

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Exelon Generation Company, LLC  
Attn: Terry Steinert  
1411 Opus Place, Suite 250  
Downers Grove, Illinois 60515

Application No.: 79020011                      I.D. No.: 197816AAB  
Applicant's Designation: BRAIDFESOP   Date Received: May 29, 2001  
Subject: Diesel Generators and Boilers  
Date Issued:                                      Expiration Date:  
Location: Braidwood Nuclear Station, 35100 Route 53, Braceville, Will County

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of support equipment for the Braidwood Nuclear Power Station, including four (4)-large diesel engine generators (58.18 mmBtu/hr each), various smaller diesel engines (used for electric generation or pumping water)\*, two (2)-auxiliary boilers (93.0 mmBtu/hr each), two (2)-gasoline storage and dispensing facilities with vapor balance systems, and one (1)-Rad Waste Volume Reduction System (RWVRS) pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- \* This permit does not address emergency engines maintained at the source by the Illinois Department of Nuclear Safety.
- 1a. This Federally Enforceable State Operating Permit (FESOP) is issued to limit the emissions of air pollutants from all the emission units combined, as listed in the above paragraph to less than major source thresholds, for example, less than 100 tons per year of nitrogen oxide (NO<sub>x</sub>), as further described in Attachment A. As a result, the source is excluded from requirements to obtain a Clean Air Act Permit Program (CAAPP) permit.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- 2a. Total usage of distillate fuel oil for large engines (generators and other engines with a capacity greater than 600 horsepower each) shall not exceed 80,000 gallons per month and 400,000 gallons per year, based on AP-42 emission factors.
- b. Total usage of distillate fuel oil for the small engines with a capacity of 600 horsepower each or smaller shall not exceed 2,500 gallons per month and 12,500 gallons per year, based on AP-42 emission factors.

- c. Total usage of distillate fuel oil for the boilers shall not exceed 50,000 gallons per month and 150,000 gallons per year, based on AP-42 emission factors.
  - d. Operation of the Rad Waste Volume Reduction System (RWVRS) shall not exceed 200 hours per month and 1,512 hours per year, based on information provided in the permit application.
  - e. Annual throughput of gasoline through the gasoline storage tanks shall not exceed 50,000 gallons.
  - f. Compliance with annual limits shall be determined from a running total of twelve months of data.
- 3a. Each gasoline storage tank shall be equipped as follows:
- i. The tank shall be equipped with a submerged loading pipe [35 IAC 218.583(a)(1)]; and
  - ii. All tank vent pipes shall be equipped with pressure/vacuum relief valves with the valves set to resist a pressure of at least 3.5 inches water column and to resist a vacuum of no less than 6.0 inches water column [35 IAC 218.583(a)(3)].
- b. Pursuant to 35 IAC 218.583(a), gasoline shall not be transferred from a delivery vessel into a gasoline storage tank unless:
- i. The vapors displaced from the tank during filling are processed by a vapor collection system (Stage I vapor recovery system) that prevents:
    - A. Vapor leaks, as shown by a reading equal to or greater than 100 percent of the LEL (measured as propane) when tested in accordance with the procedure described in EPA 450/2-78-051 Appendix B [35 IAC 218.583(a)(2)(A) and (d)(4)(A)]; and
    - B. Avoidable leaks of liquid [35 IAC 218.583(a)(2)(A) and (d)(4)(B)].
  - ii. The delivery vessel displays the appropriate sticker pursuant to the requirements of 35 IAC 218.584(b) or (d) [35 IAC 218.583(a)(2)(C)].
  - iii. Testing of pressure/vacuum relief valves has been performed as specified by Condition 3(e) below [35 IAC 218.583(a)(4)].
- c. Pursuant to 35 IAC 218.583(c), the Permittee shall, with respect to the Stage I vapor recovery system on the gasoline storage tanks:
- i. Provide instructions to the personnel operating the facility describing necessary maintenance operations and procedures for

prompt notification of the Permittee in case of any malfunction of a vapor control system [35 IAC 218.583(c)(2)]; and

