

**RECEIVED**  
CLERK'S OFFICE

MAR 30 2006

STATE OF ILLINOIS  
Pollution Control Board

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD  
OF THE STATE OF ILLINOIS**

**MIDWEST GENERATION, LLC,** )  
**POWERTON GENERATING STATION,** )

**Petitioner,** )

**v.** )

**ILLINOIS ENVIRONMENTAL** )  
**PROTECTION AGENCY,** )

**Respondent.** )

**PCB 2006-59**  
**(CAAPP Permit Appeal)**

To: Dorothy Gunn, Clerk  
Illinois Pollution Control Board  
100 West Randolph Street  
Suite 11-500  
Chicago, Illinois 60601

Bradley P. Halloran  
Hearing Officer  
Illinois Pollution Control Board  
James R. Thompson Center  
Suite 11-500  
100 West Randolph Street  
Chicago, Illinois 60601

Sheldon A. Zabel  
Kathleen C. Bassi  
Stephen J. Bonebrake  
Joshua R. More  
Kavita M. Patel  
Schiff Hardin, LLP  
6600 Sears Tower  
233 South Wacker Drive  
Chicago, Illinois 60606

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board the **ADMINISTRATIVE RECORD** of the Respondent, Illinois Environmental Protection Agency, a copy of which is herewith served upon the assigned Hearing Office and the attorney for the Petitioner.

Respectfully submitted by,

  
\_\_\_\_\_  
Sally Carter  
Assistant Counsel

Dated: March 29, 2006  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD  
OF THE STATE OF ILLINOIS

**RECEIVED**  
CLERK'S OFFICE

MAR 30 2006

STATE OF ILLINOIS  
Pollution Control Board

MIDWEST GENERATION, LLC, )  
POWERTON GENERATING STATION, )

Petitioner, )

v. )

ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )

Respondent. )

PCB 2006-59  
(CAAPP Permit Appeal)

**ADMINISTRATIVE RECORD**

The Respondent, Illinois Environmental Protection Agency ("Illinois EPA"), by and through its attorneys in accordance with the Illinois Pollution Control Board's ("Board") Order of February 16, 2006, files its Administrative Record ("Administrative Record") in this cause.

Acting in accordance with its authority under the CAAPP provisions of the Illinois Environmental Protection Act (hereinafter "Act"), 415 ILCS 5/39.5(2004), the Illinois EPA issued a CAAPP permit to Midwest Generation on September 29, 2005. The permit authorized the operation of an electrical power generation facility known as the Powerton Generating Station. The facility is located at 13082 East Manito Road in Pekin, Illinois. On November 2, 2005, Petitioner filed a petition before the Board challenging certain permit conditions contained within the Clean Air Act Permit Program ("CAAPP") permit issued by the Illinois EPA.

In accordance with the Board's February 16, 2006, Order, a hard copy of the Administrative Record and four copies of the Administrative Record on compact discs are filed with the Board. The Administrative Record consists of, among other things,

Midwest Generation's permit application materials, various draft permits issued for public comment, correspondence between the Illinois EPA and both Midwest Generation and the United States Environmental Protection Agency, public comments received during the multiple public comment periods, various construction and operating permits issued to Midwest Generation, internal agency memorandums, and miscellaneous general reference materials.

Given the considerable amount of paginated materials and the resources required to provide the Administrative Record to the Board and opposing counsel, the Illinois EPA generally did not copy duplicative materials (e.g., general reference and Electric Energy - AUGI model documents) for each of the twenty-one records for the related CAAPP appeals. As the General Reference Material is applicable to all twenty-two appeals, the Illinois EPA has provided one hard copy of the General Reference Materials and four copies of the General Reference Materials on compact discs with the Board for all the related appeals. These documents are listed at the end of this Administrative Record under the heading "General Materials."

