BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

Wabash Valley Service Company - Allendale	)	
(Property Identification Number	)	**PCB No. 25 -**
1-07-11-200-006)	)	**(Tax Certification)**
	)	

N O T I C E

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

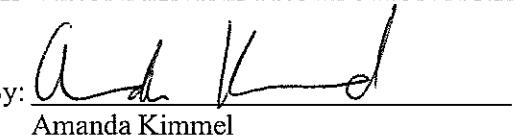
Wabash Valley Service Company - Allendale
Kent Ochs
909 N. Court Street
Grayville, Illinois 62844

Don Brown, Clerk
Illinois Pollution Control Board
60 East Van Buren Street, Suite 630
Chicago, Illinois 60605

Copies also provided electronically as follows:

Illinois Department of Revenue
via email at REV.PropTaxApp@illinois.gov
101 West Jefferson
P.O. Box 19033
Springfield, Illinois 62794

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: 

Amanda Kimmel
Assistant Counsel
Division of Legal Counsel

DATED: December 3, 2024

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

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

Wabash Valley Service Company - Allendale	)	
(Property Identification Number	)	**PCB No. 25-**
1-07-11-200-006)	)	**(Tax Certification)**
	)	

A P P E A R A N C E

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

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: _____

Amanda Kimmel
Assistant Counsel
Division of Legal Counsel

DATED: December 3, 2024

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

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

Wabash Valley Service Company - Allendale	)	
(Property Identification Number	)	**PCB No. 25-**
1-07-11-200-006)	)	**(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 November 28, 2023, the Illinois EPA received a request from Wabash Valley Service Company - Allendale (Log number TC-148667, 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 - Allendale
21546 Highway 1
Allendale, Illinois 62410

The proposed water pollution control facilities in this request are located in the SE ¼ of Section 11, T1N, R12W of the 2nd P.M. in Wabash County, at the above street address and consist of the following agrichemical containment structures:

Dry Fertilizer

Dry Fertilizer Storage Building measuring 80.42 ft. (width) x 161.33 ft. (length) constructed of reinforced concrete with an estimated storage capacity of 5,300 tons.

Operational containment structure measuring 82 ft. (width) x 183 ft. (length) constructed of reinforced concrete. End loader transfer of bulk dry fertilizer between storage and the blenders, the unloading of bulk dry fertilizer transportation and application equipment, and the blending of bulk dry fertilizer is performed upon this structure.

Operational containment structure measuring 16 ft. (width) x 22 ft. (length) constructed of reinforced concrete. Conveyor transfer of bulk dry fertilizer from the blender to the bulk dry fertilizer loading area containment structure is performed upon this structure.

Operational containment structure measuring 20 ft. (width) x 54 ft. (length) constructed of reinforced concrete. Loading of bulk dry fertilizer transportation and application equipment is perfonned upon this structure.

Liquid Fertilizer

Liquid Fertilizer Storage Building over the liquid fertilizer operational containmnent structures measuring approximately 45 ft. 3in. (width) x 80 ft. 3 in. (length).

Operational containment area (OC-2) comprised ofreinforced concrete, measuring approximately 19.5 ft. (width) x 80.25 ft. (length) x .67 ft. (depth) with an approximate capacity of 956.5 cubic ft. Loading, unloading and washing of bulk liquid agrichemical transportation and application equipment takes place upon this structure.

Operational containment area (OC-3) comprised of reinforced concrete, measuring 24.2 ft (width). x 37.42 ft. (length) x .67 ft. (depth) with an approximate capacity of 452.2 cubic ft. The storage and repackaging of bulk liquid fertilizer is performed within this structure.

Secondary containment area (SC-3) measuring 23.33 ft. (width) x 40.33 ft. (length) x 2.0 ft (height) with an approximate capacity of 1,727.9 cubic ft. Bulk liquid fertilizer is stored within this structure.

Synthetic Bladder

Synthetic membrane liner within a 1,000,000 gallon steel bulk liquid fertilizer storage tank. Serves as containment within the bulk storage tank.

These agrichemical facilities collect, store, or prevent the comingling of precipitation with agrichemical rinsates, resides, or washwaters prior to reuse or disposal as approved under the Agency endorsed Agrichemical Facility Permit No. AC90120143 (Log No. 21113481 issued on November 17, 2021) and Agrichemical Facility Permit No. AC22023539 (Log No. 22023539 issued on July 30, 2022) and prevent stormwater runoff from agrichemical affected areas.

3. Section 11-10 of the Property Tax Code, 35 ILCS 200/11-10 (2022), and Section 125.200(a) of the Board's regulations, 35 Ill. Adm. Code 125.200(a), define "pollution control facilities" as:

> any system, method, construction, device or appliance appurtenant thereto or any portion of any building or equipment, that is designed, constructed,

> installed or operated for the primary purpose of: eliminating, preventing, or reducing air or water pollution …or treating, pretreating, modifying or disposing of any potential solid, liquid or gaseous pollutant which if released without treatment, pretreatment modification or disposal might be harmful, detrimental or offensive to human, plant or animal life, or to property.

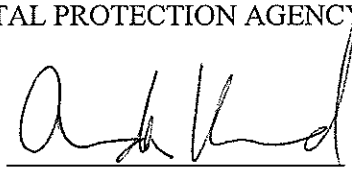
4. In order to receive preferential tax treatment as pursuant to 35 ILCS 200/11-5 (2022), pollution control facilities must be certified as such by the Board, 35 ILCS 200/11-20 (2022) and 35 Ill. Adm. Code 125.200(a).

5. Upon receipt of a tax certification application, the Illinois EPA must file a recommendation on the application with the Board, 35 Ill Adm. Code 125.204(a).

6. Based on the information in the application and the purpose of the facility, it is the Illinois EPA's engineering judgment that the described facilities may be considered "pollution control facilities," pursuant to 35 Ill. Adm. Code 125.200(a), with the primary purpose of eliminating, preventing, or reducing water pollution, or as otherwise provided in 35 Ill. Adm. Code 125.200, and are eligible for tax certification from the Board.

WHEREFORE, the Illinois EPA recommends that the Board issue the requested tax certification.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: 

Amanda Kimmel
Assistant Counsel
Division of Legal Counsel

Dated: December 3, 2024

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

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 · (217) 782-3397
JB PRITZKER, GOVERNOR JAMES JENNINGS, INTERIM DIRECTOR

Memorandum

To: Mike Roubitchek, Division of Legal Counsel

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

Date: OCT 16 2024

Re: Wabash Valley Service Co.- Allendale
Recommendation of Tax Certification
Log No.: TC-148667
BOW ID No.: W1858580001
Property Index Number: 1-07-11-200-006

The Bureau of Water received a request on November 28, 2023 from Wabash Valley Service Company, having a principal place of business at 909 N. Court Street, Grayville, IL 62844, 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
21546 Hwy 1
Allendale, IL 62410

Section 11, Township 1N, Range 12W of the 2nd PM in Wabash County.

Agrichemical Facilities consisting of:

Dry Fertilizer

Dry Fertilizer Storage Building measuring 80.42 ft. (width) x 161.33 ft. (length) constructed of reinforced concrete with an estimated storage capacity of 5,300 tons.

Operational containment structure measuring 82 ft. (width) x 183 ft. (length) constructed of reinforced concrete. End loader transfer of bulk dry fertilizer between storage and the blenders, the unloading of bulk dry fertilizer transportation and application equipment, and the blending of bulk dry fertilizer is performed upon this structure.

Operational containment structure measuring 16 ft. (width) x 22 ft. (length) constructed of reinforced concrete. Conveyor transfer of bulk dry fertilizer from the blender to the bulk dry fertilizer loading area containment structure is performed upon this structure.
Operational containment structure measuring 20 ft. (width) x 54 ft. (length) constructed of reinforced concrete. Loading of bulk dry fertilizer transportation and application equipment is performed upon this structure.

Liquid Fertilizer

Liquid Fertilizer Storage Building over the liquid fertilizer operational containment structures measuring approximately 45 ft. 3in. (width) x 80 ft. 3 in. (length).

Operational containment area **(OC-2)** comprised of reinforced concrete, measuring approximately 19.5 ft. (width) x 80.25 ft. (length) x .67 ft. (depth) with an approximate capacity of 956.5 cubic ft. Loading, unloading and washing of bulk liquid agrichemical transportation and application equipment takes place upon this structure.

