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STATE OF ILLINOIS  
Pollution Control Board

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD  
OF THE STATE OF ILLINOIS

AMEREN ENERGY RESOURCES )  
GENERATING COMPANY, )  
DUCK CREEK POWER STATION, )

Petitioner, )

v. )

ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )

Respondent. )

PCB 2006-66  
(CAAPP Permit Appeal)

NOTICE

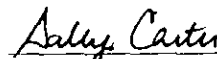
To: Dorothy Gunn, Clerk  
Illinois Pollution Control Board  
100 West Randolph Street  
Suite 11-500  
Chicago, Illinois 60601

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

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: April 12, 2006  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

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v.	)	PCB 2006-66
	)	(CAAPP Permit Appeal)
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Respondent.	)	

**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 Ameren Energy Resources Generating Company ("Ameren") on September 29, 2005. The permit authorized the operation of an electrical power generation facility known as the Duck Creek Power Station. The facility is located at 17751 North CILCO Lane in Canton, Illinois. On November 3, 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, Ameren's permit application materials, various draft permits issued for public comment, correspondence between the Illinois EPA and both Ameren and the Illinois EPA and the United States Environmental Protection Agency, public comments received during the multiple public comment periods, various construction and operating permits issued to Ameren, 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 1-124]**

Hearing Transcript, 200 N.E. Water Street, Peoria, Illinois, August 21, 2003. **[Pages 125-476]**

Preliminary Responsiveness Summary, dated August 15, 2005. **[Pages 477-520]**

Proposed Permit (USEPA Review) Revised Proposed Permit, dated August 2005. **[Pages 521-663]**

Proposed Permit (USEPA Review) Proposed CAAPP Permit, dated October 12, 2003. **[Pages 664-770]**

Extension Denial Letter notifying that the comments must be postmarked by August 1, 2005. **[Page 771]**

Coal-Fired CAAPP Repreproposed Notification. **[Page 772]**

Draft Revised Proposed Permit, dated July 2005. **[Pages 773-915]**

Coal-Fired Revised Proposed CAAPP Notification. **[Page 916]**

Revised Proposed CAAPP Permit Draft, dated December 2004. **[Pages 917-1035]**

July 19, 2005, Letter. **[Pages 1036-1041]**

August 15, 2005, Letter. **[Pages 1042-1047]**

Final Permit and Calculation Sheet, dated September 2005. **[Pages 1048-1189]**

September 29, 2005, Letter. **[Pages 1190-1196]**

Final Responsiveness Summary. **[Pages 1197-1240]**

Letter from Cheryl A. Miller, Sr. Air Pollution Control Engineer, to Donald Sutton, Permit Manager, providing Initial Application Submittal including Title V Operating Permit Application and Title V Operating Permit Appendices, dated July 7, 1995. **[Pages 1241-1509]**

057 801 AAA 95 07 0025 - Duck Creek Plant. **[Pages 1510-1754]**

- \* Application for CAAPP Permit, dated received July 10, 1995. **[Pages 1510-1514]**
- \* Fee Determination for CAAPP Permit, dated received July 10, 1995. **[Pages 1515-1516]**
- \* Compliance Certification, dated received July 10, 1995. **[Pages 1517-1521]**
- \* Delegation of Authority for Responsible Official to a Representative, dated received July 10, 1995. **[Page 1522]**
- \* Completeness Review Sheet, Application Deemed Incomplete, dated July 17, 1995. **[Pages 1523-1524]**
- \* CAAPP Application Completeness Determination and Source Fee Determination, dated July 18, 1995. **[Pages 1525-1530]**
- \* Letter from Cheryl A. Miller, Sr., Air Pollution Control Admin., CILCO, to Donald Sutton, dated July 31, 1995, and attachment. **[Pages 1531-1565]**