#### **Contents of the Administrative Record**

Miscellaneous documents pertaining to Draft Permit and Public Notice. **[Pages 1-135]**

Hearing Transcript, 200 N.E. Water Street, Peoria, Illinois, August 21, 2003. **[Pages 136-485]**

Preliminary Responsiveness Summary, dated August 15, 2005. **[Pages 486-529]**

Proposed Permit (USEPA Review) Revised Proposed Permit, dated August 2005. **[Pages 530-668]**

Proposed Permit (USEPA Review) Proposed CAAPP Permit, dated October 6, 2003. **[Pages 669-783]**

Extension Denial Letter notifying that the comments must be postmarked by August 1, 2005. **[Page 784]**

Coal-Fired CAAPP Repreproposed Notification. **[Page 785]**

Draft Revised Proposed Permit, dated July 2005. **[Pages 786-924]**

Coal-Fired Revised Proposed CAAPP Notification. **[Page 925]**

Revised Proposed CAAPP Permit Draft, dated December 2004. **[Pages 926-1059]**

July 19, 2005, Letter. **[Pages 1060-1065]**

August 15, 2005, Letter. **[Pages 1066-1071]**

Final Permit and Calculation Sheet, dated September 2005. **[Pages 1072-1227]**

September 29, 2005, Letter. **[Pages 1228-1234]**

Final Responsiveness Summary. **[Pages 1235-1278]**

179 801 AAA 95 09 0074 - Midwest Generation Powerton Station **[Pages 1279-1337]**

- \* Application for CAAPP Permit, dated received September 7, 1995. **[Pages 1279-1283]**
- \* Fee Determination for CAAPP Permit, dated received September 7, 1995. **[Pages 1284-1285]**
- \* Compliance Certification, dated received September 7, 1995. **[Pages 1286-1294]**
- \* CAAPP Application Completeness Determination and Source Fee Determination, Determination dated October 11, 1995. **[Pages 1295-1297]**
- \* Cost Estimates for NOx Emissions Reduction for All Coal-Fired Utility Boilers, date updated 3/5/97. **[Page 1298]**
- \* Letter from Basil G. Constantelos, Director of Environmental, Health and Safety, Midwest Generation, to Clean Air Markets Official, USEPA, regarding Revised NOx Budget Account Certificate of Representation Forms, dated May 31, 2002, and attachments. **[Pages 1299-1304]**
- \* Power Plant Initiative - February 2003, dated 2/3/03. **[Pages 1305-1306]**
- \* Letter from Basil G. Constantelos to Jim Ross, Manager, Permit Section, Illinois EPA, regarding Notification of NOx Averaging for Compliance with IAC 217

Subpart V and Submittal of Form 640-CAAPP, dated April 3, 2003, and attachment. **[Pages 1307-1326]**

- \* Memorandum from David Kolaz to Renee Cipriano regarding Approval for Public Hearings for Coal-Fired Power Plant Permits, dated June 2, 2003. **[Pages 1327-1328]**
- \* Email from Jim Ross, Acting Permit Section Manager, Illinois EPA to Stacey Coburn, USEPA, regarding comments on CAAPP permits, dated 7/10/03 9:10 AM. **[Page 1329]**
- \* Letter from Basil Constantelos to Jim Ross regarding NOx SIP Call and Application for Budget Permit for Electrical Generating Units, dated July 15, 2003, and attachment. **[Pages 1330-1335]**
- \* Information concerning Greenhouse Gases, dated 7/31/03. **[Pages 1336-1337]**

Letter from Basil Constantelos to Jim Ross regarding Title V Permit Application Complete Update for Powerton Electrical Generating Station, dated August 22, 2003, attached Title V Permit Application for Powerton, dated August 12, 2003. **[Pages 1338-2159]**

Miscellaneous Correspondence & Application Material. **[Pages 2160-2417]**

- \* Letter from Basil Constantelos to Jim Ross regarding Title V Permit Application Complete Update for Powerton Electrical Generating Station, dated August 22, 2003. **[Pages 2160-2163]**
- \* Letter from Scott B. Miller, Senior Engineer, Environmental, Health & Safety, Midwest Generation, to John Cashman, Permit Section Engineer, Illinois EPA, providing Title V application supplement to Powerton Station, dated September 19, 2003, and attachments. **[Pages 2164-2232]**
- \* Handwritten notes of Laurel Kroack regarding Title V permits, dated November 21, 2003. **[Pages 2233-2234]**
- \* Facsimile from Keith Harley to Julie Armitage, dated November 24, 2003. **[Pages 2235-2240]**
- \* Note and attachment from Chris Romaine to Dave Kolaz, dated 12/10/03. **[Pages 2241-2248]**
- \* Email from Bruce Nilles to Renee Cipriano and David Kolaz dated 1/12/2004 including "Draft 1.12.03" and handwritten notes of Laurel Kroack. **[Pages 2249-2250]**

- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM, with handwritten notes. **[Pages 2251-2252]**
- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM. **[Page 2253]**
- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Laurel Kroack. **[Page 2254]**
- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Chris Romaine. **[Pages 2255-2261]**
- \* Handwritten notes of Laurel Kroack beginning “Enviros & Title V Power Plants,” dated 2/3/2004. **[Pages 2262-2263]**
- \* Meeting sign-in sheet, dated 2/4/04. **[Page 2264]**
- \* Memorandum from Laurel Kroack to Renee Cipriano regarding Title V permits for coal-fired power plants, including Midwest Generation, dated February 4, 2004. **[Pages 2265-2268]**
- \* Email from Chris Romaine to Natalie Locke and Steve Whitworth, dated 2/19/2004, 2:41 PM. **[Page 2269]**
- \* Handwritten notes of Manish Patel regarding meeting with USEPA on coal-fired power plant CAAPPs dated 2/24/04, 1:30 PM. **[Page 2270]**
- \* Handwritten notes of Manish Patel regarding conference call with coal-utility facilities, dated 2/25/04, 1:30 PM. **[Page 2271]**
- \* Handwritten notes regarding call with USEPA for MidGen coal fired CAAPP, dated 3/2/04. **[Page 2272]**
- \* Facsimile “Midwest Generation L.L.C., Voluntary Opacity Improvement Protocol, dated April 22, 2004. **[Pages 2273-2274]**
- \* Letter from Scott Miller to Julie Armitage, Compliance and Systems Management Section, Illinois EPA, regarding Powerton Unit 5-PM Stack Test, dated April 26, 2004. **[Page 2275]**
- \* Memorandum from David Kolaz to Renee Cipriano regarding status and time line for Title V Power Plant Issuance, dated April 28, 2004. **[Pages 2276-2277]**
- \* Handwritten notes of Laurel Kroack regarding meeting with USEPA concerning power plant permits, dated 5/6/04. **[Pages 2278-2280]**

- \* Handwritten notes of Chris Romaine beginning “ ‘Midwest Generation’- IEPA - USEPA,” dated 5-6-04. **[Pages 2281-2282]**
- \* Facsimile from Bill Constantelos to Dave Kolaz, dated May 10, 2004, and attached letter to Renee Cipriano from Fred McCluskey, dated May 10, 2004. **[Pages 2283-2306]**
- \* Memorandum from Laurel Kroack to Cheryl Newton regarding Utility Permit Issuance Timeline, dated June 1, 2004. **[Page 2307]**
- \* Email from Manish Patel to Chris Romaine, John Cashman, & Kunj Patel regarding Utility CAAPP Permits, dated 6/16/04, and handwritten notes. **[Page 2308]**
- \* Facsimile from Chris Romaine to Stacey Coburn, USEPA, Region V, dated 6/29/04, providing facsimile from Basil Constantelos to Dave Kolaz, dated May 10, 2004, and attachments. **[Pages 2309-2322]**
- \* Facsimile cover sheet from Chris Romaine to Stacey Coburn, dated 6/29/04. **[Page 2323]**
- \* Email from Chris Romaine to John Cashman, Ross Cooper, Kunj Patel and Manish Patel, dated 7/24/04, 5:08 AM, with handwritten notes from Chris Romaine. **[Pages 2324]**
- \* Handwritten notes of Laurel Kroack regarding Title V, dated 8/30/04. **[Pages 2325-2327]**
- \* Letter from Bharat Mathur, Acting Regional Administrator, USEPA, to Renee Cipriano, Illinois EPA, dated December 2, 2004. **[Pages 2328-2330]**
- \* Email from Chris Romaine to Manish Patel regarding Power Plant CAAPP Permits, dated 12/7/2004, 4:14 AM, and handwritten notes of Manish Patel. **[Page 2331]**
- \* Letter from American Bottom Conservancy, et al. to Renee Cipriano regarding procedure to issue Title V permits for coal-fired power plants, dated January 6, 2005. **[Pages 2332-2333]**
- \* Letter from Donald Sutton to American Bottom Conservancy, et al., dated January 13, 2005, responding to letter dated January 6, 2005. **[Pages 2334-2345]**
- \* Letter from Laurel Kroack, Acting Chief, Bureau of Air, Illinois EPA, to Steve Rothblat, USEPA, dated January 18, 2005. **[Pages 2346-2353]**

