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Bloomington, IL 61701

July 11th, 2014

United States Environmental Protection Agency Headquarters
William Jefferson Clinton Building
1200 Pennsylvania Avenue NW
Mailcode: 1101A
Washington, DC 20460

REC-11
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OFFICE OF THE
EXECUTIVE SECRETARY

United States Environmental Protection Agency Administrator,

Pursuant to Clean Air Act § 505(b)(2) and 40 CFR § 70.8(d), I hereby petition the Administrator of the United States Environmental Protection Agency to object to a proposed Title V Operating Permit revision for the Cargill facility located in Bloomington, Illinois, Permit Number 96030019. Because this petition establishes that the superseding permit fails to assure compliance with applicable requirements and contains material errors and inaccurate or unclear statements, the EPA must reopen and revise the permit pursuant to 42 U.S.C. § 7661c1(e) and 40 CFR § 70.7(g) and 70.8.

The following statements are excerpts from the permit (Exhibit 1) and should be used only as initial evidence for the basis of revising the entire permit.

- On page 4 of the permit, in the Emergency Provisions section, 'properly operated' and 'reasonable steps' are both terms that need to be further defined. As they stand, they are too vague to be enforceable.
- On page 6 of the permit, under Obligation to Allow IEPA Surveillance, 'reasonable times', 'any records', 'other parameters', and 'standard test methods' are too vague or need to be defined.
- On page 7 of the permit, in the section regarding Testing, 'procedures adopted by the IEPA' are not outlined and there is no reference to such procedures.
- On page 8-9 of the permit, the Recordkeeping section states that the permittee is able to extend the deadline for material submitted if he/she 'believes that the volume and nature of requested material would make this overly burdensome.' This statement needs to be further defined. Additionally, in the Permit Shield section, there is an error where the date USEPA notice started should appear.
- On page 9, Title I Conditions, 'timely' submittal of the complete renewal application should be explicitly defined.

As evidenced by the Compliance Monitoring Report (Exhibit 2), Cargill are forewarned of any inspections and are able to make arrangements to delay the inspection weeks into the future. They have ample opportunity to correct any issues that would be found during inspection.

In addition, this report illustrates the outdated machinery currently in use (Pre-1973). This same report also notates the source-wide production and emission limitations for this facility. In 2011, Cargill emitted 57% more particulate matter over the allowable limit. This seems to indicate the need for more inspections and restrictions in the future. In addition, upgrades to equipment should be mandated to ensure compliance with the allowable limits in the permit.

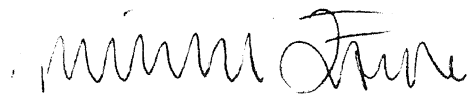
Inspections from the surrounding neighborhood community indicate that there may be days of increased production and therefore, if a daily limit is set based on an average per calendar month (as shown in the Compliance Monitoring Report, page 19) then the amount of grain processed per day should be recorded. This would also contribute to compliance with permit limitations as the operating facility would become more aware of the output.

Additionally, it shall be officially noted that area resident reports exist of symptoms and observations contributed to Cargill's emissions which include, but are not limited to, dry heaving, nausea,

headaches, and a visible film forming on vehicles overnight. Area residents' quality of life is being severely impacted by the continued operation of Cargill, including the ability to open the windows or enjoy their property outdoors for prolonged periods of time.

The aforementioned reasons contribute to the permit lacking the requirements necessary for accurate monitoring. These examples will require the US EPA Administrator to re-open and revise the permit.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michelle Ford". The signature is written in dark ink and is positioned below the word "Sincerely,".

Michelle Ford