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

MAR 31 2006

STATE OF ILLINOIS
Pollution Control Board

MIDWEST GENERATION, LLC,)
CRAWFORD GENERATING STATION,)

Petitioner,)

v.)

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)

Respondent.)

PCB No. 2006-056
(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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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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STATE OF ILLINOIS
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**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
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PROTECTION AGENCY,)

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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 ("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 Crawford Generating Station. The facility is located at 3501 South Pulaski Road in Chicago, 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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Final Permit and Calculation Sheet, dated September 2005. **[Pages 1063-1230]**

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- * Application for CAAPP Permit, dated received September 7, 1995. **[Pages 1282-1286]**
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- * CAAPP Application Completeness Determination and Source Fee Determination, Determination dated October 12, 1995. **[Pages 1298-1303]**
- * Cost Estimates for NOx Emissions Reduction for All Coal-Fired Utility Boilers, date updated 3/5/97. **[Pages 1304-1305]**
- * 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 1306-1311]**
- * Letter from Renee Cipriano to Keith Harley regarding public hearings for Crawford and Fisk, dated December 6, 2002. **[Page 1312]**

- * Power Plant Initiative - February 2003, dated 2/3/03. **[Pages 1313-1314]**

Letter from Basil Constantelos to Donald Sutton, Permit Manager, Illinois EPA, providing Title V Permit Application Complete Update, dated February 26, 2003, and attached Title V Permit Application, dated February 18, 2003. **[Pages 1315-2190]**

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- * 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 2191-2210]**
- * Memorandum from David Kolaz to Renee Cipriano regarding Approval for Public Hearings for Coal-Fired Power Plant Permits, dated June 2, 2003. **[Pages 2211-2212]**
- * 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 2213]**
- * 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 2214-2254]**
- * Information concerning Greenhouse Gases, dated 7/31/03. **[Pages 2255-2256]**

Memorandum from Pamela Brooks, Air Quality Planning Section, BOA, to Rob Kaleel, Air Quality Planning Section, BOA, regarding Midwest Generation Environmental Justice Study Modeling Analysis, dated November 3, 2003. **[Pages 2257-2262]**

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- * Handwritten notes of Laurel Kroack regarding Title V permits, dated November 21, 2003. **[Pages 2263-2264]**
- * Facsimile from Keith Harley to Julie Armitage, dated November 24, 2003. **[Pages 2265-2270]**
- * Note and attachment from Chris Romaine to Dave Kolaz, dated 12/10/03. **[Pages 2271-2278]**
- * 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 2279-2280]**

- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM, with handwritten notes. **[Pages 2281-2282]**
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- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Laurel Kroack. **[Page 2284]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Chris Romaine. **[Pages 2285-2291]**
- * Handwritten notes of Laurel Kroack beginning “Enviros & Title V Power Plants,” dated 2/3/2004. **[Pages 2292-2293]**
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- * Memorandum from Laurel Kroack to Renee Cipriano regarding Title V permits for coal-fired power plants, including Midwest Generation, dated February 4, 2004. **[Pages 2295-2298]**
- * Email from Chris Romaine to Natalie Locke and Steve Whitworth, dated 2/19/2004, 2:41 PM. **[Page 2299]**
- * Handwritten notes of Manish Patel regarding meeting with USEPA on coal-fired power plant CAAPPs dated 2/24/04, 1:30 PM. **[Page 2300]**
- * Handwritten notes of Manish Patel regarding conference call with coal-utility facilities, dated 2/25/04, 1:30 PM. **[Page 2301]**
- * Handwritten notes regarding call with USEPA for MidGen coal fired CAAPP, dated 3/2/04. **[Page 2302]**
- * Facsimile “Midwest Generation L.L.C., Voluntary Opacity Improvement Protocol, dated April 22, 2004. **[Pages 2303-2304]**
- * Memorandum from David Kolaz to Renee Cipriano regarding status and time line for Title V Power Plant Issuance, dated April 28, 2004. **[Pages 2305-2306]**
- * Handwritten notes of Laurel Kroack regarding meeting with USEPA concerning power plant permits, dated 5/6/04. **[Pages 2307-2309]**
- * Handwritten notes of Chris Romaine beginning “ ‘Midwest Generation’ - IEPA - USEPA,” dated 5-6-04. **[Pages 2310-2311]**

- * 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 2312-2335]**
- * Memorandum from Laurel Kroack to Cheryl Newton regarding Utility Permit Issuance Timeline, dated June 1, 2004. **[Page 2336]**
- * 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 2337]**
- * 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 2338-2351]**
- * Facsimile cover sheet from Chris Romaine to Stacey Coburn, dated 6/29/04. **[Page 2352]**
- * Facsimile from Chris Romaine to Stacey Coburn, dated 6/20/04, providing draft turbine language. **[Pages 2353-2378]**
- * 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 2379]**
- * Handwritten notes of Laurel Kroack regarding Title V, dated 8/30/04. **[Pages 2380-2382]**
- * Letter from Bharat Mathur, Acting Regional Administrator, USEPA, to Renee Cipriano, Illinois EPA, dated December 2, 2004. **[Pages 2383-2385]**
- * 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 2386]**
- * 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 2387-2398]**
- * Letter from Donald Sutton to American Bottom Conservancy, et al., dated January 13, 2005, responding to letter dated January 6, 2005. **[Pages 2399-2400]**
- * Letter from Laurel Kroack, Acting Chief, Bureau of Air, Illinois EPA, to Steve Rothblat, USEPA, dated January 18, 2005. **[Pages 2401-2408]**