- \* Handwritten notes of Laurel Kroack regarding utility, title V, dated 1/26/05. **[Pages 2354-2355]**
- \* Notes of Laurel Kroack regarding March 21, 2005, call with feds. **[Pages 2356-2357]**
- \* Notes of Julie Armitage regarding May 10, 2005, meeting with the feds. **[Pages 2358-2363]**
- \* Handwritten note of Matt Will to Chris Romaine, dated 5-13-2005, and attachments. **[Pages 2364-2376]**
- \* List of Michael Reed, dated June 9, 2005. **[Page 2377]**
- \* Draft Instructions, dated June 23, 2005. **[Pages 2378-2388]**
- \* Note and attachments from Michael Reed to Chris Romaine, dated July 17, 2005. **[Pages 2389-2400]**
- \* Miscellaneous documents regarding request for extension of time to comment on the Preliminary Responsiveness Summary and Draft Revised Proposed Title V Permits. **[Pages 2401-2407]**
- \* Handwritten notes of Michael Reed, dated August 1, 2005. **[Pages 2408-2412]**
- \* Notes of Michael Reed regarding feds conference call, dated September 16, 2005. **[Pages 2413-2414]**
- \* Email exchange between Chris Romaine and Bill Constantelos regarding testing of PM emissions, dated 9/20/05-9/23/05. **[Pages 2415-2416]**
- \* Handwritten notes of Laurel Kroack, dated September 23, 2005. **[Page 2417]**

Model Permit Developments, Summer 2003. **[Pages 2418-2566]**

Miscellaneous Emails Relevant to Powerton. **[Pages 2567-3120]**

Miscellaneous Undated Notes of Illinois EPA Staff. **[Pages 3121-3183]**

Miscellaneous Undated Documents Likely Generated by Illinois EPA. **[Pages 3184-3262]**

Miscellaneous Documents Supplied to USEPA. **[Pages 3263-3440]**

Miscellaneous Lists or Drafting Documents. **[Pages 3441-3571]**



Miscellaneous Drafting Documents - Permits. [Pages 3572-4303]

Miscellaneous Opacity Documents. [Pages 4304-4423]

FESOP NOx Averaging Permits. [Pages 4424-4427]

NSPS Worksheet. [Page 4428]

Miscellaneous Information Relative to Harvard School of Public Health. [Pages 4429-4450]

Powerton Construction Permits & Miscellaneous Operating Permits. [Pages 4451-4582]

Documentation Relative to Proceedings Before the Administrator, USEPA. [Pages 4583-4971]

Miscellaneous documents pertaining to Midwest Generation's response to the USEPA's Section 114(a) of the Clean Air Act request including the trade secret appeal pending before the Illinois Pollution Control Board, *Midwest Generation EME, LLC v. Illinois EPA, PCB 4-185*. For purposes of this administrative record, the Illinois EPA requests that the Board take judicial notice of the administrative record previously filed before the Board in *PCB 4-185*. [Pages 4972-5275]

Miscellaneous documents pertaining to Commonwealth Edison's response to the USEPA's Section 114(a) of the Clean Air Act request including the trade secret appeal pending before the Illinois Pollution Control Board, *Commonwealth Edison Company v. Illinois EPA, PCB 4-215*. For purposes of this administrative record, the Illinois EPA requests that the Board take judicial notice of the administrative record previously filed before the Board in *PCB 4-215*. [Pages 5276-5317]

Startup, combustion Evaluations & Alternative Fuel Memorandums. [Pages 5318-5325]

