BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

LASALLE COUNTY FARM SUPPLY Vapor Recovery System	))	
	)	PCB 07-
	)	(Tax Certification)
PROPERTY IDENTIFICATION NUMBER 22-25-333-000	))	

NOTICE

TO: Dorothy Gunn, Clerk
Illinois Pollution Control Board
State of Illinois Center
100 W. Randolph Street, Suite 11-500
Chicago, Illinois 60601

Andy Wagner
LaSalle County Farm Supply
3107 North Illinois Rte. 23
P.O. Box 459
Ottawa, Illinois 61350

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

PLEASE TAKE NOTICE that I have today filed with the Office of the Pollution Control Board the **APPEARANCE** and **RECOMMENDATION** of the Illinois Environmental Protection Agency, a copy of which is herewith served upon the applicant and a representative of the Illinois Department of Revenue.

Respectfully submitted by,

_____/s/_____
Robb H. Layman
Assistant Counsel

Date: December 28, 2006

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276
Telephone: (217) 524-9137

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

LASALLE COUNTY FARM SUPPLY Vapor Recovery System	))	
	)	PCB 07-
	)	(Tax Certification)
PROPERTY IDENTIFICATION NUMBER 22-25-333-000	))	

APPEARANCE

I hereby file my Appearance in this proceeding on behalf of the Illinois Environmental Protection Agency.

Respectfully submitted by,

_____/s/_____
Robb H. Layman
Assistant Counsel

Date: December 28, 2006

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

LASALLE COUNTY FARM SUPPLY Vapor Recovery System	)	
	)	PCB 07-
	)	(Tax Certification)
PROPERTY IDENTIFICATION NUMBER 22-25-333-000	)	

RECOMMENDATION

NOW COMES the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY ("Illinois EPA"), through its attorneys, and pursuant to 35 Ill. Adm. Code 125.204 of the ILLINOIS POLUTION CONTROL BOARD'S ("Board") procedural regulations, files the Illinois EPA's Recommendation in the above-referenced request for tax certification of pollution control facilities. The Illinois EPA recommends a **grant** of the applicant's request. In support thereof, the Illinois EPA states as follows:

1. On August 30, 2006, the Illinois EPA received a request and supporting information from LASALLE COUNTY FARM SUPPLY ("LaSalle County FS") concerning the proposed tax certification of certain air emission sources and/or equipment located at its fuel bulk storage facility in Ottawa, LaSalle County, Illinois. A copy of the relevant portions of LaSalle County FS's application is attached hereto. **[Exhibit A]**.

2. The applicant's address is as follows:

LaSalle County Farm Supply
2540 South Illinois Rte. 23
Ottawa Illinois 61350

3. The subject matter of this request consists of a Vapor Recovery System that is associated with the fuel storage and truck loading/unloading facilities. The Vapor Recovery System generally collects volatile organic materials that would otherwise be emitted from process operations during the loading and unloading of gasoline and diesel products stored in the storage tanks.

4. Section 11-10 of the Property Tax Code, 35 ILCS 200/11-10 (2004), defines "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: (a) eliminating, preventing, or reducing air or water pollution… or (b) treating, pretreating, modifying or disposing of any potential solid, liquid, 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."

5. Pollution control facilities are entitled to preferential tax treatment, as provided by 35 ILCS 200/11-5 (2004).

6. Based on information in the application and the underlying purpose of the Vapor Recovery System to prevent, eliminate or reduce air pollution, it is the Illinois EPA's engineering judgment that the described project and/or equipment may be considered as "pollution control facilities" in accordance with the statutory definition and consistent with the Board's regulations at 35 Ill. Adm. Code 125.200. **[Exhibit B].**

7. Because the Vapor Recovery System satisfies the aforementioned criteria, the Illinois EPA recommends that the Board **grant** the applicant's requested tax certification.

8. The Illinois EPA notes that the applicant has not documented whether the cost estimate in its application is representative of the total costs for the fuel storage and

truck loading/unloading facilities in their entirety or for the vapor recovery system alone. For purposes of this Tax Certification, preferential tax treatment should only be afforded to the costs of the vapor recovery system.

Respectfully submitted by,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

_____/s/_____
Robb H. Layman
Assistant Counsel

DATED: December 28, 2006

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
Telephone: (217) 524-9137

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of December, 2006, I electronically filed the following instruments entitled **NOTICE, APPEARANCE** and **RECOMMENDATION** with:

Dorothy Gunn, Clerk
Illinois Pollution Control Board
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

and, further, that I did send a true and correct copy of the same foregoing instruments, by First Class Mail with postage thereon fully paid and deposited into the possession of the United States Postal Service, to:

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

Andy Wagner
LaSalle County Farm Supply
3107 North Illinois Rte. 23
P.O. Box 459
Ottawa, Illinois 61350

_____/s/_____
Robb H. Layman
Assistant Counsel

APPLICATION FOR CERTIFICATION (PROPERTY TAX TREATMENT)
POLLUTION CONTROL FACILITY
AIR X **WATER** ☐

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
P. O. Box 19276, Springfield, IL 62794-9276

This Agency is authorized to request this information under Illinois Revised Statues, 1979, Chapter, 120, Section 502a-5. Disclosure of this information is voluntary. However, failure to comply could prevent your application from being processed or could result in denial of your application for certification.

