

# Illinois EPA Operating Programs and Fugitive Dust Plans

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# Operating Program Overview:

- Operating Program is required for sources with SIC Code types (e.g. mining , manufacturing, grain handling, and electric generating operations located in specific geographical areas defined by 35 Ill. Adm. Code 212.302 .
  - 35 Ill. Adm. Code 212.302:  
<http://www.ilga.gov/commission/jcar/admincode/035/035002120K03020R.html>
- Operating Program must contain information identified in 35 Ill. Adm. Code 212.309 and 212.310.
  - 35 Ill. Adm. Code 212.309:  
<http://www.ilga.gov/commission/jcar/admincode/035/035002120K03090R.html>
  - 35 Ill. Adm. Code 212.310:  
<http://www.ilga.gov/commission/jcar/admincode/035/035002120K03100R.html>
- Operating Program must be an enforceable document. This mean no ambiguity such as “as needed”, “abnormal”, or similar language.

## Operating Program Overview (continued):

- Operating Program should ensure the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.. [35 Ill. Adm. Code 212.301]
- Operating Program must contain a minimum treatment (i.e. water application, sweeping, etc.) frequency for each type of operation (roads, material transfer, storage piles, etc.,).
- Operating Program must contain monitoring/inspections, including frequency, for operational periods between treatments. If issues are identified, they must be address immediately by the treatment identified in the plan or some alternative equivalent effective treatment method.
- Program must include recordkeeping for treatments (normal and incident driven) and inspections/monitoring

# Operating Program Specifics

- Must address and discuss applicability of 35 Ill. Adm. Code 212.304-212.308.
- Must address best management practices for each operation that is subject to the requirements of 35 Ill. Adm. Code 212.304- 212.308 and 212.315, including minimum frequency of application.
- Must address best control measure(s) for each source of potential fugitive particulate matter that is **not** subject to the requirements of 35 Ill. Adm. Code 212.304- 212.308, including minimum frequency of application.
- Must address specific monitoring/inspection procedures (type and frequency) between the application of control measure(s) for each operation .
- Must address what records will be maintained pursuant to the activities described above. (Examples are provided in later slides).

# Fugitive Dust Plan:

- A Fugitive Dust plan is requested for potential sources of fugitive particulate matter not required to submit an Operating Program. These plans are to be designed to ensure compliance with 35 Ill. Adm. Code 212.301.
- Addresses best control measure(s) for each source of potential fugitive particulate matter t, including minimum frequency of application.
- Addresses specific monitoring/inspection procedures (type and frequency) between the application of control measure(s) for each operation .
- Addresses what records will be maintained pursuant to the activities described above. (Examples are provided in later slides).
- Fugitive Dust Plans must be an enforceable document. This mean no ambiguity such as “as needed”, “abnormal”, or similar language.

# Monitoring:

- USEPA Method 22 for visible particulate matter emissions
- USEPA Method 9 for Opacity (if there is a certified observer)
- Operating Program and Fugitive Dust Plan must identify the frequency of these observations.

# Recordkeeping (USEPA Method 22)

- Reason (post corrective action or scheduled)
- Observer's name
- Weather conditions
- Complied with positioning required by USEPA Method 22
- Wind speed and direction
- Time of observation
- Area or operation observed
- A determination if dust was observed
- Corrective actions taken if visible emissions were observed

# Recordkeeping (USEPA Method 9)

- Reason (post corrective action or scheduled)
- Observer's name
- USEPA Method 9 Certification
- Weather conditions
- Complied with positioning required by USEPA Method 9
- Wind speed and direction
- Time of observation
- Area or operation observed
- Observed opacity
- Corrective actions taken



# Recordkeeping for Operating Program Best Management Practices:

- **Sweeping and Watering Logs:**
  - Reason for watering or sweeping
  - Driver's name
  - Weather conditions
  - Wind speed and direction
  - Time of treatment
  - Area or operation treated
  - Duration of treatment
  - Amount of water applied (if applicable)
  - Type of treatment conducted

# Recordkeeping for Fugitive Dust Plan Best Control Measures:

- **Sweeping and Watering Logs:**
  - Reason for watering or sweeping
  - Driver's Name
  - Weather conditions
  - Wind speed and direction
  - Time of treatment
  - Area or operation treated
  - Type of treatment conducted

## Recordkeeping (other):

- If your source has emission limitations for emission units in certain areas that are subject to 35 Ill. Adm. Code 212.316, the application of control measures shall be recorded in accordance with 35 Ill. Adm. Code 212.316(g)(2).

# Record Retention

- Lifetime Operating Permit, Federally Enforceable State Operating Permits:
  - Operating Program or Fugitive Dust Plan records should be maintained in accordance with your permit.
- ROSS
  - Develop a record retention procedure within the Operating Program or Fugitive Dust Plan.
- If your source has emission limitations for emission units in certain areas that are subject to 35 Ill. Adm. Code 212.316, then you must retain records for at least 3 years of the application of control measures in accordance with 35 Ill. Adm. Code 212.316(g)(4) and your permit.

## Reporting Requirement:

- Lifetime Operating Permit, Federally Enforceable State Operating Permits:
  - Submit deviations from the Operating Program or Fugitive Dust Plan in accordance with your permit.
- ROSS
  - Develop a deviation reporting procedure within the Operating Program or Fugitive Dust Plan.
- If your source has emission limitations for emission units in certain areas that are subject to 35 Ill. Adm. Code 212.316, then you must submit annual and quarterly reports of control measure utilized by the source to the Illinois EPA in accordance with 35 Ill. Adm. Code 212.316(g)(1) and (5), respectively.

# Amendments:

- Operating Program:
  - Must be amended per 35 Ill. Adm. Code 212.312 if there are any changes to the plan or to unit and operation included within. There is no specific timeframe specified in the rule, however the Illinois EPA recommends at least an annual evaluation of the plan for amendments.
  - Scheduled review period should be identified with the Operating Program.
- Fugitive Dust Plan:
  - Should be reviewed and amended as necessary on at least an annual basis.
  - Review and amendment procedure should be described within the Fugitive Dust Plan.