- \* Memorandum from Michael T. Reed, CAAPP Unit Manager, to Power Plant File regarding Provisions Requiring Detailed Records of Startups After a Certain Timeframe, dated September 23, 2005. [Pages 5318-5320]
- \* Memorandum from Michael Reed to Power Plant File regarding Provisions Requiring Combustion Evaluations, dated September 23, 2005. [Pages 5321-5322]
- \* Memorandum from Chris Romaine, Manager, Utility Unit to Power Plant File regarding Provisions for Burning Materials Other Than Coal in Power Boilers, dated September 28, 2005. [Pages 5323-5325]

Comments Specific to Powerton. [Pages 5326-5749]

- \* Electronic mail from Scott Miller, Midwest Generation, to John Cashman regarding Title V Comments Powerton, dated 6/25/03, 4:20 PM. **[Page 5326]**
- \* Letter from Fred W. McCluskey, Vice President of Technical Services and Partnership Management, Midwest Generation, to Charles Matoesian, Hearing Officer, regarding Comments on the Draft Title V Permit for the Powerton Generating Station, dated September 24, 2003, and attachments. **[Pages 5327-5487]**
- \* Letter from Basil Constantelos to Charles Matoesian regarding Comments on the Proposed Title V Permit for the Powerton Generating Station, dated November 20, 2003, and attachments. **[Pages 5488-5598]**
- \* Letter from Fred W. McCluskey, Vice-President, Technical Services and Partnership Management, Midwest Generation, to Charles Matoesian regarding Comments for the Powerton Generating Station, dated January 17, 2005, and attachments. **[Pages 5599-5749]**

Comments Particular to Midwest Generation. **[Pages 5750-5776]**

- \* Letter from Kathleen C., Bassi, Sonnenschein Nath & Rosenthal LLP, to Charles Matoesian, regarding CAAPP Permit Hearings for Midwest Generation Electrical Generating Stations, dated September 19, 2003. **[Pages 5750-5751]**
- \* Letter from Basil Constantelos to Brad Frost and Charles Matoesian regarding Request for Extension of Time for Commenting on the Preliminary Responsiveness Summary and Draft Revised Proposed Title V Permits Posted July 19, 2005, dated July 25, 2005. **[Page 5752]**
- \* Letter from Charles Matoesian to Basil Constantelos regarding Request for Extension of Time for Commenting on Proposed Title V Permits Posted On July 19, 2005, dated July 28, 2005. **[Page 5753]**
- \* Letter from Fred McCluskey to Charles Matoesian regarding Comments on the Draft Revised Proposed Permits Posted July 19, 2005, and on the Preliminary Responsiveness Summary, dated August 1, 2005. **[Pages 5754-5776]**

General Comments. **[Pages 5777-6712]**

- \* Comments of the Sierra Club and American Bottom Conservancy, Summer 2003. **[Pages 5777-5815]**
- \* Letter from Matthew J. Dunn, Division Chief, Environmental Enforcement/Asbestos Litigation Division, Illinois Attorney General's Office, to Charles Matoesian regarding Coal Powered Generation Plants Title V Permit Applications, dated September 29, 2003. **[Pages 5816-5830]**

- \* Email from Stacey Coburn to Chris Romaine regarding Enhanced coal-fired boiler CAAPP permits, dated April 12, 2004, 4:53 PM, and handwritten notes of Manish Patel. **[Pages 5831-5833]**
- \* Email from Verna Owen to Mr. Holmstead, dated 12/14/2004 12:09:23 PM. **[Page 5834]**
- \* Letter from Paula Becker Wheeler, Assistant Attorney General, Illinois Attorney General's Office, to Charles Matoesian providing comments to Revised Proposed CAAPP Permits for 22 Coal-Fired Power Plants, dated January 14, 2005, and attachments. **[Pages 5835-6220]**
- \* Letter from Keith Harley, Attorney at Law, Chicago Legal Clinic, Inc., to Charles Matoesian regarding Revised Proposed CAAPP Permits for Coal-Fired Power Plants, dated January 14, 2005, and attachments. **[Pages 6221-6605]**
- \* Letter from Ann Alexander, Environmental Counsel to Attorney General Lisa Madigan, to Charles Matoesian regarding Comments on draft revised proposed CAAPP permits, dated August 1, 2005, and attachments. **[Pages 6606-6712]**