- \* Cost Estimates for NOx Emissions Reduction for All Coal-Fired Utility Boilers, date updated 3/5/97. **[Page 1566]**
- \* Power Plant Initiative - February 2003, dated 2/3/03. **[Pages 1567-1568]**
- \* Letter from Michael L. Menne, Vice President, Environmental, Safety and Health, Ameren to Donald Sutton regarding CAAPP Application Forms for 35 IAC Part 217 Subparts V and W, dated May 16, 2003, and attachment. **[Pages 1569-1573]**
- \* Letter from Michael Menne to Donald Sutton regarding Supplement to the Title V Operating Permit Application, dated May 28, 2003, and attachment. **[Pages 1574-1584]**
- \* Memorandum from David Kolaz to Renee Cipriano regarding Approval for Public Hearings for Coal-Fired Power Plant Permits, dated June 2, 2003. **[Pages 1585-1586]**
- \* Email from Steven Whitworth to Manish Patel regarding nominal capacity of plants, dated 6/27/03 4:12 PM. **[Page 1587]**
- \* Letter from Michael Menne to Donald Sutton regarding Title V Operating Permit Application for Duck Creek and Edwards Power Station, dated July 2, 2003. **[Page 1588]**
- \* 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 1589]**
- \* Information concerning Greenhouse Gases, dated 7/31/03. **[Pages 1590-1591]**
- \* Notes from Peoria Hearing, dated August 21, 2003, likely of Manish Patel and attached talking points of Manish Patel. **[Pages 1592-1593]**
- \* Handwritten notes of Manish Patel regarding Utility CAAPP meeting with Ameren/Dynegy, dated 9/18/03. 10:30 AM. **[Pages 1594-1595]**
- \* Handwritten notes of Laurel Kroack regarding Title V permits, dated November 21, 2003. **[Pages 1596-1597]**
- \* Facsimile from Keith Harley to Julie Armitage, dated November 24, 2003. **[Pages 1598-1603]**
- \* Note and attachment from Chris Romaine to Dave Kolaz, dated 12/10/03. **[Pages 1604-1611]**

- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM, with handwritten notes. **[non-paginated page]**
- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM. **[Page 1612]**
- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Laurel Kroack. **[Page 1613]**
- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Chris Romaine. **[Pages 1614-1620]**
- \* Handwritten notes of Laurel Kroack beginning “Enviros & Title V Power Plants,” dated 2/3/2004. **[Pages 1621-1622]**
- \* Memorandum from Laurel Kroack to Renee Cipriano regarding Title V permits for coal-fired power plants, including Midwest Generation, dated February 4, 2004. **[Pages 1623-1626]**
- \* Email from Chris Romaine to Natalie Locke and Steve Whitworth, dated 2/19/2004, 2:41 PM. **[Page 1627]**
- \* Handwritten notes of Manish Patel regarding meeting with USEPA on coal-fired power plant CAAPPs dated 2/24/04, 1:30 PM. **[Page 1628]**
- \* Handwritten notes of Manish Patel regarding conference call with coal-utility facilities, dated 2/25/04, 1:30 PM. **[Page 1629]**
- \* Memorandum from David Kolaz to Renee Cipriano regarding status and time line for Title V Power Plant Issuance, dated April 28, 2004. **[Pages 1630-1631]**
- \* Handwritten notes of Laurel Kroack regarding meeting with USEPA concerning power plant permits, dated 5/6/04. **[Pages 1632-1633]**
- \* 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 1634-1657]**
- \* Memorandum from Laurel Kroack to Cheryl Newton regarding Utility Permit Issuance Timeline, dated June 1, 2004. **[Page 1658]**
- \* 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 1659-1672]**
- \* Facsimile cover sheet from Chris Romaine to Stacey Coburn, dated 6/29/04. **[Page 1673]**

- \* 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 1674]**
- \* Handwritten notes of Laurel Kroack regarding Title V, dated 8/30/04. **[Pages 1675-1677]**
- \* Letter from Bharat Mathur, Acting Regional Administrator, USEPA, to Renee Cipriano, Illinois EPA, dated December 2, 2004. **[Pages 1678-1680]**
- \* 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 1681]**
- \* 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. **[Page 1682]**
- \* Letter from Donald Sutton to American Bottom Conservancy, et al., dated January 13, 2005, responding to letter dated January 6, 2005. **[Pages 1684-1695]**
- \* Letter from Laurel Kroack, Acting Chief, Bureau of Air, Illinois EPA, to Steve Rothblat, USEPA, dated January 18, 2005. **[Pages 1696-1703]**
- \* Handwritten notes of Laurel Kroack regarding utility, title V, dated 1/26/05. **[Pages 1704-1705]**
- \* Notes of Laurel Kroack regarding March 21, 2005, call with feds. **[Pages 1706-1707]**
- \* Notes of Julie Armitage regarding May 10, 2005, meeting with the feds. **[Pages 1708-1713]**
- \* List of Michael Reed, dated June 9, 2005. **[Page 1714]**
- \* Draft Instructions, dated June 23, 2005. **[Pages 1715-1725]**
- \* Note and attachments from Michael Reed to Chris Romaine, dated July 17, 2005. **[Pages 1726-1737]**
- \* Miscellaneous documents regarding request for extension of time to comment on the Preliminary Responsiveness Summary and Draft Revised Proposed Title V Permits. **[Pages 1738-1744]**
- \* Handwritten notes of Michael Reed, dated August 1, 2005. **[Pages 1745-1749]**

