

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

APR 14 2006

STATE OF ILLINOIS
Pollution Control Board

DYNEGY MIDWEST GENERATION, INC.)
(WOOD RIVER POWER STATION),)

Petitioner,)

v.)

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)

Respondent.)

PCB 2006-74
(CAAPP Permit Appeal)

NOTICE


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
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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: April 13, 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

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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 Dynegy Midwest Generation, Inc. ("Dynegy") on September 29, 2005. The permit authorized the operation of an electrical power generation facility known as the Wood River Power Station. The facility is located at #1 Chessen Lane in Alton, 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,

Dynegy's permit application materials, various draft permits issued for public comment, correspondence between the Illinois EPA and both Dynegy and the United States Environmental Protection Agency, public comments received during the multiple public comment periods, various construction and operating permits issued to Dynegy, 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 1-165]**

Public Hearing Transcript, Belleville City Hall, dated August 13, 2003. **[Pages 166-485]**

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

Proposed Permit (USEPA Review) Revised Proposed Permit, dated August 2005. **[Pages 530-717]**

Proposed Permit (USEPA Review) Proposed CAAPP Permit, dated October 10, 2003. **[Pages 718-856]**

Extension Denial Letter notifying that the comments must be postmarked by August 1, 2005. **[Page 857]**

Coal-Fired CAAPP Reproposed Notification. **[Page 858]**

In the United States District Court for the Southern District of Illinois, United States of America and the State of Illinois, American Bottom Conservancy, Health and Environmental Justice-St. Louis, Inc., Illinois Stewardship Alliance, and Prairie State Rivers Network v. Illinois Power Company and Dynegy Midwest Generation, Inc., Civil Action No. 00-833-MJR, Consent Decree and Order. **[Pages 859-951]**

Draft Revised Proposed Permit, dated July 2005. **[Pages 952-1136]**

Coal-Fired Revised Proposed CAAPP Notification. **[Page 1137]**

Revised Proposed CAAPP Permit Draft, dated December 2004. **[Pages 1138-1291]**

July 19, 2005, Letter. **[Pages 1292-1297]**

August 15, 2005, Letter. **[Pages 1298-1303]**

Final Permit and Calculation Sheet, dated September 2005. **[Pages 1304-1501]**

September 29, 2005, Letter. **[Pages 1502-1508]**

Final Responsiveness Summary. **[Pages 1509-1552]**

Letter from Rick Diercix, Air Group Leader, Illinois Power, to Donald Sutton, Bureau of Air, Illinois EPA, providing Initial CAAPP Application, dated September 6, 1995, and attached application. **[Pages 1553-2093]**

Miscellaneous Correspondence & Application Material **[Pages 2094-2143]**

- * Dynegy Midwest Generation, Inc. Unit Nameplate Ratings, undated. **[Page 2094]**
- * Compliance Certification, dated received September 7, 1995. **[Pages 2095-2100]**
- * Application for CAAPP Permit, dated received September 7, 1995. **[Pages 2101-2106]**
- * Telephone Log Sheet , dated September 29, 1995. **[Page 2107]**
- * Completeness Review Sheet, Application Deemed Incomplete, dated October 3, 1995. **[Pages 2108-2109]**
- * CAAPP Application Completeness Determination and Source Fee Determination, dated October 23, 1995. **[Pages 2110-2117]**
- * Cost Estimates for NOx Emissions Reduction for All Coal-Fired Utility Boilers, date updated 3/5/97. **[Page 2118]**

- * Letter from Donald Sutton to Rick Diericx regarding change of name, dated March 15, 2001. **[Page 2119]**
- * Letter from Natalie Locke, Air Programs, Group Leader, Dynegy Midwest Generation, to Donald Sutton regarding revision to responsible official, dated October 12, 2002, and attachment. **[Pages 2120-2121]**
- * Power Plant Initiative - February 2003, dated 2/3/03. **[Pages 2122-2123]**
- * Memorandum from David Kolaz to Renee Cipriano regarding Approval for Public Hearings for Coal-Fired Power Plant Permits, dated June 2, 2003. **[Pages 2124-2125]**
- * 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 2126]**
- * Letter from Rick Diericx to Jim Ross, Acting Manager - Air Permit Section, Illinois EPA. regarding Subpart V Request for Authorization for NOx Averaging for EGUs, dated July 30, 2003, and attachment. **[Pages 2127-2129]**
- * Information concerning Greenhouse Gases, dated 7/31/03. **[Pages 2130-2131]**
- * Letter from Natalie Locke to Jim Ross regarding Replacement of Oil-Burning Equipment, dated September 3, 2003. **[Pages 2132-2133]**
- * Handwritten notes of Manish Patel regarding Utility CAAPP meeting with Ameren/Dynegy, dated 9/18/03. 10:30 AM. **[Pages 2134-2135]**
- * Handwritten notes of Laurel Kroack regarding Title V permits, dated November 21, 2003. **[Pages 2136-2137]**
- * Facsimile from Keith Harley to Julie Armitage, dated November 24, 2003. **[Pages 2138-2143]**