FOR AGENCY USE

File No. | Date Received | Certification No. | Date 8/28/2006

Sec. A — APPLICANT

Company Name: LaSalle County Farm Supply

Person Authorized to Receive Certification	Person to Contact for Additional Details
Andy Wagner	Keith Honegger
Street Address: 3107 N. IL Rt. 23 Box 459	Street Address: 3200 Old Troy Road
Municipality, State & Zip Code: Ottawa, IL 61350	Municipality, State & Zip Code: Glen Carbon, IL 62034
Telephone Number: 815/434-0131	Telephone Number: 618/656-8046

Location of Facility: Quarter Section: SW QTR SEC 25 | Township: T33N | Range: R3E | Municipality: Ottawa | Township: Ottawa

Street Address: 2540 S. IL 23 Ottawa, IL | County: LaSalle | Book Number:

Property Identification Number: 22-25-333-000 | Parcel Number:

Sec. B — MANUFACTURING OPERATIONS

Nature of Operations Conducted at the Above Location:
Fuel bulk storage facility for petroleum distilled products and soyoil products. Stored products are loaded and unloaded from transport trucks into the storage facility within a containment building

Water Pollution Control Construction Permit No.	Date Issued	
NPDES PERMIT No.	Date Issued	Expiration Date
Air Pollution Control Construction Permit No.	Date Issued	
Application No. 04080014 I.D. No: 099080ACD Date Issued: Oct. 27, 2004		
Air Pollution Control Operating Permit No.	Date Issued	

Sec. C — MANUFACTURING PROCESS

Describe Unit Process

Materials Used in Process

RECEIVED
AUG 3 0 2006
IEPA DAPC - SPFLD

Sec. D — POLLUTION CONTROL FACILITY DESCRIPTION

Describe Pollution Abatement Control Facility

8- 24,000 gallon capacity gasoline, diesel and soy oil, aboveground, outdoor bulk liquid storage tanks. The tanks are pre-fabricated, U.L. labeled and electrically grounded with both regular and emergency venting. The tanks are situated within a 40' x 70' x 4' concrete containment facility.

Truck loading and unloading station within a 40' x 60' open sided building with concrete containment and vapor recovery system.

Permit issued by IL State Fire Marshall. Application No. 04080014. I.D. No. 099080ACD (attached)

— Exhibit A —

POLLUTION CONTROL FACILITY – CONTAMINANTS

Sec. E — (1) Nature of Contaminants or Pollutants

Contaminant or Pollutant	Material Retained, Captured or Recovered: DESCRIPTION	DISPOSAL OR USE
Petroleum and Soyoil Products	Spilled products	Waste
Air Pollutants	Vapors	Recycle w/ vapor recovery

(2) Point(s) of Waste Water Discharge

ACCOUNTING DATA

	Plans and Specifications Attached	Yes X	No
(3)	Are contaminants (or residues) collected by the control facility?	Yes X	No
(4)	Date installation completed 8/2005 status of installation on date of application operational		
(5)	a. FAIR CASH VALUE IF CONSIDERED REAL PROPERTY:	$ 125,000	
	b. NET SALVAGE VALUE IF CONSIDERED REAL PROPERTY:	$ 12,500	
	c. PRODUCTIVE GROSS ANNUAL INCOME OF CONTROL FACILITY:	$ 0	
	d. PRODUCTIVE NET ANNUAL INCOME OF CONTROL FACILITY:	$ 0	
	e. PERCENTAGE CONTROL FACILITY BEARS TO WHOLE FACILITY VALUE:	% 100	

SIGNATURE

Sec. F — 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. The facilities claimed herein are "pollution control facilities" as defined in Section 11-10 of the Illinois Property Tax Code.

