

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

MIDWEST GENERATION, LLC,	)	
	)	
Petitioner,	)	
	)	PCB 13-024
v.	)	(Variance-Air)
	)	
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Respondent.	)	

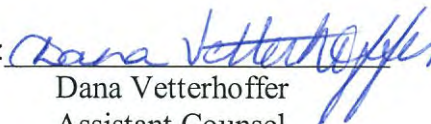
**NOTICE**

To: John Therriault, Assistant Clerk Illinois Pollution Control Board James R. Thompson Center 100 West Randolph, Suite 11-500 Chicago, Illinois 60601-3218	Kathleen C. Bassi Stephen J. Bonebrake Andrew N. Sawula 233 South Wacker Drive, Suite 6600 Chicago, IL 60606
Bradley Halloran, Hearing Officer Illinois Pollution Control Board James R. Thompson Center 100 West Randolph, Suite 11-500 Chicago, Illinois 60601	Christopher Foley 500 West Madison Street, Suite 2640 Chicago, Illinois 60661

PLEASE TAKE NOTICE that I have today filed with the Office of the Pollution Control Board the RECOMMENDATION of the Illinois Environmental Protection Agency, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By:   
Dana Vetterhoffer  
Assistant Counsel  
Division of Legal Counsel

DATED: January 10, 2013  
1021 N. Grand Ave. East  
P.O. Box 19276  
Springfield, IL 62794-9276  
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**RECOMMENDATION**

The Illinois Environmental Protection Agency (“Illinois EPA” or “Agency”), by its attorney, hereby responds to the Petition for Variance (“Petition”) of Midwest Generation, LLC (“MWG” or “Petitioner”) from certain provisions of the Illinois Combined Pollutant Standard (“CPS”) and from provisions in the Illinois Pollution Control Board’s (“Board”) Order in *Midwest Generation, LLC – Waukegan Generating Station v. Illinois Environmental Protection Agency*, PCB 12-121 (Aug. 23, 2012) (“Waukegan Order”). Pursuant to Section 37(a) of the Illinois Environmental Protection Act (“Act”) [415 ILCS 5/37(a) (2010)] and 35 Ill. Adm. Code 104.216, the Illinois EPA neither supports nor objects to the Board granting MWG’s Petition as specified in this Recommendation. In support of its recommendation, the Illinois EPA states as follows.

**I. PROCEDURAL HISTORY**

1. On November 30, 2012, MWG filed its Petition with the Board, requesting a variance from the system-wide sulfur dioxide (“SO<sub>2</sub>”) emission rates set forth in 35 Ill. Adm. Code 225.295(b) from January 1, 2015, to December 31, 2016, with regard to the Crawford Generating Station in Cook County (“Crawford”), the Joliet Generating Station in Will County (“Joliet”), the Powerton Generating Station in Tazewell County (“Powerton”), the Waukegan



Generating Station in Lake County (“Waukegan”), and the Will County Generating Station in Will County (“Will County”). To align with this requested relief, MWG also seeks a variance from, or amendments to, portions of the Waukegan Order in which the Board ordered MWG to comply with the Section 225.295(b) emission rates. Finally, MWG requests a variance from the requirement set forth in 35 Ill. Adm. Code 225.296(a)(2) regarding installation of certain SO<sub>2</sub> control equipment on Waukegan Unit 8 by December 31, 2014; MWG requests a five-month delay in such requirement, to May 31, 2015.

2. Pursuant to the Board’s procedural rules, the Illinois EPA must provide public notice of any petition for variance within 14 days after the filing of the petition. 35 Ill. Adm. Code 104.214(a); *See also*, 415 ILCS 5/37(a) (2010). Additionally, the Illinois EPA must provide written notice of a petition to the County State’s Attorney, the Chairman of the County Board, each member of the General Assembly from the legislative district affected, and any person in the county who has in writing requested notice of variance petitions. 35 Ill. Adm. Code 104.214(b). Pursuant to these requirements, the Illinois EPA published notice of MWG’s Petition in the *Joliet Herald News* on December 12, 2012; the *Peoria Journal Star* on December 11, 2012; the *Waukegan News-Sun* on December 12, 2012; and the *Lawndale News/Westside Times* on December 13, 2012. Consistent with Section 104.214(b), the Illinois EPA mailed notice of the Petition on December 11, 2012.

3. Section 104.214(f) of the Board’s procedural rules provides, “Within 21 days after the publication of notice, the Agency must file with the Board a certification of publication that states the date on which the notice was published and must attach a copy of the published notice.” 35 Ill. Adm. Code 104.214(f). In accordance with this requirement, the Illinois EPA filed a Certification of Publication with the Board on December 13, 2012.



4. To date, the Illinois EPA has received one written comment regarding the Petition. William Uhlman submitted a comment dated December 13, 2012, on behalf of Uhlman Farms in Morton, IL. A copy of the comment is attached as Exhibit A.

5. Unless otherwise ordered by the hearing officer or Board, the Illinois EPA is required to make a recommendation to the Board on the disposition of a petition for variance within forty-five (45) days of the filing of the petition or any amendment thereto, or at least thirty (30) days before a scheduled hearing, whichever is earlier. 35 Ill. Adm. Code 104.216. On December 17, 2012, the Illinois EPA agreed to file its recommendation by January 10, 2013.

## **II. BACKGROUND REGARDING AFFECTED FACILITIES**

6. MWG explains in its Petition that as of 2013, it “will or legally could generate electricity from coal-fired units at five electric generating stations in Illinois, all subject to the CPS,” namely Crawford, Joliet, Powerton, Waukegan, and Will County. Petition at 11, *footnote omitted*. The Illinois EPA accepts and incorporates by reference MWG’s description of its facilities in Section II of its Petition. Petition at 11-15.

7. MWG states that the Board’s Waukegan Order required that MWG shut down the coal-fired electric-generating unit (“EGU”) at Fisk by the end of 2012, and that Fisk is therefore not affected by the requested variance. Petition at 11, footnote 5. The Waukegan Order also required that Petitioner shut down the coal-fired units at Crawford by December 31, 2014. Petition at 12. Petitioner asserts that, while it ceased operation of such units by the end of August 2012, it maintains the permits issued to Crawford and could therefore “legally generate electricity from these coal-fired units through the end of 2014.” Petition at 12.

8. MWG indicates that it intends to comply with the CPS SO<sub>2</sub> rate standards, and with requirements regarding the installation of flue gas desulfurization (“FGD”) equipment on



designated units, through the use of ultra-low sulfur coal and dry sorbent injection of Trona.

Petition at 15. MWG explains that it controls particulate matter ("PM") emissions from its coal-fired boilers via electrostatic precipitators ("ESPs"), a number of which must be upgraded or supplemented by other PM control measures, as injection of Trona increases the particulate loading to ESPs. Petition at 15-16

9. To the best of the Illinois EPA's knowledge, there are no state enforcement actions against MWG currently pending before the Board.

10. Other pending permits associated with Petitioner's facilities are set forth in detail in Exhibit 2 to the Petition, incorporated by reference into the Agency's Recommendation.

### **III. RELIEF REQUESTED**

11. Petitioner requests relief from the following provisions of the CPS:

**Section 225.295 Combined Pollutant Standard: Emissions Standards for NO<sub>x</sub> and SO<sub>2</sub>**

.....

b) Emissions Standards for SO<sub>2</sub>. Beginning in calendar year 2013 and continuing in each calendar year thereafter, the CPS group must comply with the applicable CPS group average annual SO<sub>2</sub> emissions rate listed as follows:

Year	lbs/mmBtu
------	-----------

.....

2015	0.28
------	------

2016	0.195
------	-------

.....