Operational containment area **(OC-3)** comprised of reinforced concrete, measuring 24.2 ft (width). x 37.42 ft. (length) x .67 ft. (depth) with an approximate capacity of 452.2 cubic ft. The storage and repackaging of bulk liquid fertilizer is performed within this structure.

Secondary containment area **(SC-3)** measuring 23.33 ft. (width) x 40.33 ft. (length) x 2.0 ft (height) with an approximate capacity of 1,727.9 cubic ft. Bulk liquid fertilizer is stored within this structure.

Synthetic Bladder

Synthetic membrane liner within a 1,000,000 gallon steel bulk liquid fertilizer storage tank. Serves as containment within the bulk storage tank.

These agrichemical facilities collect, store, or prevent the comingling of precipitation with agrichemical rinsates, resides, or washwaters prior to reuse or disposal as approved under the Agency endorsed Agrichemical Facility Permit No. AC90120143 (Log No. 21113481 issued on November 17, 2021) and Agrichemical Facility Permit No. AC22023539 (Log No. 22023539 issued on July 30, 2022) and prevent stormwater runoff from agrichemical affected areas.

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

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

If you have any questions regarding the above, please contact Stephanie Burge-Bollero at 217/557-8666.

SAB: TC-148667 Tax Cert Recommendation_16Sept24.docx

cc: Tax Cert File

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

Agency Recommendation of Pollution Control Facilities.

BOW ID #: W1858580001

Project Name: Wabash Valley Service- Allendale

Date application received: TC-148667

Reviewer: SAB

Log number: TC-148667

Legal Description:
Section 11, Twp: 1N, Range:12W of the 2nd PM

County: Wabash

Facility Contact: Kent A. Ochs
909 N. Court Street
Grayville, IL 62844

Phone: 618/375-2311

Pollution Control Facility Type:
Agrichemical Facility

Property ID: 1-07-11-200-006

Applicant: Wabash Valley Service Co.
909 N. Court Street
Grayville, IL 62844

Facility: Wabash Valley Service Co.
21546 Hwy 1
Allendale, IL 62410

Date Control Devices installed:
Dry Fertilizer: April 2006
Liquid Fertilizer: April 2024
Synthetic Bladder: March 2024

Application Signature by: Allen K Rusk

Title: Manager

Contents of Application: Applicant submitted 3 separate "Application for Certification (Property Tax Treatment) Pollution Control Facility Forms for the same facility (one for Dry Fertilizer, one for liquid fertilizer, one for synthetic bladder), Facility pictures, drawings, agrichemical permit: AC90120143 (Dry Fertilizer and Liquid Fertilizer) and agrichemical permit: AC22023539 (synthetic bladder).

Is there a pollutant control flow diagram? Choose an item.
N/A

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

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

Physical description of pollution control facilities that ARE recommended:

Dry Fertilizer

Dry Fertilizer Storage Building measuring 80.42 ft. (width) x 161.33 ft. (length) constructed of reinforced concrete with an estimated storage capacity of 5,300 tons.

Operational containment structure measuring 82 ft. (width) x 183 ft. (length) constructed of reinforced concrete. End loader transfer of bulk dry fertilizer between storage and the blenders, the unloading of bulk dry fertilizer transportation and application equipment, and the blending of bulk dry fertilizer is performed upon this structure.

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Synthetic Bladder

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Notes:
Applicant submitted 3 separate "Application for Certification (Property Tax Treatment) Pollution Control Facility Forms for the same facility (one for Dry Fertilizer, one for liquid fertilizer, one for synthetic bladder), Facility pictures, drawings, agrichemical permit: AC90120143 (Dry Fertilizer and Liquid Fertilizer) and agrichemical permit: AC22023539 (synthetic bladder).

Nothing follows – SAB - (September 16, 2024)

Wabash Valley
Allendale, IL
Dry Fertilizer

nvironmental Protection Agency

P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

Certification (Property Tax Treatment) Pollution Control Facility

For Agency Use Only			
File Number:	TC-1481617	Date Rec'd:	11-28-2023
Certification Number:		Date:	

Facility Type (check one): ○ Air ⊘ Water

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

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

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

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

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

I. Applicant Information

Company Name: Wabash Valley Service Company

Person Authorized to Receive Certification	Person to Contact for Additional Information
Name: Allen K. Rusk, General Manager	Name: Kent A. Ochs, Regulatory and Safety Coordinator
Street Addr: 909 N. Court Street	Street Addr: 909 N. Court Street
City: Grayville State: IL	City: Grayville State: IL
ZIP: 62844 Phone: 618/375-2311	ZIP: 62844 Phone: 618/375-2311
Email:	Email: kentochs@wabashvalleyfs.com

II. Facility Information

Facility Location: Quarter Section: SE Sec. 11 Township: 1N Range: 12W
Municipality: Allendale Township: Wabash

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

Address: 21546 Hwy 1 City: Allendale
State: IL Zip Code: 62410 County: Wabash Book Number:
Property Index Number: 1-07-11-200-006

Note: The Property Index Number is the numerical reference used to identify a parcel of real property for assessment and taxation purposes.

Manufacturing Operations Information

Nature of Operations Conducted at the Above Location

Loading, unloading, and storage of dry fertilizer and agrichemicals

Permit Information

WPC Construction Permit Number: AC90120143 Date Issued: Nov 17, 2021
NPDES Permit Number: Date Issued: Exp. Date:
APC Construction Permit Number: Date Issued:
APC Operating Permit Number: Date Issued: Exp. Date:

Note: Submit copies of all relevant permits issued by local pollution control agencies (e.g. MSD Construction Permit).

This Agency is authorized to request this information under 415 ILCS 5/4(b)(2012). Disclosure of this information is voluntary and no penalties will result from the failure to provide the information. However, the absence of the information could prevent your application from being processed or could result in denial of your application.

Manufacturing Process Information

Please provide information on the manufacturing process and materials on which pollution control facility is used, including each major piece of equipment associated with the pollution control facility (or low sulfur dioxide emission coal fueled device).

Description of the Process

Not Applicable

Materials Used in the Process

Not Applicable

Pollution Control Facility Information

Please provide a narrative description of the pollution control facility (or low sulfur dioxide emission coal fueled device), and an explanation of why its primary purpose is to eliminate, prevent or reduce pollution. State the type of control facility, as well as a narrative description and a process flow diagram describing the pollution control facility. Include an average analysis of the influent and effluent of the control facility stating the collection efficiency, if applicable.

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

See Attached Addendum

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

The concrete operational containment areas are designed to prevent or reduce surface runoff of spilled fertilizer by allowing the spilled fertilizer to be swept up to prevent exterior weather elements from coming in contact with the residue that spills during normal operations of handling agriculture fertilizers and chemicals from storage to field applicators.

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 Administration Code Chapter I: Sub Chapter i: Pesticide Control: Part 255 Agrichemical Facilities

Nature of Contaminants or Pollutants

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

Material Retained, Captured or Recovered		
Contaminant or Pollutant	Description	Disposal or Use
Dry Fertilizer	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: April, 2006

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))

