

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	R 23-18(A)
AMENDMENTS TO)	
35 Ill. Adm. Code Parts 212 and 215)	(Rulemaking – Air)
)	
)	

NOTICE OF FILING

To: Attached Service List

PLEASE TAKE NOTICE that on this day, the 8th day of April, 2024, I caused to be filed with the Clerk of the Illinois Pollution Control Board **RAIN CII CARBON LLC’S SECOND SUPPLEMENTAL RESPONSE TO ILLINOIS EPA COMMENTS**, a copy of which is herewith served upon you.

/s/ Alexander Garel-Frantzen

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**RAIN CII CARBON LLC'S
SECOND SUPPLEMENTAL RESPONSE TO ILLINOIS EPA COMMENTS**

Rain Carbon, by and through its attorneys, ArentFox Schiff LLP, submits this Second Supplemental Response to Illinois EPA's Comments, P.C. #5.¹

1. Previously, Rain Carbon submitted an Initial Response to Illinois EPA Comments (P.C. #11) on December 1, 2023, and a Supplemental Response to Illinois EPA Comments (P.C. #14) on March 15, 2024 ("Supplemental Response"). As noted in footnote 7 of the Supplemental Response, Illinois EPA requested that Rain Carbon provide the Agency and the Board with sample pyroscrubber data from malfunction/breakdown events in order to substantiate the applicability of the Revised Proposed AEL for PM to *both* emissions that occur during start-up and emissions that occur during malfunction and breakdown events.

2. Rain Carbon previously explained that start-up events have the potential for a greater impact in terms of the emission of PM because start-up events are longer in duration and occur over a wider temperature spectrum. Start-up events can last up to 24 hours to reach 1800°F (on a 3-hour average). Green coke is generally introduced into the kiln around 400°F, meaning that the generation of PM at lower temperatures occurs during start-up events. Similar

¹ Capitalized terms have the same meaning as set forth in Rain Carbon's Proposal of Regulations and the Supplemental Response to Illinois EPA Comments, unless otherwise indicated herein.

lower temperatures are generally not experienced during malfunction/breakdown events because the kilns are kept in a “slow roll” to maintain temperature in the kiln. This also means that the time needed for the kiln to reach 1800°F after a malfunction/breakdown is resolved is shorter than a start-up event from ambient temperature. Rain Carbon is providing, as Table 1, below, examples of typical malfunction/breakdown events that occurred at the Facility in 2020. The data demonstrates that malfunction/breakdown events are of shorter duration and more narrow temperature range as compared to start-up events. As a result, the inclusion of malfunction and breakdown events in the total hours of relief proposed in the Revised Proposed AEL for PM does not reduce the stringency of the Revised Proposed AEL for PM.

Table 1

Date	Duration (hrs)	Pyroscrubber Inlet Temperature (°F) (3-hr rolling avg)		
		Minimum	Maximum	Average
01/09/2020	8.75	1063	1792	1406
01/20/2020	5.75	1237	1798	1494
04/1/2020	4.00	1556	1792	1406
04/15/2020	5.00	1381	1792	1579
09/12/2020	5.75	1011	1760	1306

Respectfully submitted,
Rain CII Carbon LLC

By: /s/ David M. Loring
David M. Loring

Dated: April 8, 2024

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CERTIFICATE OF SERVICE

I, the undersigned, certify that on this 8th day of April, 2024, I have electronically served a true and correct copy of **Rain CII Carbon LLC's Second Supplemental Response to Illinois EPA Comments**, by electronically filing with the Clerk of the Illinois Pollution Control Board and by e-mail upon the persons identified on the attached Service List.

My e-mail address is Alex.Garel-Frantzen@afslaw.com.

The number of pages in the e-mail transmission is 6.

The e-mail transmission took place before 5:00 p.m.

/s/ Alexander J. Garel-Frantzen

Alexander J. Garel-Frantzen

Dated: April 8, 2024

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