

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

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APR 17 2006

DYNEGY MIDWEST GENERATION, INC.)
(HENNEPIN POWER STATION),)

STATE OF ILLINOIS
Pollution Control Board

Petitioner,)

v.)

PCB 2006-72
(CAAPP Permit Appeal)

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)

Respondent.)

NOTICE

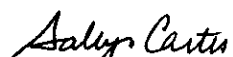
To: Dorothy Gunn, Clerk
Illinois Pollution Control Board
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

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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 14, 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 Dynegy Midwest Generation, Inc. ("Dynegy") on September 29, 2005. The permit authorized the operation of an electrical power generation facility known as the Hennepin Power Station. The facility is located at R.R. #1, Box 200AA in Hennepin, 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 1-118]**

Preliminary Responsiveness Summary, dated August 15, 2005. **[Pages 119-162]**

Proposed Permit (USEPA Review) Revised Proposed Permit, dated August 2005. **[Pages 163-330]**

Proposed Permit (USEPA Review) Proposed CAAPP Permit, dated October 10, 2003. **[Pages 331-447]**

Extension Denial Letter notifying that the comments must be postmarked by August 1, 2005. **[Page 448]**

Coal-Fired CAAPP Repreproposed Notification. **[Page 449]**

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 450-542]**

Draft Revised Proposed Permit, dated July 2005. **[Pages 543-709]**

Coal-Fired Revised Proposed CAAPP Notification. **[Page 710]**

Revised Proposed CAAPP Permit Draft, dated December 2004. **[Pages 711-839]**

July 19, 2005, Letter. **[Pages 840-845]**

August 15, 2005, Letter. **[Pages 846-851]**

Final Permit and Calculation Sheet, dated September 2005. **[Pages 852-1028]**

September 29, 2005, Letter. **[Pages 1029-1035]**

Final Responsiveness Summary. **[Pages 1036-1079]**

Letter from Aric D. Diericx, Air Group Leader, Illinois Power, to Donald Sutton, P.E., Manager, Permit Section, Illinois EPA, regarding Initial CAAPP Application for the Hennepin Power Station, dated September 6, 1995, and attached application. **[Pages 1080-1309]**

155 010 AA 03 95 09 0052 - Dynegy Midwest Generation Inc. - Title V **[Pages 1310-1568]**

- * *In the Matter of Particulate Emission Limitations, Rule 23(g)(1) and 202(b) of Chapter 2, R82-1, June 30, 1988. [Pages 1310-1352]*
- * Dynegy Midwest Generation, Inc. Unit Nameplate Ratings, undated. **[Page 1353]**
- * Compliance Certification, dated received September 7, 1995. **[Pages 1354-1359]**
- * Fee Determination for CAAPP Permit, dated received September 7, 1995. **[Pages 1360-1362]**
- * Application for CAAPP Permit, dated received September 7, 1995. **[Pages 1363-1367]**
- * Telephone Log Sheet, dated October 4, 1995. **[Pages 1368]**

- * CAAPP Application Completeness Determination and Source Fee Determination, dated October 11, 1995. **[Pages 1369-1373]**
- * Letter from John M. Burke, Environmental Professional, Illinois Power, to David Kolaz, Manager, Compliance and Systems Management Section, Illinois EPA, regarding Annual Data Submittal, dated February 4, 1997. **[Page 1374]**
- * Cost Estimates for NOx Emissions Reduction for All Coal-Fired Utility Boilers, date updated 3/5/97. **[Page 1375]**
- * Power Plant Initiative - February 2003, dated 2/3/03. **[Pages 1376-1377]**
- * Memorandum from David Kolaz to Renee Cipriano regarding Approval for Public Hearings for Coal-Fired Power Plant Permits, dated June 2, 2003. **[Pages 1378-1379]**
- * Letter from Natalie Locke, Air Programs Group Leader, Dynegy, to Kunj Patel, Illinois EPA, providing Supplement to Initial CAAPP Application, dated June 9, 2003, and attachment. **[Pages 1380-1392]**
- * 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 1393]**
- * Letter from Rick Diericx, Manager - Environmental Resources, Dynegy, to Jim Ross, Acting Manager - Air Permit Section, regarding Subpart W Budget Permit Applications, dated July 29, 2003, and attachment. **[Pages 1394-1396]**
- * Letter from Rick Diericx to Jim Ross regarding Subpart V Request for Authorization for NOx Averaging for EGU's, dated July 30, 2003, and attachment. **[Pages 1397-1399]**
- * Information concerning Greenhouse Gases, dated 7/31/03. **[Pages 1400-1401]**
- * Handwritten notes of Manish Patel regarding Utility CAAPP meeting with Ameren/Dynegy, dated 9/18/03. 10:30 AM. **[Pages 1402-1403]**
- * Handwritten notes of Laurel Kroack regarding Title V permits, dated November 21, 2003. **[Pages 1404-1405]**
- * Facsimile from Keith Harley to Julie Armitage, dated November 24, 2003. **[Pages 1406-1411]**
- * Note and attachment from Chris Romaine to Dave Kolaz, dated 12/10/03. **[Pages 1412-1419]**

- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM, with handwritten notes. **[Pages 1420-1421]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM. **[Page 1422]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Laurel Kroack. **[Page 1423]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Chris Romaine. **[Pages 1424-1430]**
- * Handwritten notes of Laurel Kroack beginning “Enviros & Title V Power Plants,” dated 2/3/2004. **[Pages 1431-1432]**
- * Memorandum from Laurel Kroack to Renee Cipriano regarding Title V permits for coal-fired power plants, including Midwest Generation, dated February 4, 2004. **[Pages 1433-1436]**
- * Email from Chris Romaine to Natalie Locke and Steve Whitworth, dated 2/19/2004, 2:41 PM. **[Page 1437]**
- * Handwritten notes of Manish Patel regarding meeting with USEPA on coal-fired power plant CAAPPs dated 2/24/04, 1:30 PM. **[Page 1438]**
- * Handwritten notes of Manish Patel regarding conference call with coal-utility facilities, dated 2/25/04, 1:30 PM. **[Page 1439]**
- * Memorandum from David Kolaz to Renee Cipriano regarding status and time line for Title V Power Plant Issuance, dated April 28, 2004. **[Pages 1440-1441]**
- * Handwritten notes of Laurel Kroack regarding meeting with USEPA concerning power plant permits, dated 5/6/04. **[Pages 1442-1444]**
- * 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 1445-1468]**
- * Memorandum from Laurel Kroack to Cheryl Newton regarding Utility Permit Issuance Timeline, dated June 1, 2004. **[Page 1469]**
- * 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 1470-1483]**
- * Facsimile cover sheet from Chris Romaine to Stacey Coburn, dated 6/29/04. **[Page 1484]**

- * 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 1485]**
- * Handwritten notes of Laurel Kroack regarding Title V, dated 8/30/04. **[Pages 1486-1488]**
- * Letter from Bharat Mathur, Acting Regional Administrator, USEPA, to Renee Cipriano, Illinois EPA, dated December 2, 2004. **[Pages 1489-1491]**
- * 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 1492]**
- * 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 1493-1494]**
- * Letter from Donald Sutton to American Bottom Conservancy, et al., dated January 13, 2005, responding to letter dated January 6, 2005. **[Pages 1495-1505]**
- * Letter from Laurel Kroack, Acting Chief, Bureau of Air, Illinois EPA, to Steve Rothblat, USEPA, dated January 18, 2005. **[Pages 1506-1513]**
- * Handwritten notes of Laurel Kroack regarding utility, title V, dated 1/26/05. **[Pages 1514-1515]**
- * Notes of Laurel Kroack regarding March 21, 2005, call with feds. **[Pages 1516-1517]**
- * Letter from John Burke to Julie Armitage regarding Particulate Matter Emission Results, dated April 13, 2005. **[Pages 1518-1520]**
- * Notes of Julie Armitage regarding May 10, 2005, meeting with the feds. **[Pages 1521-1526]**
- * List of Michael Reed, dated June 9, 2005. **[Page 1527]**
- * Draft Instructions, dated June 23, 2005. **[Pages 1528-1538]**
- * Note and attachments from Michael Reed to Chris Romaine, dated July 17, 2005. **[Pages 1539-1550]**