x Andrew Wagner — Signature

x General Manager — Title

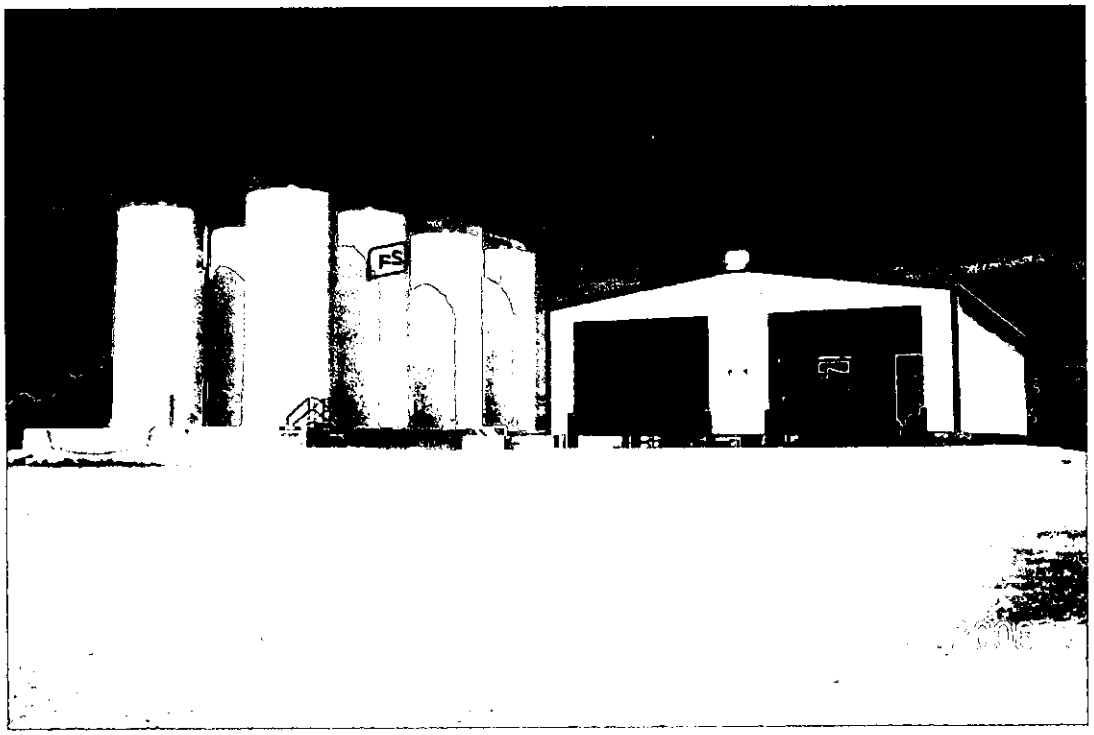
INSTRUCTIONS

Sec. G — INSTRUCTIONS FOR COMPILING AND FILING APPLICATION

General: Separate applications must be completed for each control facility claimed. Do not mix types (water and air). Where both air and water operations are related, file two applications. If attachments are needed, record them consecutively on an index sheet.

Sec. A	Information refers to applicant as listed in the tax records and the person to be contacted for further details or for inspection of facilities. Define facility location by street address or legal description. A plat map location is required for facilities located outside of municipal boundaries. The property identification number is required.
Sec. B	Self-explanatory. Submit copies of all permits issued by local pollution control agencies. (e.g. MSD Construction Permit)
Sec. C	Refers to manufacturing processes or materials on which pollution control facility is used.
Sec. D	Narrative description of the pollution control facility, indicating that its primary purpose is to eliminate, prevent or reduce pollution. State the type of control facility. State permit number, date, and agency issuing permit. A narrative description and a process flow diagram describing the pollution control facility. Include a listing of each major piece of equipment included in the claimed fair cash value for real property. Include an average analysis of the influent and effluent of the control facility stating the collection efficiency.
Sec. E	List air contaminants, or water pollution substances released as effluents to the manufacturing processes. List also the final disposal of any contaminants removed from the manufacturing processes. Item (1) – Refers to pollutants and contaminants removed from the process by the pollution control facility. Item (2) – Refers to water pollution but can apply to water-carried wastes from air pollution control facilities. 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. Item (3) – If the collected contaminants are disposed of other than as wastes, state the disposition of the materials, and the value in dollars reclaimed by sale or reuse of the collected substances. State the cost of reclamation and related expense. Item (4) – State the date which the pollution control facility was first placed in service and operated. If not, explain. Item (5) – This information is essential to the certification and assessment actions. This accounting data must be completed to activate project review prior to certification by this Agency.
Sec. F	Self-explanatory. Signature must be a corporate authorized signature.

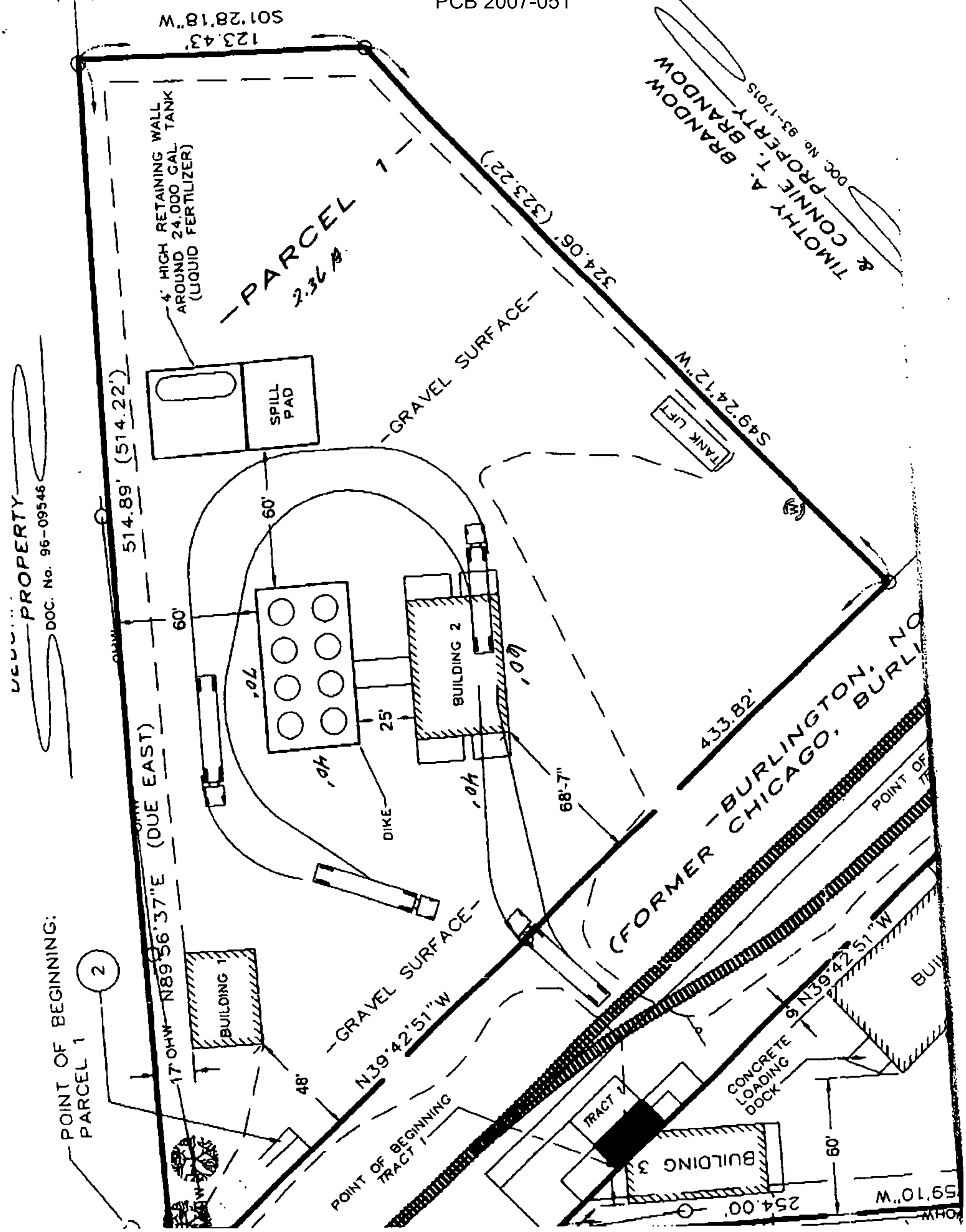
Submit to:	Attention:	Attention:
Illinois EPA P.O. Box 19276 Springfield, IL 62794-9276	Thomas McSwiggin Permit Section Division of Water Pollution Control	Donald E. Sutton Permit Section Division of Air Pollution Control



