

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
City of Geneseo
for Renewal of the
Federally Enforceable State Operating Permit (FESOP) for
City of Geneseo, Geneseo, Illinois

Site Identification No.: 073050AAA
Application No.: 73090137

Schedule

Public Comment Period Begins: January 21, 2011
Public Comment Period Closes: February 20, 2011

Illinois EPA Contacts

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I. INTRODUCTION

The City of Geneseo has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its electric utility plant located in Geneseo, Henry County, Illinois. This plant 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

The City of Geneseo electric utility plant is an electrical generating facility consisting of six dual fuel-fired (natural gas and diesel) reciprocating engine driven generators. This facility is used to generate electrical power for the community during peak demand periods which usually occur during the summer months. The emission units at this plant that require an operating permit are the seven reciprocating engines that drive the generators. These units are sources of emissions because there are nitrogen oxides, carbon monoxide, particulate matter, sulfur dioxide, and volatile organic material emissions produced by the operation of these engines.

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 plant 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's 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, 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 Board has standards for sources of particulate matter and sulfur dioxide. The application shows that the plant 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 plant. As explained, the two newest engines (Engines 6 and 8) are exempted from the Acid Rain Program but are subject to specific provisions of the Acid Rain Program (40 CFR 72.2 through 72.7 and 72.10 through 72.13) which require specific record keeping of the sulfur content of all fuel used in the diesel-fired reciprocating engines and limit the average sulfur content of the fuel used to 0.05 weight percent. The other existing engines are not subject to the Acid Rain Program. The source is also subject to 35 IAC Parts 212 and 214 which regulate the emissions of particulate matter and sulfur dioxide.

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 nitrogen oxides, carbon monoxide, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

The permit would also set limitations on the sulfur content of the fuel used by all the existing engines to 0.05 weight percent. These limitations were requested in the application and are consistent with the historical operation of emission units at the plant.

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.