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

Allen K. Rusk	General Manager
Printed Name	Title
Signature	11/20/2023 Date

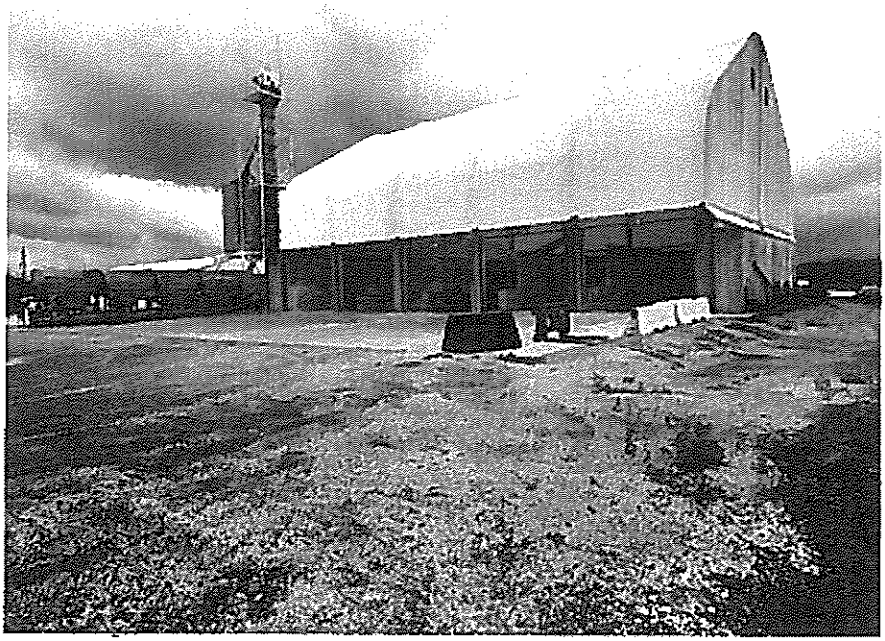
Document Index

Wabash Valley Allendale Facility Dry Fertilizer

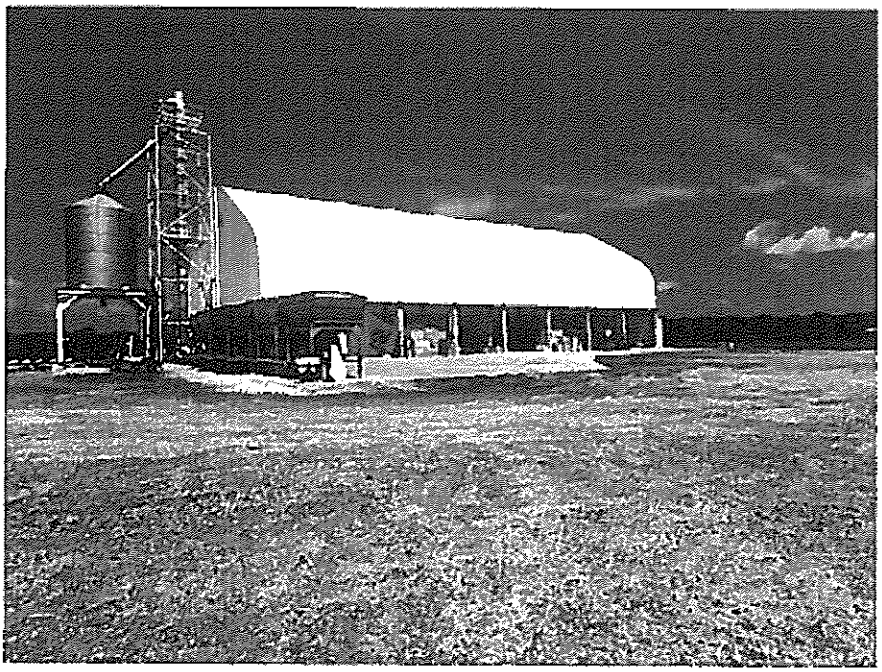
1) Application (3 pages)
2) Document Index (1 page)
3) Addendum to Application (7 pages)

Dry Fertilizer/Agrichemical Facility:

Dry Fertilzer Storage and Outside Operational Containment:



Allendale Dry Fertilizer Storage and Operational Concrete



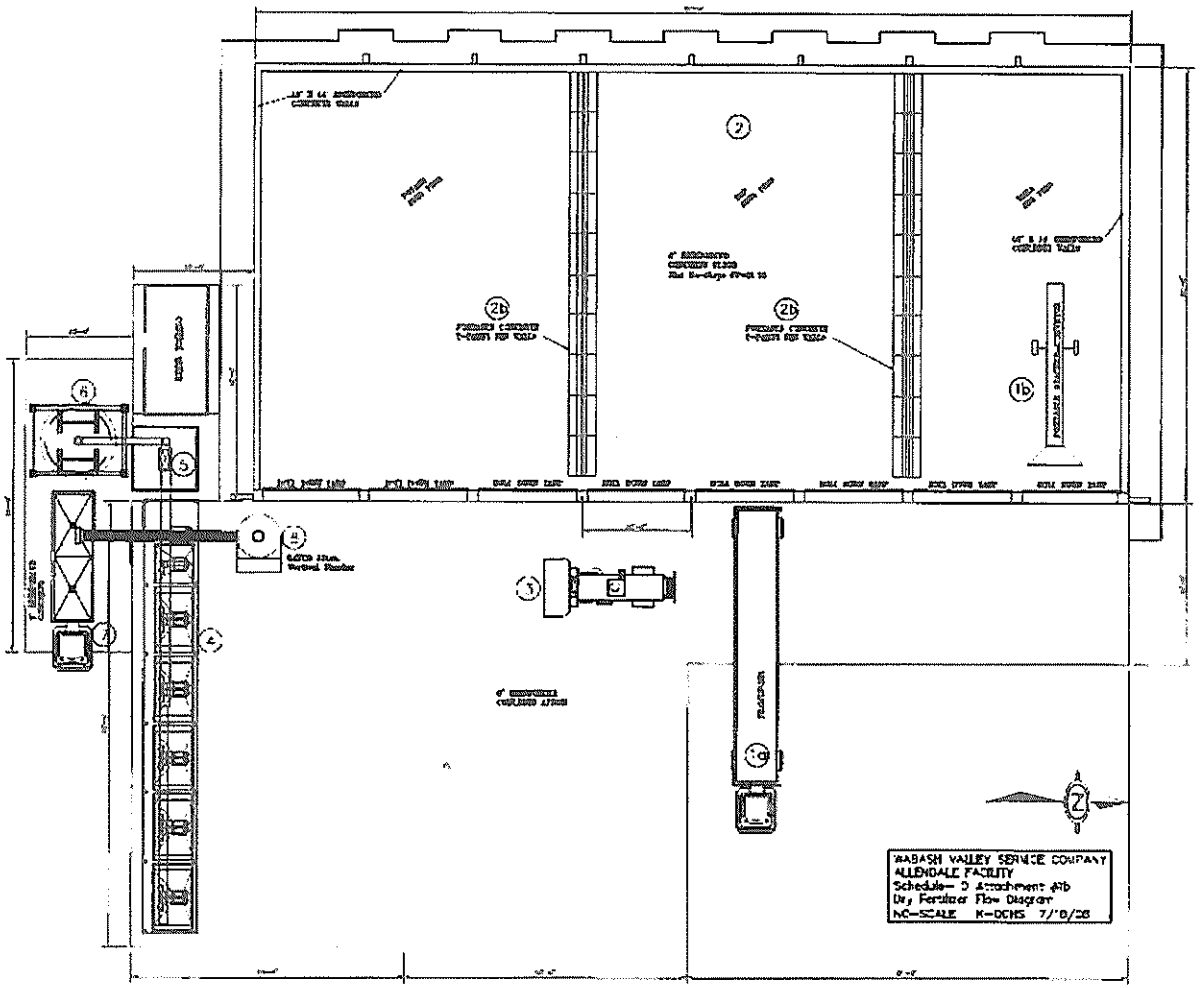
Allendale Dry Fertilizer Storage and Operational Concrete

The photographs on the previous page shows that the Dry fertilizer builidng is used exclusively for dry fertilizer storage. This building is described dimensionally in the Agrichemical Facility Permit AC90120143 Log# 21113481 **(Exhibit A).** The building measures 80.42' wide x 161.3' long with an estimated storage capacity of 5,300 tons of fertilizers.

The three external operational concrete structures described in the agrichemical facility permit are where 1) the fertilizer is moved from the storage bins to the blender by an end loader, 2) the fertilizer moves from the blender to the loading area, and 3) the fertilizer is loaded into transportation and application equipment.

The storage portion on the dry building qualifies for certification based on Part 255.140 (a) of Title 8 Illinois Administrative Code, Chapter I Sub Chapter i, A recent Pollution Control Board Decision (PCB 24-23) certified the dry fertilizer concrete and the building over the concrete siting Part 255.140 as the justification for the certification. The dry fertilizer storage portion of the total building at Allendale makes up 100% of the building area. This area would be equivalent to 80.42' x 161.33' as described in the agrichemical facility permit sited above.

The three concrete operational areas also qualify for certification. The concrete allows for spilled dry fertilizer to be swept up on a daily basis to prevent rain water from washing fertilizer residue off of the concrete structures onto the surrounding soil and ground water.



