

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
Northwestern University for Renewal of the
Federally Enforceable State Operating Permit (FESOP) for
410 East Huron Street
Chicago, Illinois 60611

Site Identification No.: 031600CUO
Application No.: 73032180

Schedule

Public Comment Period Begins: December 26, 2007
Public Comment Period Closes: January 25, 2008

Illinois EPA Contacts

Permit Analyst: George Kennedy
Community Relations Coordinator: Brad Frost

I. INTRODUCTION

Northwestern University has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its 410 East Huron Street, Chicago location. This site 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

Northwestern University is a university facility. The university operates heat generating plant comprised of four natural gas fired boilers (distillate fuel oil is a backup for three of these boilers). The university also operates one pathological medical waste incinerator for their research and development department.

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 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 facility to below the major-source-thresholds of 100 tons for NO_x, CO, SO₂, PM and VOM, 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 regulation that apply to this source are 35 ICA 212.123 to limit opacity to 30 percent, 35 ICA 214.122 to limit SO₂, and 35 ICA 216.121 to limit CO.

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. As explained, the CO, and SO₂ are subject to 35 ICA 214.122 and 35 ICA 216 which requires: SO₂ emissions into the atmosphere from any process to not exceed 0.46 kg of sulfur dioxide per MW-hour of actual heat input when distillate fuel oil is burned; and CO of less than 200 ppm into the atmosphere from any fuel combustion emission source with input greater than 10 mmBtu/hour corrected to 50 percent excess air. 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_x, CO, SO₂, PM and VOM, 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.

GMK:73032180:psj