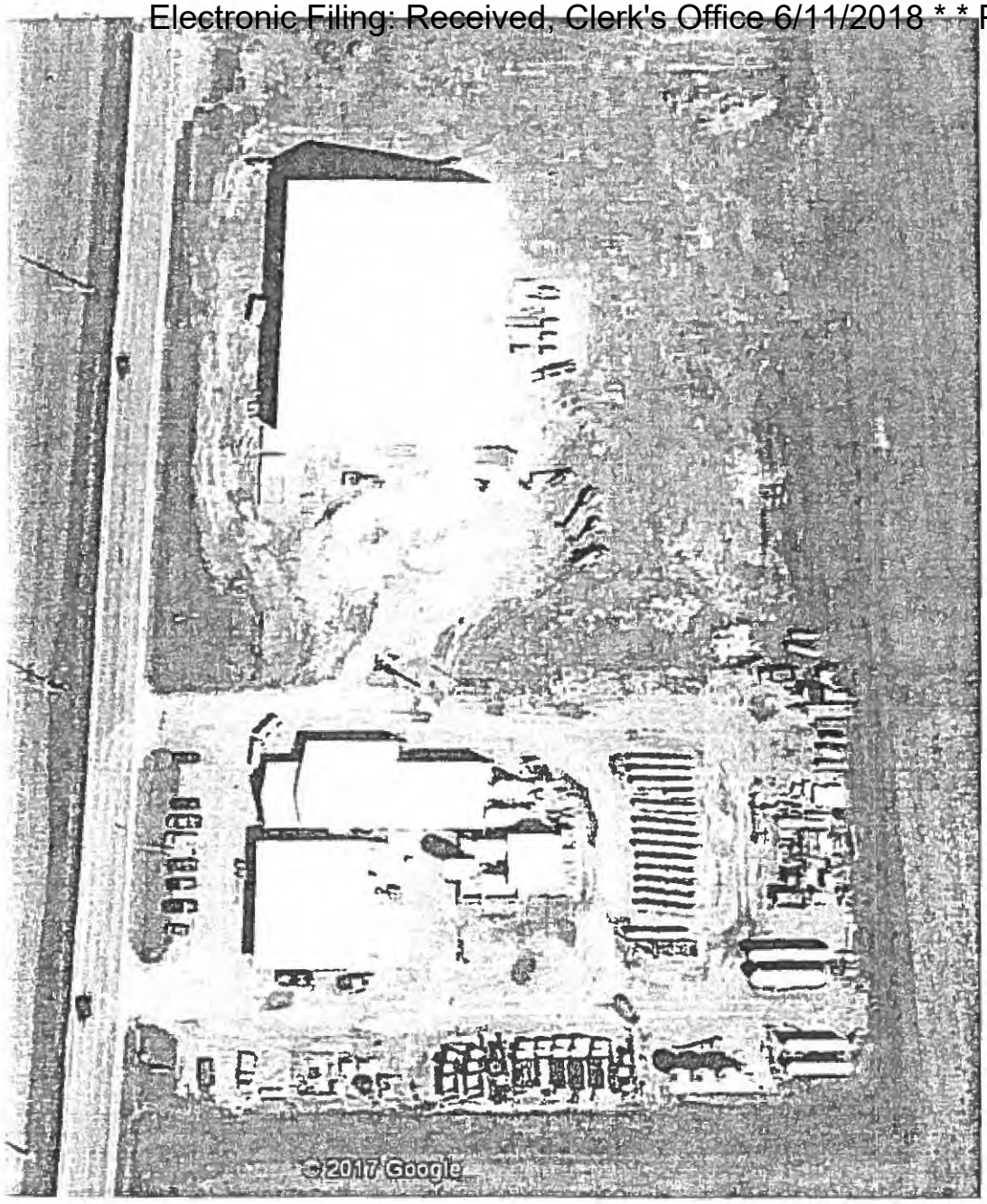
8) 73' Load-out bucket elevator is stainless steel constructed and rated at 250 tons/hour. This bucket elevator lifts the blended products up and through stainless steel spouting, delivers it into either of the two-weigh hoppers

9) Weigh hoppers hold the staged blended plant food until the applicator is ready to load: two 30 ton over head weigh hoppers are cone bottom stainless steel constructed. Both are enclosed within their own s/s tank-like structure. These structures act both as a wind breaks and dust emission control devices. Other dust control devices include canvas shrouds and spouting.