**Section 225.296 Combined Pollutant Standard: Control Technology Requirements for NO<sub>x</sub>, SO<sub>2</sub>, and PM Emissions**

a) Control Technology Requirements for NO<sub>x</sub> and SO<sub>2</sub>.

.....



- 2) On or before December 31, 2014, the owner or operator must either permanently shut down or install and have operational FGD equipment on Waukegan 8;

35 Ill. Adm. Code 225.295(b) and 225.296(a)(2).

12. Consistent with the relief requested above, MWG also requests a variance from, or adjustments to, Condition 1(a) of the Board's Waukegan Order, which provides:

The Board grants Midwest Generation, LLC – Waukegan Generation Station (Midwest Generation) a variance for Waukegan Unit 7 . . . from the requirements of Section 225.296(a)(1) and (c)(1) subject to the following conditions:

1. During the period of the variance, Midwest Generation must:

(a) comply with the system-wide SO<sub>2</sub> emissions rate set forth in Section 225.295(b),

.....

Waukegan Order at 20.

13. In conjunction with these requests, MWG proposes to comply with a system-wide SO<sub>2</sub> annual emission rate of 0.38 lb/mmBtu in 2015 and 2016. Petition at 22. MWG also commits to: 1) achieving a mass SO<sub>2</sub> emission level no greater than 39,000 tons per year in 2015, and no greater than 37,000 tons per year in 2016; 2) emitting no more than 57,000 tons of SO<sub>2</sub> in 2013 and no more than 54,000 tons of SO<sub>2</sub> in 2014; and 3) not operating the Crawford coal-fired units in 2013 and 2014, the two years prior to the date of shutdown required by the Waukegan Order. Petition at 22. MWG will then comply with the SO<sub>2</sub> annual emission rate of 0.15 lb/mmBtu in 2017, as required by the CPS. Petition at 23.

14. Finally, MWG proposes a five-month delay of the requirement to either complete installation of FGD equipment on Waukegan Unit 8 or shut down the unit by December 31, 2014. MWG “commits to not operate Waukegan Unit 8 after December 31, 2014, until installation of the FGD equipment is complete.” Petition at 23.



**IV. FACTS PRESENTED IN THE PETITION**

15. Pursuant to 35 Ill. Adm. Code 104.216(a), the Illinois EPA conducted an investigation of the facts alleged in MWG's Petition, which included discussions with representatives of MWG. To the extent of the information currently available to the Illinois EPA and its level of expertise, the Illinois EPA does not disagree with the facts set forth in MWG's Petition, except as otherwise specified in this Recommendation.

16. As discussed *supra*, the Illinois EPA has received one public comment regarding the Petition.

**V. ENVIRONMENTAL IMPACT**

17. Section 104.216(b)(2) of the Board's rules requires that the Illinois EPA state the location of the nearest air monitoring station maintained by the Agency, where applicable. 35 Ill. Adm. Code 104.216(b)(2). The Illinois EPA confirms the locations of the air monitoring stations relative to MWG's facilities as set forth in Exhibit 1 of the Petition, as of 2010; however, in 2011, several monitors and/or sites included in Exhibit 1 were shut down. Specifically, in Lake County, the ozone monitor and site in Waukegan and the PM<sub>2.5</sub> monitor in Zion were discontinued. In Will County, the SO<sub>2</sub> monitor and site in Joliet and the PM<sub>10</sub> monitor in Joliet were discontinued. Affidavit of Ernest Kierbach, attached as Exhibit B. The 2011 *Illinois Annual Air Quality Report* ("2011 Report") reflects the current locations of the air monitoring stations in Lake, Will, and Tazewell Counties. Affidavit of Ernest Kierbach. The Illinois EPA attaches pertinent portions of the 2011 Report as Exhibit C.<sup>1</sup>

18. Petitioner states that the additional compliance commitments it proposes in connection with its requested relief, as described above, will ensure a net environmental benefit;

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<sup>1</sup> The 2011 Report was most likely not available to Petitioner at the time the Petition for Variance was filed; it was posted on the Illinois EPA's website on or about November 30, 2012.



such commitments will ensure that total SO<sub>2</sub> tons of emissions are less than projected under the CPS. Petition at 2, 8-10.

19. Under MWG's proposed mass emission limits for 2013-2016, total actual tons of SO<sub>2</sub> emissions from units permitted to operate during that period would be "less than expected based upon historical average 2008-2011 heat input and the CPS rates." Petition at 44. Meeting such mass emission limits will provide a cumulative net reduction of 3,181 tons of SO<sub>2</sub> over the four-year term. Petition at 44.

20. Additionally, MWG explains that the early shutdown of Crawford in August 2012 reduced SO<sub>2</sub> emissions by approximately 1,249 tons in that year. Petition at 45. MWG proposes "to commit to no further operation of the coal-fired units at Crawford." Petition at 45.

21. MWG estimates that its proposed SO<sub>2</sub> emission commitments will reduce other pollutants as well, including nitrogen oxides ("NO<sub>x</sub>") by approximately 8,503 tons; PM by 3,169 tons; mercury by 135 pounds; and carbon dioxide ("CO<sub>2</sub>") by 16 million tons. The early shutdown at Crawford also resulted in reductions of these pollutants in 2012. Petition at 45.

22. MWG explains that the five-month delay in either installing FGD equipment on Waukegan Unit 8 or shutting down the unit will have no adverse impact on emissions, as MWG commits that it will not operate the unit during the deferral period. Petition at 45.

23. Petitioner indicates that system-wide reductions of mercury will not be negatively impacted by the requested variance, and PM emissions will not increase; MWG will continue to operate its activated carbon injection systems to control mercury emissions, and will continue to operate its ESPs to control PM. Petition at 47-49.

24. The Illinois EPA notes that the calculated net environmental benefit is smaller than that calculated for previous variances granted to Ameren Energy Resources on September



20, 2012, and to Midwest Generation, LLC on August 23, 2012. *See* Board Order in *Ameren Energy Resources v. Illinois Environmental Protection Agency*, PCB 12-126 (Sept. 20, 2012) (“Ameren Order”); Waukegan Order. These previously granted variances provided for a net environmental benefit of 64,964 and 8,385 tons of SO<sub>2</sub> reductions, respectively, whereas MWG is proposing 3,181 tons of SO<sub>2</sub> reduction in this variance request. Ameren Order at 25; *Midwest Generation, LLC – Waukegan Generating Station v. Illinois Environmental Protection Agency*, PCB 12-121, Petition for Variance at 21. As this is MWG’s second variance request in the same year, it would be preferable that a stronger case be made to again amend a voluntary agreement and expend the considerable resources required by numerous parties to review the merits of the variance request.

25. However, the amounts of creditable SO<sub>2</sub> emission reductions set forth by MWG above are consistent with the data currently available to, and reviewed by, the Illinois EPA during the course of its investigation of MWG’s Petition. In particular, the emission reduction credits available as a result of MWG’s proposed mass emission limitations are quantifiable and creditable. Furthermore, the determination by MWG showing a net environmental benefit in SO<sub>2</sub> emissions over the term of the variance is consistent with the method utilized in similar previous variance requests.

#### **VI. ARBITRARY AND UNREASONABLE HARDSHIP**

26. In considering whether to grant or deny a variance pursuant to Section 35(a) of the Act, the Board is required to determine whether the Petitioner has shown that it would suffer an arbitrary or unreasonable hardship if required to comply with the regulation or permit requirement at issue. 415 ILCS 5/35(a) (2010). The Board’s rules require that Illinois EPA estimate the cost that compliance would impose on the petitioner and on others, as well as the



injury that the grant of the variance would impose on the public. 35 Ill. Adm. Code 104.216(b)(5).