Concrete Containment Around Fuel Storage Tanks, left

View of 40' x 60' Fuel Truck Loading and Unloading Facility, right

Interior View of Fuel Truck Loading and Unloading Shed showing Concrete Containment.



PARCEL 1
2.36 A
4' HIGH RETAINING WALL AROUND 24,000 GAL TANK (LIQUID FERTILIZER)
SPILL PAD
GRAVEL SURFACE
TANK LIFT
BUILDING 1
BUILDING 2
BUILDING 3
DIKE
POINT OF BEGINNING: PARCEL 1
POINT OF BEGINNING TRACT 1
TRACT 1
CONCRETE LOADING DOCK
(FORMER BURLINGTON, NO CHICAGO, BURLI
TIMOTHY A. & CONNIE T. BRANDOW PROPERTY DOC. No. 93-17015
PROPERTY DOC. No. 96-09546
S01°28'18"W
123.43'
S49°24'12"W
324.06' (323.22')
514.89' (514.22')
N89°56'37"E (DUE EAST)
N39°42'51"W
433.82'
254.00'
60'
25'
40'
68'-7"
48'
17' OHW

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506

RENEE CIPRIANO, DIRECTOR

217/782-2113

JOINT CONSTRUCTION AND LIFETIME OPERATING PERMIT

PERMITTEE

La Salle County Farm Supply Co.
Attn: Andrew Wagner
3107 North State HWY 23
Ottawa, Illinois 61350-9801

Application No.: 04080014
Applicant's Designation:
Subject: Bulk Gasoline Plant
Date Issued: October 27, 2004
Location: 2540 North Illinois Route 23, Ottawa

I.D. No.: 099080ACD
Date Received: August 6, 2004

Expiration Date: See Condition 1.

This permit is hereby granted to the above-designated Permittee to CONSTRUCT and OPERATE emission unit(s) and/or air pollution control equipment consisting of:

Two(2) 24,000 Gallon Gasoline Storage Tanks
One (1) Truck Loading Rack Equipped with a Vapor Recovery System
Gasoline Loadin/Loadout
Distillate and Soy Oil Loadin/Loadout

pursuant to the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

1a. This operating permit is effective only if the Permittee has complied with all standard conditions of the construction permit.

b. Operation of the emission units included in this permit shall not begin until all associated air pollution control equipment has been constructed and is operational.

c. This operating permit shall expire 180 days after the Illinois EPA sends a written request for the renewal of this permit.

d. This permit shall terminate if it is withdrawn or is superseded by a revised permit.

2. The facility is not subject to the New Source Performance Standard (NSPS) for Volatile Organic Liquid Storage Vessels, 40 CFR 60, Subparts A and Kb because vessels located at gasoline bulk plants do not apply, pursuant to 40 CFR 60.110b(d)(5).

3. The facility is not subject to the 35 IAC 215 Subpart B, Organic Emissions from storage and loading operations, because no storage tank has greater than a 40,000 gallon capacity.

4. This permit is issued based on the potential to emit (PTE) for Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements of Section 112(g) of the Clean Air Act.

5. Gasoline and gasoline blend means; any commercial quality gasoline and blend stocks for use as fuel in motor vehicle without further processing. A petroleum product shall be considered to be a distillate material if the true vapor pressure is less than 0.01 psia at 70°F.

6. Gasoline blend, gasoline, ethanol, and other material with a true vapor pressure of 2.5 psia or greater shall only be loaded out through the loading racks using submerged loading and only with the vapor control system properly operating.