10) Application equipment pull under one of the two over-head weigh hoppers and onto reinforced concrete to receive its load.

Note: All portions of this dry fertilizer system sit on reinforced concrete. Any spillage will be swept up daily and reused.

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State of Illinois
Department of Agriculture

AGRICHEMICAL CONTAINMENT PERMIT

AGRICHEMICAL FACILITY PERMIT MODIFICATION

Permittee:		**Facility ID Number:**	**AC1913150000**
		Facility Location:	Cisne
Wabash Valley Service Company 909 N. Court St. Grayville, IL 62844			
Permit #:	**AC93032063**	**Log Number:**	16011887
Facility Type:	Commercial: Retail Dealer	**Date Received:**	January 4, 2016
Date Issued:	**February 23, 2016**	**Expiration Date:**	**May 24, 2018**

A permit modification is hereby granted to the above designated permittee to construct and/or operate an agrichemical facility which was previously approved under the above referenced permit number. The facility and associated permit has been modified as follows:

DRY FERTILIZER STRUCTURES

Installation and operation of an existing bulk dry fertilizer storage building with the greatest dimensions measuring 120' (width) x 192.5' (length) with an estimated total storage capacity of 7,700 tons. The structure is composed of six (6) storage bins (two (2) bins, each measuring 24.67' (width) x 40' (length) with an estimated storage capacity of 250 tons, one (1) bin measuring 58' (width) x 65.42' (length) with an estimated storage capacity of 2,400 tons, one (1) bin measuring 58' (width) x 65.42' (length) with an estimated storage capacity of 3,000 tons, one (1) bin measuring 30.5' (width) x 58' (length) with an estimated storage capacity of 700 tons, and one (1) bin measuring 30.5' (width) x 58' (length) with an estimated storage capacity of 1,100 tons).

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

Installation and operation of a reinforced concrete operational containment structure with the greatest dimensions measuring 58' (width) x 192.5' (length). All end loader transfer of bulk dry fertilizer between storage and the blenders shall be performed upon the herein permitted structure.

Installation and operation of a reinforced concrete operational containment structure measuring 14' (width) x 32.33' (length). The unloading of bulk dry fertilizer transportation and application equipment shall be performed upon the herein permitted structure.

Installation and operation of a reinforced concrete operational containment structure measuring 12.83' (width) x 94' (length) x 2.5' (depth). All blending of bulk dry fertilizer shall be performed upon the herein permitted structure.

Installation and operation of a reinforced concrete operational containment structure measuring 17' (width) x 17' (length). The bulk dry fertilizer elevation tower shall be located upon the herein permitted structure.

State of Illinois
Department of Agriculture

AGRICHEMICAL CONTAINMENT PERMIT

Installation and operation of a reinforced concrete operational containment structure measuring 12' (width) x 30.92' (length). The bulk dry fertilizer unloading conveyor shall be located upon the herein permitted structure.

Installation and operation of a reinforced concrete operational containment structure with the greatest dimensions measuring 48.58' (width) x 60' (length). All loading of bulk dry fertilizer transportation and application equipment shall be performed upon the herein permitted structure.

This permit modification has also been reviewed and approved by the Illinois Environmental Protection Agency per the attached permit modification endorsement. The expiration date of this permit modification shall remain the same as issued on the original permit.

All Special Conditions on the original permit issued are also applicable to this permit unless specifically deleted or revised in this permit.

SPECIAL CONDITION 1: The permittee shall operate the exposed dry fertilizer operations pursuant to 8 Illinois Administrative Code 255.140 (a), (c) and (d).

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

John Teefey, Chief
Bureau of Environmental Programs

Brad A. Beaver, Manager
Permits and Downstate Field Operations

IEPA WPC Permits
file
191315 pmod

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 June 11, 2018, 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:

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

Kent Ochs
Wabash Valley Service Company
909 N. Court Street
Grayville, Illinois 62844

[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/ Christine M. Zeivel
Assistant Counsel
Division of Legal Counsel
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
217.782.5544
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THIS FILING IS SUBMITTED ON RECYCLED PAPER