



Air Pollution Control

Permitting, Dust Control, and Being A Good Neighbor

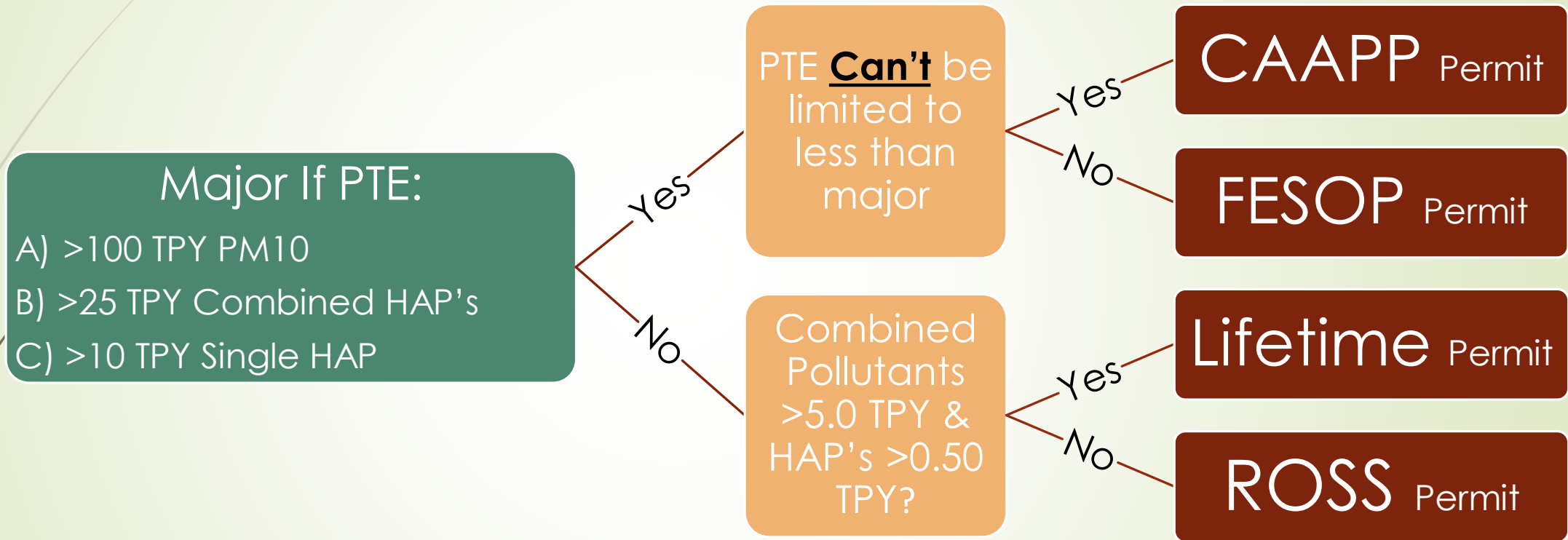
Types of Permits in Illinois

A.K.A. Everyone Needs a Permit So What's The Scoop?

- **ROSS** (Registration of Small Source): Registration program
- **State Operating Permit** (Lifetime Operating Permit & General Permits): All other Sources that are not mandated to be in the ROSS (Registration of Smaller Sources).
- **FESOP** (Federally Enforceable State Operating Permit): Sources that apply for operation and emission limits. For Sources that are not major and CAAPP permit is not required.
- **CAAPP** (Clean Air Act Permit Program) Permit (Title V Permit): Major sources and others Sources required by rule.
- **State Construction Permits** for each permit program