27. MWG claims, “The need for this variance arises from a combination of circumstances that were not foreseen, and could not have been expected to be foreseen, when the CPS was adopted in 2007.” Petition at 29.

28. First, MWG states that “the deregulated status of power generators in Illinois and the uneven playing field created by the imposition of stringent Illinois requirements coupled with the deferral of comparable federal requirements that would have helped to level the competitive playing field” contribute to an arbitrary and unreasonable hardship. Petition at 29.

29. MWG indicates that Illinois has a deregulated energy market, placing Illinois facilities at a competitive disadvantage with facilities located in regulated states, where generators are allowed to recover the costs of capital projects from a consumer base through rates. Petition at 31. Illinois electricity generators, on the other hand, are “entirely dependent on wholesale prices in the competitive power price market for their revenue stream.” Petition at 31.

30. Further, Petitioner claims that certain Illinois emission reduction requirements, including those set forth in the Illinois Clean Air Interstate Rule (“CAIR”) and Illinois Mercury Rule, are significantly more stringent than those in other states, and that federal rules that would have required MWG’s competitors to incur costs similar to those undertaken by MWG have been remanded or vacated. Petition at 4-5, 29-30. For example, “the mercury reduction requirements of the CPS continued to apply after vacatur of the [federal Clean Air Mercury Rule], and the NO<sub>x</sub>, SO<sub>2</sub>, and PM reduction requirements of the CPS . . . , not necessary for compliance with current [National Ambient Air Quality Standards] or other federal requirements, continue to apply in Illinois.” Petition at 30, *footnote omitted*.



31. MWG cites “substantial uncertainty regarding future regulatory requirements that apply to all coal-fired power generators.” Petition at 32. Petitioner states that the federal CAIR “remains the operative transport rule controlling NO<sub>x</sub> and SO<sub>2</sub>,” despite the D.C. Circuit Court’s holding that such program is “fatally flawed.” Petition at 32. The program intended to replace the CAIR, the Cross State Air Pollution Rule (“CSAPR”), has been vacated, and it is uncertain whether the CSAPR will be reinstated or whether the United States Environmental Protection Agency (“USEPA”) will promulgate a “second successor to the CAIR.” Petition at 32-33. MWG argues that “many of [its] competitors that are not subject to the [CPS] can await certainty before making some of the capital decisions and expenditures that Midwest Generation has already begun to make.” Petition at 33. MWG goes to state that “the regulatory ambiguity inherent in knowing that the current program, *i.e.*, the CAIR, is legally insufficient and not knowing what will replace it creates significant uncertainty for funding pollution control work.” Petition at 33.

32. Similarly, MWG explains that the Mercury and Air Toxics Standards (“MATS”), which requires reductions of emissions of mercury, hazardous metals, and hydrogen chloride from coal-and oil-fired EGUs, has been appealed. MWG argues, “The uncertainties inherent in an appeal, including what changes in the relevant requirements might arise as a result of the appeal, make planning more difficult . . . and suggest the need for control plan flexibility.” Petition at 34-35.

33. Second, MWG states that its current financial condition necessitates the granting of the variance. Petition at 36.

34. Petitioner explains that, to date, it has spent more than \$170 million in capital costs for CPS compliance, and that it incurs significant operating costs on an ongoing basis.



Petition at 36. MWG plans to spend approximately \$230 million in 2013 and 2014, “including for planned controls at Powerton Unit 6 and Waukegan Unit 7 to comply with the CPS 2013 and 2014 SO<sub>2</sub> emission rates and the Waukegan Unit 7 control equipment requirements.” Petition at 5-6, 26, 36.

35. MWG estimates that an additional \$210 million in capital expenditures in 2013 and 2014 is necessary to comply with the 2015 and 2016 CPS system-wide SO<sub>2</sub> emission rates and to install FGD equipment on Waukegan Unit 8. Petition at 37.

36. Petitioner explains that it is facing significant financial challenges, due in part to steep reductions in the price of natural gas and the resulting lower energy prices. Petition at 37. Additionally, MWG reports lower “capacity prices and revenues,” estimating an 85% decline in capacity revenues in 2013, compared to 2010 and 2011 revenues. Petition at 37-38. MWG expects capacity revenues to increase, however, in 2014 and 2015. Petition at 38.

37. MWG explains that it has also experienced substantial increases in fuel costs, with as-delivered fuel costs 60% higher in the first nine months of 2012 than during the same period in 2008. Petition at 38. With lower revenues and increased costs, MWG experienced a net loss of \$63 million during the first three quarters of 2012. Petition at 38. Petitioner estimates that operating losses and deficits are likely to continue through 2014. Petition at 38.

38. MWG explains that thus far, it has been largely dependent on its indirect parent corporation, Edison Mission Energy (“EME”), to “fund its cash flow deficits and environmental retrofits,” but that EME’s own financial challenges “throw into question its ability to provide funding to [MWG] to install additional controls required to comply with the CPS system-wide rates in 2015 and 2016.” Petition at 39. Both MWG and EME may need to file for protection under Chapter 11 of the U.S. Bankruptcy Code and/or engage in financial restructuring. Petition



at 39-40. MWG requests time to “work through its financial constraints and operating revenue issues” so that it can comply with the CPS and satisfy its other obligations as well. Petition at 40.

39. MWG states that it has been unable to identify other sources of funding for the capital needed to install controls necessary to achieve the 2015 and 2016 CPS system-wide SO<sub>2</sub> emission rates. Petition at 40. Edison International, EME’s parent company, has stated that it will not invest new funds in MWG, and MWG does not believe that “EME [or MWG] has a reasonable likelihood of securing financing for these additional control costs from an unrelated third party in time to comply with the current CPS schedule.” Petition at 40-41.

40. MWG asserts that, if the requested variance is denied, Petitioner would be faced with two possible compliance alternatives. Petition at 42. MWG could attempt to fund in 2013 and 2014 the additional \$210 million in control costs necessary to comply with the portions of the CPS at issue. MWG explains that funding “would be uncertain at best and such a large additional expenditure could threaten Midwest Generation’s viability and that of its Stations.” Petition at 42. Alternatively, MWG could be forced to significantly curtail generation from other coal-fired units in MWG’s fleet that do not have Trona injection systems installed. Petition at 42. These curtailments could substantially reduce MWG’s revenues, result in penalties under MWG’s capacity contracts, or require regulatory approval to address grid reliability concerns. Petition at 42.

41. MWG indicates that either of these two scenarios could adversely impact its employees, the providers of goods and services purchased by MWG, and state tax revenues. Petition at 43.

42. On the other hand, Petitioner asserts that the effect of granting the variance would be to shift \$210 million in control costs out of 2013 and 2014 and into 2015 and 2016, when



electricity capacity markets are expected to improve and certain federal regulatory requirements will go into effect that will help “level the competitive playing field.” Petition at 6. Deferral of these costs also provides MWG time to “conduct its financial restructuring and benefit from market recovery.” Petition at 6.

43. The Illinois EPA does not disagree that certain Illinois emission reduction requirements are more stringent than those required by other states or under federal rules, but notes that MWG was aware of several of these requirements when the CPS was promulgated and that such provisions in fact formed the backdrop for negotiations between the Illinois EPA and power generators.

44. Based on the information currently available to it and its level of expertise, the Illinois EPA is unable to estimate the cost of MWG’s compliance with the CPS provisions at issue. The Illinois EPA does not believe that any injury to the public will result from the granting of the variance. The Illinois EPA, however, notes the uncertainty associated with the Chapter 11 bankruptcy proceedings entered into by MWG and EME in December 2012. *See Information Regarding Midwest Generation’s Filing Under Chapter 11 of the Federal Bankruptcy Code*, PCB 13-24 (January 8, 2013). Such proceeding may aid MWG’s compliance with current regulations, but it could also potentially hinder MWG’s ability to comply both with the CPS and with any Board Order issued regarding MWG’s requested variance.