- ii. Repair, replace or modify any worn out or malfunctioning component or element of design of the facility [35 IAC 218.583(c)(3)].
- d. Pursuant to 35 IAC 218.583(d), personnel operating the gasoline dispensing facility shall, with respect to the Stage I vapor recovery system:
- i. Maintain and operate the vapor control system in accordance with the Permittee's instructions [35 IAC 218.583(d)(1)];
  - ii. Promptly notify the Permittee of any scheduled maintenance or malfunction requiring replacement or repair of a major component of a vapor control system [35 IAC 218.583(d)(2)];
  - iii. Maintain gauges, meters or other specified testing devices in proper working order [35 IAC 218.583(d)(3)]; and
  - iv. Operate the vapor collection system, including delivery vessel unloading points, in a manner that prevents leaks as required by Condition 3(b)(i) above [35 IAC 218.583(d)(4)(A) and (B)].
- e. Pursuant to 35 IAC 218.583(a)(4), within 30 days of initial startup of each gasoline storage tank and at least annually thereafter, and within 30 days after replacement of a pressure/vacuum relief valve, the Permittee shall test the relief valves on the tank for compliance with the requirements in Condition 3(a)(ii) [35 IAC 218.583(a)(3)(A)] by measuring and recording the pressure indicated by a pressure/vacuum gauge at each tank vent pipe. The test shall be performed on each tank vent pipe within two hours after product delivery into the respective tank. For manifold tank vent systems, observations at any point within the system shall be adequate.
- f. Pursuant to 35 IAC 218.583(d)(5), within 15 business days after discovery of a leak in the vapor collection system on a gasoline storage tank that exceeds the limit of Condition 3(b)(i)(A) [35 IAC 218.583(d)(4)(A)], the Permittee shall repair and then retest the vapor collection system to show compliance.
4. Emissions of volatile organic material (VOM) from storage and handling of gasoline shall not exceed 2.0 ton per year. This limit is based on standard USEPA emission factors for breathing and working losses and information provided in the permit application.
5. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA.

As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

6. At all times, the Permittee shall to the extent practicable, maintain and operate the above referenced emission sources, in a manner consistent with good air pollution control practice for minimizing emissions.
- 7a. Organic liquid by-products or waste materials shall not be used in these fuel combustion emission sources without written approval from the Illinois EPA.
- b. At the above location, the Permittee shall not keep, store, or utilize:
  - i. Distillate fuel oil (Grades No. 1 and 2) with a sulfur content greater than the larger of the following two values:
    - A. 0.28 weight percent, or
    - B. The wt. percent given by the formula: Maximum wt. percent sulfur =  $(0.000015) \times (\text{Gross heating value of oil, Btu/lb})$ .
  - c. The Illinois EPA shall be allowed to sample all fuels stored at the above location.
8. The Permittee shall maintain records of the following items:
  - a. Fuel usage for the large engines (generators and other engines with a capacity greater than 600 horsepower) and for the boilers, (gallons/month and gallons/year).
  - b. Documentation for sulfur content of fuel oil, e.g., analysis results of representative fuel samples or copies of fuel supplier certifications.
  - c. The Permittee shall maintain the following records for each gasoline storage dispensing facility, including associated gasoline storage tanks:
    - i. A logbook or other record that identifies each shipment of gasoline added to each tank, with date and amount;
    - ii. A logbook or other record of each inspection of the tanks and dispensing facilities to verify proper operation, with date and responsible individual;
    - iii. Maintenance and repair records, as related to the repair or replacement of the Vapor Recovery Systems and storage tank loading pipes;

- iv. Records of testing performed pursuant to Condition 3(e) that include the company or entity that performed each test, the operating conditions existing at the time of each test, the dates, times and locations of each measurement, each analytical techniques or methods used, and each measurement result; and
  - v. The combined gasoline throughput of the storage tanks, (gallons/month and gallons/year).
9. 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 or USEPA 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.
- 10a. The Permittee shall submit an Annual Emissions Statement to the Agency by May 1st of each year. This report shall include the fuel oil consumption by the large diesel engines (generators and pumps greater than 600 horsepower), the other engines, and the boilers. If there has been no exceedance during the prior year, the Annual Emissions Statement shall include a statement to that effect.
- b. If there is an exceedance of the requirements of this permit, as determined by the records required by this permit or by other means, 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, a description of the exceedance and efforts to reduce emissions and future occurrences.
11. 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  
Telephone: 217/782-5811 Facsimile: 217/782-6348

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

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Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016  
Telephone: 847/294-4000      Facsimile: 847/294-4018

If you have any questions concerning this permit, please call Youra Benofamil  
at 217/782-2113.

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

DES:YB:jar

cc:    Region 1  
      Illinois EPA, FOS, CMU  
      Lotus Notes

I.D. No.: 197816AAB  
 Application No.: 79020011  
 Facility: Braidwood Nuclear Power Station

Attachment A

This attachment provides a summary of the maximum emissions from the source operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario that results in maximum emissions from this source. This is handling 572,500 gallons of distillate fuel oil. The resulting maximum emissions are well below the levels, e.g., 100 tons per year of NO<sub>x</sub> at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

1. Large Diesel Engines (Generators and other engines with a capacity greater than 600 horsepower each):

Limit on Total Fuel Usage: 400,000 Gallons/Year

<u>Pollutant</u>	Emission Rate		Emission s (Ton/Yr)
	(Lb/mmBtu)		
NO <sub>x</sub>	3.2		88.26
CO	0.85		23.44
SO <sub>2</sub>	1.01 * 0.28 = 0.2828		7.80
VOM	0.09		2.48
PM	0.0697		1.92

These emissions reflect, AP-42 emission factors for internal combustion units, and a conversion factor of 137,903 Btu per gallon of distillate oil.

