

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

<b>Wabash Valley Service Company (Browns)</b>	)	
<b>(Property Identification Number</b>	)	<b>PCB 18-</b>
<b>05-1-161-07)</b>	)	<b>(Tax Certification)</b>
	)	
	)	

**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

Wabash Valley Service Company (Browns)  
Attn: Kent Ochs  
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 the **APPEARANCE** and **RECOMMENDATION OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**, a copy of which is herewith served upon you.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By:   
Roberto M. Durango  
Assistant Counsel  
Division of Legal Counsel

DATED: March 6, 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**

<b>Wabash Valley Service Company (Browns)</b>	)	
<b>(Property Identification Number</b>	)	<b>PCB 18-</b>
<b>05-1-161-07)</b>	)	<b>(Tax Certification)</b>
	)	
	)	

**RECOMMENDATION OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

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

1. On September 5, 2017, the Illinois EPA received a request from Wabash Valley Service Company (Browns) (log number TC-138601, Exhibit A) for an Illinois EPA recommendation regarding the tax certification of water pollution control facilities pursuant to Section 125.204(a) of the Board's regulations, 35 Ill. Adm. Code 125.204(a).

2. The facility's address is: Wabash Valley Service Company (Browns)  
County Road 900  
Browns, Illinois 62818

3. The proposed water pollution control facilities in this request are located at Section 33, T1S, R14E of the 3rd P.M. in Edwards County, at the above street address and consist of the following:

Agrichemical containment structures consisting of: two liquid agrichemical operational containment structures and associated collection and recovery systems; two bulk liquid agrichemical secondary containment structures; four dry fertilizer operational containment structures; one dry fertilizer blending operational containment structure; and the portion of the building over the operational containment structures as approved under the Illinois EPA issued Agrichemical Facility Permit No. 91020282 (Log No. 16021944 issued on May 7, 2016).

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

5. Section 11-10 of the Property Tax Code, 35 ILCS 200/11-10 (2014), and Section 125.200(a)(1) of the Board's regulations, 35 Ill. Adm. Code 125.200(a)(1), define pollution control facilities as:

[A]ny 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, as the terms air pollution and water pollution are defined in the Act; 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.

6. If it is found that the claimed facility or relevant portion thereof is a pollution control facility as defined in Section 125.200(a)(1) of the Board's regulations, 35 Ill. Adm. Code 125.200(a)(1), the Board has the authority to enter a finding and issue a certificate to that effect, pursuant to Section 11-20 of the Property Tax Code, 35 ILCS 200/11-20 (2014) and Section 125.216 of the Board's regulations, 35 Ill. Adm. Code 125.216.

7. Pursuant to Section 125.204(a) of the Board's regulations, 35 Ill. Adm. Code 125.204(a), if the Illinois EPA receives a tax certification application it must file a recommendation on the application with the Board.

8. Based on the information in the application and the purpose of the facilities, it is the Illinois EPA's engineering judgment that the described facilities may be considered pollution control facilities, with the primary purpose of eliminating,

preventing, or reducing water pollution, or as otherwise provided in Section 125.200(a)(1) of the Board's regulations, 35 Ill. Adm. Code 125.200(a)(1), 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:   
Roberto M. Durango  
Assistant Counsel  
Division of Legal Counsel

Dated: March 6, 2018  
Illinois Environmental Protection Agency  
1021 North Grand Ave. E.  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
(217) 782-5544



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 09 2018  
Re: Wabash Valley Service Company – Browns  
Recommendation of Tax Certification  
Log # TC-138601  
Property Identification # 05-1-161-07

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  
County Road 900  
Browns, IL 62818

Section 33, Township 1S, Range 14E of the 3<sup>rd</sup> PM in Edwards County.

