

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

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APR 13 2006

STATE OF ILLINOIS
Pollution Control Board

AMEREN ENERGY)
GENERATING COMPANY,)
MEREDOSIA POWER STATION,)
)
Petitioner,)
)
v.)
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Respondent.)

PCB 2006-69
(CAAPP Permit Appeal)

NOTICE

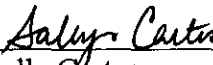
To: Dorothy Gunn, Clerk
Illinois Pollution Control Board
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

James T. Harrington
David L. Rieser
McGuire Woods, LLP
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Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
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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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 Meredosia Power Station. The facility is located at 800 South Washington Street in Meredosia, 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 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 1-137]**

Preliminary Responsiveness Summary, dated August 15, 2005. **[Pages 138-181]**

Proposed Permit (USEPA Review) Revised Proposed Permit, dated August 2005. **[Pages 182-325]**

Proposed Permit (USEPA Review) Proposed CAAPP Permit, dated October 12, 2003. **[Pages 326-456]**

Extension Denial Letter notifying that the comments must be postmarked by August 1, 2005. **[Page 457]**

Coal-Fired CAAPP Repreproposed Notification. **[Page 458]**

Draft Revised Proposed Permit, dated July 2005. **[Page 459-602]**

Coal-Fired Revised Proposed CAAPP Notification. **[Page 603]**

Revised Proposed CAAPP Permit Draft, dated December 2004. **[Pages 604-749]**

July 19, 2005, Letter. **[Pages 750-755]**

August 15, 2005, Letter. **[Pages 756-761]**

Final Permit and Calculation Sheet, dated September 2005. **[Pages 762-912]**

September 29, 2005, Letter. **[Pages 913-919]**

Final Responsiveness Summary. **[Pages 920-963]**

*In the Matter of Particulate Emission Limitations, Rule 203(g)(1) and 202(b) of Chapter 2, R82-1, June 30, 1988. **[Pages 964-1007]***

Letter from J.T. Birkett, Vice President, Central Illinois Public Service Company, to Donald Sutton, Manager, Permit Section, providing operating permit application for Meredosia, dated August 31, 1995, and attached application. **[Pages 1008-1332]**

137 805 AAA 03 95 09 0100 **[Pages 1334-1550]**

- * Application for CAAPP Permit, dated received September 1, 1995. **[Pages 1334-1338]**
- * Fee Determination for CAAPP Permit, dated received September 1, 1995. **[Pages 1339-1340]**
- * Compliance Certification, dated received September 1, 1995. **[Pages 1341-1345]**
- * Delegation of Authority for Responsible Official to a Representative, dated received September 1, 1995. **[Pages 1346-1347]**
- * CAAPP Application Completeness Determination and Source Fee Determination, dated September 18, 1995. **[Pages 1348-1352]**
- * Cost Estimates for NOx Emissions Reduction for All Coal-Fired Utility Boilers, date updated 3/5/97. **[Page 1353]**
- * Letter from Steven C. Whitworth, Supervising Environmental Scientist, to Kevin Fergusson, Illinois EPA, regarding future correspondence, dated April 26, 1999. **[Page 1354]**