7a. Pursuant to 215.581, no person may cause or allow the transfer of gasoline from a delivery vessel into a stationary storage tank located at a bulk gasoline plant unless:

i. The delivery vessel and the stationary storage tank are each equipped with a vapor collection system that meets the requirements of (d)(4) of this condition;

ii. Each vapor collection system is operating;

iii. The delivery vessel displays the appropriate sticker pursuant to the requirements of Sections 215.584 (b) or (d);

iv. The pressure relief valve(s) on the stationary storage tank and the delivery vessel are set to release at no less than 0.7 psi or the highest pressure allowed by state or local fire codes or the guidelines of the National Fire Prevention Association; and

v. The stationary storage tank is equipped with a submerged loading pipe.

b. No person may cause or allow the transfer of gasoline from a stationary storage tank located at a bulk gasoline plant into a delivery vessel unless:

i. The requirements set forth in (a)(i) through (a)(iv) of this condition are met; and

ii. Equipment is available at the bulk gasoline plant to provide for the submerged filling of the delivery vessel or the delivery vessel is equipped for bottom loading.

c. Each owner of a stationary storage tank located at a bulk gasoline plant shall:

i. Equip each stationary storage tank with a vapor control system that meets the requirements of (a) or (b) of this condition;

ii. Provide instructions to the operator of the bulk gasoline plant describing necessary maintenance operations and procedures for prompt notification of the owner in case of any malfunction of a vapor control system; and

iii. Repair, replace or modify any worn out or malfunctioning component or element of design.

d. Each operator of a bulk gasoline plant shall:

i. Maintain and operate each vapor control system in accordance with the owner's instructions;

ii. Promptly notify the owner of any scheduled maintenance or malfunction requiring replacement or repair of a major component of a vapor control system; and

iii. Maintain gauges, meters or other specified testing devices in proper working order;

iv. Operate the bulk plant vapor collection system and gasoline loading equipment in a manner that prevents:

A. Gauge pressure from exceeding 18 in. of water and vacuum from exceeding 6 in. of water, as measured as close as possible to the vapor hose connection; and

B. A reading equal to or greater than 100 percent of the lower explosive limit (LEL measured as propane) when tested in accordance with the procedure described in "Control of Volatile Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems", Appendix B; and

C. Avoidable leaks of liquid during loading or unloading operations.

v. Provide a pressure tap or equivalent on the bulk plant vapor collection system in order to allow the determination of compliance with (d)(iv)(A) of this condition; and

vi. Within 15 business days after discovery of any leak by the owner, the operator, the Agency or the USEPA, repair and retest a vapor collection system which exceeds the limits of (d)(iv)(A) or (B) of this condition.

8. Emissions and operation of the gasoline bulk plant shall not exceed the following limits:

a. The amount of distillate and soy oil loaded out shall not exceed 800,000 and 20,000 gallons per month and 8,000,000 and 200,000 gallons per year, respectively.

Process	Throughput (Gal/Mo)	Throughput (Gal/Yr)	Emission Factor (Lb/1000 Gal)	VOM Emissions (Ton/Mo)	VOM Emissions (Ton/Yr)
Gasoline Storage**	200,000	2,000,000		0.83	8.53
Gasoline Blend and/or Gasoline Loadout	200,000	2,000,000	5.13*	0.51	5.13
				Total	13.66

* Based on standard AP-42 emission factors for uncaptured emissions of VOM with a 0% overall control efficiency for fugitive losses for the loadout of gasoline/gasoline blend, 0% for Ethanol and distillates for the following equation:

$$E = \frac{(12.46 * S * P * M) * (1 - EFF)}{(T)}$$

E is the loading loss (lb/1,000 gal)

S is the saturation factor

P is true vapor pressure of the liquid loaded (psia)

M is vapor molecular weight (lb/lb-mole)

T is the temperature of the bulk liquid loaded (°R)

Eff is the overall control efficiency.

** Based on standard AP-42 emission factors for breathing and working losses (TANKS 4.0)

These limits are based on standard AP-42 emission factors and the information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

9. This permit is issued based on negligible emissions of VOM from fugitive losses (pumps, valves, seals, etc.), and maintenance activities. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.

10. This permit is issued based on negligible emissions of VOM from loading/unloading and storage operations of distillate fuel oil and soy oil. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year, each.

11. The Permittee shall maintain records of the following:

    a. The throughput of each product through the loading racks (gallons/month and gallons/year);

    b. The throughput of each product stored and in what storage tank. (gallons/month and gallons/year);

    c. Emissions of VOM and HAP for each product from the truck loading racks as determined through Standard AP-42 emissions factors or other methods approved by the USEPA (lb/month and tons/year);

    d. Total emissions of VOM and HAP for each product from the Storage Tanks as determined through Standard AP-42 emission factors or the most current version of the TANKs software (lb/month and tons/year); and

    e. Total emissions of VOM and HAP for the facility (lb/month and tons/year).

12. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.

13. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.

14. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

15. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

    Illinois Environmental Protection Agency
    Division of Air Pollution Control
    Compliance Section (#40)
    P. O. Box 19276
    Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University
Peoria, Illinois 61614

16. Persons with lifetime operating permits must obtain a revised permit for any of the following changes at the source:

a. An increase in emissions above the amount the emission unit or the source is permitted to emit;

b. A modification;

c. A change in operations that will result in the source's noncompliance with conditions in the existing permit; or

d. A change in ownership, company name, or address, so that the application or existing permit is no longer accurate.

It should be noted that the distillate fuel tanks and the soy oil tanks are exempt pursuant to 35 IAC 201.146(n).