Floor Diagram of Dry Fertilizer Storage Building and Outside Operational Concrete

Exhibit A

Agrichemical Containment Permit

Allendale – Dry Fertilizer Building

State of Illinois
Department of Agriculture
AGRICHEMICAL CONTAINMENT PERMIT

Permittee:		**Facility ID Number:**	AC1853020000
		Facility Location:	Allendale
Wabash Valley Service Company 909 N. Court St. Grayville, IL 62844			
Permit #:	AC90120143	**Log Number:**	21113481
Facility Type:	Commercial: Retail Dealer	**Date Received:**	November 9, 2021
Date Issued:	November 17, 2021	**Expiration Date:**	November 17, 2026

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

OPERATIONAL CONTAINMENT STRUCTURE

Operation of an existing reinforced concrete operational containment structure measuring 48' (width) x 88' (length) x 1.17' (depth) with a total design capacity of 2911.0 cubic feet ($ft.^3$). The floor shall slope to one (1) of two (2) sumps, each sump measuring 1.5' (diameter) x 0.75' (depth), or to a series of six (6) sumps (three (3) for the separation of solids and three (3) for the recovery of liquid), each sump measuring 1.5' (width) x 1.5' (length) x 2.35' (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) 1500 gallon recovery tanks with a manually activated sump pump. Segregation shall be performed based upon the applicable target crop and label use. All loading, unloading and washing of bulk liquid agrichemical transportation and application equipment shall be performed upon the herein permitted structure.

SECONDARY CONTAINMENT STRUCTURES

Operation of an existing reinforced concrete secondary containment structure measuring 24' (width) x 54' (length) x 4' (height) with a perimeter wall elevation of 94.7' providing a total design capacity of 6769 cubic feet (ft^3). This structure shall be separated into two (2) areas, (one (1) area for the storage of bulk liquid pesticides and one (1) are for the storage of bulk liquid fertilizer) by a common segregating wall at elevation 96.7'. Details of the segregated areas are as follows:

Operation of an existing reinforced concrete secondary containment structure measuring 24' (width) x 34' (length) x 2.0' (height) with a total design capacity of 1594.0 cubic feet ($ft.^3$) to the limiting elevation of the segregating wall. The floor shall slope to a single sump measuring 1.5' (diameter) 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 1500 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 said structure. This structure shall be referred to as **SC-1**.

Operation of an existing reinforced concrete secondary containment structure measuring 20' (width) x 24' (length) x 2' (height) with a total design capacity of 925.0 cubic feet (ft^3) to the limiting elevation of the segregating wall. The floor shall slope to a single sump measuring 1.5' (diameter) x 0.75' (depth) to facilitate the collection and recovery of all escaped product and/or agrichemical wastewater. All recovered

State of Illinois
Department of Agriculture
AGRICHEMICAL CONTAINMENT PERMIT

effluent shall be transferred to one (1) of the two (2) aforementioned 1500 gallon recovery tank(s) 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 said structure. This structure shall be referred to as **SC-2**.

DRY FERTILIZER STRUCTURES

Operation of an existing bulk dry fertilizer storage building measuring 80.42' (width) x 161.33' (length) with an estimated total storage capacity of 5,300 tons. The structure is composed of three (3) storage bins (one (1) bin measuring 60' (width) x 80.42' (length) with an estimated storage capacity of 2,500 tons, one (1) bin measuring 60' (width) x 80.42' (length) with an estimated storage capacity of 2,000 tons, one (1) bin measuring 40' (width) x 80.42' (length) with an estimated storage capacity of 500 tons).

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

Operation of an existing reinforced concrete operational containment structure measuring 82' (width) x 183' (length). The end loader transfer of bulk dry fertilizer between storage and the blenders, the unloading of bulk dry fertilizer transportation and application equipment, and the blending of bulk dry fertilizer shall be performed upon the herein permitted structure.

Operation of an existing reinforced concrete operational containment structure measuring 16' (width) x 22' (length). The conveyor transfer of bulk dry fertilizer from the blender to the bulk dry fertilizer loading area containment structure shall be performed upon the herein permitted structure.

Operation of an existing reinforced concrete operational containment structure measuring 20' (width) x 54' (length). All loading of bulk dry fertilizer transportation and application equipment 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).

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 operate the herein permitted operational containment structure pursuant to 8 Illinois Administrative Code 255.90 (a) (b) (c) and (f), and 8 Illinois Administrative Code 255 110 (c).

SPECIAL CONDITION 4: The permittee shall operate the exposed dry fertilizer operations pursuant to 8 Illinois Administrative Code 255.140 (a), (c) and (d).

State of Illinois
Department of Agriculture
AGRICHEMICAL CONTAINMENT PERMIT

SPECIAL CONDITION 5: The permittee shall employ concentric piping for the piping span from the bulk liquid pesticide secondary containment structure (**SC-1**) to the operational containment structure (**OC-1**).

SPECIAL CONDITION 6: Accumulated rinsates and wash water in the scale pit shall not have a detention time greater than 72 hours pursuant to 8 Illinois Administrative Code 255.90 (g).

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

Brad A. Beaver, Acting Chief
Bureau of Environmental Programs

Rosario Johnstone, Manager
Technical Services & Pesticide Laboratory

IEPA WPC: Permits
file
185302.pr

Wabash Valley
Allendale, IL
Liquid Fertilizer

Environmental Protection Agency

P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

Certification (Property Tax Treatment)
Pollution Control Facility

For Agency Use Only			
File Number:	TC-48667	Date Rec'd:	11-28-2023
Certification Number:		Date:	

Facility Type (check one): ○ Air ⊘ Water

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

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

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

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

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

I. Applicant Information

Company Name: Wabash Valley Service Company

Person Authorized to Receive Certification	Person to Contact for Additional Information
Name: Allen K. Rusk, General Manager	Name: Kent A. Ochs, Regulatory and Safety Coordinator
Street Addr: 909 N. Court Street	Street Addr: 909 N. Court Street
City: Grayville State: IL	City: Grayville State: IL
ZIP: 62844 Phone: 618/375-2311	ZIP: 62844 Phone: 618/375-2311
Email:	Email: kentochs@wabashvalleyfs.com

II. Facility Information

Facility Location: Quarter Section: SE Sec. 11 Township: 1N Range: 12W
Municipality: Allendale Township: Wabash

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

Address: 21546 Hwy 1 City: Allendale
State: IL Zip Code: 62410 County: Wabash Book Number:
Property Index Number: 1-07-11-200-006

Note: The Property Index Number is the numerical reference used to identify a parcel of real property for assessment and taxation purposes.

Manufacturing Operations Information

Nature of Operations Conducted at the Above Location

Loading, unloading, and storage of liquid fertilizer and agrichemicals

Permit Information

WPC Construction Permit Number: AC90120143 Date Issued: Jul 30, 2022
NPDES Permit Number: Date Issued: Exp. Date:
APC Construction Permit Number: Date Issued:
APC Operating Permit Number: Date Issued: Exp. Date:

Note: Submit copies of all relevant permits issued by local pollution control agencies (e.g. MSD Construction Permit).

This Agency is authorized to request this information under 415 ILCS 5/4(b)(2012). Disclosure of this information is voluntary and no penalties will result from the failure to provide the information. However, the absence of the information could prevent your application from being processed or could result in denial of your application.

Manufacturing Process Information

Please provide information on the manufacturing process and materials on which pollution control facility is used, including each major piece of equipment associated with the pollution control facility (or low sulfur dioxide emission coal fueled device).

Description of the Process

Not Applicable

Materials Used in the Process

Not Applicable

Pollution Control Facility Information

Please provide a narrative description of the pollution control facility (or low sulfur dioxide emission coal fueled device), and an explanation of why its primary purpose is to eliminate, prevent or reduce pollution. State the type of control facility, as well as a narrative description and a process flow diagram describing the pollution control facility. Include an average analysis of the influent and effluent of the control facility stating the collection efficiency, if applicable.

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

See Attached Addendum

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

The operational and secondary containment areas are designed to eliminate, prevent or reduce surface runoff of agrichemicals and fertilizer by covering the exposed operational areas to prevent exterior weather elements from coming in contact with residue that spills during normal operations of handling agriculture fertilizers and chemicals from storage to field applicators.

