**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

| | | |
|---|---|---|
| **IN THE MATTER OF:** | ) | |
| | ) | |
| **PROPOSED NEW CLEAN AIR** | ) | **R06-26** |
| **INTERSTATE RULES (CAIR)** | ) | **(Rulemaking – Air)** |
| **$SO_2$, $NO_x$ ANNUAL AND $NO_x$** | ) | |
| **OZONE SEASON TRADING** | ) | |
| **PROGRAMS, 35 ILL. ADM. CODE 225,** | ) | |
| **SUBPARTS A, C, D, E and F** | ) | |

**NOTICE OF FILING**

To:

Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
Suite 11-500
100 West Randolph
Chicago, Illinois 60601

Persons included on the
**ATTACHED SERVICE LIST**

PLEASE TAKE NOTICE that we have today filed with the Office of the Clerk of the Pollution Control Board the FIRST NOTICE COMMENTS OF MIDWEST GENERATION, LLC, a copy of which is herewith served upon you.

/s/ Karl A. Karg
Karl A. Karg

Dated: June 25, 2007

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**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

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| **PROGRAMS, 35 ILL. ADM. CODE 225,** | ) | |
| **SUBPARTS A, C, D, E and F** | ) | |

**FIRST NOTICE COMMENTS OF MIDWEST GENERATION**

NOW COMES Participant MIDWEST GENERATION, LLC, pursuant to 35 Ill. Adm. Code §102.108, and offers the following comments on Section 225.615(g)(4), proposed in the above-captioned proposed rule, as published for first notice in 31 Ill. Reg. 6769 (May 11, 2007):

Under Subpart F of the Rule, the Combined Pollutant Standards, and specifically, Section 225.615(g)(4), the flue gas flow rate must be determined for the point of sorbent injection; provided that this flow rate may be assumed to be identical to the stack flow rate if the gas temperatures at the point of injection and the stack are normally within 100° F, or it may otherwise be calculated from the stack flow rate, corrected for the difference in gas temperatures.

Midwest Generation, LLC proposes to amend Section 225.615(g)(4) to allow for correction of the flue gas flow rate for the amount of air in-leakage between the injection location and the stack, in addition to the currently allowed correction for the difference in gas temperatures. Allowing for correction of the flue gas flow rate for air in-leakage provides a more accurate determination of the flue gas flow rate at the point of sorbent injection. As such, this amendment would result in a reduction of unnecessary sorbent use where the cost of such sorbent is significant and where the supply of sorbent is limited and may be subject to shortfalls. Moreover, the proposed amendment will not diminish the effectiveness of the applied sorbent

nor the ability of each affected source to otherwise comply with the limits for Mercury emissions. Rather, the amendment will eliminate the need for additional sorbent to be added in response to added stack flow caused by air in-leakage, which air in-leakage does not contain any emissions, let alone additional concentrations of Mercury. For Midwest Generation, LLC, the average air in-leakage at each unit between the point of sorbent injection and the stack is expected to be between 10 and 15 percent of the total flue gas flow.

Midwest Generation requests that the text of Section 225.615(g)(4) be amended as follows, with proposed revised language in underlined bold format:

(g)(4) For purposes of subsection (g)(3) of this Section, the flue gas flow rate must be determined for the point of sorbent injection; provided that this flow rate may be assumed to be identical to the stack flow rate if the gas temperatures at the point of injection and the stack are normally within 100º F, or the flue gas flow rate may otherwise be calculated from the stack flow rate, corrected for the difference in gas temperatures **and air leakage into the ductwork after the point of injection as determined by measurement of $O_2$ or $CO_2$. Unless the Agency approves an alternative procedure, the following equations shall be used to determine the flow rate at the point of injection corrected for air in-leakage into the ductwork:**

**Corrected Flow Rate (acfm) = Stack Flow Rate (acfm) x (1-Air In-Leakage Factor)**

**where:**

$$\text{Air In-Leakage Factor} = \frac{(\%O_2, \text{Stack, Wet} - \%O_2, \text{ESP Inlet, Wet})}{(20.9 - \%O_2, \text{Stack, Wet})}$$

**or**

$$\text{Air In-Leakage Factor} = \frac{(\%CO_2, \text{ESP Inlet, Wet} - \%CO_2, \text{Stack, Wet})}{(\%CO_2, \text{Stack, Wet})}$$

**For purposes of this subsection, "acfm" shall mean actual cubic feet per minute.**

For the reasons outlined above, Midwest Generation, LLC requests that the Board adopt the proposed changes to Section 225.615(g)(4) as set forth above.

Dated: June 25, 2007

Respectfully submitted,

MIDWEST GENERATION, LLC

By: /s/ Karl A. Karg
One of its Attorneys

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Cary R. Perlman
Andrea Hogan
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## CERTIFICATE OF SERVICE

I, the undersigned, certify that on this 25th day of June, 2007, I have served electronically the attached FIRST NOTICE COMMENTS OF MIDWEST GENERATION, LLC upon the following person:

Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
Suite 11-500
100 West Randolph
Chicago, Illinois 60601

and by first-class mail with postage thereon fully prepaid and affixed to the persons listed on the **ATTACHED SERVICE LIST.**

/s/ Karl A. Karg
Karl A. Karg

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