## **VII. CONSISTENCY WITH FEDERAL LAW**

45. Pursuant to Section 35 of the Act [415 ILCS 5/35 (2010)] and 35 Ill. Adm. Code 104.208(a), all petitions for variances must be consistent with federal law. MWG states that the requested variance satisfies this requirement. Petition at 50.

46. Petitioner states that it complies with the federal CAIR, and that it will continue to



do so as long as the rule is applicable. Petition at 50.

47. MWG also addresses potential concerns regarding consistency with portions of Illinois' federally-approved State Implementation Plan ("SIP"). On June 24, 2011, the Agency submitted portions of the CPS, including Sections 225.295(b) and 225.296(a)(2), to USEPA for inclusion in Illinois' SIP addressing Best Available Retrofit Technology ("BART") and regional haze. Petition at 50. On July 6, 2012, the USEPA approved Illinois' submittal. Petition at 50.

48. MWG asserts that states are required to comply with the limit reflecting BART no later than five years after SIP approval; compliance for Illinois is therefore due by mid-2017, approximately six months after the end of the requested variance period. Petition at 50. MWG argues that by that time, it will be complying with the 2017 system-wide SO<sub>2</sub> limit set forth in the CPS. Petition at 51.

49. MWG also explains that the Illinois EPA "demonstrated that the system-wide average SO<sub>2</sub> emission rates included in the CPS provide greater reductions than applying the presumptive BART rate to only BART-eligible units by applying the rates to average heat input," an analysis accepted by the USEPA. Petition at 51. Therefore, the increase in emissions due to a higher emissions rate of 0.38 lb/mmBtu "still leaves Illinois compliant with presumptive BART levels." Petition at 51.

50. The Illinois EPA agrees that there is currently no federal authority that precludes granting the instant variance request, and that if granted, the Illinois EPA will submit the variance order to USEPA for approval as a SIP revision.

### **VIII. COMPLIANCE PLAN**

51. Pursuant to Section 104.204(f) of the Board's rules, the Petitioner is required to present a detailed compliance plan in the Petition for Variance. 35 Ill. Adm. Code 104.204(f).



52. MWG's proposed compliance plan entails: 1) limiting system-wide emissions of SO<sub>2</sub> to no more than 57,000 tons in 2013; 54,000 tons in 2014; 39,000 tons in 2015; and 37,000 tons in 2016; 2) reporting to the Agency its system-wide mass SO<sub>2</sub> emissions for 2013, 2014, 2015, and 2016 with each applicable Annual Emissions Report; 3) not operating the coal-fired boilers at Crawford in 2013 and 2014; 4) not operating Waukegan Unit 8 from January 1, 2015, until completion of installation of FGD equipment; 5) completing installation and having operational FGD equipment on Waukegan Unit 8, or permanently shutting down such unit, by May 1, 2015; 5) complying with system-wide annual SO<sub>2</sub> emission rate of 0.38 lb/mmBtu in 2015 and 2016; and 6) complying with the CAIR, Acid Rain Program, and all other applicable requirements during the term of the variance.

**IX. RECOMMENDATION AND CONCLUSION**

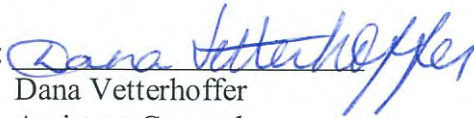
53. Section 37(a) of the Act and Section 104.216(b)(11) of the Board's rules require that Illinois EPA make a recommendation to the Board as to the disposition of the petition. 415 ILCS 5/37(a) (2010) and 35 Ill. Adm. Code 104.216(b)(11). The burden of proof in a variance proceeding is on the Petitioner to demonstrate that compliance with the rule or regulation would impose an arbitrary or unreasonable hardship. *See*, 415 ILCS 5/35(a) (2010) and 35 Ill. Adm. Code 104.238.

54. For the reasons set forth above, the Illinois EPA neither supports nor objects to the Board granting MWG's Petition as specified in this Recommendation.



Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By:   
Dana Vetterhoffer  
Assistant Counsel

DATED: January 10, 2013

1021 North Grand Avenue East  
P. O. Box 19276  
Springfield, IL 62794-9276  
217/782-5544



## EXHIBIT A





Morton, Illinois  
December 13, 2012

Dear Mr. Vetterhoffer,

We recently read your Pollution Variance notice in the Peoria Journal Star.

We are agricultural producers in Tazewell County not far from the Powerton Generating Station. In recent years we have had to apply Sulfur fertilizer to our land to maximize yields. We would favor relaxing the sulfur emissions from the Powerton facility to save expenses for our fertilizer and it would probably save some expense for the generating station.

We will appreciate your consideration.

Sincerely,  
William Uhlman

A handwritten signature in black ink that reads "William Uhlman". The signature is written in a cursive style.

Uhlman Farms  
16 Meadowbrook Lane  
Morton, Illinois 61568



## EXHIBIT B







## EXHIBIT C



State of Illinois  
Illinois Environmental Protection Agency



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# Annual Air Quality Report



Illinois



2011



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November 2012



# **ILLINOIS ANNUAL AIR QUALITY REPORT 2011**

**Illinois Environmental Protection Agency  
Bureau of Air  
1021 North Grand Avenue, East  
P.O. Box 19276  
Springfield, IL 62794-9276**

*Printed on recycled paper*



## APPENDIX A AIR SAMPLING NETWORK

### DESCRIPTION OF THE AIR SAMPLING NETWORK

The Illinois air monitoring network is composed of instrumentation owned and operated by both the Illinois Environmental Protection Agency and by cooperating local agencies. This network has been designed to measure ambient air quality levels in the various Illinois Air Quality Control Regions (AQCR). Historically, each AQCR was classified on the basis of known air pollutant concentrations or, where these were not known, estimated air quality. A map of the AQCR's in Illinois and overlapping into surrounding states can be found at the end of this section.

Many local agencies and volunteers cooperate and support the operation of the Illinois air monitoring network. The network contains both continuous and intermittent instruments. The continuous instruments operate throughout the year, while noncontinuous instruments operate intermittently based on the schedule shown in **Table A1**. This is the official noncontinuous sampling schedule used by the Illinois EPA during 2011.

The Illinois network is deployed along the lines described in the Illinois State Implementation Plan. An updated air monitoring plan is submitted to USEPA each year for review. In accordance with USEPA air quality monitoring requirements as set forth in Title 40 of the Code of Federal Regulations, Part 58 (40 CFR 58), five types of monitoring stations are used to collect ambient air data (SLAMS, NAMS, PAMS, SPMS and NCORE). The types of stations are distinguished from one another on the basis of the general monitoring objectives they are designed to meet.

The SLAMS, NAMS, PAMS, SPMS and NCORE designations for the sites operated within the State of Illinois are provided in the Annual Network Plan ([epa.state.il.us/air/monitoring/index.html](http://epa.state.il.us/air/monitoring/index.html)). All of the industrial sites are considered to be SPMS. **Table A2** is a summary of the distribution of pollutants through the years along with total number of instruments and total number of sites. The Site Directory is listed in **Table A3** and the Monitoring Directory is listed in **Table A4**.