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 Administration Code Chapter I: Sub Chapter i: Pesticide Control: Part 255 Agrichemical Facilities

Nature of Contaminants or Pollutants

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

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

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

Liquid Fertilizer and Chemical Facility; April, 2024 Estimated Completion

Status of installation on date of application

Liquid Fertilizer Operational in 2024

III. Verification and Signature

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

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

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

Allen K. Rusk	General Manager
Printed Name	Title
Signature	11/20/2023
	Date

Document Index

Wabash Valley Allendale Facility

Liquid Fertilizer

1) Application (3 pages)
2) Document Index (1 page)
3) Addendum to Application (11 pages)

Addendum:

Liquid Fertilizer/Agrichemical Facility:

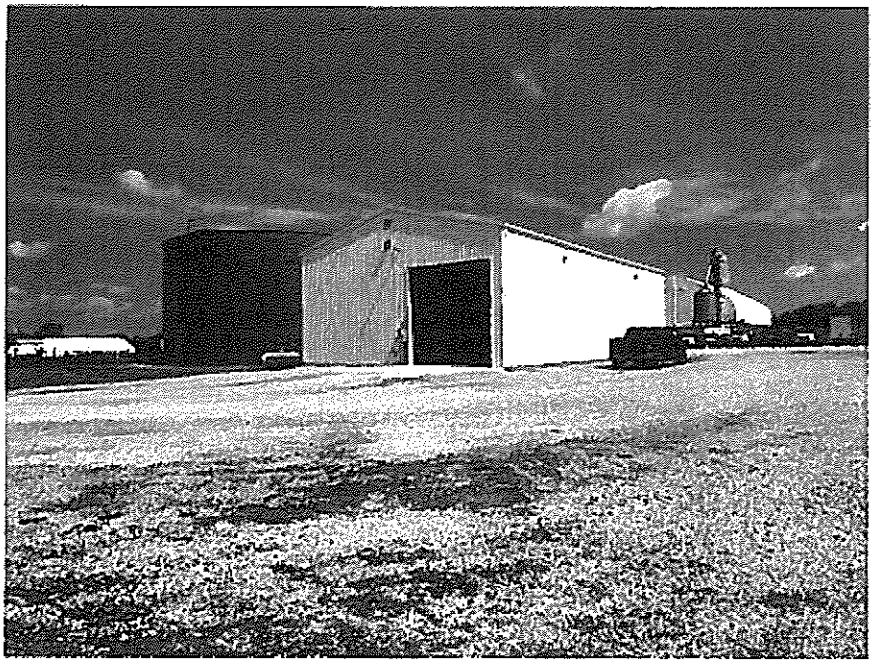


Figure 1- Liquid fertilizer truck loading/unloading building / 1,000,000 Nitrogen Storage Tank