Agrichemical containment structures consisting of two liquid agrichemical operational containment structures and associated collection and recovery systems; two bulk liquid agrichemical secondary containment structures; four dry fertilizer operational containment structures; 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. 91020282 (Log No. 16021944 issued on May 7, 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-138601.docx

cc: Tax Cert File

Project Name: Wabash Valley Service Company Location: Browns  
 Reviewer: Thaddeus Foyt Date: 2/7/18  
 Log No.: TC-138601 Type:  Agchem  
 Livestock

Applicant: Wabash Valley Service Company Contact: Kent Ochs  
909 N. Court Street Phone: 618-842-5631  
Grayville, IL 62844 kentochs@wabashvalleyfs.com  
618-842-5631

Facility: Wabash Valley Service -- Browns Property ID: 05-1-161-07

Legal Description: Section 33, T15, R14E of 34 PM County: Edwards

Date Control Devices Installed: 5/1/16 Provided Fair Cash Value: Not on new form

Signature: by Kent Ochs Title: Regulator & 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 pads & secondary containment structures

- See permit AC91020282 attached to application:
- OC-1 60x144 operational containment (liquid)
  - OC-2 32x60 operational containment (liquid)
  - SC-1 24x60x0.5 secondary containment (liquid)
  - SC-2 30x62x4 secondary containment (liquid)
  - Four (4) operational containment structures (dry)  
16x31  
24.5x35.42  
30x40  
70x128
  - One (1) blending operational containment structure (dry)

primary purpose of these structures is pollution control

Structures NOT eligible:  
2 greenhouses for dry fertilizer storage  
6 tanks for dry fertilizer storage  
The primary purpose of these structures is storage and to protect product quality.  
These structures were withdrawn in a 2/6/18 letter from Kent Ochs.

Other: Note: 2 separate applications ⇒ one for dry fertilizer, one for liquid

Structures described in "describe the Pollution Control facility" box on the application forms and is attached Ag permit AC91020282.  
Note → see domes and storage tanks withdrawn in 2/6/18 letter from Kent Ochs.

Waste flow → any spills/contaminated precipitation is contained in structures and recycled → Effluent recovery system described in Ag Permit AC91020282

TC-158601



# Illinois Environmental Protection Agency

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

## Application for Certification (Property Tax Treatment) Pollution Control Facility

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

Facility Type (check one):  Air  Water

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

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

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

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

**RECEIVED**  
 SEP 05 2017  
 IEP  
 DOW/WPC/PERMIT SECTION

### I. Applicant Information:

Company Name: <u>Wabash Valley Service Company</u>	
Person Authorized to Receive Certification: <u>Kent Ochs</u>	Person to Contact for Additional Details: <u>Kent Ochs</u>
Street Address: <u>909 N. Court Street</u>	Street Address: <u>909 N. Court Street</u>
City: <u>Grayville</u> State: <u>IL</u>	City: <u>Grayville</u> State: <u>IL</u>
Zip: <u>62844</u> Phone: <u>618-842-5631</u>	Zip: <u>62844</u> Phone: <u>618-842-5631</u>
Email Address: <u>kentochs@wabashvalleyfs.com</u>	Email Address: <u>kentochs@wabashvalleyfs.com</u>

### II. Facility Information:

Facility Location: Quarter Section: 33 Township: T1S Range: R14  
 Municipality: Browns Township: Browns

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

Address: County Road 900 City: Browns  
 State: IL Zip Code: 62818 County: Edwards Book Number: \_\_\_\_\_  
 Property Index Number: 05-1-161-07

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: <u>AC91020282</u>	Date Issued: <u>May 7, 2016</u>
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:

**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) six bulk dry fertilizer storage tanks, 2) two dry fertilizer storage domes 61' diameter 3) 38' x 62' Concrete Operational Containment Structure (COCS), 4) 16' x 31' COCS, 5) 24.5' x 35.42' COCS, 6) 30' x 40' COCS, 7) 70' x 128' 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 AC91020282.

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.

Contaminant or Pollutant	Material Retained, Captured or Recovered	
	Description	Disposal or Use
Agrichemicals & Fertilizers	Spilled Products	Reduce, Recycle 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: May 1, 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:**

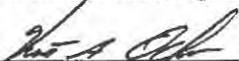
The following information is submitted in accordance with the Illinois Property Tax Code, as amended, and to the best of my knowledge is true and correct.

*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:



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 Faight, P.E.,

Re: Pollution Control Facility (WPC Construction Permit # AC91020282)

Per our phone conversation this morning, it is my understanding that dry fertilizer storage structures and/or areas are not considered under the pollution control criteria. In light of this, I would like to withdraw the two geo-domes and the six dry fertilizer storage tanks from our Browns facility application.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'K. A. Ochs'.

