

Illinois Pollution Control Board  
James R. Thompson Center, Suite 11-500  
100 W. Randolph St.  
Chicago, IL 60601-3218

Attn: Don Brown, Clerk of the Board

Re: GIII Illinois Pollution Control Board Permit Appeal

On July 30, 2020, GIII (which does business as General Iron) petitioned the Illinois Pollution Control Board for a review of certain conditions in the final construction permit issued on June 25, 2020 by the Illinois Environmental Protection Agency. The Board has scheduled a hearing for November 19, 2020 and must make a final decision on GIII's appeal by January 7, 2021. I am submitting this written statement, as a resident of Illinois, so that the Board may hear the views of ordinary Illinois citizens on this subject.

GIII objects to the Fugitive Emissions Operating Program (FOP) Amendment Procedure Condition, which gives the Illinois EPA the right to review and disapprove any future revisions or amendments to GIII FOP. I believe that FOP Amendment Procedure Condition should be left as written, as the Illinois EPA needs to represent the people of Illinois if amendments are proposed.

GIII also objects to the Emergency Bypass Event Monitoring Condition, requiring a continuous monitoring device for the Regeneration Thermal Oxidizer Emergency Bypass Damper to be located in or for the control train for the Hammermill Shredder System. GIII argues that this requirement should be removed because it is ambiguous. I ask that it not be removed, but that the Board provide language that will make it clearer to GIII and any other interested parties.

GIII objects to both the Emission Testing Conditions and the Capture Efficiency Testing Condition. The conditions require GIII to conduct various emissions tests once every five years from the original test date to ensure continued compliance with the permit conditions and emissions limits. Conditions requires volatile organic material capture efficiency testing every 12 months from the preceding testing, to ensure continued compliance. GIII argues that these requirements should be removed because "future compliance can be assessed based on the initial emissions testing." That argument should be rejected as blatantly irrational. Future compliance requires periodic future testing.

Lastly, GIII also objects to the Expiration Date of the Construction Permit, which requires GIII to submit its operating permit application to the Illinois EPA 12 months from commencing operations. That is a very reasonable timetable and should be sustained.

Thank you for considering my views.

Sincerely,

*Stephanie Downs Hughes*  
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