



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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Project Summary

Federally Enforceable State Operating Permit (FESOP)
Ameren Illinois – Ashmore Storage Facility
Ashmore, Coles County

Site Identification No.: 029800AAF

Application No.: 09100035

Schedule

Public Comment Period Begins: November 14, 2014

Public Comment Period Closes: December 14, 2014

Illinois EPA Contacts

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I. INTRODUCTION

Ameren Illinois – Ashmore Storage Facility has applied for a Federally Enforceable State Operating Permit (FESOP) for its gas storage facility at 24818 East County Road 850N in Ashmore. This facility requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the permit that it would propose to issue for the facility. However, before issuing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

II. SOURCE DESCRIPTION

Ameren Illinois – Ashmore Storage Facility is located in Coles County, Illinois. The largest city near the facility is Chareston, Illinois which is located approximately 30 kilometers northwest of the facility. The facility is owned and operated by Ameren CIPS a subsidiary of Ameren Corporation.

The facility stores natural gas in a depleted native gas storage field utilizing pipeline pressure to drive natural gas into the storage field. This method of gas storage is referred to as free flow in gas storage. The facility stores gas in the field during summer months when the price of natural gas is lower. During the winter, the facility pumps gas out of the storage field back into the pipeline for distribution to its customers. The facility utilizes natural gas driven compressors to pressurize the gas from the storage field during this part of the operation.

The fuel combustion equipment combusts natural gas. Nitrogen oxides are emitted from the fuel combustion equipment. Nitrogen oxides are formed thermally by a combination of oxygen and nitrogen in the air at the temperatures at which fuel is burned. Thermal nitrogen oxides formed during the operation of all common high temperature combustion processes.

Carbon monoxide is also emitted from the fuel combustion equipment. It is formed by the incomplete combustion of fuel. Carbon monoxide is associated with most combustion processes and is found in measurable amounts in the exhausts of fuel combustion equipment. Other air contaminants formed by the combustion of natural gas are particulate matter, sulfur dioxide and VOM. These air pollutants are emitted in smaller amounts than nitrogen oxides and carbon monoxide.

III. GENERAL DISCUSSION

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law,

as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has applied for a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

IV. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The application shows that the plant is in compliance with applicable state and federal emission standards.

V. CONTENTS OF THE PERMIT

This permit that the Illinois EPA is proposing will identify the specific emission standards that apply to the emission units at the plant. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for nitrogen oxides and carbon monoxide. HAP emissions will be below 10 tons for an individual HAP and 25 tons for combined HAPs.

The permit conditions would also require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and that the plant's emissions are being properly controlled.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the source has met the requirements for issuance of its permit. The Illinois EPA is therefore proposing to issue the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.