Kent A. Ochs  
Regulatory & Safety Coordinator

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 AC91020282 (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.”<sup>1</sup>

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.”<sup>1</sup>

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

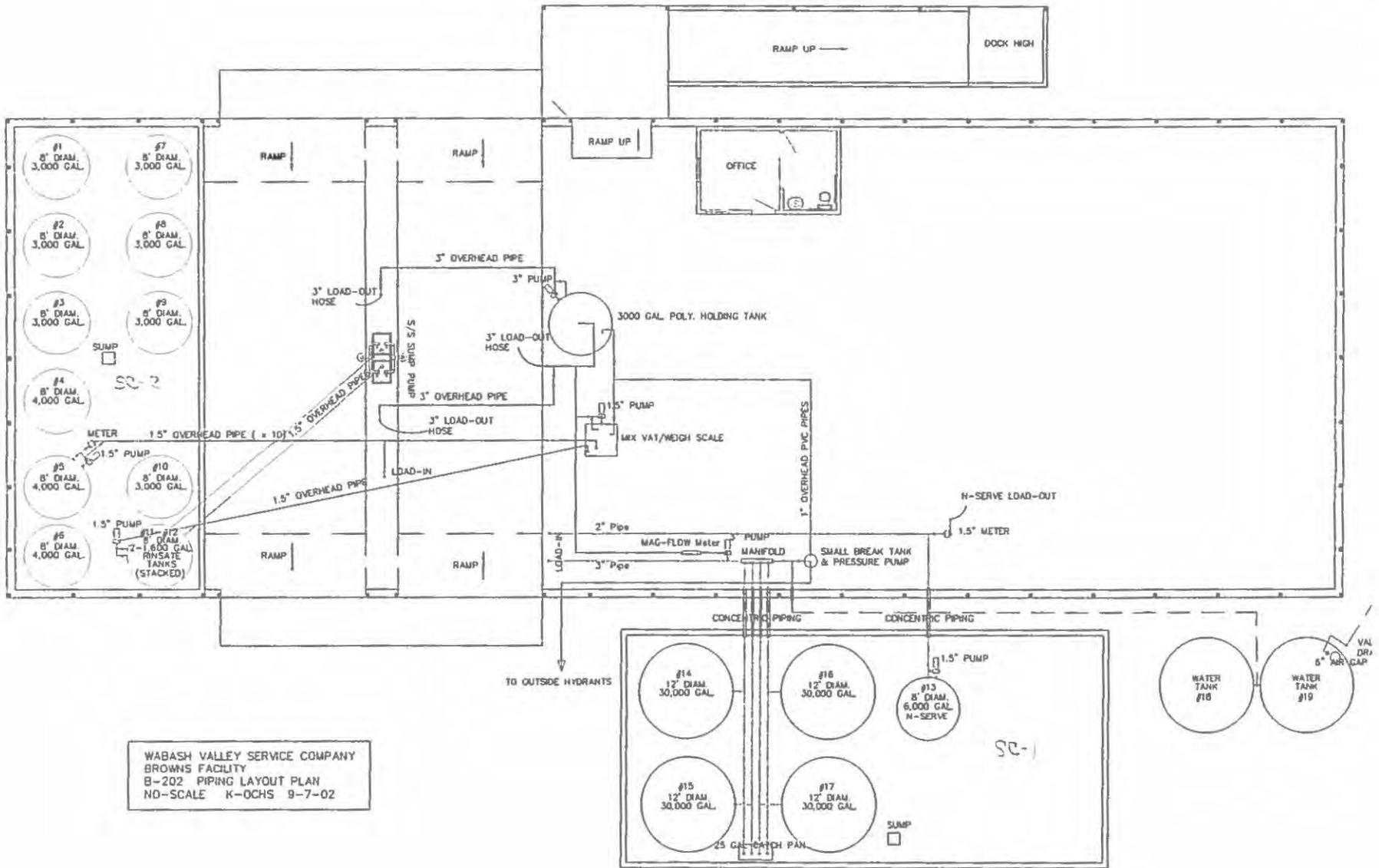
- a) Dry fertilizer materials shall be stored and handled in a manner to prevent pollution by minimizing losses to the air, surface water, underground water or subsoil.
- b) Non liquid fertilizers shall be stored inside a sound structure or device having a cover or rooftop, sidewalls and base sufficient 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  $1 \times 10^{-6}$  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.