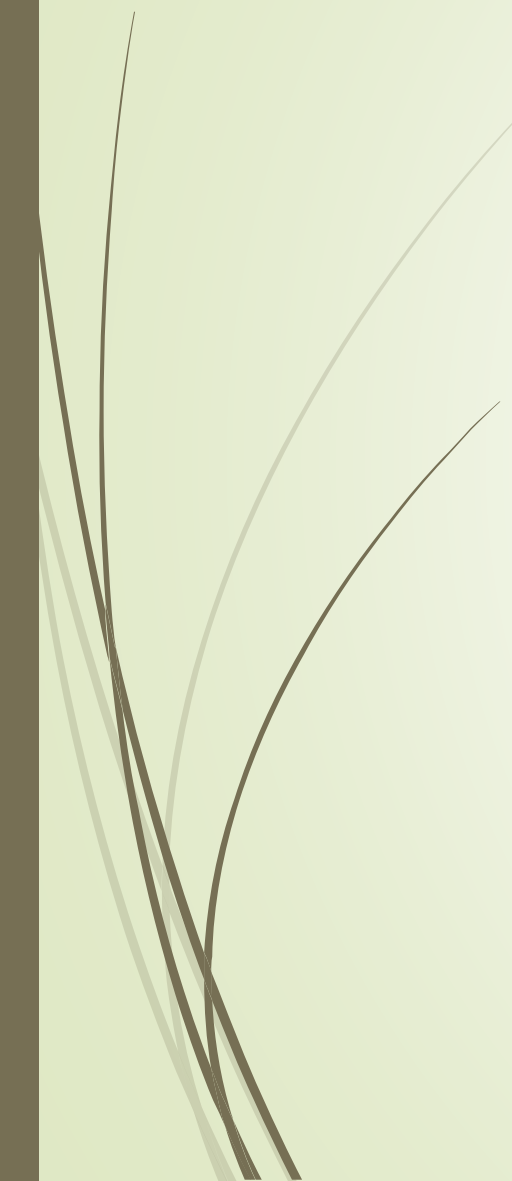
? But Which One Do I need ?

How to Determine Which Permit You Need





Potential to Emit (PTE)

- USEPA's "Calculating Potential to Emit (PTE) and Other Guidance for Grain Handling Facilities" will be posted online along with a user friendly version of this presentation by the Feed and Grain Association sometime after this presentation.
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Benefits of Permit Types

➤ ROSS

- Not Required to apply for construction or operating permits from BOA for new or modified emission units
- Not required to submit Annual Emission Reports
- Questions concerning ROSS: Illinois Small Business Environmental Assistance Program at DCEO, 800-252-3998 or www.ienconnect.com/enviro

➤ Lifetime Permits

- Do not require renewal or reapplication unless requested by the Agency.
- There are some General Permits in this category

➤ FESOP & CAAPP Permits

- You have lots of business



Construction Permits

- Construction permits are for all permit programs except ROSS.
- Issued prior to undertaking the construction or modification at the Source.
- Addresses applicable and nonapplicable rules, emission or production limitations, work practices, rule avoidance, controls, initial and subsequent testing, operating scenarios.
 - May establish requirements to be further addressed in the operating permit.
E.g., after initial source testing
- Required to be incorporated into the operating permit.

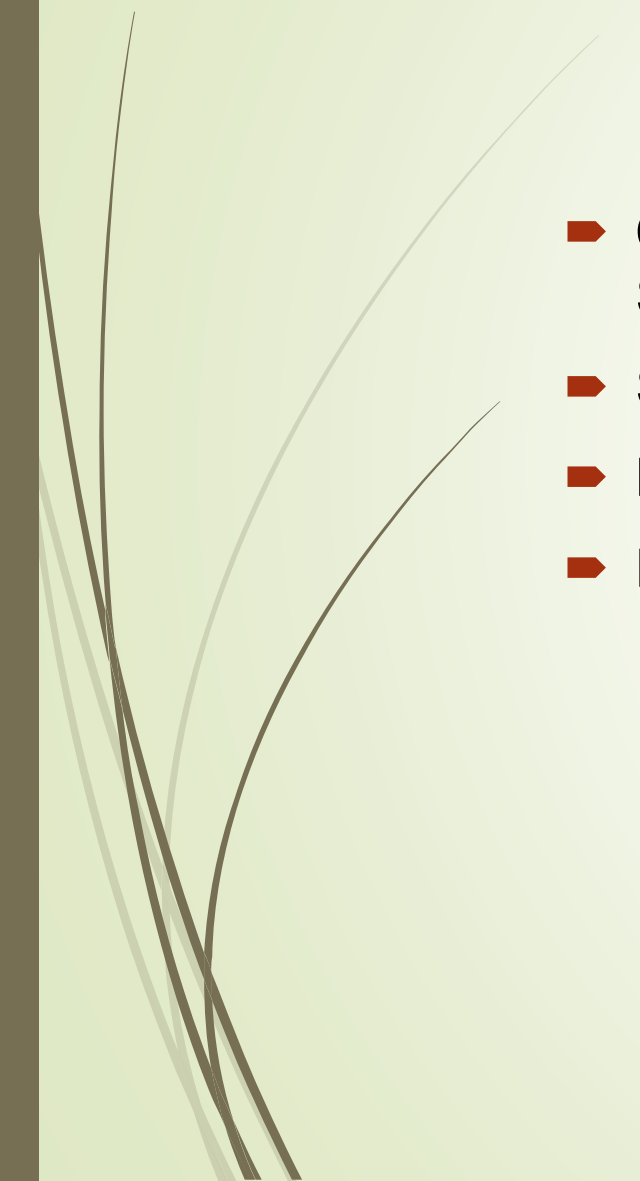


General Permits

- General permits allows for the addition or modification of emission units without a construction permit or revised operating permit up to the number of emission units allowed by the general operating permit.
- There a few industries that can take advantage of these permits including:
 - Grain elevators, being one of those industries, have eight (8) categories of general permits