1. **State/Local Air Monitoring Station (SLAMS) Network** - The SLAMS network is designed to meet a minimum of four basis monitoring objectives:
  - a. To determine the highest concentrations expected to occur in the area covered by the network.
  - b. To determine representative concentrations in areas of high population density.
  - c. To determine the air quality impact of significant sources or source categories.
  - d. To determine general background concentration levels.
2. **National Air Monitoring Station (NAMS) Network** - The NAMS network is a subset of stations selected from the SLAMS network with emphasis given to urban and multisource areas. The primary objectives of the NAMS network are:
  - a. To measure expected maximum concentrations.



Table A1  
2011 Noncontinuous Sampling Schedule

JANUARY						
S	M	T	W	R	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

FEBRUARY						
S	M	T	W	R	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28					

MARCH						
S	M	T	W	R	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

APRIL						
S	M	T	W	R	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

MAY						
S	M	T	W	R	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

JUNE						
S	M	T	W	R	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30		

JULY						
S	M	T	W	R	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

AUGUST						
S	M	T	W	R	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

SEPTEMBER						
S	M	T	W	R	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	

OCTOBER						
S	M	T	W	R	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

NOVEMBER						
S	M	T	W	R	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30			

DECEMBER						
S	M	T	W	R	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

13 Every 6 Day Sampling Schedule    22 Every 3 Day Sampling Schedule



- b. To measure concentrations in areas where poor air quality is combined with high population exposure.
  - c. To provide data useable for the determination of national trends.
  - d. To provide data necessary to allow the development of nationwide control strategies.
3. **Photochemical Assessment Monitoring Station (PAMS) Network** - The PAMS network is required in serious, severe, and extreme ozone non-attainment areas to obtain detailed data for ozone, precursors (NO<sub>x</sub> and VOC), and meteorology. VOC and NO<sub>x</sub> sampling is required for the period June - August each year. Ozone sampling occurs during the ozone season, April - October. Network design is based on four monitoring types. In Illinois PAMS are required in the Chicago metropolitan area only.
- a. Type 1 sites are located upwind of the non-attainment area and are located to measure background levels of ozone and precursors coming into the area
  - b. Type 2 sites are located slightly downwind of the major source areas of ozone precursors.
  - c. Type 3 sites are located at the area of maximum ozone concentrations.
  - d. Type 4 sites are located at the domain edge of the non-attainment area and measure ozone and precursors leaving the area.
4. **Special Purpose Monitoring Station (SPMS) Network** - Any monitoring site that is not a designated SLAMS or NAMS is considered a special purpose monitoring station. Some of the SPMS network objectives are as follows:
- a. To provide data as a supplement to stations used in developing local control strategies, including enforcement actions.
  - b. To verify the maintenance of ambient standards in areas not covered by the SLAMS/NAMS network.
  - c. To provide data on noncriteria pollutants.
5. **National Core Station (NCore) Network** - NCore is a multi pollutant network that integrates several advanced measurement systems. It is anticipated that each state operate at least one NCore site by 2011. In Illinois, Northbrook and Bondville will be considered NCore sites. A few of the NCore network objectives are as follows:
- a. Support for development of emission strategies and accountability of emission strategy progress through tracking long-term trends of pollutants and their precursors.
  - b. Support of long-term health assessments that contribute to review of National Standards.
  - c. Support to scientific studies ranging across technological, health and atmospheric process disciplines.
  - d. Support to ecosystem assessments recognizing that national air quality networks benefit ecosystems assessments.



Table A2  
Distribution of Air Monitoring Instruments

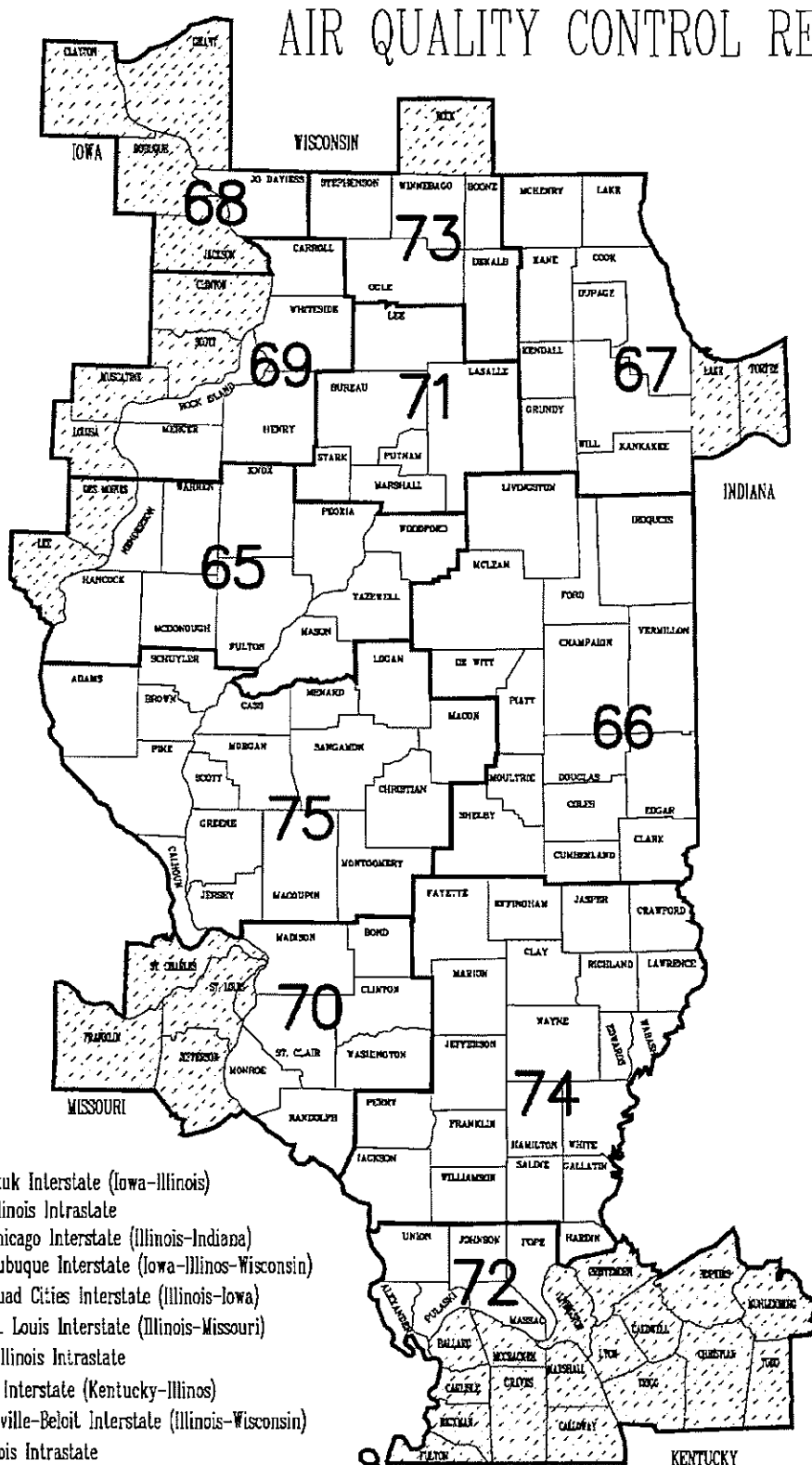
	2011	2010	2009	2008	2007
Particulate Matter (PM <sub>2.5</sub> )	34	38	38	38	38
PM <sub>2.5</sub> Air Quality Index	12	13	13	13	13
PM <sub>2.5</sub> Speciation	5	5	5	5	6
Particulate Matter (PM <sub>10</sub> )	5	17	17	17	17
Total Suspended Particulates (TSP)	13	18	13	13	13
Lead	13	18	13	13	13
Continuous Mercury	1	1	1	1	1
Sulfur Dioxide	15	19	19	20	20
Nitrogen Dioxide	7	7	7	7	8
Ozone	34	36	36	36	37
Carbon Dioxide	1	1	1	1	1
Carbon Monoxide	9	9	9	9	9
Volatile Organic Compounds/Toxics	2	2	2	2	4
Wind Systems	17	18	18	18	19
Solar Radiation	2	9	9	9	9
Meteorology	3	3	3	4	4
Total Instruments	173	214	204	206	212
Total Sites	75	84	77	77	79