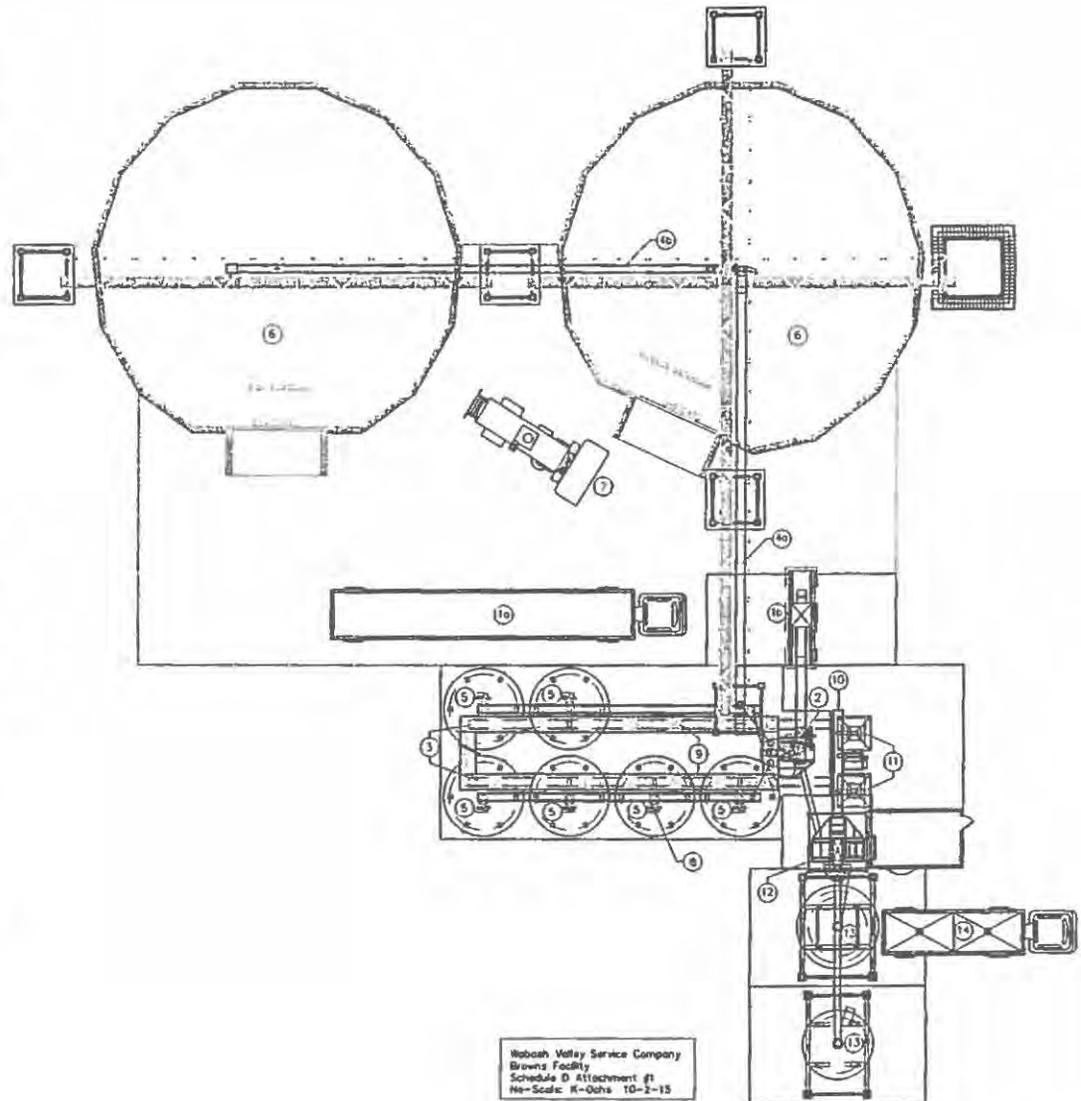
<sup>1</sup>Guidance Manual for Developing Best Management Practices, US Environmental Protection Agency, EPA 833B-93-004, October 1993.