If you have any questions on this permit, please contact Mike Dragovich at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:MJD:psj

cc: Region 2

Office of the Illinois
State Fire Marshal

General Office
217-785-0969
FAX
217-782-1062
Divisions
ARSON INVESTIGATION
217-782-9116
BOILER and PRESSURE VESSEL SAFETY
217-782-2696
FIRE PREVENTION
217-785-4714
MANAGEMENT SERVICES
217-782-9889
INFIRS
217-785-5626
HUMAN RESOURCES
217-785-1029
PERSONNEL STANDARDS and EDUCATION
217-782-4542
PETROLEUM and CHEMICAL SAFETY
217-785-5876
PUBLIC INFORMATION
217-785-1021
WEB SITE
www.state.il.us/osfm

EPA Air Permit

March 3, 2005

LaSalle County Farm Supply
3107 N. Rt 23
Ottawa, Il. 61350

RE: Facility #New
LaSalle County Farm Supply
2540 N Rt 23
Ottawa, LaSalle Co., Il. 61350

Dear Gentlemen:

Applications and drawings have been reviewed by the Technical Services Group of the Office of the Illinois State Fire Marshal (OSFM), for the proposed installation of above ground bulk storage tanks (ASTs) at the above referenced location.

This review specifically pertains to:

1. 8 – New, 24,000 gallon capacity gasoline, diesel and soy oil, aboveground, outdoor bulk liquid storage tank(s). The tanks are to be pre-fabricated, U.L. labeled and electrically grounded. Both regular and emergency venting is to be provided.

The installation appears to conform with Title 41 Illinois Administrative Code Part 160 *"Storage, Transportation, Sale and Use of Gasoline and Volatile Oils: Rule and Regulations Relating to General Storage"* with the following noted exceptions or special conditions:

MISCELLANEOUS

1. This review does not pertain to the installation, removal, lining or abandonment of underground storage tanks at this facility. Nor does this review pertain to any other existing or future aboveground or LP-Gas storage tanks located at this site other than those specified on the application and in this review letter.

2. This review does not pertain to the dispensing of fuel from this tank(s) (such as gasoline or diesel fuel) into the fuel tank(s) of motor vehicles. Any tank installed at this site for the purpose of dispensing fuel into other vehicles shall have a "Dispensing Only" application submitted to the Division of Petroleum and Chemical Safety of the Office of the Illinois State Fire Marshal and shall be installed in compliance with Title 41 Illinois Administrative Code 180.

(Bulk truck and tank car loading/unloading is not considered "dispensing" and therefore is permitted.)

3. The findings of this review pertain specifically to the product listed and do not automatically pertain to any other classification of flammable or combustible liquid being stored in the tank(s).

If flammable/combustible liquids are accepted for the general public for deposit into waste oil or waste anti-freeze storage tanks, the tanks shall not be considered Class III-B combustible liquid storage tanks and will therefore be required to be vented to the exterior of the building, filled from the exterior of the building, and separated from other areas of the occupancy by construction providing 2-hour fire resistance.

TANKS & VENTING

Factory assembled tanks shall bear the label of Underwriter's Laboratories Standards 142 Steel Aboveground Tanks for Flammable and Combustible Liquids or 2085 Insulated Aboveground Tanks for Flammable and Combustible Liquids, 2080 Fire Resistant Aboveground Tanks for Flammable & Combustible Liquids, or be part of a UL 2044 listed aboveground storage tank "system". Pre-fabricated tanks listed by other OSFM recognized testing laboratories are also acceptable to the OSFM if proper listing documentation and markings are available. Field erected tanks shall meet the specifications of the National Fire Protection Association, as published in NFPA Standard #30, (1981) or those of the American Petroleum Institute, Standard 650 (1983) or 620 (1978). (Updated editions of these standards are also acceptable). No open tank shall be used.

Vent openings in no case shall be less than one and one-fourth inches in diameter, and where a pump is used to fill the tank, and a tight connection is made to the fill pipe, the vent shall not be smaller than the fill pipe.

Additional vent openings (emergency vents) or safety valves to relieve any excessive pressure due to external heat shall be provided, of a type which shall be self-closing when pressure is relieved and shall meet the requirements of NFPA #30 (1981 or updated edition).

The tank(s) shall be electrically grounded.

Unprotected steel as a support for tanks shall not be permitted.

VALVES & PIPING

All product piping shall be tested at a pressure 50% in excess of normal working pressure for a period of 30 minutes and be proven leak free.

Aboveground piping shall be protected against mechanical injury to the extent reasonably possible.

Pipe lines shall have a definite color scheme for painting to indicate the product which is being carried in respective lines. Valves on lines shall be tagged to denote the product handled and controlled by each valve.

Any indoor product piping shall be so located that any leakage resulting from pipe failure would not unduly expose persons. Piping shall be arranged so leakage can readily be controlled by operation of an accessible remotely located valve(s).

Any indoor product piping shall be of steel or nodular iron, or otherwise be protected by materials having a fire resistatnce rating of no less than 2-hours.

In addition to any normal valves, there must be an extra valve at each pipe line connection to any tank below normal liquid level, which valve is effective inside the tank shell and is operated both manually and by an effective heat actuated device which, in the case of fire, will automatically close the valve to prevent the flow of liquid from the tank even though the pipe lines are broken from the tank. These extra valves are not required in crude oil tanks in oil fields, on tanks at refineries, or on tanks at terminals which are equipped with a swing line or where facilities are provided to transfer the contents of the tank to another tank in case of fire. On tanks installed prior to April 14, 1977, emergency check valves may be external, if the size of the opening is too small to admit the smallest emergency check valve provided:

a) The valve used incorporates a shear section, and
b) The valve is so installed that any undue strain beyond the valve will not cause failure between the valve and the tank.
c) When an opening on a previously installed tank is enlarged, an internal valve is installed.

