

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Tribune Company  
Attn: Anthony W. Gac  
435 North Michigan Avenue  
Chicago, Illinois 60611

Application No.: 74030087                      I.D. No.: 031600COL  
Applicant's Designation:                      Date Received: March 30, 2000  
Subject: Boilers, Generators, and Tanks  
Date Issued: December 12, 2000              Expiration Date: December 12, 2005  
Location: 435 North Michigan Avenue, Chicago

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of three natural gas/#6 oil fired boilers, two 25,300 gallon #6 fuel oil storage tanks, 3,700 gallon #2 fuel oil storage tank, #2 fuel oil fired emergency generator, and a natural gas fired emergency generator as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of sulfur dioxide and nitrogen oxides from the source to less than the levels at which the source would be a major source, as further described in Attachment A. As a result the source is excluded from the requirements to obtain a Clean Air Act Permit Program permit.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes the current permit(s) issued for this location.

2a. Operation of the 3 boilers shall not exceed the following limits:

Natural Gas Usage: 30 x 10<sup>6</sup>scf/month    150 x 10<sup>6</sup>scf/year  
#6 Fuel Oil Usage: 180 x 10<sup>3</sup>gal/month    300 x 10<sup>3</sup>gal/year  
#6 Fuel Oil Maximum Sulfur Content by Weight pursuant to 35 Ill. Adm. Code 214.161(a): (.00005) x (gross heating value of oil in Btu/lb)

- b. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the proceeding 11 months.

3a. Operation of the 2 generators shall not exceed the following limits:

Natural Gas Usage: 0.12 x 10<sup>6</sup>scf/month    0.12 x 10<sup>6</sup>scf/year

#2 Fuel Oil Usage:  $11.5 \times 10^3$ gal/month     $11.5 \times 10^3$ gal/year  
#2 Fuel Oil Maximum Sulfur Content by Weight pursuant to 35 Ill. Adm.  
Code 214.122(b)(2):  $(.000015) \times$  (gross heating value of oil in Btu/lb)

- b. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the proceeding 11 months.

- 4a. Within 30 days of a written request from the Agency the Permittee shall submit data on the sulfur content by weight of representative #6 and/or #2 fuel oil, determined by laboratory analysis.
  - b. The submitted data shall include the sulfur content by weight of the #6 and/or #2 fuel oil, a justification of why this is representative, and a description of the sampling procedures and documentation for the analysis.
  - c. The Agency may provide additional time for the performance of this testing upon request from the Permittee which shows that it is not feasible to perform representative testing within 30 days.
- 5a. The Permittee shall maintain monthly records of the following items:
- i. Natural gas usage ( $10^6$  scf/month and  $10^6$  scf/year);
  - ii. #6 fuel oil usage ( $10^3$  gal/month and  $10^3$  gal/year);
  - iii. #2 fuel oil usage ( $10^3$  gal/month and  $10^3$  gal/year); and
  - iv.  $SO_2$  and  $NO_x$  emissions as calculated by AP-42 emission factors and the actual natural gas, #6 fuel oil, and #2 fuel oil usage (lb/month and lb/year).
- b. These records shall be retained at a readily accessible location at the plant for at least 3 years from the date of entry and shall be made available for inspection and copying by the Agency and USEPA upon request.
6. Any exceedance of the requirements of this permit determined by the records required by Condition 5 shall be reported by the Permittee by submitting a report to the Agency's Compliance Section in Springfield, Illinois within 30 days after the occurrence of the excess. The report shall include the emissions on an hourly basis, a copy of the relevant records, and a description of the excess or violation and efforts to reduce emissions and future occurrences.
- Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276
7. This permit supersedes the current permits issued for this location.
8. This permit is issued based on negligible emissions of volatile organic material from the 3 storage tanks. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr from each storage tank.

9. Along with the Annual Emissions Report required by May 1st of each year the Permittee shall include the following information: natural gas usage, #6 fuel oil usage, #2 fuel oil usage, and sulfur dioxide and nitrogen oxide emissions from the prior calendar year. If there have been no excesses during the prior calendar year the Annual Emissions Statement shall include a statement to that effect.

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If you have any questions on this, please call Jim Kallmeyer at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:JDK:jar

cc: IEPA Region 1  
CASM  
USEPA

Attachment A - Emissions Summary

1. Gas-fired and #6 fuel oil-fired fuel combustion emissions of nitrogen oxide (NO<sub>x</sub>), carbon monoxide (CO), volatile organic material (VOM), sulfur dioxide (SO<sub>2</sub>), and particulate matter (PM) from the boilers:

<u>Pollutant</u>	<u>Fuel Usage (10<sup>6</sup> scf/Yr)</u>	<u>Emission Factor (Lb/10<sup>6</sup>scf)</u>	<u>Emissions (Ton/Yr)</u>
NO <sub>x</sub>	150	100	7.5
CO	150	84	6.3
VOM	150	5.5	0.42
SO <sub>2</sub>	150	0.6	0.05
PM	150	7.6	0.57

<u>Pollutant</u>	<u>Fuel Usage (10<sup>3</sup> gal/Yr)</u>	<u>Emission Factor (Lb/10<sup>3</sup> gal)</u>	<u>Emissions (Ton/Yr)</u>
NO <sub>x</sub>	300	55	8.25
CO	300	5	0.75
VOM	300	0.76	0.11
SO <sub>2</sub>	300	142.87	21.43
PM	300	11.58	1.74

This table defines the potential emissions of the boilers and are based on the fuel fired and standard emission factors at the maximum annual fuel usage indicated in the permit application.

2. Gas-fired and #2 fuel-oil fired fuel combustion emissions of nitrogen oxide (NO<sub>x</sub>), carbon monoxide (CO), volatile organic material (VOM), sulfur dioxide (SO<sub>2</sub>), and particulate matter (PM) from the emergency generators:

<u>Pollutant</u>	<u>Fuel Usage (10<sup>6</sup> scf/Yr)</u>	<u>Emission Factor (Lb/10<sup>6</sup>scf)</u>	<u>Emissions (Ton/Yr)</u>
NO <sub>x</sub>	0.12	3,200	0.19
CO	0.12	420	0.03
VOM	0.12	180	0.01
SO <sub>2</sub>	----	-----	----
PM	----	-----	----

<u>Pollutant</u>	<u>Fuel Usage (10<sup>3</sup> gal/Yr)</u>	<u>Emission Factor (Lb/10<sup>3</sup> Gal)</u>	<u>Emissions (Ton/Yr)</u>
NO <sub>x</sub>	11.5	434	2.50
CO	11.5	113.4	0.65
VOM	11.5	12.6	0.07
SO <sub>2</sub>	11.5	39.6	0.23
PM	11.5	10.9	0.06

This table defines the potential emissions of the generators and are based on the fuel fired and standard emission factors at the maximum annual fuel usage indicated in the permit application.

3. This permit is issued based on negligible emissions of volatile organic material from the 3 storage tanks. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr from each storage tank.

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