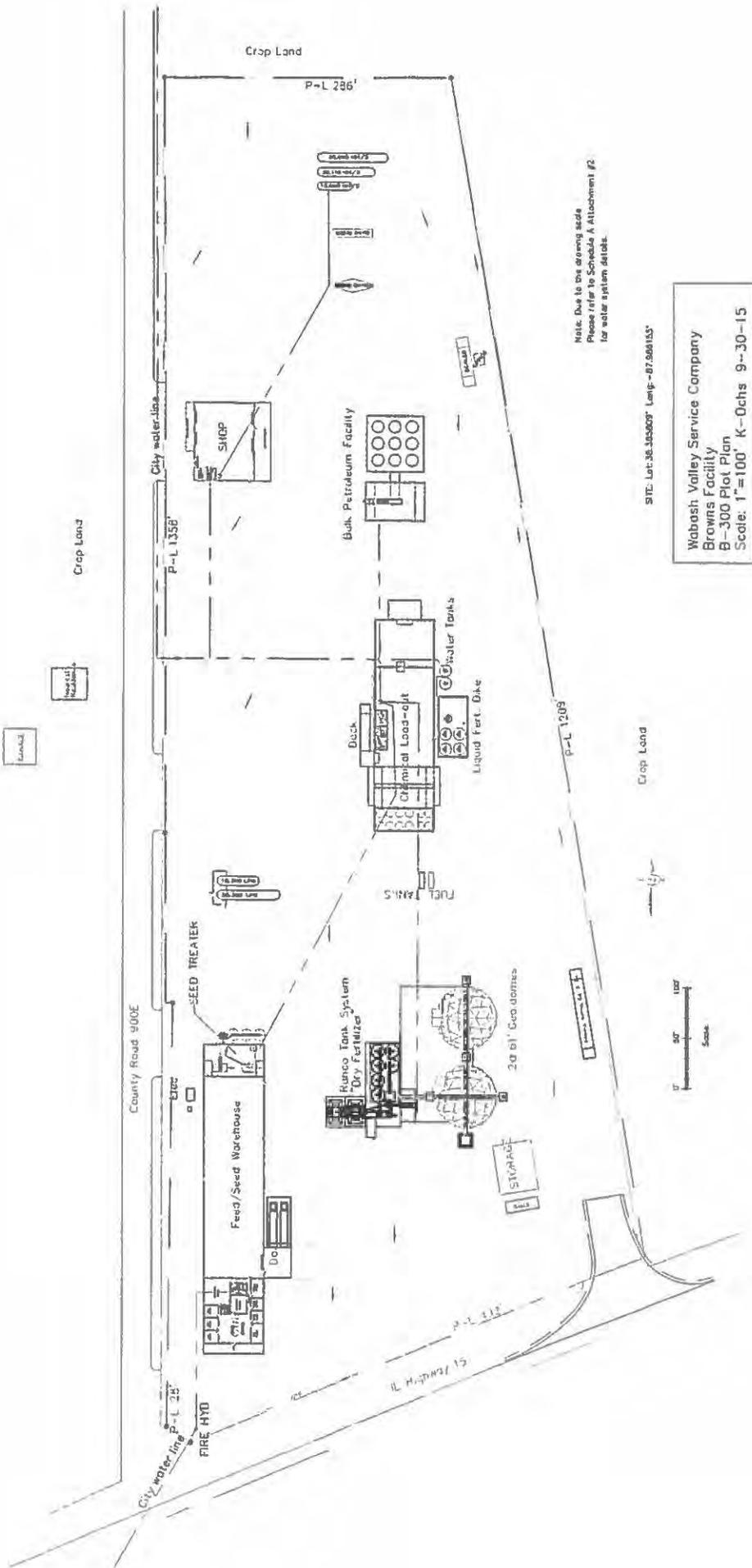
### WVSC-Browns: Dry Fertilizer Flow Diagram