2. Small Diesel Engines with a capacity of 600 horsepower each or smaller:

Limit on Total Fuel Usage: 12,500 Gallons/Year

<u>Pollutant</u>	Emission Rate (Lb/mmBtu)	Emissions (Tons/Yr)
NO <sub>x</sub>	4.41	3.80
CO	0.95	0.82
SO <sub>2</sub>	0.29	0.25
VOM	0.36	0.31

PM

0.31

0.27

These emissions reflect AP-42 emission factors for internal combustion units and a conversion factor of 137,903 Btu per gallon of distillate oil.

3. Two Boilers:

Limit on Total Fuel Usage: 150,000 Gallons/Year

<u>Pollutant</u>	<u>Emission Rate</u> (Lb/1,000 Gal)	<u>Emissions</u> (Ton/Yr)
NO <sub>x</sub>	20.0	1.50
CO	5.0	0.38
SO <sub>2</sub>	142 * 0.28 = 39.76	2.98
VOM	0.2	0.02
PM	2.0	0.15

These emissions reflect, AP-42 emission factors for distillate fuel oil fired boilers.

4. Rad Waste Volume Reduction System (RWVRS):

Limit on Hours of Operation: 1,512 Hours/Year

<u>Pollutant</u>	<u>Emission Rate</u> (Lb/Hr)	<u>Emissions</u> (Tons/Yr)
NO <sub>x</sub>	0.131	0.10
CO	0.980	0.75
SO <sub>2</sub>	0.200	0.16
VOM	0.310	0.25

These emissions reflect, emission factors supplied by the Permittee which are based on tests.

5. Emissions from all gasoline storage and handling, in total:  
Throughput of 50,000 gallons year.

Limit on Gasoline Throughput: 2.0 ton VOM per year. This reflects standard USEPA emission factors from Compilation of Air Pollutant Emission Factors, AP-42 for breathing and working losses.

6. This permit is issued based on negligible emissions of particulate matter from the lime silo. For this purpose, particulate matter emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

## PROJECT SUMMARY

### I. INTRODUCTION

Exelon Generation Company, LLC has submitted an application for renewal of their federally enforceable state operating permit covering an electric power plant consisting of support equipment for the Braidwood nuclear generating station, including two auxiliary steam boilers, four large diesel engines generators, various small diesel engines, a gasoline dispensing facility, and one Rad Waste Volume Reduction System (RWVRS). This permit prevents the site from being classified as a major source of emissions under the Clean Air Act. Therefore, Exelon Generation Company will not have to obtain a federal permit under the Clean Air Act Permit Program. The renewal permit would contain limitations and accompanying recordkeeping and reporting requirements to assure that the site is operated as a non-major source.

### II. SOURCE DESCRIPTION

These boilers, four large diesel engines generators and various smaller diesel engines are used by the Exelon Generation to support operation of the plant. The boilers provide steam to keep the plant warm. The generators supply electrical power for their own usage. Each generator consists of a reciprocating engine which drives an electric generator by means of a rotating shaft. The reciprocating engines are driven by the combustion of distillate diesel fuel oil.

### III. EMISSIONS

Air pollutants are generated when the reciprocating engines are in operation. These emissions occur from the combustion of diesel fuel and are exhausted through a pipe to a vent located on the roof.

The primary air pollutants from the boilers and burning oil reciprocating engines are nitrogen oxide ( $\text{NO}_x$ ), carbon monoxide (CO), volatile organic material (VOM), sulfur dioxide ( $\text{SO}_2$ ), and particulate matter (PM).

$\text{NO}_x$  is formed thermally by the combination of oxygen and nitrogen in the air at the temperature at which the fuel is burned. CO, VOM, and PM are formed from incomplete combustion of the fuel. Emissions of  $\text{SO}_2$  are found in varying amounts from the combustion of diesel fuel, depending on the sulfur content of the oil.

The proposed permit includes limitations that restrict the potential annual emissions of  $\text{NO}_x$ , CO, VOM, and  $\text{SO}_2$  to levels below major source thresholds.

### IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois

Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois. The Board has standards for sources of particulate matter, volatile organic material, and sulfur dioxide for reciprocating engines. This site readily complies with those Board standards.

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V. PROPOSED PERMIT

The conditions of the proposed permit contain limitations and requirements to assure that this site will be operated as a non-major source. The permit establishes limitations on the amount of fuel which may be burned.

The permit conditions also establish appropriate compliance procedures, including record keeping requirements and reporting requirements. Exelon Generation must carry out these procedures on a continual basis to demonstrate that its emission units are operating within the limitations established by the permit.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that these emission units meet all applicable state and federal air pollution control requirements, subject to the conditions of the draft permit. The Illinois EPA is therefore proposing to issue a permit with federally enforceable limits for the above referenced equipment to Exelon Generation Company.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If there is significant public interest in this matter, the Illinois EPA may hold a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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