

BACKGROUND INFORMATION FOR THE
PROPOSED DRAFT CAAPP PERMIT FOR
CITY OF RED BUD MUNICIPAL POWER PLANT

I. INTRODUCTION

The city of Red Bud has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its Municipal Power Plant located at 525 Power Street in the City of Red Bud. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by Title V of the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

This CAAPP permit would be a combined CAAPP/Title I permit that also contains terms and conditions adopted to address provisions established under regulations adopted under Title I of the Clean Air Act.

II. SOURCE DESCRIPTION

Red Bud Municipal Power Plant operates engine driven electric generators. The source primarily operates as a peaking station, generating electric power for the community and surrounding area when the normal sources of electrical power are not available, due to planned repair and maintenance, unexpected breakdowns, or high levels of electricity consumption.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Rated Nominal Capacity (kW)	Emission Control Equipment
Engine #1	Combustion engines fired with distillate oil only	2,412	None
Engine #2		1,136	None
Engine #3		2,412	None
Engine #4		3,500	None
Engine #7		2,800	None
Engine #8		2,800	None

III. EMISSIONS

The Red Bud Municipal Power Plant is required to have a CAAPP permit since it is a major source of NO_x emissions. This permit would limit the maximum annual emissions of NO_x, VOM, SO₂, PM, and CO from all significant emission units combined at the source to 245, 6.9, 3.9, 5.3, and 65.1 tons/year, respectively.

These limits are based on a theoretical annual capacity of the engines. Historically, based on normal annual operation as a peaking station, which is significantly less than the theoretical capacity, the annual emissions have been considerably lower than this. Insignificant activities at the source are not accounted for in the permitted emission limits. These activities include items such as storage tanks of distillate oil, lubricating oil, waste oil, and organic liquids.

IV. APPLICABLE EMISSION STANDARDS

The significant emission units at this source must comply with the emission standards adopted by the Illinois Pollution Control Board. The Board's emission standards represent the basic requirements for sources in Illinois.

The significant emission units at this source must also comply with the applicable federal emission standards, which the Illinois EPA administers in Illinois on behalf of the United States EPA under a delegation agreement. The CAAPP permit would not affect the applicability of any such standards.

As a part of its application, City of Red Bud has certified that it is in full compliance with applicable requirements. The Illinois EPA's review of the application and on-site inspections also indicate that the station is in compliance. At this time there are no rules, regulations, or requirements with future compliance dates that would apply to the Red Bud Municipal Power Plant that need to be addressed by this CAAPP permit.

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions related to air pollution control that apply to a source, together with the identification of the applicable state and federal rules that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The source must carry out these procedures on an on-going basis.

Title I

This permit would be a combined Title I/CAAPP permit. A combined CAAPP/Title I permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I of the Clean Air Act and regulations promulgated thereunder, e.g., the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21. These terms and conditions in the CAAPP permit address the applicability, and compliance if determined applicable, of these Title I provisions. Such terms and conditions in the CAAPP permit are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application.

Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft 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 Ill. Adm. Code Part 166.