There were a number of changes to the monitoring network from 2010 to 2011. Five non-source oriented TSP/Lead monitors were discontinued. The discontinued monitors were: Alsip, Summit, Wood River, Peoria and East St. Louis. A special purpose source oriented TSP/Lead monitor was temporarily installed at the Juarez school in Chicago. Five PM<sub>2.5</sub> monitors were discontinued or site access was lost: Champaign, Chicago Southeast Police Station, Zion, Oglesby and Swansea. A replacement PM<sub>2.5</sub> site in Champaign was established. Twelve PM<sub>10</sub> monitors were discontinued: Alsip, Chicago Carver High School, Midlothian, Blue Island, Summit, Oglesby, Nilwood, Wood River,

Peoria, East St. Louis, Joliet and Carbondale. Four sulfur dioxide monitors were discontinued: Chicago Southeast Police Station, Chicago CTA, Joliet and Indiana discontinued the Rural Wabash County monitor. Two ozone monitors were discontinued: Chicago Willis Tower and Waukegan. A replacement ozone site was established in Thomasboro for site access lost in Champaign. An additional replacement ozone site was established at the Springfield Illinois Building in the State Fairgrounds for access lost at the Springfield Blandco site.



# AIR QUALITY CONTROL REGIONS

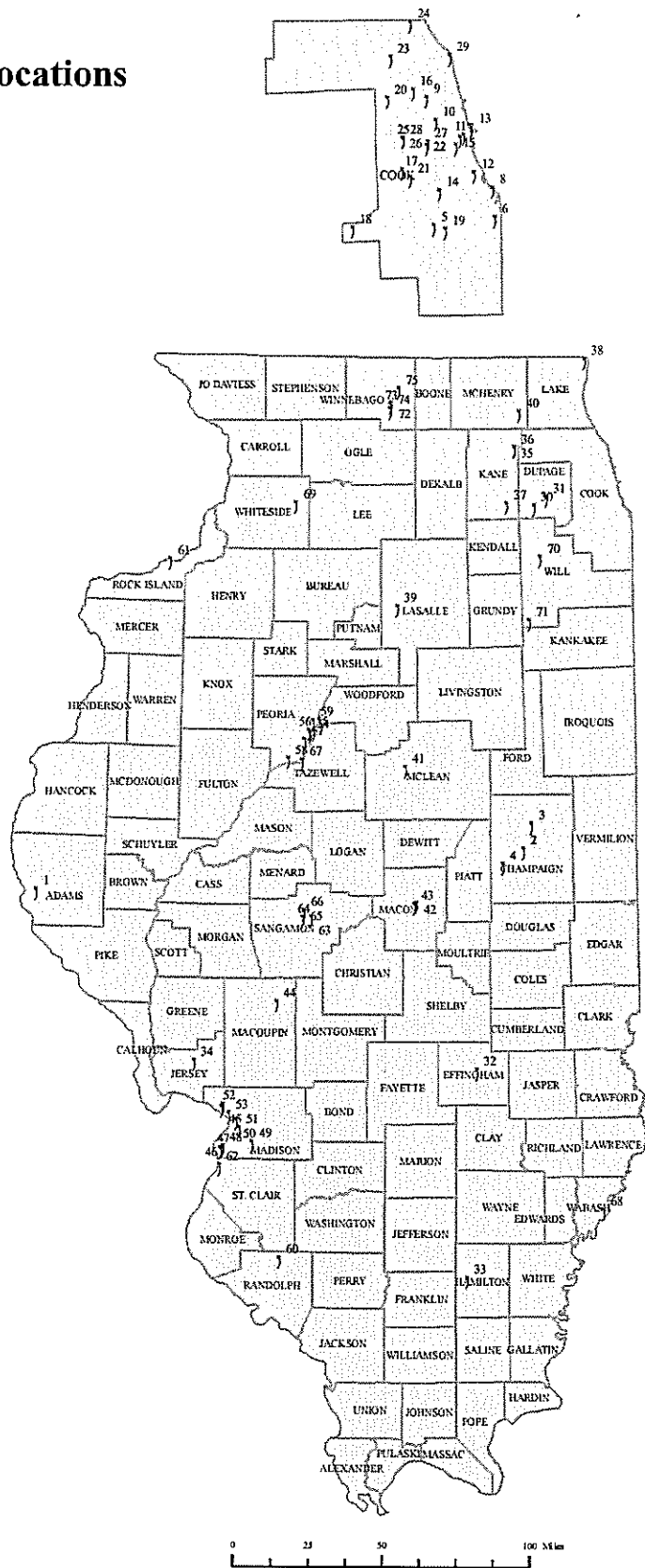


- 65 - Burlington-Keokuk Interstate (Iowa-Illinois)
- 66 - East Central Illinois Intrastate
- 67 - Metropolitan Chicago Interstate (Illinois-Indiana)
- 68 - Metropolitan Dubuque Interstate (Iowa-Illinois-Wisconsin)
- 69 - Metropolitan Quad Cities Interstate (Illinois-Iowa)
- 70 - Metropolitan St. Louis Interstate (Illinois-Missouri)
- 71 - North Central Illinois Intrastate
- 72 - Paducah-Cairo Interstate (Kentucky-Illinois)
- 73 - Rockford-Janesville-Beloit Interstate (Illinois-Wisconsin)
- 74 - Southeast Illinois Intrastate
- 75 - West Central Illinois Intrastate