- * Handwritten notes of Laurel Kroack regarding utility, title V, dated 1/26/05. **[Pages 2409-2410]**
- * Facsimile from Chris Romaine to Genevieve Damico, dated March 9, 2005. **[Pages 2411-2457]**
- * Notes of Laurel Kroack regarding March 21, 2005, call with feds. **[Pages 2458-2459]**
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- * Draft Instructions, dated June 23, 2005. **[Pages 2467-2477]**
- * Note and attachments from Michael Reed to Chris Romaine, dated July 17, 2005. **[Pages 2478-2489]**
- * Miscellaneous documents regarding request for extension of time to comment on the Preliminary Responsiveness Summary and Draft Revised Proposed Title V Permits. **[Pages 2490-2496]**
- * Handwritten notes of Michael Reed, dated August 1, 2005. **[Pages 2497-2501]**

Letter from Basil Constantelos to Donald Sutton regarding Crawford Station Title V Application Update, dated August 2, 2005, and attached Title V Permit Application Update-Revision 1, revised July 29, 2005. **[Pages 2502-2640]**

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- * Notes of Michael Reed regarding feds conference call, dated September 16, 2005. **[Pages 2641-2642]**
- * Email exchange between Chris Romaine and Bill Constantelos regarding testing of PM emissions, dated 9/20/05-9/23/05. **[Pages 2643-2644]**
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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 5701-6002]**

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 6003-6044]**

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* 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 6045-6047]**

- * Memorandum from Michael Reed to Power Plant File regarding Provisions Requiring Combustion Evaluations, dated September 23, 2005. **[Pages 6048-6049]**
- * 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 6050-6052]**

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- * Public Comment Form of Tonya Cabrera, dated August 12, 2003. **[Page 6053]**
- * Letter from Keith Harley, Attorney at Law, Chicago Legal Clinic, Inc. to Renee Cipriano, Director, Illinois EPA, providing comments to the Crawford permit, dated August 12, 2003, and attachments. **[Pages 6054-6066]**
- * 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 Crawford Generating Station, dated September 24, 2003, and attachments. **[Pages 6067-6230]**
- * Comments of the Illinois Environmental and Public Health Organizations on Final Draft CAAPP Permit Midwest Generation EME, LLC, Crawford Generating Station, dated September 26, 2003. **[Pages 6231-6526]**
- * Letter from N. Marcia Jimenez, Commissioner, Chicago Department of Environment, providing comments to the Crawford CAAPP, dated September 26, 2003. **[Pages 6527-6528]**
- * Letter from Basil Constantelos to Charles Matoesian regarding Comments on the Proposed Title V Permit for the Crawford Generating Station, dated November 20, 2003, and attachments. **[Pages 6529-6652]**
- * Letter from Fred W. McCluskey, Vice-President, Technical Services and Partnership Management, Midwest Generation, to Charles Matoesian regarding Supplement Comments for the Crawford Generating Station, dated January 17, 2005, and attachments. **[Pages 6653-6839A]**

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- * Letter from Keith Harley to Renee Cipriano regarding Request for Public Hearing, Fisk and Crawford Generating Stations, Title V Permit, dated October 15, 2002. **[Pages 6839B-6839C]**

- * Email from Scott Miller to John Cashman regarding Title V permit comments - Joliet continued, Fisk and Crawford, dated 6/25/03 8:19 AM. **[Pages 6840-6841]**
- * Electronic mail from Britt Willey to Brad Frost concerning Public Comment on Title Five Permits, dated 8/20/03 9:01 AM. **[Page 6842]**
- * Electronic mail from Diarmuid Donnellan to Brad Frost concerning Title five permits, dated 8/20/2003 12:10 PM. **[Page 6843]**
- * Electronic mail from Margaret Queeney to Brad Frost providing Public Comment concerning Fisk and Crawford, dated 8/20/03 4:27PM. **[Page 6844]**
- * Electronic mail from Nicholas Monsour to Brad Frost providing public comment on coal fired power plants, dated 8/20/03 7:24 PM. **[Page 6845]**
- * Public Comment from Allan J. Lindrup, Chair, Green Sanctuary Group, to Charles Matoesian, dated September 10, 2003. **[Pages 6846-6847]**
- * 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 6848-6849]**
- * 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 6850-6855]**
- * 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 6856]**
- * 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 6857]**
- * Letter from Faith E. Bugel, American Lung Association of Metropolitan Chicago, Citizens Against Ruining the Environment, Environmental Law & Policy Center, Illinois Public Interest Research Group, Lake County Conservation Alliance, Little Village Environmental Justice Organization, to Charles Matoesian, regarding Comments on the Draft Revised Proposed CAAPP Permits for Fisk and Crawford, dated August 1, 2005. **[Pages 6858-6862]**
- * 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 6863-6885]**

- * 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 6886-7015]**

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- * Comments of the Sierra Club and American Bottom Conservancy, Summer 2003. **[Pages 7016-7054]**
- * 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 7055-7069]**
- * 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 7070-7072]**
- * Email from Verna Owen to Mr. Holmstead, dated 12/14/2004 12:09:23 PM. **[Pages 7073-7074]**
- * 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 7075-7489]**
- * 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 7490-7895]**
- * 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 7896-8035]**

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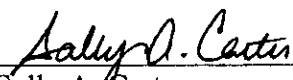
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Respectfully submitted by,

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

CMS Courier

I hereby certify that on the 29th day of March 2006, I did send, by ~~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
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