- 1) Load-in. Transports (1a) pull across a raised reinforced concrete pad and unloads into a hopper, which feeds an above ground stainless steel drag paddle conveyor (1b). This enclosed conveyor takes the product over to the receiving elevator leg.
- 2) 75' Receiving bucket elevator is stainless steel constructed and rated at 110 tons/hour. It lifts the dry fertilizer up and through spouting drops the product into one of the two over-tank augers or onto the new overhead belt conveyor.
- 3) The dual over-tank fiberglass enclosed u-trough augers deliver the product through spouting to the appropriate holding tank. Augers are 12" x 48" mild steel.
- 4) The new 16" x 75' overhead belt conveyor (4a) delivers product eastward to the south dome or drops it onto 85'-10" drag paddle conveyor (4b) which delivers it to the north dome.
- 5) Storage: Six 4,978 cubic ft, mild steel epoxy coated, cone bottom Friesen tanks hold the dry fertilizer until needed.
- 6) Storage: Two 61' diameter geodesic dome structures with 12" x 12" reinforced concrete walls and 6" asphalt floors. Each a single product storage bin.
- 7) End loader: Takes the product out of the domes and delivers it back to the drag paddle conveyor in step #1.
- 8) Metering units: Six 10" augers with fiberglass hoppers and tubes, meter out product from the tanks into the blend augers.
- 9) Blending: Dual under-tank fiberglass enclosed u-trough augers take the product to a common blend auger. Augers are 14" x 62" mild steel.
- 10) Common blend auger: 18" x 22" mild steel, fiberglass enclosed u-trough which delivers the product to the load-out bucket elevator.
- 11) Two 4-ton additive bins allow the induction of trace minerals or seeds into the common blend auger. The additive bins use 10" metering augers with fiberglass hoppers, tubes and spouts to take the product from beneath the bins to the common blend auger.
- 12) 69' Load-out bucket elevator is stainless steel constructed and rated at 200 tons/hour. It lifts the blended fertilizer up and through stainless steel spouting drops the product into either of the two weigh hoppers.
- 13) Weigh hoppers hold the staged blended fertilizer 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 steel 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.
- 14) Application equipment pulls under one of the two over-head weigh hoppers and onto reinforced concrete to load to receive its load.

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



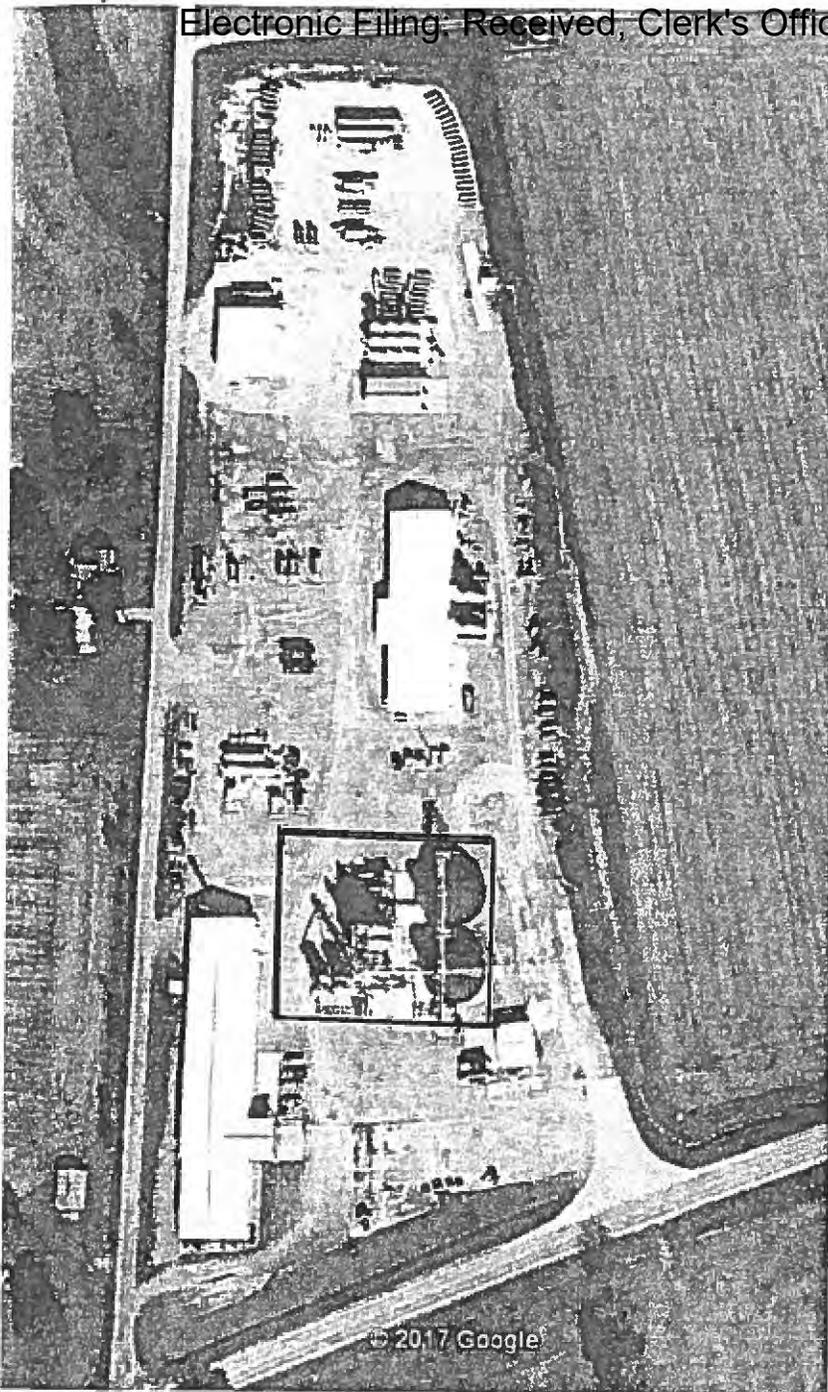
Wabash Valley Service Company  
 Browns Facility  
 Schedule D Attachment #1  
 No-Scale R-0chs 10-2-15