\$\$ Permit Fees \$\$

- Construct Permit Fees: Vary Based on Size of Project. See FORM 197-FEE for more details
 - Smaller sources (less than 25 t/y, total) and ROSS: \$235
 - Medium sources (25 t/y or more but less than 100 t/y): \$2,150
 - Larger sources (100 t/y or more): \$21.50/ton
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What Do I Do Once I Get My Air Permit?

Understanding My Air Permit

- **What Are The Various Elements That Comprise My Permit?**
 - Listing of the emission units and air pollution control equipment to be regulated.
 - Make sure all of your emission units or processes (groups of units) are listed
 - Emission limitation values incorporated into permit conditions.
 - Triple check!! Make sure you can meet **ALL** these limits(on short and long term basis)
 - Make sure they agree with the limits as requested in your permit application
 - Recordkeeping obligations.
 - 12 Month Rolling: What Happens If I had a Really Good And Late Harvest?
 - 12 month rolling limits are like a slider bar, you have to meet them no matter which 12 months the slider bar spans.
 - Monitoring or testing requirements.
 - Check your permit, is there testing that has to be conducted within a certain time frame?
 - Make sure that when it comes to Fugitive Dust and records, you keep records of everything you did to abate or fix problems when found and what you did to help prevent future occurrences.
 - Reporting requirements.
 - Make sure to know what yours are and that you perform them timely

What To Watch For

▶ Dust and Fugitive Emissions

- ▶ House Keeping: Know the applicable State Rules governing Agricultural and Fugitive Dust Sources:
 - ▶ Title 35 Subpart s: Agricultural Sections 212.461(b)(1-6) and Subpart K: Fugitive Particulate Mater Sections 212.301-314
- ▶ Be Proactive
 - ▶ Make daily observations and record them
 - ▶ Anything seen crossing the property line is a potential violation
 - ▶ Have a written operating program that is updated regularly(Housekeeping, Fugitive dust, FPOP)
 - ▶ Keep spare parts for wear items on hand
 - ▶ Oil, Water, Rinse, **Repeat**

▶ Complaints

- ▶ Be a good neighbor (even if you're the only one)
 - ▶ Work with local village or township: sweep streets, wash cars, annual notification at harvest season, annual girl scout cookies or Christmas tree sales(for example)
- ▶ Social media can turn a small problem into an big one (rumors generally spread faster than truth)
- ▶ FYI there's been an up-tick in grain silo fire complaints over past couple seasons, ask your grain and feed associate how to help limit this problem so you too don't get burned.

▶ Don't forget to submit all required Demolition/Asbestos notification

▶ If things are about to or already have gone wrong, then what...



What Do I Do if Things Go Wrong?

- ▶ If things are about to or already have gone south:

DON'T:

- ▶ Curl up into a ball and hide.

DO:

- ▶ Contact your friendly neighborhood Grain and Feed Associate and ask for advice.
- ▶ Contact the IEPA, let them know what's going on, submit any necessary deviation reports and/or permit revisions, work to correct the problem(s), and modify operating/maintenance procedures to avoid future occurrences.



Other Helpful Information

WEB PORTAL

- Checklists and guidance relating to completion of permit applications <http://www.epa.illinois.gov/topics/forms/index>
 - Online Application Forms
 - User friendly forms that can be saved electronically and submitted to Agency.
- Online Tracking <http://www.epa.state.il.us/air/permits/>
 - Review status of pending applications, including name and contact information of assigned permit analyst.



Other Guidance Available

- Does My Business Need An Air Pollution Control Permit? (IEPA website):

<https://www.illinois.gov/dceo/SmallBizAssistance/EnvironmentalAssistanceProgram/Documents/AirPermit2016.pdf>

- Department of Commerce and Economic Opportunity's Small Business assistance website:

<http://www.smallbiz-enviroweb.org/>

- Questions concerning ROSS (Illinois Small Business Environmental Assistance Program at DCEO):

<https://www.illinois.gov/dceo/SmallBizAssistance/EnvironmentalAssistanceProgram/Pages/SBEAP-ROSSProgram.aspx>