

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
1021 N. Grand Avenue East  
P.O. Box 19506  
Springfield, Illinois 62794-9506

Project Summary for an Application from  
MB Real Estate Services, Inc. for a  
Federally Enforceable State Operating Permit (FESOP) for  
50 West Washington Street  
Chicago, Illinois 60602

Site Identification No.: 031600GXD  
Application No.: 10080032

Illinois EPA Contacts

Permit Analyst: David Hulskotter  
Community Relations Coordinator:

Brad Frost  
217/782-7027  
Brad.frost@illinois.gov

## **I. INTRODUCTION**

MB Real Estate Services Inc. has applied for a Federally Enforceable State Operating Permit (FESOP) for its office building at 50 West Washington Street in Chicago. This office building 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 this source. 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**

MB Real Estate Services Inc. operates four industrial boilers and four emergency generators. The industrial boilers produce high-pressure steam used for general cooling and heating. The boilers burn natural gas and number 2 fuel oil. The emergency generators burn ultra low sulfur diesel fuel oil.

The principal air contaminant emitted from the facility is nitrogen oxides which is generated from the fuel combustion process. Nitrogen oxides are formed thermally by a combination of oxygen and nitrogen in the air at a temperature at which fuel is burned.

In addition, sulfur dioxides (SO<sub>2</sub>), carbon monoxide (CO), particulate matter (PM) and volatile organic material (VOM) are emissions formed by combustion processes. CO is formed by the incomplete combustion of fuel. SO<sub>2</sub> emissions are mostly generated during the combustion of fuel oil.

## **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 hospital 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 hospital's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the source's 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 hospital, 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 NO<sub>x</sub>, 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 Illinois Pollution Control Board has specific standards for units emitting volatile organic material in the Greater Chicago Area. The 1500 KW (2012 horse power) diesel-powered emergency generator is subject to the New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60 IIII. The main requirements are the engine must be certified by the manufacturer that it meets the applicable emission requirements in 40 CFR 60.4202 and the engine must have a non-resettable hour meter per 40 CFR 60.4209(a). 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 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 NO<sub>x</sub>, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the source are well below the 100 ton major source threshold.)

The permit would also set limitations on monthly and annual natural gas usage and fuel oil usage. Since these items are limited, therefore the air emissions are limited.

The permit conditions 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 source is being operated within the limitations set by the permit and the source'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.