- * Letter from Donald Sutton to Steve Whitworth regarding Fees for Emission from Affected Sources for Acid Deposition, dated November 5, 1999, and attachment. **[Pages 1355-1356]**
- * Letter from Thomas E. Siedhoff, Manager, Environmental, Safety, and Health, Ameren to Donald Sutton regarding Title V Permit Fees, dated December 9, 1999, and attachment. **[Pages 1357-1361]**
- * Letter from Donald Sutton, P.E., to Mark Davis regarding change of name, dated September 26, 2000. **[Page 1362]**
- * Power Plant Initiative - February 2003, dated 2/3/03. **[Pages 1363-1364]**
- * 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 1365-1369]**
- * Letter from Michael Menne to Donald Sutton regarding Supplement to the Title V Operating Permit Application, dated May 28, 2003, and attachment. **[Pages 1370-1380]**
- * Memorandum from David Kolaz to Renee Cipriano regarding Approval for Public Hearings for Coal-Fired Power Plant Permits, dated June 2, 2003. **[Pages 1381-1382]**
- * Email from Steven Whitworth to Manish Patel regarding nominal capacity of plants, dated 6/27/03, 4:12 PM. **[Page 1383]**
- * 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 1384]**
- * Information concerning Greenhouse Gases, dated 7/31/03. **[Pages 1385-1386]**
- * Handwritten notes of Manish Patel regarding Utility CAAPP meeting with Ameren/Dynegy, dated 9/18/03, 10:30 AM. **[Pages 1387-1388]**
- * Handwritten notes of Laurel Kroack regarding Title V permits, dated November 21, 2003. **[Pages 1389-1390]**
- * Facsimile from Keith Harley to Julie Armitage, dated November 24, 2003. **[Pages 1391-1396]**
- * Note and attachment from Chris Romaine to Dave Kolaz, dated 12/10/03. **[Pages 1397-1404]**

- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM, with handwritten notes. **[Pages 1405-1406]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM. **[Page 1407]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Laurel Kroack. **[Page 1408]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Chris Romaine. **[Pages 1409-1415]**
- * Handwritten notes of Laurel Kroack beginning “Enviros & Title V Power Plants,” dated 2/3/2004. **[Pages 1416-1417]**
- * Memorandum from Laurel Kroack to Renee Cipriano regarding Title V permits for coal-fired power plants, including Midwest Generation, dated February 4, 2004. **[Pages 1418-1421]**
- * Email from Chris Romaine to Natalie Locke and Steve Whitworth, dated 2/19/2004, 2:41 PM. **[Page 1422]**
- * Handwritten notes of Manish Patel regarding meeting with USEPA on coal-fired power plant CAAPPs dated 2/24/04, 1:30 PM. **[Page 1423]**
- * Handwritten notes of Manish Patel regarding conference call with coal-utility facilities, dated 2/25/04, 1:30 PM. **[Page 1424]**
- * Memorandum from David Kolaz to Renee Cipriano regarding status and time line for Title V Power Plant Issuance, dated April 28, 2004. **[Pages 1425-1426]**
- * Handwritten notes of Laurel Kroack regarding meeting with USEPA concerning power plant permits, dated 5/6/04. **[Pages 1427-1429]**
- * 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 1430-1453]**
- * Memorandum from Laurel Kroack to Cheryl Newton regarding Utility Permit Issuance Timeline, dated June 1, 2004. **[Page 1454]**
- * 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 1455-1468]**

- * Facsimile cover sheet from Chris Romaine to Stacey Coburn, dated 6/29/04. **[Page 1469]**
- * 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 1470]**
- * Handwritten notes of Laurel Kroack regarding Title V, dated 8/30/04. **[Pages 1471-1473]**
- * Letter from Bharat Mathur, Acting Regional Administrator, USEPA, to Renee Cipriano, Illinois EPA, dated December 2, 2004. **[Pages 1474-1476]**
- * 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 1477]**
- * 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 1478-1479]**
- * Letter from Donald Sutton to American Bottom Conservancy, et al., dated January 13, 2005, responding to letter dated January 6, 2005. **[Pages 1480-1491]**
- * Letter from Laurel Kroack, Acting Chief, Bureau of Air, Illinois EPA, to Steve Rothblat, USEPA, dated January 18, 2005. **[Pages 1492-1499]**
- * Handwritten notes of Laurel Kroack regarding utility, title V, dated 1/26/05. **[Pages 1500-1501]**
- * Notes of Laurel Kroack regarding March 21, 2005, call with feds. **[Pages 1502-1503]**
- * Notes of Julie Armitage regarding May 10, 2005, meeting with the feds. **[Pages 1504-1509]**
- * List of Michael Reed, dated June 9, 2005. **[Page 1510]**
- * Draft Instructions, dated June 23, 2005. **[Pages 1511-1521]**
- * Note and attachments from Michael Reed to Chris Romaine, dated July 17, 2005. **[Pages 1522-1533]**
- * Miscellaneous documents regarding request for extension of time to comment on the Preliminary Responsiveness Summary and Draft Revised Proposed Title V Permits. **[Pages 1534-1540]**