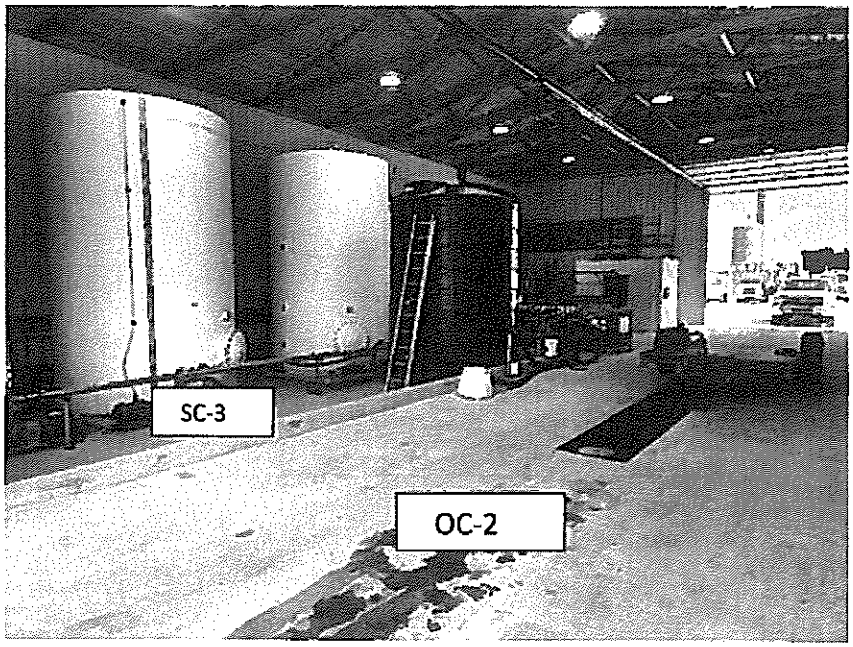


Figure 2 - Inside view of OC-2 and SC-3

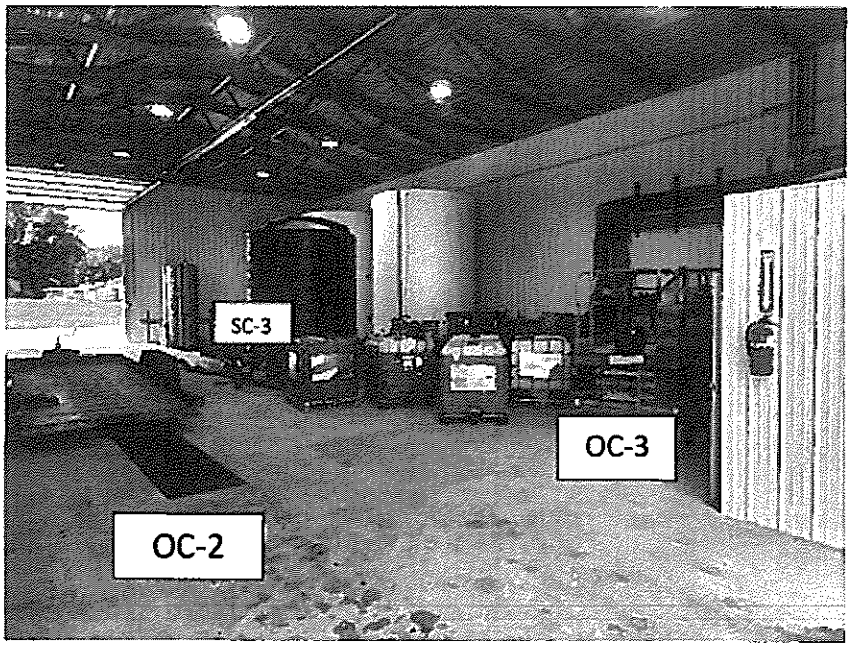


Figure 3- **Inside View of OC-2, OC-3 and SC-3**

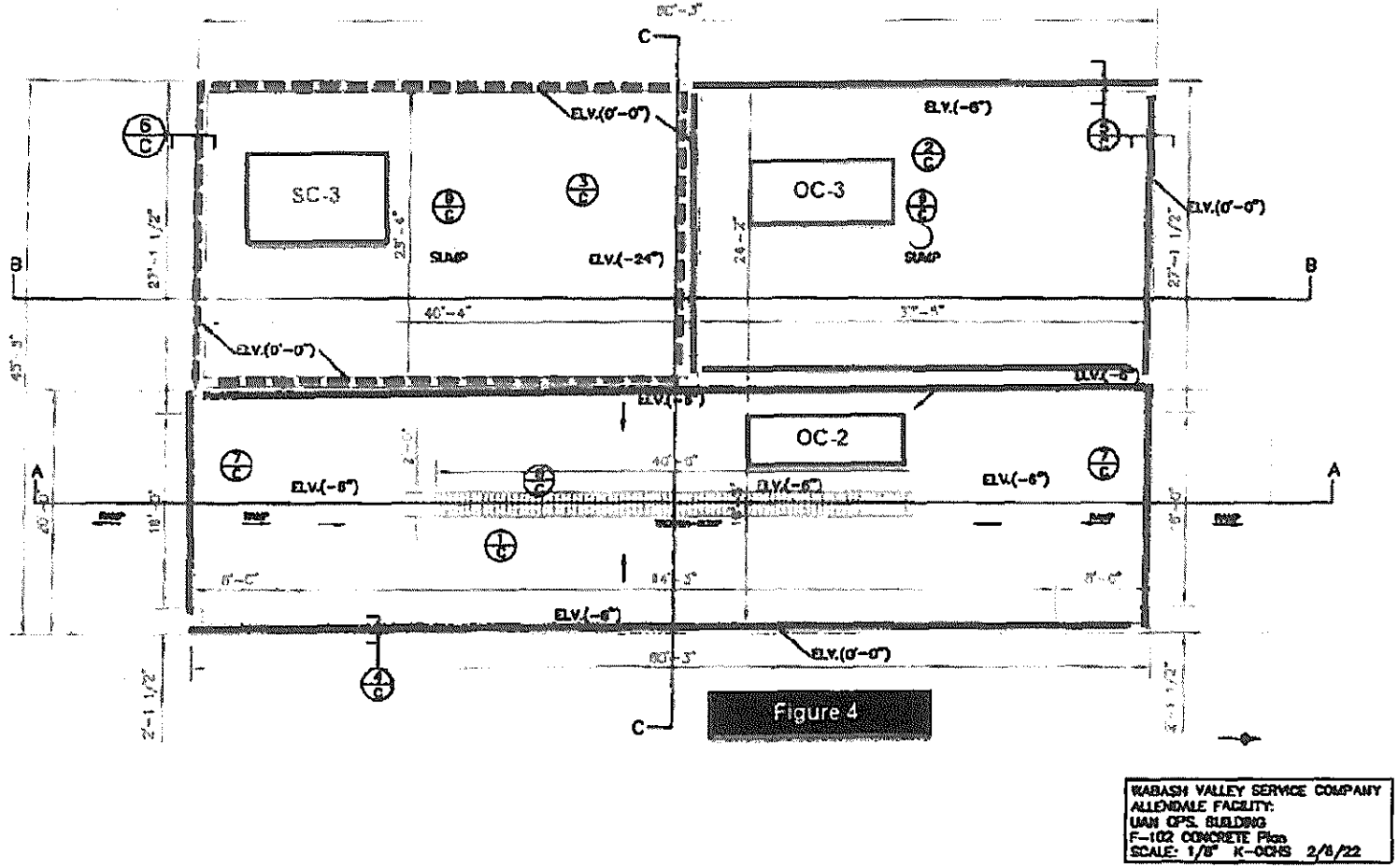


Figure 4

Floor Plan of Liquid Fertilizer Load Out Building

OC-2 , OC-3 and SC-3 designations correspond with description in the Agrichemical Permit # AC90120143 Log# 22023540

Exhibit A

OC-2 and OC-3 Operational Areas in Figure 4

The containment structure, (OC-2 and OC-3) included in this certification application, are called out and described in the Agrichemical Facility Permit Modification #AC90120143 Log# 22023540 issued July 30, 2022 **(Exhibit A (1).**

OC-2 and OC-3 both qualify as operational containment areas under 8 Illinois Administrative Code, Title 8: Chapter I: Subchapter i: Part 255: Section: 255.90.

OC-2 is an operational containment area comprised of a curbed, concrete structure. The described dimension is a single truck width bay approximately 19.50' wide and 80.25' x .67' which runs the length of the building. This bay is used for customer trucks and application vehicles to load liquid nitrogen fertilizer blended with micro nutrients. The bay is also used to unload liquid nitrogen fertilizer from transport trucks into the large storage tank adjacent to the building. The second operational containment, (OC-3), with a described dimension of is a 24.2' x 37.42' x. 67' is an offset area used to store mini-bulk products that are sold to retail customers. The building over the containment structure, prevents rain water from accumulating throughout the year within the concrete operational containment structure (COCS) thereby maintaining the integrity of the collection device as approved under the Agency endorsed Agrichemical Facility permit.

SC-3 Secondary Containment Area Green Outline in Figure 4

This secondary containment area is a concrete structure measuring 23.33' x 40.33 feet x 2.0'. This structure is where 4-10,000 gallon micro nutrient tanks, 1-10,000 water tank and 1-2,400 gallon rinsate and spill recovery tank can be located. The containment area of SC-3 is 1,727.9 cu. Ft.

Section 255.90 of Title 8 of the Illinois Administrative Code states, in part, "if the loading area containment area is not protected from contact with precipitation, the containment volume shall be equal to or greater than the volume generated by a 6-inch rain storm." Since the loading area is curbed with an 8" concrete curb, if uncovered, the containment volume of the operational containment areas will contain the volume of the 6-inch rain storm. Stated in the code this would be equivalent to the 25-year, 24-hour storm event."

However, the building covering the containment areas is an integral part of the engineered design components that are necessary to mitigate yearly accumulated rain water runoff. For example, if the operational and secondary containment structures were open to the elements the total rainfall that would accumulate on OC-2, OC-3 and SC-3 during a one-year period would be 45 inches in Wabash County Illinois (Exhibit B). Without the building this accumulated water would otherwise have to be stored in a tank until such time that it could be emptied by field spraying on fallow or bare ground during the months when no crops were present. To illustrate, if the operational and secondary containment located within the liquid building at Allendale were not covered by a roof, the required containment holding capacity for a yearly average accumulated rain fall would be 100,980 gallons. Holding the accumulated rainfall in a holding tank is an impractical solution and would not be cost effective.

Covering the operational and secondary containment areas with a building is the most efficient and cost-effective method to mitigate all potential causes of environmental pollution from rain water over a year-to-year time frame.

Calculating the cost of rinsate disposal without building

Allendale Liquid UAN Building

Sq. Ft. Size of Liquid Building		3,600	
Inches of Ave. Annual Rain (20% in Winter & 80% during growing season)		45	
Total yearly gallons collected on liquid bulildng operational and secondary containment =		100,980	
yearly accumulate percipitation during summer		80.00%	
Gallons of Rinsate Storage Req.		80,784	
cost of 100,000 gal. tank		$100,000	
Cost to Field spread 100% yrly rainfall)	assuming 50 gal. / acre & $10 /acre spreading cost	$20,196	annual cost/ year
Cost to spread rinsate over 20 years		$403,920	
Total 20 yr. cost to mitigate rinsate w/o buiding		$503,920	
Cost of Building		$150,000	
Conclusion	A building covering the operational containment contributes over 200% of its value to pollution control		

The chart above assumes that 80% of the rainfall will occur during the crop growing season. During this time frame (April – October) it would be impossible to empty the rinsate collection tank on fallow or empty fields. This is an impractical method to mitigate a potential pollution hazard. Further, if a 100,000-gallon holding tank was integral in the design as the solution to mitigate the yearly rainfall without a building where would you dispose of 100,000 residue laced gallons of herbicide, insecticide and fungicide water? I do not think any farmers would want this mixture sprayed on their field.

In addition, the above chart shows that a 20-year accumulated cost to dispose of the collected rainfall without a building covering the operational and secondary containment areas would be more than three times the cost of a building. Therefore, it is concluded that a building over this large operational and secondary containment area is the most efficient, cost effective and surest method of mitigating foreseen and unforeseen ground water contamination from residue runoff.

Therefore, it is concluded that the primary purpose of the roof covering the operational and secondary containment areas of the subject liquid fertilizer loadout building is for eliminating, preventing, or reducing pollution. A building operational containment structure qualifies as a containment system referenced in Title 8 Ill. Admin Code 255.90 (a) because it is integral to the overall integrity of the collection system

Exhibit A

Agrichemical Containment Permit

Allendale – New Liquid Fertilizer Building

State of Illinois
Department of Agriculture
AGRICHEMICAL CONTAINMENT PERMIT

AGRICHEMICAL FACILITY PERMIT MODIFICATION

Permittee:		**Facility ID Number:**	**AC1853020000**
		Facility Location:	Allendale
Wabash Valley Service Company 909 N. Court St. Grayville, IL 62844			
Permit #:	**AC90120143**	**Log Number:**	22023540
Facility Type:	Commercial: Retail Dealer	**Date Received:**	February 14, 2022
Date Issued:	**July 30, 2022**	**Expiration Date:**	**November 17, 2026**

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:

OPERATIONAL CONTAINMENT STRUCTURE

Installation and operation of a reinforced concrete operational containment structure with the greatest dimensions measuring 19.5' (width) x 80.25' (length) x 0.67' (depth) with a total design capacity of 956.5 cubic feet (ft.^{3}). The floor shall slope to a single trench measuring 2' (width) x 40' (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 a single 1,500 gallon recovery tank with a manually activated sump pump. All 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-2**.