- \* Notes of Michael Reed regarding feds conference call, dated September 16, 2005. **[Pages 1750-1751]**
- \* Email exchange between Chris Romaine and Steve Whitworth, dated 9/20/05-9/23/05. **[Pages 1752-1753]**
- \* Handwritten notes of Laurel Kroack, dated September 23, 2005. **[Page 1754]**

Model Permit Developments, Summer 2003. **[Pages 1755-1903]**

Miscellaneous Emails Relevant to Canton. **[Pages 1904-2056]**

Miscellaneous Undated Notes of Illinois EPA Staff. **[Pages 2057-2119]**

Miscellaneous Undated Documents Likely Generated by Illinois EPA. **[Pages 2120-2174]**

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Miscellaneous Drafting Documents - Permits. **[Pages 2470-3204]**

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Documentation Relative to Proceedings Before the Administrator, USEPA. **[Pages 3407-3754]**

Startup, Combustion Evaluation & Alternative Fuel Memorandums **[Pages 3755-3762]**

- \* 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 3755-3757]**
- \* Memorandum from Michael Reed to Power Plant File regarding Provisions Requiring Combustion Evaluations, dated September 23, 2005. **[Pages 3758-3759]**



- \* 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 3760-3762]**

Comments Specific to Canton **[Page 3763]**

- \* Electronic mail from Steve Whitworth to Brad Frost, Manish Patel and Chris Romaine regarding comments on proposed CAAPP for Duck Creek Power Plant, dated September 26, 2003, 7:30 PM. **[Page 3763]**

Comments Particular to Ameren **[Pages 3764-3794]**

- \* Email from Stacey Coburn, USEPA, to Manish Patel regarding comments on Ameren Title V permits, dated 7/8/03, dated 11:54 AM, and attached handwritten notes of Manish Patel. **[Pages 3764-3767]**
- \* Letter from Michael Menne to Mr. Charles Matoesian/ Mr. Frost, Illinois EPA, providing Comments on proposed CAAPP Permits, dated January 12, 2005, and attachment. **[Pages 3768-3779]**
- \* Letter from David Reiser 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. **[Pages 3780-3781]**
- \* Letter from Charles Matoesian to Steven Whitworth regarding Request for Extension of Time for Commenting on Proposed Title V Permits Posted on July 19, 2005, dated July 28, 2005. **[Page 3782]**
- \* Letter from Steven C. Whitworth, Supervising Environmental Scientist, Environmental, Safety and Health, Ameren, to Charles Matoesian providing Comments on revised proposed CAAPP Permits, dated August 1, 2005, and attachment. **[Pages 3783-3794]**

General Comments **[Pages 3795-4733]**

- \* Comments of the Sierra Club and American Bottom Conservancy, Summer 2003. **[Pages 3795-3833]**
- \* 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 3834-3848]**

- \* 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 3849-3851]**
- \* Email from Verna Owen to Mr. Holmstead, dated 12/14/2004 12:09:23 PM. **[Pages 3852-3853]**
- \* 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 3854-4239]**
- \* 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 4240-4625]**
- \* 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 4626-4733]**

Proceedings in the US District Court. **[Pages 4734-4774]**

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Design of Flexible Air Permits **[Pages 4888-4942]**

September 28, 1982 Bennett Memorandum **[Pages 4943-4945]**

February 15, 1983 Bennett Memorandum **[Pages 4946-4950]**

Limiting PTE in New Source Permitting, June 13, 1989 **[Pages 4951-4962]**

Startup, Shutdown Guidance: January 28, 1993 **[Pages 4963-4965]**

January 15, 1997, Title V Guidance **[Pages 4966-4972]**

USEPA Guidance Directed to Ohio EPA [Pages 4973-4970 (erroneous page number, should be 4976)]

January 21, 1998 Fuel Flexibility Guidance [Pages 4977-4987]

August 11, 1999 (September 20, 1999) Herman Memorandum [Pages 4988-5008]

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### General Materials

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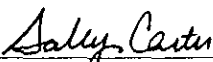
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Draft Title V Permit Review Guidelines [Pages 9487-9620]

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**

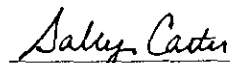
I hereby certify that on the 12th day of April 2006, I did send, via CMS Courier, the following instrument entitled **ADMINISTRATIVE RECORD** to:

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

James T. Harrington  
David L. Rieser  
McGuire Woods, LLP  
77 West Wacker, Suite 4100  
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\_\_\_\_\_  
Sally Carter  
Assistant Counsel