Proceedings in the US District Court. **[Pages 6713-6753]**

Title I/ Title V MOU **[Pages 6754-6759]**

November 12, 1981 USEPA Directive **[Pages 6760-6764]**

HPV Matrix Criteria Opacity **[Pages 6765-6775]**

White Paper **[Pages 6776-6810]**

White Paper 2 **[Pages 6811-6863]**

Guidance: Statement of Basis **[Pages 6864-6866]**

Design of Flexible Air Permits **[Pages 6867-6921]**

September 28, 1982 Bennett Memorandum **[Pages 6922-6924]**

February 15, 1983 Bennett Memorandum **[Pages 6925-6929]**

Limiting PTE in New Source Permitting, June 13, 1989 **[Pages 6930-6941]**

Startup, Shutdown Guidance: January 28, 1993 **[Pages 6942-6944]**

January 15, 1997, Title V Guidance **[Pages 6945-6951]**

USEPA Guidance Directed to Ohio EPA [Pages 6952-6954]

January 21, 1998 Fuel Flexibility Guidance [Pages 6955-6965]

August 11, 1999 (September 20, 1999) Herman Memorandum [Pages 6966-6986]

December 5, 2001, Schaeffer Memorandum [Pages 6987-6988]

Miscellaneous Reference Material [Pages 6989-6990]

Fort James Cames Mill Petition [Pages 6991-7033]

### **General Materials**

Electric Energy - AUGI Model Documents: [Pages 1-2536]

Early Discussions with AUGI on Fugitives [Page 1]

Model Permit Development Early Discussions with AUGI [Pages 2-12]

Early Discussion with AUGI Effect of Flow Rater (Load) on ESP Performance [Pages 13-14]

EEI - June 25, 1997 [Pages 15-65]

EEI - August 13, 1997 [Pages 66-80]

EEI - August 14, 1997 [Pages 81-82]

EEI - August 20, 1997 [Pages 83-91]

EEI - September 9, 1997 [Pages 92-98]

EEI - October 1997, Cover Letter and Preliminary Draft Permit [Pages 99-160]

EEI - October 27, 1997 [Pages 161-162]

EEI - December 8, 1997 [Pages 163-165]

EEI - December 12, 1997 [Pages 166-176]

EEI - December 17, 1997 [Pages 177-263]

EEI - December 25, 1997 [Pages 264-321]

Late 1997 - Early 1998 Internal Drafting [**Pages 322-378**]

EEI - January 9, 1998 [**Pages 379-444**]

EEI - February 4, 1998 [**Pages 445-452**]

EEI - February 16, 1998 [**Pages 453-512**]

EEI - February 23, 1998 [**Pages 513-521**]

EEI - February 24, 1998 [**Pages 522-524**]

EEI - February 26, 1998 [**Pages 525-527**]

EEI - February 27, 1998 [**Pages 528-546**]

EEI - March 1998 [**Pages 547-566**]

EEI - April 1998 [**Pages 567-580**]

EEI - Sharing with USEPA 1998 [**Pages 581-612**]

EEI - May 4, 1998 [**Pages 613-670**]

EEI - June 26, 1998 [**Pages 671-677**]

EEI - July 5, 1998 [**Pages 678-716**]

EEI - August 4, 1998 [**Pages 717-773**]

EEI - September 30, 1998 [**Pages 774-829**]

USEPA Comments September 1998 [**Pages 830-851**]

EEI - December 28, 1998 [**Pages 852-859**]

EEI - May 11, 1999 [**Pages 860-871**]

EEI - May 12, 1999, Draft to Notice? [**Pages 872-966**]

EEI - May 12, 1999 [**Pages 967-972**]

EEI - May 14, 1999 [**Pages 973-1047**]

EEI - May 20, 1999 [**Page 1048**]