Installation and operation of a reinforced concrete operational containment structure with the greatest dimensions measuring 24.2' (width) x 37.42' (length) x 0.67' (depth) with a total design capacity of 452.2 cubic feet (ft.^{3}). The floor shall slope to a single trench measuring 1.25' (width) x 1.25' (length) x .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 1,500 gallon recovery tank with a manually activated sump pump. The storage and repackaging of bulk liquid fertilizer shall be performed within the said structure. This structure shall be referred to as **OC-3**.

SECONDARY CONTAINMENT STRUCTURE

Installation and operation of a reinforced concrete secondary containment structure measuring 23.33' (width) x 40.33' (length) x 2' (height) with a total design capacity of 1,727.9 cubic feet (ft.^{3}). The floor shall slope to a single trench measuring 1.25' (width) x 1.25' (length) x .75' (depth) to facilitate the collection and recovery of all escaped product and/or agrichemical wastewater. All recovered effluent shall be transferred to the aforementioned 1,500 gallon recovery tank with a manually activated sump pump. All bulk liquid fertilizer shall be stored within the said structure. This structure shall be referred to as **SC-3**.

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

State of Illinois
Department of Agriculture
AGRICHEMICAL CONTAINMENT PERMIT

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.

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

Brad A. Beaver, Acting-Chief
Bureau of Environmental Programs

Rosario Johnstone, Manager
Technical Services & Pesticide Laboratory

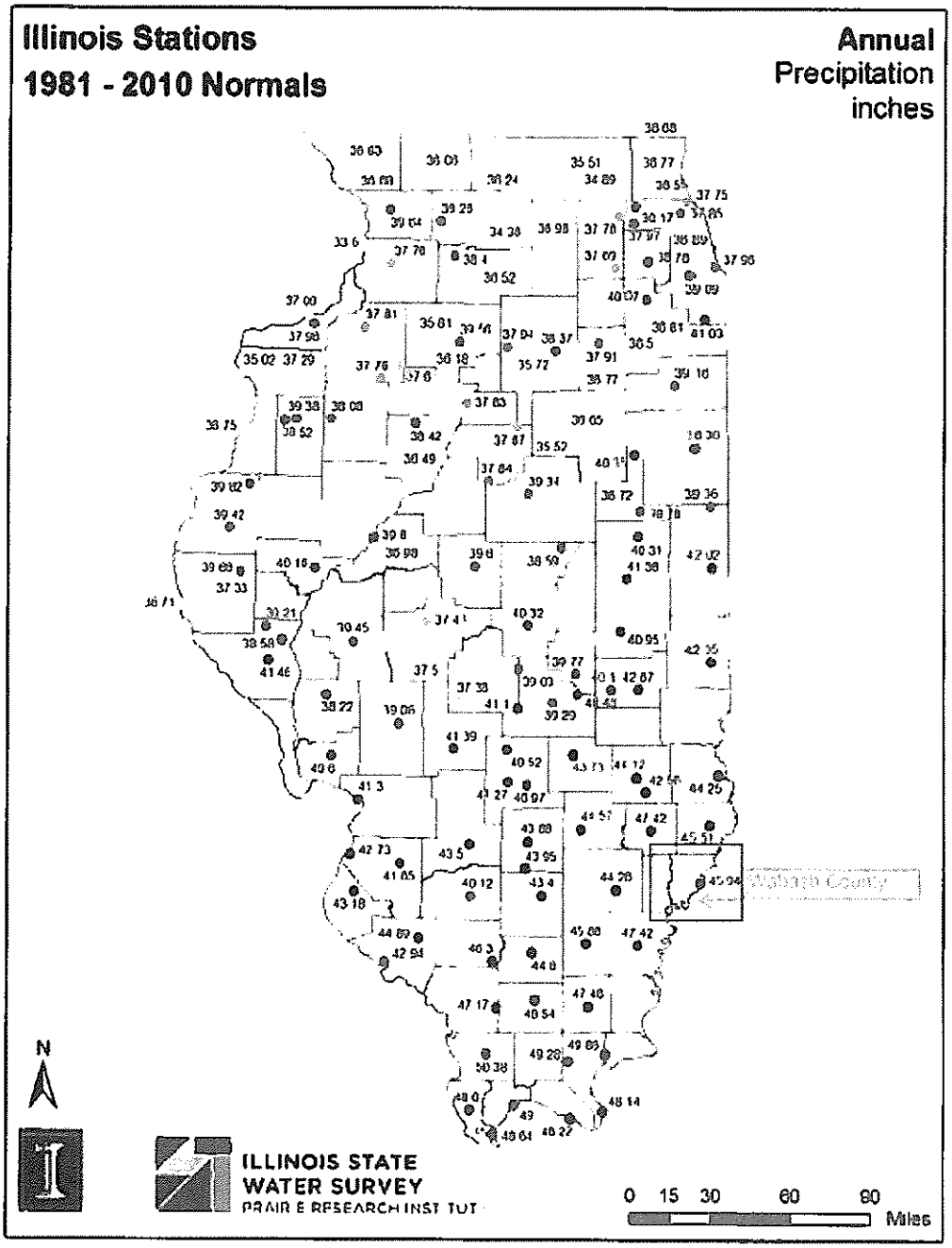
IEPA W PC: Permits
file
185302 pmod

Exhibit B

Illinois Annual Rainfall Map

For

Wabash County (Allendale)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Wabash Valley
Allendale, IL
SynThetic Bladder

nvironmental Protection Agency

P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

Certification (Property Tax Treatment) Pollution Control Facility

For Agency Use Only			
File Number:	TC-1486167	Date Rec'd:	11-28-2023
Certification Number:		Date:	

Facility Type (check one): ○ Air ⊘ Water

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

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

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

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

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

I. Applicant Information

Company Name: Wabash Valley Service Company

Person Authorized to Receive Certification	Person to Contact for Additional Information
Name: Allen K. Rusk, General Manager	Name: Kent A. Ochs, Regulatory and Safety Coordinator
Street Addr: 909 N. Court Street	Street Addr: 909 N. Court Street
City: Grayville State: IL	City: Grayville State: IL
ZIP: 62844 Phone: 618/375-2311	ZIP: 62844 Phone: 618/375-2311
Email:	Email: kentochs@wabashvalleyfs.com

II. Facility Information

Facility Location: Quarter Section: SE Sec. 11 Township: 1N Range: 12W
Municipality: Allendale Township: Wabash

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

Address: 21546 Hwy 1 City: Allendale
State: IL Zip Code: 62410 County: Wabash Book Number:
Property Index Number: 1-07-11-200-006

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

Storage of liquid fertilizer

Permit Information

WPC Construction Permit Number: AC22023539 Date Issued: Jul 30, 2022
NPDES Permit Number: Date Issued: Exp. Date:
APC Construction Permit Number: Date Issued:
APC Operating Permit Number: Date Issued: Exp. Date:

Note: Submit copies of all relevant permits issued by local pollution control agencies (e.g. MSD Construction Permit).

This Agency is authorized to request this information under 415 ILCS 5/4(b)(2012). Disclosure of this information is voluntary and no penalties will result from the failure to provide the information. However, the absence of the information could prevent your application from being processed or could result in denial of your application.

Manufacturing Process Information

Please provide information on the manufacturing process and materials on which pollution control facility is used, including each major piece of equipment associated with the pollution control facility (or low sulfur dioxide emission coal fueled device).

Description of the Process

Not Applicable

Materials Used in the Process

Not Applicable

Pollution Control Facility Information

Please provide a narrative description of the pollution control facility (or low sulfur dioxide emission coal fueled device), and an explanation of why its primary purpose is to eliminate, prevent or reduce pollution. State the type of control facility, as well as a narrative description and a process flow diagram describing the pollution control facility. Include an average analysis of the influent and effluent of the control facility stating the collection efficiency, if applicable.

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

Agrichemical secondary containment synthetic membrane with a 1,000,000 gallon steel storage tank.
See Attached Addendum

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

The primary purpose of the synthetic membrane is to eliminate, prevent or reduce stored fertilizer within the tank from entering ground water providing a backup storage vessel to contain any leaked product.