Memorandum from Pamela Brooks, Air Quality Planning Section, Bureau of Air, to Rob Kaleel, Air Quality Planning Section, Bureau of Air, regarding Wood River, Dynegy Midwest Generation, Environmental Justice Study Modeling Analysis, dated December 1, 2003. **[Pages 2144-2148]**

119 020 AAE 03 95 09 0095 - Dynegy Midwest Generation, Inc. **[Pages 2149-2403]**

- * Note and attachment from Chris Romaine to Dave Kolaz, dated 12/10/03. **[Pages 2149-2156]**

- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM, with handwritten notes. **[Pages 2157-2158]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM. **[Page 2159]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Laurel Kroack. **[Page 2160]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Chris Romaine. **[Pages 2161-2167]**
- * Handwritten notes of Laurel Kroack beginning “Enviros & Title V Power Plants,” dated 2/3/2004. **[Pages 2168-2169]**
- * Memorandum from Laurel Kroack to Renee Cipriano regarding Title V permits for coal-fired power plants, including Midwest Generation, dated February 4, 2004. **[Pages 2170-2173]**
- * Email from Chris Romaine to Natalie Locke and Steve Whitworth, dated 2/19/2004, 2:41 PM. **[Page 2174]**
- * Handwritten notes of Manish Patel regarding meeting with USEPA on coal-fired power plant CAAPPs dated 2/24/04, 1:30 PM. **[Page 2175]**
- * Handwritten notes of Manish Patel regarding conference call with coal-utility facilities, dated 2/25/04, 1:30 PM. **[Page 2176]**
- * Memorandum from David Kolaz to Renee Cipriano regarding status and time line for Title V Power Plant Issuance, dated April 28, 2004. **[Pages 2177-2178]**
- * Handwritten notes of Laurel Kroack regarding meeting with USEPA concerning power plant permits, dated 5/6/04. **[Pages 2179-2181]**
- * 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 2182-2205]**
- * Memorandum from Laurel Kroack to Cheryl Newton regarding Utility Permit Issuance Timeline, dated June 1, 2004. **[Page 2206]**
- * 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 2207]**

- * 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 2208-2221]**
- * Facsimile cover sheet from Chris Romaine to Stacey Coburn, dated 6/29/04. **[Page 2222]**
- * 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 2223]**
- * Letter from Rick Diericx to Donald Sutton regarding Subpart W Application for Budge Permit - Application Correction, dated August 6, 2004, and attachments. **[Pages 2224-2226]**
- * Handwritten note of Laurel Kroack regarding Title V, dated 8/30/04. **[Pages 2227-2229]**
- * Letter from Bharat Mathur, Acting Regional Administrator, USEPA, to Renee Cipriano, Illinois EPA, dated December 2, 2004. **[Pages 2230-2232]**
- * 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 2233]**
- * Email from Kunj Patel to Chris Romaine regarding Dynegy, Wood River dated 12/8/2004, 9:05 AM. **[Page 2234]**
- * 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 2235-2236]**
- * Letter from Donald Sutton to American Bottom Conservancy, et al., dated January 13, 2005, responding to letter dated January 6, 2005. **[Pages 2237-2248]**
- * Letter from Laurel Kroack, Acting Chief, Bureau of Air, Illinois EPA, to Steve Rothblat, USEPA, dated January 18, 2005. **[Pages 2249-2256]**
- * Handwritten notes of Laurel Kroack regarding utility, title V, dated 1/26/05. **[Pages 2257-2258]**
- * Notes of Laurel Kroack regarding March 21, 2005, call with feds. **[Pages 2259-2260]**