EEI - August 4, 1999 [**Pages 1049-1052**]  
AUGI Comments Summer 1999 [**Pages 1053-1067**]  
EEI - March 17, 2002 [**Pages 1068-1139**]  
EEI - May 10, 2002 [**Page 1140**]  
EEI - July 2002 [**Pages 1141-1225**]  
EEI - August 2002 [**Page 1226**]  
EEI - September 2002 [**Pages 1227-1410**]  
EEI - Draft to Notice September 2002 [**Pages 1411-1505**]  
EEI - Public Comments October 2002 [**Pages 1506-1514**]  
EEI - Exchange with USEPA November 2002 [**Pages 1515-1519**]  
EEI - December 6, 2002 [**Pages 1520-1521**]  
EEI - March 11 and 12, 2003 [**Pages 1522-1524**]  
EEI - April 2003 [**Pages 1525-1631**]  
EEI Tracked Changes for Preparation of October 2003 Proposed Permit [**Pages 1632-1683**]  
EEI - Miscellaneous Emails [**Pages 1684-2514**]  
AUGI Miscellaneous Notes [**Pages 2515-2536**]

#### Emails

General Emails, 2002 [**Pages 2537-2567**]  
General Emails, 2003 [**Pages 2568-3807**]  
General Emails, January 2004 - May 31, 2004 [**Pages 3808-4739**]  
General Emails, June 1, 2004 - December 31, 2004 [**Pages 4740-5906**]  
General Emails, 2005 [**Pages 5907-7131**]

Miscellaneous Reference Documents:

Miscellaneous Cases Before the Administrator - USEPA [Pages 7132-7483]

Compliance Assurance Monitoring Rule [Pages 7484-7597]

Good Engineering Practices [Page 7598]

Electrostatic Precipitators [Pages 7599-7644]

Environmental Justice [Pages 7645-7649]

Information on Existing Plants [Pages 7650-7660]

Monitoring [Page 7661]

Periodic Monitoring Guidance [Pages 7662-7694]

Background Information on NSR Enforcement [Pages 7695-7876]

Public Hearing Reference Document/Folder [Pages 7877-8157]

Miscellaneous Opacity Reports [Pages 8158-9038]

- \* CWLP [Pages 8158-8181]
- \* Dynegy [Pages 8182-8202]
- \* Electric [Pages 8203-8248].
- \* Miscellaneous [Pages 8249-8255]
- \* Ameren [Pages 8256-8593]
- \* Midwest Generation [Pages 8594-8778]
- \* Midwest Generation - Old [Pages 8779-9038]

Collins Opacity Report [Pages 9039-9113]

Miscellaneous Documents from Florida [Pages 9114-9135]

Miscellaneous Documents from Georgia [Pages 9136-9176]

Miscellaneous Documents from Indiana [Pages 9177-9183]

Miscellaneous Documents from Iowa [Pages 9184-9228]

Miscellaneous Documents from Kentucky [Pages 9229-9263]

Miscellaneous Documents from Michigan [Pages 9264-9298]

Miscellaneous Documents from Ohio [Pages 9299-9365]

Miscellaneous Documents from Utah [Pages 9366-9482]

Supersession and Credible Evidence Guidance [Pages 9483-9486]

Draft Title V Permit Review Guidelines [Pages 9487-9620]

Respectfully submitted by,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,



---

Sally A. Carter  
Assistant Counsel

Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
(217)782-5544



**CERTIFICATE OF SERVICE**

I hereby certify that on the 29<sup>th</sup> day of March 2006, I did send, by <sup>CMS Courier</sup>~~first class mail~~,  
~~postage prepaid~~, one (1) original and four (4) copies of the following instrument entitled

**ADMINISTRATIVE RECORD to:**

Dorothy Gunn, Clerk  
Illinois Pollution Control Board  
100 West Randolph Street  
Suite 11-500  
Chicago, Illinois 60601

and a true and correct copy of the same foregoing instrument, by First Class Mail with postage thereon fully paid and deposited into the possession of the United States Postal Service, to:

Bradley P. Halloran  
Hearing Officer  
Illinois Pollution Control Board  
James R. Thompson Center  
Suite 11-500  
100 West Randolph Street  
Chicago, Illinois 60601

Sheldon A. Zabel  
Kathleen C. Bassi  
Stephen J. Bonebrake  
Joshua R. More  
Kavita M. Patel  
Schiff Hardin, LLP  
6600 Sears Tower  
233 South Wacker Drive  
Chicago, Illinois 60606

  
\_\_\_\_\_  
Sally Carter  
Assistant Counsel