

MAR 30 2006

STATE OF ILLINOIS
Pollution Control Board

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

MIDWEST GENERATION, LLC,)
WILL COUNTY GENERATING STATION,)

Petitioner,)

v.)

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)

Respondent.)

PCB 2006-60
(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
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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

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CLERK'S OFFICE

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Pollution Control Board

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ADMINISTRATIVE RECORD

The Respondent, Illinois Environmental Protection Agency ("Illinois EPA"), by and through its attorneys in accordance with the Illinois Pollution Control Board's 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 Will County Generating Station. The facility is located at 529 East 135th Road in Romeoville, 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."

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Hearing Transcript, 150 North Ottawa Street, Joliet, Illinois, August 25, 2003. **[Pages 148-530]**

Preliminary Responsiveness Summary, dated August 15, 2005. **[Pages 531-574]**

Proposed Permit (USEPA Review) Revised Proposed Permit, dated August 2005. **[Pages 575-711]**

Proposed Permit (USEPA Review) Proposed CAAPP Permit, dated October 6, 2003. **[Pages 712-828]**

Extension Denial Letter notifying that the comments must be postmarked by August 1, 2005. [Page 829]

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Revised Proposed CAAPP Permit Draft, dated December 2004. [Pages 970-1101]

July 19, 2005, Letter. [Pages 1102-1107]

August 15, 2005, Letter. [Pages 1108-1113]

Final Permit and Calculation Sheet, dated September 2005. [Pages 1114-1262]

September 29, 2005, Letter. [Pages 1263-1269]

Final Responsiveness Summary. [Pages 1270-1313]

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- * Application for CAAPP Permit, dated received September 7, 1995. [Pages 1314-1318]
- * Fee Determination for CAAPP Permit, dated received September 7, 1995. [Pages 1319-1320]
- * Compliance Certification, dated received September 7, 1995. [Pages 1321-1329]
- * Telephone Log Sheet, dated September 18, 1995. [Page 1330]
- * CAAPP Application Completeness Determination and Source Fee Determination, Determination dated September 25, 1995. [Pages 1331-1333]
- * Letter from Scott Miller to Don Sutton regarding model permit for Com Ed's Will County Station, dated May 22, 1996, and attachment. [Pages 1334-1424]
- * Cost Estimates for NOx Emissions Reduction for All Coal-Fired Utility Boilers, date updated 3/5/97. [Page 1425]
- * 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 1426-1431]

- * Power Plant Initiative - February 2003, dated 2/3/03. **[Pages 1432-1433]**
- * 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 1434-1453]**

Letter from Basil Constantelos to Donald Sutton, Permit Manager, Illinois EPA, regarding Title V Permit Application Complete Update, Will County Electrical Generating Station, dated May 23, 2003, and attached Title V Permit Application for the Will County Generating Station, dated May 22, 2003. **[Pages 1454-2668]**

Miscellaneous Correspondence & Application Material **[Pages 2669-2853]**

- * Memorandum from David Kolaz to Renee Cipriano regarding Approval for Public Hearings for Coal-Fired Power Plant Permits, dated June 2, 2003. **[Pages 2669-2670]**
- * 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 2671]**
- * 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 2672-2677]**
- * Information concerning Greenhouse Gases, dated 7/31/03. **[Pages 2678-2679]**
- * Handwritten notes of Laurel Kroack regarding Title V permits, dated November 21, 2003. **[Pages 2680-2681]**
- * Facsimile from Keith Harley to Julie Armitage, dated November 24, 2003. **[Pages 2682-2687]**
- * Note and attachment from Chris Romaine to Dave Kolaz, dated 12/10/03. **[Pages 2688-2695]**
- * 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 2696-2697]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM, with handwritten notes. **[Pages 2698-2699]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM. **[Page 2700]**

- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Laurel Kroack. **[Page 2701]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Chris Romaine. **[Pages 2702-2708]**
- * Handwritten notes of Laurel Kroack beginning "Enviros & Title V Power Plants," dated 2/3/2004. **[Pages 2709-2710]**
- * Meeting sign-in sheet, dated 2/4/04. **[Page 2711]**
- * Memorandum from Laurel Kroack to Renee Cipriano regarding Title V permits for coal-fired power plants, including Midwest Generation, dated February 4, 2004. **[Pages 2712-2715]**
- * Email from Chris Romaine to Natalie Locke and Steve Whitworth, dated 2/19/2004, 2:41 PM. **[Page 2716]**
- * Handwritten notes of Manish Patel regarding meeting with USEPA on coal-fired power plant CAAPPs dated 2/24/04, 1:30 PM. **[Page 2717]**
- * Handwritten notes of Manish Patel regarding conference call with coal-utility facilities, dated 2/25/04, 1:30 PM. **[Page 2718]**
- * Handwritten notes regarding call with USEPA for MidGen coal fired CAAPP, dated 3/2/04. **[Page 2719]**
- * Facsimile "Midwest Generation L.L.C., Voluntary Opacity Improvement Protocol," dated April 22, 2004. **[Pages 2720-2721]**
- * Memorandum from David Kolaz to Renee Cipriano regarding status and time line for Title V Power Plant Issuance, dated April 28, 2004. **[Pages 2722-2723]**
- * Handwritten notes of Laurel Kroack regarding meeting with USEPA concerning power plant permits, dated 5/6/04. **[Pages 2724-2726]**
- * Handwritten notes of Chris Romaine beginning " 'Midwest Generation' - IEPA - USEPA," dated 5-6-04. **[Page 2727]**
- * 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 2728-2751]**
- * Memorandum from Laurel Kroack to Cheryl Newton regarding Utility Permit Issuance Timeline, dated June 1, 2004. **[Page 2752]**

