

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD **RECEIVED**
CLERK'S OFFICE

IN THE MATTER OF:)
)
PROPOSED NEW 35 ILL.ADM.CODE PART 225) PCB R06-25
CONTROL OF EMISSIONS FROM) Rulemaking - Air
LARGE COMBUSTION SOURCES))

MAY 23 2006

STATE OF ILLINOIS
Pollution Control Board

NOTICE OF FILING

To:

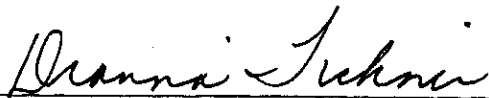
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Persons included on the
ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that we have today filed with the Office of the Clerk of the Pollution Control Board PARTICIPANT PRAIRIE STATE GENERATING COMPANY, LLC's **PREFILED QUESTIONS**, copies of which are herewith served upon you.



Dated: May 19, 2006

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PRAIRIE STATE GENERATING COMPANY, LLC'S
PREFILED QUESTIONS

Prairie State Generating Company, LLC has the following questions for the witnesses identified by the Illinois Environmental Protection Agency ("IEPA") and relating to their prefiled testimony in the above captioned matter. Prairie State Generating Company, LLC reserves the right to prefile additional questions for IEPA witness James Staudt based on his revised pre-filed testimony to be filed on May 19, 2006.

Thomas Hornshaw

1. What do Illinois fish measurements show about the long-term trend of mercury in fish? Is it going up? Is it going down?
2. Hornshaw states that there are no surveys of how much fish Illinois anglers consume (page 4). Are national surveys of fish consumption relevant to Illinois anglers? Doesn't the largest fish consumption occur near the coasts?

Gerald Keeler

1. Have the details of your Steubenville modeling been made publicly available?
2. You state that 70% of the mercury wet deposition in Steubenville comes from coal-fired power plants. How far have you traced back power plant plumes to reach that conclusion? Hundreds of miles?
3. Have you modeled what mercury wet deposition you would predict in Steubenville after the implementation of CAMR? Have you modeled what the mercury wet deposition in Steubenville would be if all coal-fired power plants were required to reduce emissions by some percentage (70, 80 or 90%)?
4. Would you expect coal-fired power plants to contribute 70% of the mercury wet deposition at every location in the U.S.? If not, what is the contribution of Illinois coal-fired power plants to mercury wet deposition in Illinois?

Christopher Romaine

1. Please explain how the proposed rule gives a plant credit for coal washing?
2. On page 10 of your prefiled testimony, you discuss the federal PSD requirements. Aren't HAPs excluded from the PSD provisions?
3. On page 11, you state that the Illinois monitoring requirements are "essentially identical" to the federal requirements. How are they different?
4. Are reliable mercury emissions monitors commercially available? If yes, who are the manufacturers? What is each manufacturer's time-frame to deliver and install a monitor from date of purchase?
5. Does IEPA intend to propose an amendment to the rule to address situations where a source has applied the appropriate technology but is unable to achieve the proposed standards? If yes, when will it be proposed and what is the scope of the proposal. If no, what is IEPA's basis for not addressing such situations in the rule?

Jim Ross

1. On page 5 of your testimony you state that as many as 10% of the children in the U.S. "have been exposed to excessive levels of mercury in the womb." What studies are you referring to? Please explain the discrepancy between your 10% value and the 6% value another Illinois EPA witness (Jeffrey Sprague) cites on page 3 of his testimony?
2. Where did you get the estimate of 7022 pounds of mercury emissions in 2002 that is cited on page 7 of your testimony?
3. On page 8 you state that the court challenges to EPA's listing decision were "unsuccessful". Why were they unsuccessful? Did the court rule on the merits of EPA's December 2000 action or did it find that a challenge was premature and could be brought before the court when EPA completed its mercury rulemaking?
4. At various places in your testimony you talk about mercury hot spots. Has Illinois defined what is meant when the term "hot spot" is used? Is Illinois EPA using the same definition that EPA used in the CAMR rulemaking? What specific "hot spots" have been identified in Illinois? If "hot spots" have been identified, what evidence is there that they are the result of coal-fired power plant emissions?
5. On page 10 of your testimony, you cite percentage reductions that EPA estimates will occur as a result of CAMR. Are these percentage reductions derived from comparing the 1999 emissions to those from CAMR Phase 1 and 2 or are they from comparing a plant's emissions to the amount of mercury entering in the coal?
6. Has Illinois conducted a detailed analysis to show what the incremental reductions in mercury deposition would be in going beyond CAMR to the proposed standards? If so, has

IEPA analyzed how those reductions (assuming reductions will occur) affect mercury levels in fish in Illinois?

7. What fish advisories are predicted to be eliminated as a result of Illinois' proposed mercury rule?
8. Has the Illinois EPA conducted a detailed analysis of the health benefits that would result from going beyond CAMR?
9. What analyses has Illinois EPA performed to determine the incremental implementation costs of going beyond EPA's CAMR rule to comply with the limits in the proposed rule?

James Staudt

1. What is the basis for your cost estimate of \$32-37 million to comply with the Illinois proposed rule? Please explain in detail.

Marcia Willhite

1. Has Illinois conducted a detailed analysis to show what the incremental reductions in mercury deposition would be in going beyond CAMR to the proposed standards? If so, has IEPA analyzed how those reductions (assuming reductions will occur) affect mercury levels in fish in Illinois?

David Foerter

1. Please describe in detail the criteria you use for concluding that a technology is "commercially available."

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Pollution Control Board

CERTIFICATE OF SERVICE

I, the undersigned, certify that on this 19th day of May, 2006, I have served by first-class mail with sufficient postage affixed the attached PARTICIPANT PRAIRIE STATE GENERATING COMPANY, LLC'S PREFILED QUESTIONS, upon the following persons:

Dorothy Gunn, Clerk
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and by first-class mail with sufficient postage affixed to the following persons

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