

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
Lake Forest Hospital  
for Issuance of the  
Federally Enforceable State Operating Permit (FESOP) for  
660 North Westmoreland Road  
Lake Forest, Illinois 60045

Site Identification No.: 097080AAC  
Application No.: 99110100

Schedule

Public Comment Period Begins: June 6, 2013  
Public Comment Period Closes: July 6, 2013

Illinois EPA Contacts

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## **PROJECT SUMMARY**

### **I. INTRODUCTION**

Lake Forest Hospital currently operates under federally enforceable state operating permit (FESOP) which expired. The company requested a renewal of their FESOP to continue to operate as non-major source for the purposes of the Clean Air Act Permit Program (CAAPP). Production and emission limitations, as well as monitoring and recordkeeping conditions contained in the FESOP have prevented the facility from being a major source and will assure this status in the future. These conditions would be enforceable by both the State of Illinois and USEPA.

### **II. SOURCE DESCRIPTION**

Lake Forest Hospital operates power and heat generating equipment comprised of several boilers, four natural gas-fired cogeneration engines/generators and two emergency diesel engine/generators. Primary fuel used in the boilers is natural gas and fuel oil #2 is used as back-up fuel.

### **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 needs to operate this plant under 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 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 Nitrogen Oxides (NO<sub>x</sub>) and Carbon Monoxide (CO).

### **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 board has specific standards for emissions of particulate matter (PM) from process and fugitive sources, e.g., 35 IAC, Part 212, Subpart B – Visible Emissions, Subpart K – Fugitive Particulate Matter and Subpart L – PM Emissions from Process Emission Units. The Sulfur Dioxide emission from fuel

combustion and process emission sources is regulated by 35 IAC, Part 214. The emissions of Carbon Monoxide and Nitrogen Oxides emissions from fuel combustion sources are subject to the requirements of Part 216 and Part 217, respectively.

The source is exempt from requirements of Emission Reduction Market System due to limitations of this FESOP.

The reciprocating internal combustion engines are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63 Subparts A and ZZZZ.

The application shows that the plant is in compliance with applicable state and federal emission standards.

## **V. CONTENTS OF THE PERMIT**

The permit that the Illinois EPA is proposing to issue would identify the specific emission standards that apply to the emission units at the plant. The process emission units shall not exhibit emission of particulate matter exceeding 30% and fugitive emissions shall not cross property line as specified in Part 212, Subpart B and Subpart K. The plant operations are subject to 35 IAC 214 which restricts emission of Sulfur Dioxide from fuel oil combustion sources. Pursuant to requirements of NESHAP Subpart ZZZZ the source has to use fuel oil with ultralow sulfur content. The conditions of this permit are intended to ensure that the source complies 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 Carbon Monoxide and Nitrogen Oxides.

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 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 renewal 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.