- * Email from Manish Patel to Chris Romaine, John Cashman and Kunj Patel regarding Utility CAAPP permits dated 6/16/2004 and handwritten notes of Manish Patel. **[Page 2753]**
- * 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 2754-2767]**
- * Facsimile cover sheet from Chris Romaine to Stacey Coburn, dated 6/20/04. **[Pages 2768]**
- * 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. **[Page 2769]**
- * Handwritten notes of Laurel Kroack regarding Title V, dated 8/30/04. **[Pages 2770-2772]**
- * Letter from Basil Constantelos to Chris Romaine regarding Units 1 and 2, dated October 19, 2004. **[Pages 2773-2776]**
- * Letter from Bharat Mathur, Acting Regional Administrator, USEPA, to Renee Cipriano, Illinois EPA, dated December 2, 2004. **[Pages 2777-2779]**
- * 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 2780]**
- * 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 2781-2782]**
- * Letter from Donald Sutton to American Bottom Conservancy, et al., dated January 13, 2005, responding to letter dated January 6, 2005. **[Pages 2783-2794]**
- * Letter from Laurel Kroack, Acting Chief, Bureau of Air, Illinois EPA, to Steve Rothblat, USEPA, dated January 18, 2005. **[Pages 2795-2802]**
- * Handwritten notes of Laurel Kroack regarding utility, title V, dated 1/26/05. **[Pages 2803-2804]**
- * Notes of Laurel Kroack regarding March 21, 2005, call with feds. **[Pages 2805-2806]**

- * Notes of Julie Armitage regarding May 10, 2005, meeting with the feds. [**Pages 2807-2812**]
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- * Draft Instructions, dated June 23, 2005. [**Pages 2814-2824**]
- * Note and attachments from Michael Reed to Chris Romaine, dated July 17, 2005. [**Pages 2825-2836**]
- * Miscellaneous documents regarding request for extension of time to comment on the Preliminary Responsiveness Summary and Draft Revised Proposed Title V Permits. [**Pages 2837-2843**]
- * Handwritten notes of Michael Reed, dated August 1, 2005. [**Pages 2844-2848**]
- * Notes of Michael Reed regarding feds conference call, dated September 16, 2005. [**Pages 2849-2850**]
- * Email exchange between Chris Romaine and Bill Constantelos regarding testing of PM emissions, dated 9/20/05-9/23/05. [**Pages 2851-2852**]
- * Handwritten notes of Laurel Kroack, dated September 23, 2005. [**Page 2853**]

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Documentation Relative to Proceedings Before the Administrator, USEPA. **[Pages 5023-5457]**

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 5458-5759]**

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 5760-5801]**

Startup, Combustion Evaluation & Alternative Fuel Memorandums **[Pages 5802-5809]**

- * 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 5802-5804]**
- * Memorandum from Michael Reed to Power Plant File regarding Provisions Requiring Combustion Evaluations, dated September 23, 2005. **[Pages 5805-5806]**
- * 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 5807-5809]**

Comments Specific to Will County **[Pages 5810-6528]**

- * Electronic mail from Scott Miller, Midwest Generation, to John Cashman providing Title V Comments-Will County, dated 6/25/03, 3:52 PM. **[Page 5810]**
- * 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 Will County

Generating Station, dated September 24, 2003, and attachments. **[Pages 5811-5974]**

- * Letter from Keith Harley, Attorney at Law, Chicago Legal Clinic, to Charles Matoesian providing comments on Will County permit, dated September 25, 2003, and attachments. **[Pages 5975-6268]**
- * Letter from Grant Spooner, The Cameraman, Retired US Coast Guard, to Charles Matoesian providing comments on the Will County permit, dated received September 30, 2003. **[Pages 6269-6270]**
- * Letter from Basil Constantelos to Charles Matoesian regarding Comments on the Proposed Title V Permit for the Will County Generating Station, dated November 20, 2003, and attachments. **[Pages 6271-6381]**
- * Letter from Fred W. McCluskey, Vice-President, Technical Services and Partnership Management, Midwest Generation, to Charles Matoesian regarding Comments for the Will County Generating Station, dated January 17, 2005, and attachments. **[Pages 6382-6528]**

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- * 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 6529-6530]**
- * Letter from Citizens Against Ruining the Environment to Charles Matoesian regarding Midwest Generation EME, LLC Title V/CAAP/ Title I Permit Application, dated received September 29, 2003. **[Pages 6531-6535]**
- * 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 6536]**
- * 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 6537]**
- * 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 6538-6560]**
- * Letter from Keith Harley, Chicago Legal Clinic, to Charles Matoesian regarding CAAPP Permits for the Fisk, Crawford, Will County, Joliet and Waukegan Coal-Fired Power Plants, dated August 1, 2005. **[Pages 6561-6690]**

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- * Comments of the Sierra Club and American Bottom Conservancy, Summer 2003. **[Pages 6691-6729]**
- * 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 6730-6744]**
- * 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 6745-6747]**
- * Email from Verna Owen to Mr. Holmstead, dated 12/14/2004 12:09:23 PM. **[Pages 6748-6749]**
- * 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 6750-7136]**
- * 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 7137-7521]**
- * 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 7522-7630]**

Proceedings in the US District Court. **[Pages 7631-7672]**

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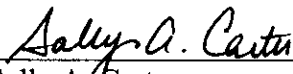
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Respectfully submitted by,

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 29th day of March 2006, I did send, by ~~first class mail~~, *CMS Courier*
~~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
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