SITE LAYOUT & SAFETY FEATURES

Fire protection shall be provided at this site in the form of either accessible portable fire extinguishers offering a minimum rating of 4A:60BC *or* a fixed fire suppression system designed for protection of flammable/combustible liquid storage shall be installed to protect the tank installation.

The property shall be kept free from weeds, high grass, rubbish and litter, and shall be kept neat, clean and orderly throughout.

In accordance with Section 160.50, tanks shall be located and anchored so as to avoid possible damage and flotation from high water in accordance with NFPA #30 2-5.6 (1981 edition or later editions).

If the location of the tank(s) is subject to vehicular traffic the installation shall be adequately protected against collision damage. Properly located bumper posts, bollards and guard rails

constitute adequate forms of collision protection. Furthermore, tanks that have been listed and labeled as being "vehicle impact resistant" are acceptable. (Concrete dikes and steel catch pans used to serve secondary containment purposes may provide adequate collision protection dependent upon the construction and height of containment walls. When these forms of secondary containment structures are installed without additional means of collision protection, the on-site OSFM inspector will verify that the secondary containment structure also serves as an adequate form of collision protection).

In accordance with Section 160.40-d a minimum separation distance shall be maintained between aboveground bulk volatile liquid storage tanks in accordance with the following schedule:

CAPACITY	SEPARATION (FT)
24,000 OR LESS	5
24,001 TO 48,000	10
48,001 TO 75,000	13
75,001 TO 100,000	15
Over 100,000	One Tank Diameter

If tanks are of different capacities the capacity of the larger tank shall govern its distance to adjacent tanks. Existing tanks of under 24,000 gallons shall maintain a minimum separation distance of at least 3 feet. Relocated tanks shall be subject to "new" tank regulations and maintain a minimum tank-to-tank separation distance of 5 feet.

In accordance with Part 160.30-a the minimum separation distance from individual tanks to lines of adjoining property and to other buildings on the property except those necessarily connected with the installation (such as oil warehouses, pump houses and garages) shall be not less than the following:

TANK CAPACITY (gallons)	MINIMUM DISTANCE (ft)
3,000 OR LESS	20
3,001 TO 20,000	25
20,001 TO 30,000	30
30,001 TO 45,000	40
45,001 TO 50,000	50

(If the storage is crude petroleum, the foregoing minimum clearances shall be doubled.)

The above noted separation distances shall not apply between Class IIIB combustible liquid storage tanks and buildings serving soley as auto service/oil change occupancies. Class IIIB liquid storage tanks are allowed to be located directly adjacent to such structures. Similarly, tanks containing fuel for emergency generators or pump drivers may be located directly adjacent to buildings serving solely as generator buildings, pump houses or unoccupied

powerhouses. (The presence of other occupancy uses within an adjacent building requires tank-to-building separation distances in accordance with the Part 160.30 schedule). Tank-to-property line separation distances required in Part 160.30 continue to apply at all installations.

No combustible material shall be permitted under, or within 10 feet of any storage tanks.

Site plan indicates that the bulk loadout is housed inside of a building. This building must be constructed of entirely non-flammable materials. The building must have at least 50% of the wall area open. Calculations should be made available to our inspector to verify compliance with the 50% wall venting requirement.No doors or curtains are allowed on the building now nor can be installed at any later date.

The National Electrical Code (published as National Fire Protection Association Standard #70) shall govern the electrical installation.

Truck loading docks and platforms shall be located not less than twenty-five (25) feet from storage tanks, plant buildings and property lines except installations existing prior to April 14, 1977 which shall not be less than ten (10) feet.

All electric lights at loading and/or unloading docks shall be of vapor-proof construction. Electric wiring shall be in sealed conduit at docks and switches shall be of the explosion-proof type or placed at least twenty (20) feet from the docks.

SECONDARY CONTAINMENT

The tank/tanks shall be equipped with some form of secondary containment. This is in the form of a U.L. labeled/listed: single-walled tank with a concrete dike constructed around the tank/s to contain the contents of the tank in the event of tank wall failure.

In accordance with Part 160.200-d alcohol products must be diked separately from petroleum products. (Alcohol products are defined as those containing more than 10% alcohol by volume.)

In accordance with Section 160.100-d tanks installed after July 1, 1985 shall have 12" diameter culvert sumps installed as follows: Within a dike, these sumps shall be as remote from each other as possible considering drainage, topography, and other factors as may appear to effect the ability of the sump to recover the product. (Up to 500,000 gallons - One Sump, 500,001 to 1,000,000 gallons - Two Sumps.)

For tanks using dikes, catch pans or room enclosures as the method of secondary containment, the capacity of the containment area shall, at a minimum, equal the capacity of the largest capacity tank within that containment area.

Walls of secondary containment areas shall be continuous with no openings for piping or roadways. A singular penetration through the secondary containment wall is allowed for purposes of rain water

drainage from the containment area. The pipe passing through this one opening shall be equipped with a indicating shut-off valve, and locked in the closed position when not being used to drain water from the containment area. Proper sealants (compatible with the liquids being stored) or welds shall be applied to ensure that opening created by the passage of the piping through the secondary containment wall cannot be penetrated by the liquid to be contained.