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 Administration Code Chapter I: Sub Chapter i: Pesticide Control: Part 255 Agrichemical Facilities

Nature of Contaminants or Pollutants

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

Material Retained, Captured or Recovered		
Contaminant or Pollutant	Description	Disposal or Use
Liquid Fertilizer	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: Mar 1, 2024

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

Being constructed in 2023 will be operational in March of 2024.

Status of installation on date of application

being constructed

III. Verification and Signature

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

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

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

Allen K. Rusk	General Manager
Printed Name	Title
Signature	11/20/2023 Date

Document Index

Wabash Valley Service Co Application for Certification

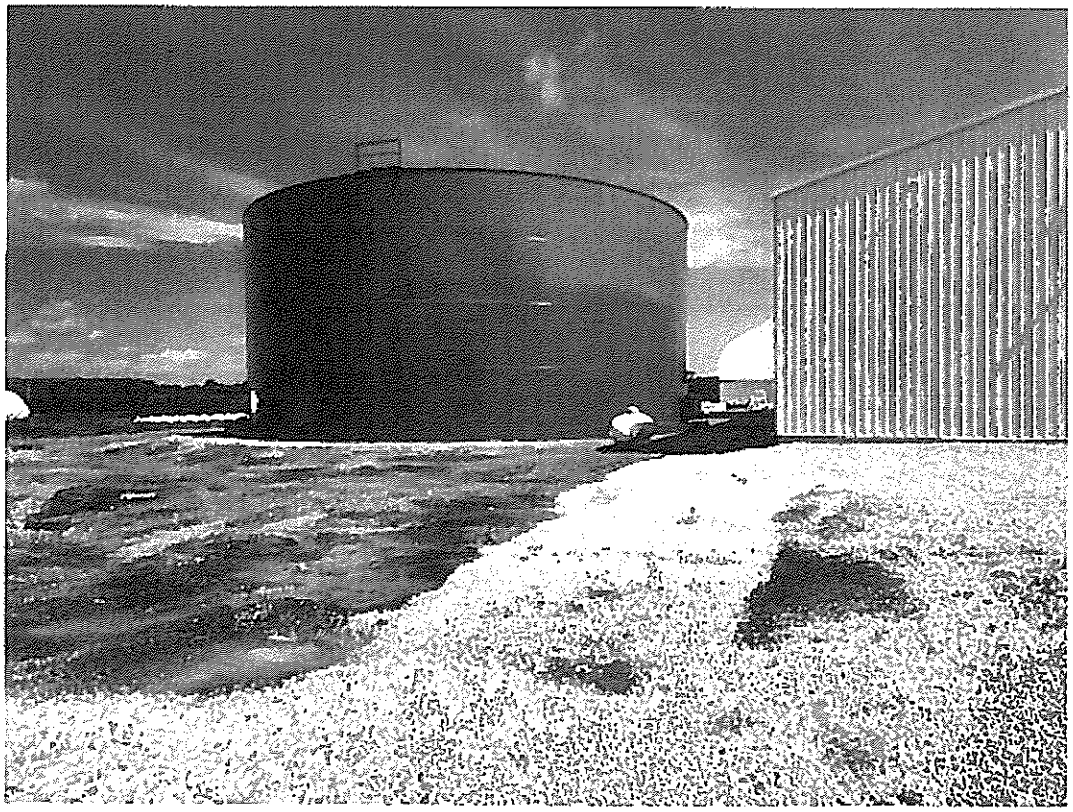
Allendale

Synthetic Membrane Fertilizer Storage Tank

1) Application
2) Document Index (1 page)
3) Addendum to Application (4 pages)

Addendum:

Experimental Secondary Containment Structure



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

The Experimental Agrichemical Containment Permit AC22023539 Log# 22023539 (Exhibit A) describes the synthetic membrane liner of the above tank. The liner serves as the primary containment within the tank. Functionally, the exterior steel tank is the secondary containment structure. Although the liner is the primary containment, it has been the policy of the Illinois EPA to treat the liner as the material that allows the steel tank to be approved as a contained liquid fertilizer storage devise. The structural integrity for containing the liquid fertilizer within the liner would not be possible without the physical strength of the steel tank. The Illinois EPA has therefore concluded that even though the synthetic liner acts as a primary containment device it is treated as a secondary containment device for certification purposes. It is therefore concluded that the synthetic liner of the above tank should be certified as a pollution containment facility.

Exhibit A

State of Illinois
Department of Agriculture
AGRICHEMICAL CONTAINMENT PERMIT

EXPERIMENTAL

Permittee:		**Facility ID Number:**	**AC1853020000**
		Facility Location:	**Allendale**
Wabash Valley Service Company 909 N. Court St. Grayville, IL 62844			
Permit #:	**AC22023539**	**Log Number:**	22023539
Facility Type:	Commercial: Retail Dealer	**Date Received:**	February 14, 2022
Date Issued:	**July 30, 2022**	**Expiration Date:**	**July 30, 2024**

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

SECONDARY CONTAINMENT STRUCTURES

Installation and operation of a mild steel bulk liquid fertilizer storage tanks with a storage capacity of 1,000,000 with the installation and operation of a synthetic membrane liner within each of the aforementioned tanks to serve as primary containment within each tank, in accordance with 8 Illinois Administrative Code 255.60.

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

This experimental permit has been reviewed and approved by the Illinois Environmental Protection Agency per the attached permit endorsement. This experimental 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).

SPECIAL CONDITION 2: All uncontained stainless steel product piping associated with the herein permitted structures shall be pressure tested annually. Records of said testing shall be maintained on file at the facility.

SPECIAL CONDITION 3: The permittee shall notify the Department immediately of any detection of agrichemicals in the effluent recovered from the leak monitoring ports installed under the synthetic liner and the valve containment boxes.

SPECIAL CONDITION 4: The Department and the Agency may require conventional secondary containment structures in accordance with 8 Illinois Administrative Code 255.80 to be installed if the experimental design permitted herein fails to provide adequate containment.

SPECIAL CONDITION 5: The permittee shall maintain all monitoring valves in a closed position, except when facility personnel are directly attending these valves for leak monitoring and maintenance.

State of Illinois
Department of Agriculture
AGRICHEMICAL CONTAINMENT PERMIT

SPECIAL CONDITION 6: The permittee shall submit on the permit renewal application an inspection report indicating the condition of the liner system and the steel storage tank. The said inspection shall be performed by a qualified individual based upon education and/or equivalent experience who is employed outside of the company. The inspections shall be performed between **February 2024** and **July 2024** at a time that is convenient to empty the storage vessel(s).

SPECIAL CONDITION 7: The inspection and maintenance records for the structures and detection valves shall be maintained at the facility. The permittee shall notify the Department immediately of any detection of agrichemicals in effluent sampled or recovered from the leak monitoring ports installed under the proposed synthetic liner and the valve containment structures. The permittee shall sample, on a quarterly basis, any effluent collected at the monitoring ports and analyze samples for fertilizer content. Results of any analysis shall be reported to the Department immediately

SPECIAL CONDITION 8: The permittee shall submit to the Department the results of all post-leak analyses used to establish baseline nitrate-nitrogen levels associated with the synthetic liner. Samples shall be taken of flush water removed during decontamination of the monitoring area and of any effluent forced out during the post repair filling of the storage tank.

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

Brad A. Beaver, Acting-Bureau Chief
Bureau of Environmental Programs

Rosario Johnstone, Manager
Technical Services & Pesticide Laboratory

IEPA WPC Permits
file
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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 December 3, 2024, the attached **NOTICE**, **APPEARANCE** and **RECOMMENDATION OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**, upon the following persons by causing to be mailed a true copy thereof in an envelope duly addressed, bearing proper first class postage, and deposited in the United States mail at Springfield, Illinois:

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

Copies also provided electronically as follows:

Illinois Department of Revenue
via email at REV.PropTaxApp@illinois.gov
101 West Jefferson
P.O. Box 19033
Springfield, Illinois 62794

[Electronic Filing]

Clerk
Illinois Pollution Control Board
60 East Van Buren Street, Suite 630
Chicago, Illinois 60605

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

/s/ Amanda Kimmel
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)