- * Miscellaneous documents regarding request for extension of time to comment on the Preliminary Responsiveness Summary and Draft Revised Proposed Title V Permits. **[Pages 1551-1557]**
- * Handwritten notes of Michael Reed, dated August 1, 2005. **[Pages 1558-1562]**
- * Email from Michael Reed to Julie Armitage regarding new permit condition for 22, dated 8/9/05, 9:42 AM. **[Page 1563]**
- * Notes of Michael Reed regarding feds conference call, dated September 16, 2005. **[Pages 1564-1565]**
- * Email exchange between Chris Romaine and Rick Diericx concerning testing of PM emissions, dated 9/20/05. **[Pages 1566-1567]**
- * Handwritten notes of Laurel Kroack, dated September 23, 2005. **[Page 1568]**

Model Permit Developments, Summer 2003. **[Pages 1569-1717]**

Miscellaneous Emails Relevant to Hennepin. **[Pages 1718-2730]**

Miscellaneous Undated Notes of Illinois EPA Staff. **[Pages 2731-2792]**

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Miscellaneous Opacity Documents. **[Pages 4073-4192]**

FESOP NOx Averaging Permits. **[Pages 4193-4196]**

NSPS Worksheet. **[Page 4197]**

Miscellaneous Information Relative to Harvard School of Public Health. **[Pages 4198-4219]**

Dynergy - Hennepin Construction Permits & Miscellaneous Operating Permits. **[Pages 4220-4275]**

Documentation Relative to Proceedings Before the Administrator, USEPA. **[Pages 4276-4623]**

Startups, Combustion Evaluations & Alternative Fuel Memorandums **[Pages 4624-4631]**

- * 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 4624-4626]**
- * Memorandum from Michael Reed to Power Plant File regarding Provisions Requiring Combustion Evaluations, dated September 23, 2005. **[Pages 4627-4628]**
- * 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 4629-4631]**

Comments Specific to Hennepin **[Pages 4632-4907]**

- * 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 attachment. **[Pages 4632-4747]**
- * Letter from Rick Diericx to Charles Matoesian, Illinois EPA, providing Comments on Draft Public Notice CAAPP Permits, dated January 17, 2005, and attachments. **[Pages 4748-4892]**
- * Letter from Rick Diericx to Charles Matoesian providing Comments on Draft Public Notice CAAPP Permits, dated July 29, 2005. **[Pages 4893-4907]**

Comments Particular to Dynegy **[Pages 4908-4911]**

- * Email from Starla Lacy, Director, Environmental, Dynegy, to Chris Romaine regarding "Here's what I propose to send," dated 6/21/03 1:20 AM. **[Pages 4908-4910]**
- * 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 4911]**

General Comments **[Pages 4912-5883]**

- * Comments of the Sierra Club and American Bottom Conservancy, Summer 2003. **[Pages 4912-4950]**
- * 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 4951-4965]**

- * 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 4966-4698]**
- * Email from Verna Owen to Mr. Holmstead, dated 12/14/2004 12:09:23 PM. **[Pages 4969-4970]**
- * 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 4971-5356]**
- * 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 5357-5743]**
- * 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 5744-5883]**

Proceedings in the US District Court. **[Pages 5884-5925]**

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November 12, 1981 USEPA Directive **[Pages 5932-5936]**

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September 28, 1982 Bennett Memorandum **[Pages 6094-6096]**

February 15, 1983 Bennett Memorandum **[Pages 6097-6101]**

Limiting PTE in New Source Permitting, June 13, 1989 **[Pages 6102-6113]**

Startup, Shutdown Guidance: January 28, 1993 **[Pages 6114-6116]**

January 15, 1997, Title V Guidance [**Pages 6117-6123**]
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January 21, 1998 Fuel Flexibility Guidance [**Pages 6128-6139**]
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EEI - May 12, 1999, Draft to Notice? [Pages 872-966]

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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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CERTIFICATE OF SERVICE

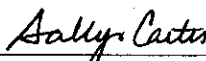
I hereby certify that on the 14th day of April 2006, I did send, via CMS Courier, the following instrument entitled **ADMINISTRATIVE RECORD** to:

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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