BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	
SECTION 27 PROPOSED RULES FOR)	
NITROGEN OXIDE (NO _x) EMISSIONS)	R07-19
FROM STATIONARY RECIPROCATING)	(Rulemaking – Air)
INTERNAL COMBUSTION ENGINES AND)	
TURBINES: AMENDMENTS TO 35 ILL.)	
ADM. CODE PARTS 211 AND 217)	

NOTICE

TO:

John Therriault, Assistant Clerk Illinois Pollution Control Board State of Illinois Center 100 West Randolph, Suite 11-500 Chicago, Illinois 60601

SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that I have today filed with the Office of the Pollution Control Board the attached <u>COMMENTS ON SECOND NOTICE</u> of the Illinois Environmental Protection Agency a copy of which is herewith served upon you.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

DATED: June 23, 2009 P.O. Box 19276 Springfield, Illinois 62794-9276 217.782-5544 217.782.9143 (TDD)

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	
SECTION 27 PROPOSED RULES FOR)	
NITROGEN OXIDE (NO _x) EMISSIONS)	R07-19
FROM STATIONARY RECIPROCATING)	(Rulemaking – Air)
INTERNAL COMBUSTION ENGINES AND)	
TURBINES: AMENDMENTS TO 35 ILL.)	
ADM. CODE SECTION 201.146)	
AND PART 217)	

COMMENTS ON SECOND NOTICE

NOW COMES the Illinois Environmental Protection Agency ("Illinois EPA"), by one of its attorneys and, pursuant to 35 Ill. Adm. Code 101.502 and 102.402. Hearings were held on April 9, 2008, and May 7, 2008, the 1st Notice was published on October 31, 2008, 32 Ill. Reg. 17035, and the 2nd Notice was published on May 21, 2009. After consulting with Illinois Environmental Regulatory Group ("IERG") and members of the Pipeline Consortium, the Illinois EPA respectfully submits the following comments on the 2nd notice:

- 1. In subsection (a)(1)(A)(ii) of Section 217.390 Emissions Averaging Plans incorrectly refers to units identified by subsection (a)(1) of Section 217.386, and the reference should be to **subsection (a)(2)** of Section 217.386. Subsection (a)(1)(A)(ii) is intended to address inclusion of units not listed in Appendix G and the applicability of Subpart Q to those units is addressed in subsection (a)(2) of Section 217.386. Subsection (a)(1)(A)(i) addresses inclusion in emissions averaging plans of units listed in Appendix G as subsection (a)(1) of Section 217.386 addresses applicability of Subpart Q to those units.
- 2. In subsection (a)(1)(C) of Section 217.390 there is a period after the final "and" in the subsection and there should not be any punctuation at all.
 - 3. In the equation for subsection(h)(2) of Section 217.390, the subscripts under the

summation sign, and in the variables for Cd and flow should be "j" not "i." See below:

2) The allowable NO_x emissions must be determined as follows:

$$EM_{(all_{(i)})} = \sum_{j=1}^{m} (Cd_j * flow_j *1.194 x 10^{-7})$$

Where:

 $EM_{all(i)}$ = Total mass of allowable NO_x emissions in lbs for a unit.

 $\underline{\text{fFlow}}_{ji}$ = Stack flow (dscf/hr) for a given stack.

 $\underline{Cd_{ji}}$ = Allowable concentration of NO_x (ppmv) specified in

Section 217.388(a) for a given stack, (1.194×10^{-7})

converts to lb/dscf).

j = subscript denoting each hour operation of a given unit.

m = Total number of hours of operation of a unit.

i = Subscript denoting an individual unit and the fuel used.

WHERFORE, for the reasons stated above, the Illinois EPA respectfully submits the above comments.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: <u>/s/</u>

Rachel L. Doctors Assistant Counsel Air Regulatory Unit Division of Legal Counsel

DATED: June 23, 2009

1021 North Grand Avenue, East P.O. Box 19276 Springfield, Illinois 62794-9276 217.782.5544 217.782.9143 (TDD)

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

STATE OF ILLINOIS)	
)	SS
COUNTY OF SANGAMON)	
)	

CERTIFICATE OF SERVICE

I, the undersigned, an attorney, state that I have served electronically the attached <u>COMMENTS ON SECOND NOTICE</u> of the Illinois Environmental Protection Agency upon the following persons:

John Therriault, Assistant Clerk Illinois Pollution Control Board State of Illinois Center 100 West Randolph, Suite 11-500 Chicago, Illinois 60601

SEE ATTACHED SERVICE LIST

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Rachel L. Doctors
Assistant Counsel

Air Regulatory Unit Division of Legal Counsel

Dated: June 23, 2009

1021 North Grand Avenue East Springfield, Illinois 62794-9276 (217) 782-5544 217.782.9143 (TDD)

R07-19 Service List

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