

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
Waukegan Illinois Hospital Company, LLC for Renewal of the  
Federally Enforceable State Operating Permit (FESOP) for  
2615 West Washington Street  
Waukegan, Illinois 60085

Site Identification No.: 097190AAW  
Application No.: 73031065

Schedule

Public Comment Period Begins: May 3, 2007  
Public Comment Period Closes: June 2, 2007

Illinois EPA Contacts

Permit Analyst: George Kennedy  
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## **I. INTRODUCTION**

Waukegan Illinois Hospital Company, LLC has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its Waukegan 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**

Waukegan Illinois Hospital Company, LLC is a medical facility. The emission units at this plant that require an operating permit include boilers, and generators. These units are sources of emissions because of fuel combustion 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 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 plant to below the major-source-thresholds of 100 tons for Nitrogen Oxides, Carbon Monoxide, and Sulfur Dioxide.

## **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, carbon monoxide, and particulate matter into the atmosphere. The application shows that the facility is in compliance with applicable state and federal emission standards.

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## **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.

The boilers must comply with 35 Ill. Adm. Section 216.121 requires boilers to not exceed a carbon dioxide emission of 200 ppm, corrected to 50 percent excess air. Section 214.122(b)(1) and (2) requires each fuel combustion emission source not to exceed a sulfur dioxide emission of 0.3 and 1.0 lbs per mmBtu when burning #2 and #6 fuel oil respectively.

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.

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.