## Statewide Air Monitoring Site Locations

ID	NAME	COORD	YCOORD	AQS CODE
1	Quincy John Wood Community College	642227.44	4419695.50	170010007
2	Champaign	394297.22	4442244.68	170190006
3	Thomasho	398939.77	4455622.22	170190007
4	Donald SWS Climate Station	382927.63	4434458.00	170191001
5	Alap Village Garage	439028.14	4613506.98	170310001
6	Chicago Washington H.S.	455116.70	4615183.98	170310022
7	Chicago Cermak Pump Station	446450.82	4635956.70	170310026
8	Chicago South Water Filtration Plant	454702.37	4622802.04	170310032
9	Chicago Mayfair Pump Station	437859.32	4646216.44	170310052
10	Chicago Springfield Pump Station	440063.88	4640354.22	170310057
11	Chicago CTA Building	447367.81	4636384.48	170310063
12	Chicago University of Chicago	450011.00	4626726.33	170310064
13	Chicago Jandine Water Plant	449599.78	4638386.72	170310072
14	Chicago Comm ED	440680.96	4622421.39	170310075
15	Perez Elementary School	443458.00	4633988.00	170310110
16	Chicago Taft H.S.	434390.00	4648367.48	170311003
17	Lyons Township Village Hall	430877.97	4628036.70	170311016
18	Lemont IEPA Trailer	417538.46	4613403.03	170311601
19	Blue Island Eisenhower H.S.	442015.58	4612496.03	170312001
20	Schiller Park IEPA Trailer	427390.48	4646283.31	170313103
21	Summit Graves Elementary School	433134.91	4626002.30	170313301
22	Cicero IEPA Trailer	437539.20	4633977.22	170314002
23	Des Plaines Regional Office Building	428543.56	4656797.86	170314007
24	Northbrook Water Plant	433953.24	4665668.78	170314201
25	Maywood 1500 Maybrook Drive Platform	431442.48	4635917.35	170316003
26	Maywood Comm ED Maintenance	431199.07	4635910.07	170316004
27	Cicero Liberty School	437852.27	4634984.65	170316005
28	Maywood 4th District Court Building	431466.96	4635994.08	170316006
29	Evanston Water Pumping Station	444223.82	4636857.88	170317002
30	Naperville City Hall	404309.07	4625007.66	170434002
31	Lisle Morton Arboretum	410890.26	4629582.92	170436001
32	Effingham Central Junior H.S.	366000.19	4325369.00	170491001
33	Knights Prairie Township	357489.72	4216177.00	170650002
34	Jerseyville Illini Junior H.S.	731349.00	4312451.50	170831001
35	Elgin McKinley School	394074.74	4656164.53	170890003
36	Elgin Larsen Junior H.S.	394651.06	4656017.29	170890005
37	Aurora Health Department	389528.14	4626729.16	170890007
38	Zion Camp Logan	433408.66	4702013.37	170971007
39	Ogleby IEPA Trailer	328401.31	4573311.00	170990007
40	Cary Grove H.S.	397480.49	4675110.16	171110001
41	Normal ISU Physical Plant	330837.53	4487250.50	171132003
42	Decatur IEPA Trailer	353194.94	4414769.00	171150013
43	Decatur Mueller	333988.00	4414303.00	171159110
44	Nibaud IEPA Trailer	258043.88	4364498.50	171170002
45	Alton Clara Barton Elementary School	747358.56	4308458.00	171190008
46	Granite City Air Products	747522.88	4286713.50	171190010
47	Granite City Gateway Medical	748300.44	4287426.50	171190024
48	Granite City Fire Station 1	748727.63	4287873.00	171191007
49	Maryville Southwestern Cable TV	242682.59	4290595.00	171191009
50	South Roxana Grade School	755553.88	4301836.50	171191010
51	Edwardsville RAPS Trailer	757101.44	4298007.00	171192007
52	Alton SU Dental Clinic	747734.94	4309900.00	171192009
53	Wood River Water Treatment Plant	751122.13	4305295.00	171193007
54	Peoria Fire Station 8	279707.38	4507329.50	171430024
55	Peoria Commercial Building	279203.50	4508748.50	171430036
56	Peoria City Office Building	281616.22	4508336.50	171430037
57	Bartonville Pump Station	276515.00	4503674.00	171430110
58	Mapleton Caterpillar Plant	267429.00	4493834.00	171430210
59	Peoria Heights H.S.	281679.94	4513723.50	171431001
60	Hooanor Island Site 2 - IEPA Trailer	255745.52	4229049.50	171570001
61	Rock Island Arsenal	707169.75	4598886.00	171613002
62	East St. Louis RAPS Trailer	747238.69	4277551.00	171630010
63	Springfield Sewage Treatment Plant	278158.03	4408840.50	171670006
64	Springfield Federal Building	273312.59	4408832.50	171670008
65	Springfield Illinois Agriculture Building	273728.00	4412449.00	171670012
66	Springfield Illinois Building	274003.78	4412395.53	171670014
67	Pekin Fire Station 3	275274.31	4492892.00	171790004
68	Mount Carmel Division Street	432441.66	4250177.00	171850001
69	Sterling Suk Medical Clinic	275084.00	4629822.00	171950110
70	Juliet Pershing Elementary School	406854.00	4597853.20	171971002
71	Irishwood Comm ED Maintenance	400173.37	4564033.85	171971011
72	Rockford City Hall	327811.72	4681606.50	172010011
73	Rockford Winnebago County Health Department	327392.16	4681107.00	172010013
74	Rockford J. Rubin and Company	327440.00	4678637.00	172010110
75	Loves Park Maple Elementary School	332121.41	4688981.00	172012003





## 2011 Site Directory

AQS ID	County	City	Address	MSA / Area Represented	Latitude Longitude	Owner / Operator
17-001-0007	Adams	Quincy	John Wood Comm. College 1301 South 48th St.	Quincy, IL-MO	+39.91540937 -91.33586832	IL EPA
17-019-1001	Champaign	Bondville	State Water Survey Township Rd. 500 E.	Champaign-Urbana, IL	+40.05224171 -88.37254916	IL EPA/SWS
17-019-0006	Champaign	Champaign	Ameren Substation 904 N. Walnut	Champaign-Urbana, IL	+40.1237962 -88.229531	IL EPA
17-019-0007	Champaign	Thomasboro	North Thomas St.	Champaign-Urbana, IL	+40.244953 -88.188176	IL EPA
17-031-0001	Cook	Alsip	Village Garage 4500 W. 123rd St.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.6709919 -87.7324569	CCDEC
17-031-2001	Cook	Blue Island	Eisenhower High School 12700 Sacramento	Chicago-Naperville-Michigan City, IL-IN-WI	+41.66210943 -87.69646652	CCDEC
17-031-0026	Cook	Chicago	Cermak Pump Station 735 W. Harrison	Chicago-Naperville-Michigan City, IL-IN-WI	+41.87372041 -87.64532569	CCDEC
17-031-0076	Cook	Chicago	Com Ed Maintenance Bldg. 7801 Lawndale	Chicago-Naperville-Michigan City, IL-IN-WI	+41.75139998 -87.71348815	CCDEC
17-031-0063	Cook	Chicago	CTA Building 320 S. Franklin	Chicago-Naperville-Michigan City, IL-IN-WI	+41.877628 -87.635027	IL EPA
17-031-0072	Cook	Chicago	Jardine Water Plant 1000 E. Ohio	Chicago-Naperville-Michigan City, IL-IN-WI	+41.89581227 -87.60768329	IL EPA
17-031-0052	Cook	Chicago	Mayfair Pump Station 4850 Wilson Ave.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.96548483 -87.74992806	CCDEC
17-031-0110	Cook	Chicago	Perez Elementary School 1241 19th St.	H.G. Kramer	+41.855917 -87.658419	CCDEC
17-031-0032	Cook	Chicago	South Water Filtration Plant 3300 E. Cheltenham Pl.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.75583241 -87.54534967	CCDEC
17-031-0057	Cook	Chicago	Springfield Pump Station 1745 N. Springfield Ave.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.91286212 -87.72272345	CCDEC
17-031-1003	Cook	Chicago	Taft High School 6545 W. Hurlbut St	Chicago-Naperville-Michigan City, IL-IN-WI	+41.98433233 -87.7920017	CCDEC
17-031-0064	Cook	Chicago	University of Chicago 5720 S. Ellis Ave.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.79078688 -87.60164649	CCDEC
17-031-0022	Cook	Chicago	Washington High School 3535 E. 114th St.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.68716544 -87.53931548	CCDEC
17-031-4002	Cook	Cicero	Cook County Trailer 1820 S. 51st Ave	Chicago-Naperville-Michigan City, IL-IN-WI	+41.85524313 -87.7524697	CCDEC



