

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:)	
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)	
)	
AMENDMENTS TO 35 ILL. ADM.)	R2023-018
CODE PARTS 201, 202, AND 212)	(Rulemaking – Air)
)	
)	

NOTICE OF FILING

To: Attached Service List

PLEASE TAKE NOTICE that today I have electronically filed with the Office of the Clerk of the Illinois Pollution Control Board **MIDWEST GENERATION, LLC’S SUPPLEMENTAL RESPONSE TO QUESTIONS RECEIVED AT HEARING** and a **CERTIFICATE OF SERVICE**, which are attached and copies of which are herewith served upon you.

Dated: March 7, 2023

Respectfully submitted,

Midwest Generation, LLC

/s/ Sarah L. Lode
One of its Attorneys

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**MIDWEST GENERATION, LLC’S
SUPPLEMENTAL RESPONSE TO QUESTIONS RECEIVED AT HEARING**

Midwest Generation, LLC (“MWG”) by its attorneys, ArentFox Schiff LLP, hereby files this supplemental response to certain questions asked of MWG at the public hearing held by the Illinois Pollution Control Board (the “Board”) on February 16, 2023.

On March 1, 2023, MWG submitted Responses to Questions Received at Hearing, providing narrative responses and data in response to Board Questions 8 and 14. This supplemental response provides additional illustrative data of opacity during SMB (responsive to Q.8) that supports the need for a 3-hour averaging period (responsive to Q.14).

Board Questions 8 and 14:

On page 1 of your pre-filed testimony, you state that MWG’s proposal provides an alternative averaging period for demonstrating compliance during times of startup, malfunction, and breakdown (SMB) of the coal-fired boilers at Midwest Generation’s Powerton Generating Station.

8. If [MWG has opacity monitoring data from Powerton station that illustrate the difference in opacity levels during normal operation and during SMB], please submit this illustrative opacity monitoring data for the affected boilers.

On page 7 of your pre-filed testimony, you note that under MWG’s proposal, demonstrating compliance “would be accomplished for a given six-minute block period when the Alternative Averaging Period is needed by taking the average opacity measurements from the COMS for those six minutes and the preceding 174 minutes of data.”

- 14. Please provide examples using actual opacity monitoring data prior to startup, malfunction, or breakdown that support MWG’s contention that the proposed 3-hour averaging time would be necessary to meet the 30 percent opacity limitation during SMB.**

Supplemental Response to Questions 8 and 14:

On October 26, 2020, Powerton experienced five consecutive opacity exceedances when attempting to start-up a boiler. The last of these consecutive periods began at 12:24 PM. MWG turned off fans in the middle of that 6-minute period in order to reduce opacity. Table 1, below, provides a summary of each 6-minute average opacity reading from 11:30 AM to 12:30 PM on October 26, 2020, in reverse chronological order. The time denoted for each 6-minute period is not inclusive of the final minute. In other words, the period 12:24-12:30 denotes the period beginning at 12:24 PM and concluding at, but not including, 12:30 PM. Table 2, then, provides a running average to show how many averaging periods are required to reduce the opacity average from the 12:24-12:30 period to 30% or lower. This analysis shows that the average opacity for that period would not be below 30% unless a full one-hour average is used, consisting of that 6-minute period and the preceding 54 minutes.

Table 1 – October 26, 2020 6-minute Averages

Time	Average Opacity (%)
12:24-12:30	41
12:18-12:24	80
12:12-12:18	37
12:06-12:12	59
12:00-12:06	48
11:54-12:00	5
11:48-11:54	5
11:42-11:48	5
11:36-11:42	5
11:30-11:36	5

Table 2 – October 26, 2020 Running Averages

Time	Total Time (min)	Average Opacity (%)
12:24-12:30	6	41
12:18-12:30	12	61
12:12-12:30	18	53
12:06-12:30	24	54
12:00-12:30	30	53
11:54-12:30	36	45
11:48-12:30	42	39
11:42-12:30	48	35
11:36-12:30	54	32
11:30-12:30	60	29

This example and the examples MWG provided in its March 1st Response are just that—examples. Excess opacity events may last longer or result in higher opacity, thus creating the need for the proposed alternative averaging period. MWG selected a 3-hour averaging period in order to align with its CAM Plan. That Plan puts an outside limit on authorized opacity exceedance, in contrast to the current regulations and Powerton’s CAAPP permit. Consequently, MWG’s proposal would not interfere with any applicable requirement concerning attainment and reasonable further progress.

Dated: March 7, 2023

Respectfully submitted,
Midwest Generation, LLC

/s/ Andrew N. Sawula
One of its Attorneys

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