When secondary containment is provided by the use of a dike, the distance from the tank shell to the toe of the dike shall not be less than five feet.

The *Gasoline Storage Act* authorizes the Office of the State Fire Marshal, in the interest of fire safety, to delegate authority to municipalities, political subdivisions or home rule units to adopt and enforce ordinances and regulations regarding aboveground tanks and piping. It is hereby noted that the Office of the State Fire Marshal has, as a matter of state-wide policy, delegated concurrent authority over the installation of aboveground storage tanks to municipalities, political subdivisions and home rule units. Therefore, the Office of the State Fire Marshal recommends contact with all local authorities to ensure compliance with their regulations as well as the findings of this review letter.

A copy of this review letter, the application and site drawings are being returned to you as well as to the local fire department and the OSFM inspector. Please advise Inspector Don Bland at 312-814-2693 when all work has been completed and before the proposed tanks are filled with product in order that an on-site inspection can be scheduled. The findings of this review are effective for a period of one year from the date of this letter. If the proposed installation is not made within this time period, the findings will be considered void, and re-application to the Office of the State Fire Marshal is required.

The Office of the State Fire Marshal will conduct an inspection as soon as possible after notification of the completion of all work. If work at the installation site is found to be incomplete or in violation of applicable regulations, follow-up inspections will be conducted at the convenience of the assigned fire prevention inspector, with use of the tanks prohibited until such final inspection occurs.

Sincerely,

W. Dale Tanke

W. Dale Tanke
Storage Tank Safety Engineer
Technical Services Unit

xc: OSFM Inspector
Fire Department

Andy Wagner

From: "Tomic, Randy" <RTOMIC@growmark.com>
To: "AgVantage FS" <gbrunssen@agvantagefs.com>; <jknoblock@rollinghillsfs.com>; "Ag-View FS" <cwesner@agviewfs.com>; "Gold Star FS" <sswanstrom@goldstarfs.com>; "LaSalle County FS" <awagner@lasallecountyfs.com>; "Effingham-Clay Service Company" <rhandel@effclay-fs.com>; "M & M Service Company" <bklaus@mmservice.com>; "Kuhn, Mike (Gateway FS)" <mkuhn@gatewayfs.com>; "Wabash Valley Serv Company" <tneibel@wabashvalleyfs.com>; "Agripride FS" <ctebbe@agripridefs.com>; "Heller, Floyd (Ag-Land FS)" <fheller@aglandfs.com>; "Illini FS" <swattnem@illinifs.com>; "West Central FS" <bschmidt@westcentralfs.com>; <morr@piattfs.com>
Sent: Thursday, February 17, 2005 4:24 PM
Subject: FW: SPCC Update #6 - One Year Until Deadline

TO: FS Member Cooperative General Managers
ATTN: Distribute to Environmental Compliance Personnel

Deadline:
The USEPA deadline to amend your Spill Prevention Control and Countermeasure (SPCC) Plan for each bulk oil storage facilitie one year from today (February 17, ~~2006~~ 2007). If physical changes are needed (e.g. spill pad, integrity testing), they must be complet August ~~18, 2006~~ 2007.

Note: Facilities without an existing SPCC Plan, must immediately prepare and implement a Plan and are considered in violation u Plan implementation.

Inspections:
In April of 2003, two FS Member Cooperative sites (in the former Southern IL & Central IL Regions) were inspected by USEPA.

Six FS Member Cooperative sites were inspected by USEPA in 2004 (one in IA, five in IL). The Region V (IL & WI) inspections occurred during April and November. Inspections at the IA FS Member (Region VII) occurred in the fall. In addition, Region VII h enforcement program with fines ranging between $400 to $3,000 for violations.

Assistance:
Contact NewTech Engineering & Environmental, LLC for assistance. We can provide FS Members with professional engineering certification of SPCC Plans, design assistance with implementing your plans, and answer questions regarding compliance.

Randall J. Tomic, PE
Environmental Services Project Manager
NewTech Engineering & Environmental, LLC
A subsidiary of GROWMARK, Inc.
P.O. Box 2500
Bloomington, IL 61702-2500
Phone: 309-557-6727
Facsimile: 309-557-7165

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 – (217) 782-2113

ROD R. BLAGOJEVICH, GOVERNOR DOUGLAS P. SCOTT, DIRECTOR

Memorandum

Technical Recommendation for Tax Certification Approval

Date: December 14, 2006

To: Robb Layman

From: Ed Bakowski

Subject: LaSalle County Farm Supply TC-06-08-30

This Agency received a request on August 30, 2006 from LaSalle County Farm Supply for an Illinois EPA recommendation regarding tax certification of air pollution control facilities pursuant to 35 Ill. Adm. Code 125.204. I offer the following recommendation.

The air pollution control facilities in this request include the following:

Vapor Recovery System whose primary purpose is to reduce VOC emissions to the atmosphere. Because the primary purpose of these units are to reduce or eliminate air pollution, it is certified as a pollution control facility.

This facility is located at 2540 S. Il. 23, Ottawa
The property identification number is 22-25-333-000

Based on the information included in this submittal, it is my engineering Judgement that the proposed facility may be considered "Pollution Control Facilities" under 35 IAC 125.200(a), with the primary purpose of eliminating, preventing, or reducing air pollution, or as otherwise provided in this section, and therefore eligible for tax certification from the Illinois Pollution Control Board. Therefore, it is my recommendation that the Board issue the requested tax Certification for this facility.

Exhibit B