Note: Due to the drawing scale  
Please refer to Schedule A Attachment #2  
for water system details.

SITE: Lot 35-355007 Long-67.504153

Wabash Valley Service Company  
Browns Facility  
B-300 Plot Plan  
Scale: 1"=100' K-Ochs 9--30-15



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State of Illinois  
Department of Agriculture  
**AGRICHEMICAL CONTAINMENT PERMIT**

<b>Permittee:</b> Wabash Valley Service Company 909 N. Court St. Grayville, IL 62844	<b>Facility ID Number:</b> AC0473030000 <b>Facility Location:</b> Browns
<b>Permit #:</b> AC91020282 <b>Facility Type:</b> Commercial: Retail Dealer <b>Date Issued:</b> May 7, 2016	<b>Log Number:</b> 16021944 <b>Date Received:</b> February 29, 2016 <b>Expiration Date:</b> May 7, 2021

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

**OPERATIONAL CONTAINMENT STRUCTURES**

Operation of an existing reinforced concrete operational containment structure measuring 60' (width) x 144' (length) x 1' (depth) with a total design capacity of 4,229.9 cubic feet (ft.<sup>3</sup>). The floor shall slope to one (1) of two (2) sumps, each sump measuring 2' (width) x 2.5' (length) x 2' (depth) to facilitate the collection and recovery of all escaped product and/or agrichemical wastewater. All recovered effluent shall be transferred to one (1) of two (2) 1,600 gallon recovery tanks with a manually activated sump pump. Segregation shall be performed based upon the applicable target crop and label use. The loading, unloading, and washing of bulk liquid agrichemical transportation and application equipment shall be performed upon the herein permitted structure. This structure shall be referred to as OC-1.

Operation of an existing reinforced concrete operational containment structure measuring 32' (width) x 60' (length) x 0.5' (depth) with a total design capacity of 940 cubic feet (ft.<sup>3</sup>). The floor shall slope to a single sump measuring 1.5' (width) x 1.5' (length) x 0.75' (depth) to facilitate the collection and recovery of all escaped product and/or agrichemical wastewater. All recovered effluent shall be transferred to a single 250 gallon recovery tank with a manually activated sump pump. Segregation shall be performed based upon the applicable target crop and label use. All treating of seed with pesticide shall be performed within the said structure. This structure shall be referred to as OC-2.

**SECONDARY CONTAINMENT STRUCTURES**

Operation of an existing reinforced concrete secondary containment structure measuring 24' (width) x 60' (length) x 0.5' (height) with a total design capacity of 664.9 cubic feet (ft.<sup>3</sup>). The floor shall slope to a single sump measuring 1.5' (width) x 1.5' (length) x 0.75' (depth) to facilitate the collection and recovery of all escaped product and/or agrichemical wastewater. All recovered effluent shall be transferred to one (1) of the two (2) aforementioned 1,600 gallon recovery tanks with a manually activated sump pump. Segregation shall be performed based upon the applicable target crop and label use. All bulk liquid pesticides shall be stored within the herein permitted structure. This structure shall be referred to as SC-1.