- * Handwritten notes of Michael Reed, dated August 1, 2005. **[Pages 1541-1545]**
- * Notes of Michael Reed regarding feds conference call, dated September 16, 2005. **[Pages 1546-1547]**
- * Email exchange between Chris Romaine and Steve Whitworth, dated 9/20/05-9/23/05. **[Pages 1548-1549]**
- * Handwritten notes of Laurel Kroack, dated September 23, 2005. **[Pages 1550]**

Model Permit Developments, Summer 2003. **[Pages 1551-1699]**

Miscellaneous Emails Relevant to Meredosia. **[Pages 1700-1821]**

Miscellaneous Undated Notes of Illinois EPA Staff. **[Pages 1822-1883]**

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Miscellaneous Documents Supplied to USEPA. **[Pages 1939-2116]**

Miscellaneous Lists or Drafting Documents. **[Pages 2117-2233]**

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Miscellaneous Opacity Documents. **[Pages 2971-3090]**

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NSPS Worksheet. **[Page 3095]**

Ameren Meredosia Construction Permits & Miscellaneous Operating Permits. **[Pages 3096-3149]**

Documentation Relative to Proceedings Before the Administrator, USEPA. **[Pages 3150-3497]**

Startup, Combustion Evaluation & Alternative Fuel Memorandums **[Pages 3498-3505]**

- * 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 3498-3500]**

- * Memorandum from Michael Reed to Power Plant File regarding Provisions Requiring Combustion Evaluations, dated September 23, 2005. **[Pages 3501-3502]**
- * 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 3503-3505]**

Comments Specific to Meredosia **[Page 3506]**

- * Electronic mail from Steve Whitworth to Brad Frost, Manish Patel and Chris Romaine regarding comments on proposed CAAPP for Meredosia Power Plant, dated September 26, 2003, 7:37 PM. **[Page 3506]**

Comments Particular to Ameren **[Pages 3507-3537]**

- * Email from Stacey Coburn, USEPA, to Manish Patel regarding comments on Ameren Title V permits, dated 7/8/03, dated 11:54 AM, and handwritten notes of Manish Patel. **[Pages 3507-3510]**
- * 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 3511-3522]**
- * 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 3523-3524]**
- * 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 3525]**
- * Letter from Steven 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 3526-3537]**

General Comments **[Pages 3538-4478]**

- * Comments of the Sierra Club and American Bottom Conservancy, Summer 2003. **[Pages 3538-3576]**
- * 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 3577-3591]**

- * 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 3592-3594]**
- * Email from Verna Owen to Mr. Holmstead, dated 12/14/2004 12:09:23 PM. **[Pages 3595-3596]**
- * 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 3597-3992]**
- * 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 3993-4368]**
- * 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 4369-4478]**

Proceedings in the US District Court. **[Pages 4479-4520]**

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Design of Flexible Air Permits **[Pages 4634-4688]**

September 28, 1982 Bennett Memorandum **[Pages 4689-4691]**

February 15, 1983 Bennett Memorandum **[Pages 4692-4696]**

Limiting PTE in New Source Permitting, June 13, 1989 **[Pages 4697-4708]**

Startup, Shutdown Guidance: January 28, 1993 **[Pages 4709-4711]**

January 15, 1997, Title V Guidance [**Pages 4712-4718**]
USEPA Guidance Directed to Ohio EPA [**Pages 4719-4722**]
January 21, 1998 Fuel Flexibility Guidance [**Pages 4723-4733**]
August 11, 1999 (September 20, 1999) Herman Memorandum [**Pages 4734-4753**]
December 5, 2001, Schaeffer Memorandum [**Pages 4754-4755**]
Miscellaneous Reference Material [**Pages 4756-4757**]
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Miscellaneous Reference Documents:

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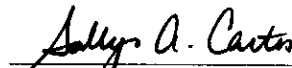
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Respectfully submitted by,

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 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