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Project Summary for an Application from  
Baxter Healthcare Corporation for Renewal of the  
Federally Enforceable State Operating Permit (FESOP) for  
Technology Park Campus  
Round Lake, Illinois

Site Identification No.: 097807AAE  
Application No.: 73031659  
Date Received: September 11, 2006

Schedule  
Public Comment Period Begins: February 4, 2010  
Public Comment Period Closes: March 6, 2010

Illinois EPA Contacts  
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## **I. INTRODUCTION**

The Baxter Healthcare Corporation has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for their Technology Park Campus. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the renewed permit that it would propose to issue for the plant. However, before renewing 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**

The Baxter Healthcare Corporation operates power and heat generating equipment comprised of nine (9) diesel-powered generators, one (1) natural gas-fired generator, two (2) natural gas/distillate fuel oil-fired boilers, eight (8) natural gas-fired boilers, a pathological waste incinerator controlled by afterburner, Primary fuel used in the boilers is natural gas and fuel oil #2 is used as back-up fuel. These units are sources of emissions because emissions generated from combustion are Nitrogen oxides (NO<sub>x</sub>) and Carbon monoxide (CO). The company also operates plastic extrusion lines, a filter integrity testing operation, three (3) ethylene oxide sterilizers, a passivation operation, a solvent re-packaging operation, and three (3) electrical discharge machines. These units are sources of volatile organic material (VOM) emissions and hazardous air pollutants (HAP).

## **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 been operating 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 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 not 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/year for Carbon Monoxide (CO), Nitrogen Oxides (NO<sub>x</sub>) and Volatile Organic Material (VOM), 10 tons/year for a single Hazardous Air Pollutant (HAP).

#### **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 standards for sources of sulfur dioxide (SO<sub>2</sub>). The application shows that the plant is in compliance with applicable state and federal emission standards.

The principal air contaminants of concern for this type of operation are 100 tons for Carbon Monoxide (CO), Nitrogen Oxides (NO<sub>x</sub>) and Volatile Organic Material (VOM), 10 tons/year for a single Hazardous Air Pollutant (HAP). This plant combusts natural gas and releases small quantities of nitrogen oxides and carbon monoxide due to the incomplete combustion of natural gas.

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

The renewed permit that the Illinois EPA is proposing to issue would continue to identify the specific emission standards that apply to the emission units at the plant.

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 (CO), Nitrogen Oxides (NO<sub>x</sub>) and Volatile Organic Material (VOM), 10 tons/year for a single Hazardous Air Pollutant (HAP). (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

The permit would also set limitations on requirements to assure that this facility will be operated as a non-major source. The permit sets limitations on technology park campus emissions. These limitations are consistent with the historical operation and capacity of the facility.

The permit conditions would also continue to 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 renew 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.