*State of Illinois*  
*Department of Agriculture*

**AGRICHEMICAL CONTAINMENT PERMIT**

Operation of an existing reinforced concrete secondary containment structure measuring 30' (width) x 62' (length) x 4' (height) with a total design capacity of 6,956.4 cubic feet (ft.<sup>3</sup>). The floor shall slope to a single sump measuring 1.5' (width) x 1.5' (length) x 0.75' (depth) to facilitate the collection and recovery of all escaped product and/or agrichemical wastewater. All recovered effluent shall be transferred to one (1) of the two (2) aforementioned 1,600 gallon recovery tanks with a manually activated sump pump. Segregation shall be performed based upon the applicable target crop and label use. All bulk liquid fertilizer shall be stored within the herein permitted structure. This structure shall be referred to as SC-2.

**DRY FERTILIZER STRUCTURES**

Operation of six (6) existing mild steel bulk dry fertilizer storage tanks, each tank measuring 13.33' (diameter) x 47' (height) with an estimated total storage capacity of 150 tons each.

Operation of two (2) existing bulk dry fertilizer storage domes (one (1) dome measuring 61' (diameter) with an estimated storage capacity of 1,500 tons and one (1) dome measuring 61' (diameter) with an estimated storage capacity of 1,800 tons).

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

Operation of an existing reinforced concrete operational containment structure measuring 38' (width) x 62' (length). The bulk dry fertilizer storage tanks and the blending auger shall be located upon the herein permitted structure.

Operation of an existing reinforced concrete operational containment structure measuring 16' (width) x 31' (length). The unloading of bulk dry fertilizer transportation and application equipment shall be performed upon the herein permitted structure.

Operation of an existing reinforced concrete operational containment structure measuring 24.5' (width) x 35.42' (length). The bulk dry fertilizer receiving elevator and the bulk dry fertilizer loading bucket elevator shall be located upon the herein permitted structure.

Operation of an existing reinforced concrete operational containment structure measuring 30' (width) x 40' (length). All loading of bulk dry fertilizer transportation and application equipment shall be performed upon the herein permitted structure.

Operation of an existing reinforced concrete operational containment structure with the greatest dimensions measuring 70' (width) x 128' (length). All end loader transfer of bulk dry fertilizer between the storage domes and the blender shall be performed upon the herein permitted structure.

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

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

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



State of Illinois  
Department of Agriculture  
**AGRICHEMICAL CONTAINMENT PERMIT**

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

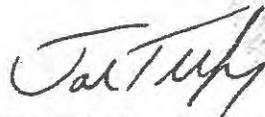
**SPECIAL CONDITION 3:** The permittee shall employ concentric piping for the piping span from the bulk liquid fertilizer secondary containment structure (SC-2) to the operational containment structure.

**SPECIAL CONDITION 4:** The permittee shall provide means for the safe emergency access to and exit from the herein permitted bulk liquid fertilizer secondary containment structure (SC-2) pursuant to 8 Illinois Administrative Code 255.80 (c) (2) (E).

**SPECIAL CONDITION 5:** The permittee shall operate the exposed dry fertilizer operations pursuant to 8 Illinois Administrative Code 255.140 (a), (c) and (d).

**SPECIAL CONDITION 6:** The permittee shall operate the herein permitted operational containment structure (OC-2) pursuant to 8 Illinois Administrative Code 255.90 (a) (b) (c) and (f), and 8 Illinois Administrative Code 255.110 (c).

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



John Teefey, Chief  
Bureau of Environmental Programs

047303.pr



Brad A. Beaver, Manager  
Permits and Downstate Field Operations



STATE OF ILLINOIS

COUNTY OF SANGAMON

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**CERTIFICATE OF SERVICE**

I, the undersigned attorney at law, hereby certify that I have served on the date of March 6, 2018, the attached **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 in Springfield, Illinois:

**[1<sup>st</sup> Class U.S. Mail]**

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

**[1<sup>st</sup> Class U.S. Mail]**

Wabash Valley Service Company (Browns)  
Attn: Kent Ochs  
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/ Roberto M. Durango  
Assistant Counsel  
Division of Legal Counsel  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
217.782.5544  
217.782.9143 (TDD)

**THIS FILING IS SUBMITTED ON RECYCLED PAPER**