- * Letter from Rick Diericx to Donald Sutton regarding Request for Renewal Authorization for NOx Averaging for EGUs per Subpart V, dated April 27, 2005, and attachments. **[Pages 2261-2267]**
 - * Notes of Julie Armitage regarding May 10, 2005, meeting with the feds. **[Pages 2268-2273]**
 - * List of Michael Reed, dated June 9, 2005. **[Page 2274]**
 - * Draft Instructions, dated June 23, 2005. **[Pages 2275-2285]**
 - * Report on Particulate Compliance Testing, Dynegy Midwest Generation, Inc., Unit 5 Stack, Wood River Power Station, dated June 29, 2005. **[Pages 2286-2369]**
 - * Note and attachments from Michael Reed to Chris Romaine, dated July 17, 2005. **[Pages 2370-2381]**
 - * Miscellaneous documents regarding request for extension of time to comment on the Preliminary Responsiveness Summary and Draft Revised Proposed Title V Permits. **[Pages 2382-2388]**
 - * Handwritten notes of Michael Reed, dated August 1, 2005. **[Pages 2389-2393]**
 - * Email from Michael Reed to Julie Armitage regarding new permit condition for 22, dated 8/9/05, 9:42 AM. **[Page 2394]**
 - * Notes of Michael Reed regarding feds conference call, dated September 16, 2005. **[Pages 2395-2396]**
 - * Email exchange between Chris Romaine and Rick Diericx concerning testing of PM emissions, dated 9/20/05. **[Pages 2397-2398]**
 - * Handwritten notes of Laurel Kroack, dated September 23, 2005. **[Page 2399]**
 - * Email from Natalie Locke to Chris Romaine regarding Wood River Power Station - Scenario 6, dated 9/22/2005, 10:47 AM. **[Pages 2400-2403]**
- Model Permit Developments, Summer 2003. **[Pages 2404-2552]**
- Miscellaneous Emails Relevant to Dynegy Alton (Wood River) **[Pages 2553-4056]**
- Miscellaneous Undated Notes of Illinois EPA Staff. **[Pages 4057-4118]**
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Miscellaneous Documents Supplied to USEPA. **[Pages 4173-4350]**

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Documentation Relative to Proceedings Before the Administrator, USEPA. **[Pages 5549-5897]**

Startups, Combustion Evaluations & Alternative Fuel Memorandums **[Pages 5898-5905]**

- * 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 5898-5900]**
- * Memorandum from Michael Reed to Power Plant File regarding Provisions Requiring Combustion Evaluations, dated September 23, 2005. **[Pages 5901-5902]**
- * 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 5903-5905]**

Comments Specific to Wood River **[Pages 5906-6233]**

- * Letter from Natalie Locke to Brad Frost, Community Relations Coordinator, Illinois EPA regarding Comments on Draft Public Notice CAAPP Permit, dated September 26, 2003, and attachments. **[Pages 5906-6048]**
- * Letter from Rick Diericx to Charles Matoesian, Illinois EPA, regarding Comments on Draft Public Notice CAAPP Permit, dated January 17, 2005, and attachments. **[Pages 6049-6218]**
- * Letter from Rick Diericx to Charles Matoesian regarding Comments on Draft Public Notice CAAPP Permit, dated July 29, 2005. **[Pages 6219-6233]**

Comments Particular to Dynegy **[Pages 6234-6243]**

- * Email from Starla Lacy, Director, Environmental, Dynegy to Chris Romaine regarding "Here's what I propose to send" dated 6/21/03, 11:20 AM. **[Pages 6234-6236]**
- * Letter from Harry H. Hazelton, Jr. to EPA Hearing Officer, dated received August 22, 2003. **[Pages 6237-6239]**
- * Letter from Chrisine Favilla to Illinois EPA Hearing Officer, dated received September 25, 2003. **[Pages 6240-6242]**
- * Letter from Charles Matoesian to Rick Diericx regarding Request for Extension of Time for Commenting on Proposed Title V Permits Posted on July 19, 2005, dated July 28, 2005. **[Page 6243]**

General Comments **[Pages 6244-7189]**

- * Comments of the Sierra Club and American Bottom Conservancy, Summer 2003. **[Pages 6244-6282]**
- * 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 6283-6297]**
- * 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 6298-6300]**
- * Email from Verna Owen to Mr. Holmstead, dated 12/14/2004 12:09:23 PM. **[Pages 6301-6302]**
- * 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 6303-6689]**
- * 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 6690-7076]**
- * 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 7077-7189]**

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Limiting PTE in New Source Permitting, June 13, 1989 [Pages 7406-7417]

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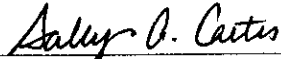
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Respectfully submitted by,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,



Sally A. Carter
Assistant Counsel

Illinois Environmental Protection Agency
1021 North Grand Avenue East
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Springfield, Illinois 62794-9276
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CERTIFICATE OF SERVICE

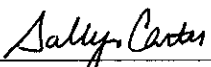
I hereby certify that on the 13th day of April 2006, I did send, via CMS Courier, the following instrument entitled **ADMINISTRATIVE RECORD** to:

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

I further hereby certify that on the 12th day of April 2006, I did send, 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

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