

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
Cook County Government for Renewal of the
Federally Enforceable State Operating Permit (FESOP) for
118 North Clark Street
Chicago, Illinois 60602

Site Identification No.: 031600CNT
Application No.: 95060011

Schedule

Public Comment Period Begins: March 5, 2008

Public Comment Period Closes: April 4, 2008

Illinois EPA Contacts

Permit Analyst: George Kennedy

Community Relations Coordinator: Brad Frost

I. INTRODUCTION

Cook County Government has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its Winfield location. 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 renewed permit that it would propose to issue for the facility. 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

Cook County Government operates a heating plant at this facility. The emission sources include seven gas-fired boilers with fuel oil backup, and two 30,000 gallon fuel oil storage tanks, and 21 standby emergency generators. These units are sources of emissions because of fuel combustion of mainly of natural gas. These emissions include Nitrogen Oxides, Carbon Monoxide, and Sulfur Dioxide.

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 facility 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 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, Carbon Monoxide, and Sulfur Dioxide; 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. Illinois regulations limit sulfur content in fuel oil used in boilers, and Federal regulations cover boilers. The application shows that the facility is in compliance with applicable state and federal emission standards.

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 facility. As explained, the boilers are subject to 40 CFR 60Dc which requires good operation and maintenance practices, and recordkeeping. 35 Ill. Adm. Code 212.123 also limits smoke or other particulate matter to no greater than 30 percent opacity. 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 facility to below the major-source-thresholds of 100 tons for Nitrogen Oxides, Carbon Monoxide, and Sulfur Dioxide; 10 tons for an individual HAP; and 25 tons for combined HAPs.

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.