## 2011 Site Directory

AQS ID	County	City	Address	MSA / Area Represented	Latitude Longitude	Owner / Operator
17-031-6005	Cook	Cicero	Liberty School 13th St. & 50th Ave.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.86442642 -87.74890238	CCDEC
17-031-4007	Cook	Des Plaines	Regional Office Building 9511 W. Harrison St	Chicago-Naperville-Michigan City, IL-IN-WI	+42.06028469 -87.86322543	IL EPA
17-031-7002	Cook	Evanston	Water Pumping Station 531 E. Lincoln	Chicago-Naperville-Michigan City, IL-IN-WI	+42.06185724 -87.67416716	IL EPA
17-031-1601	Cook	Lemont	Cook County Trailer 729 Houston	Chicago-Naperville-Michigan City, IL-IN-WI	+41.66812034 -87.99056969	CCDEC
17-031-1016	Cook	Lyons Township	Village Hall 50th St & Glencoe	Chicago-Naperville-Michigan City, IL-IN-WI	+41.80116701 -87.8319447	IL EPA
17-031-6003	Cook	Maywood	4th District Court Building 1500 Maybrook Dr.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.87220158 -87.8261648	CCDEC
17-031-6006	Cook	Maywood	4th District Court Building 1500 Maybrook Dr.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.8728972 -87.82587249	CCDEC
17-031-6004	Cook	Maywood	Com Ed Maintenance 1505 S. First Ave	Chicago-Naperville-Michigan City, IL-IN-WI	+41.87211684 -87.82908025	CCDEC
17-031-4201	Cook	Northbrook	Northbrook Water Plant 750 Dundee Rd.	Chicago-Naperville-Michigan City, IL-IN-WI	+42.13999619 -87.79922692	IL EPA
17-031-3103	Cook	Schiller Park	IEPA Trailer 4743 Mannheim Rd.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.96519348 -87.87626473	IL EPA
17-031-3301	Cook	Summit	Graves Elementary School 60th St. & 74th Ave.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.78276601 -87.80537679	CCDEC
17-043-6001	DuPage	Lisle	Morton Arboretum Route 53	Chicago-Naperville-Michigan City, IL-IN-WI	+41.81304939 -88.0728269	IL EPA
17-043-4002	DuPage	Naperville	City Hall 400 S. Eagle St.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.77107094 -88.15253365	IL EPA
17-049-1001	Effingham	Effingham	Central Junior High School Route 45 South	Effingham, IL	+39.06715932 -88.54893401	IL EPA
17-065-0002	Hamilton	Knight Prairie	Ten Mile Creek DNR Office State Route 14	Mt. Vernon, IL	+38.08215516 -88.6249434	IL EPA
17-083-1001	Jerseyville	Jerseyville	Illini Junior High School Liberty St. & County Rd.	St. Louis, MO-IL	+39.11053947 -90.32407986	IL EPA
17-089-0007	Kane	Aurora	Health Department 1240 N. Highland	Chicago-Naperville-Michigan City, IL-IN-WI	+41.78471651 -88.32937361	IL EPA



## 2011 Site Directory

AQS ID	County	City	Address	MSA / Area Represented	Latitude Longitude	Owner / Operator
17-089-0005	Kane	Elgin	Larsen Junior High School 665 Dundee Rd.	Chicago-Naperville-Michigan City, IL-IN-WI	+42.04914776 -88.27302929	IL EPA
17-089-0003	Kane	Elgin	McKinley School 258 Lovell St.	Chicago-Naperville-Michigan City, IL-IN-WI	+42.050403 -88.28001471	IL EPA
17-097-1007	Lake	Zion	Camp Logan Illinois Beach State Park	Chicago-Naperville-Michigan City, IL-IN-WI	+42.4675733 -87.81004705	IL EPA
17-099-0007	La Salle	Oglesby	308 Portland Ave.	Ottawa-Streator, IL	+41.29301454 -89.04942498	IL EPA
17-115-0013	Macon	Decatur	IEPA Trailer 2200 N. 22nd	Decatur, IL	+39.86683389 -88.92559445	IL EPA
17-115-0110	Macon	Decatur	Mueller 1226 E. Garfield	Mueller	+39.862542 -88.940894	IL EPA
17-117-0002	Macoupin	Nilwood	IEPA Trailer Heaton & Dubois	St. Louis, MO-IL	+39.39607533 -89.80973892	IL EPA
17-119-0008	Madison	Alton	Clara Barton School 409 Main St.	St. Louis, MO-IL	+38.89018605 -90.14803114	IL EPA
17-119-2009	Madison	Alton	SIU Dental Clinic 1700 Annex St.	St. Louis, MO-IL	+38.90308534 -90.14316803	IL EPA
17-119-0010	Madison	Granite City	Air Products 15th & Madison	St. Louis, MO-IL	+38.69443831 -90.15395426	IL EPA
17-119-1007	Madison	Granite City	Fire Station #1 23rd & Madison	St. Louis, MO-IL	+38.70453426 -90.13967484	IL EPA
17-119-0024	Madison	Granite City	Gateway Medical Center 2100 Madison Ave.	St. Louis, MO-IL	+38.7006315 -90.14476267	IL EPA
17-119-1009	Madison	Maryville	Southwest Cable TV 200 W. Division	St. Louis, MO-IL	+38.72657262 -89.95996251	IL EPA
17-119-1010	Madison	South Roxana	South Roxana Grade School Michigan St.	St. Louis, MO-IL	+38.82830334 -90.05843262	IL EPA
17-119-3007	Madison	Wood River	Water Treatment Plant 54 N. Walcott	St. Louis, MO-IL	+38.86066947 -90.10585111	IL EPA
17-111-0001	McHenry	Cary	Cary Grove High School 1st St. & Three Oaks Rd.	Chicago-Naperville-Michigan City, IL-IN-WI	+42.22144166 -88.24220734	IL EPA
17-113-2003	McLean	Normal	ISU Physical Plant Main & Gregory	Bloomington-Normal, IL	+40.51873537 -88.99689571	IL EPA
17-143-0110	Peoria	Bartonville	Pump Station Sanitation Rd.	Keystone Steel & Wire	+40.653703 -89.643375	IL EPA
17-143-0210	Peoria	Mapleton	Residential 9725 W. Wheeler Rd.	Caterpillar-Mapleton Plant	+40.562633 -89.747114	IL EPA
17-143-0037	Peoria	Peoria	City Office Building 613 N.E. Jefferson	Peoria, IL	+40.697007 -89.58473722	IL EPA
17-143-0036	Peoria	Peoria	Commercial Building 1005 N. University	Peoria, IL	+40.70007197 -89.61341375	IL EPA
17-143-0024	Peoria	Peoria	Fire Station #8 MacArthur & Hurlburt	Peoria, IL	+40.68742038 -89.60694277	IL EPA
17-143-1001	Peoria	Peoria Heights	Peoria Heights High School 508 E. Glen Ave.	Peoria, IL	+40.74550393 -89.58586902	IL EPA
17-157-0001	Randolph	Houston	IEPA Trailer Hickory Grove & Fallview	Houston, IL	+38.17627761 -89.78845862	IL EPA



Table A3

## 2011 Site Directory

AQS ID	County	City	Address	MSA / Area Represented	Latitude Longitude	Owner / Operator
17-161-3002	Rock Island	Rock Island	Rock Island Arsenal 32 Rodman Ave.	Davenport-Moline-Rock Island, IA-IL	+41.51472697 -90.51735026	IL EPA
17-167-0012	Sangamon	Springfield	Agricultural Building State Fair Grounds	Springfield, IL	+39.83192087 -89.64416359	IL EPA
17-167-0014	Sangamon	Springfield	Illinois Building State Fair Grounds	Springfield, IL	+39.831522 -89.640926	IL EPA
17-167-0008	Sangamon	Springfield	Federal Building 6th St. & Monroe	Springfield, IL	+39.7993092 -89.64760789	IL EPA
17-167-0006	Sangamon	Springfield	Sewage Treatment Plant 3300 Mechanicsburg Rd.	Springfield, IL	+39.80061377 -89.59122532	IL EPA
17-163-0010	St. Clair	East St. Louis	RAPS Trailer 13th & Tudor	St. Louis, MO-IL	+38.61203448 -90.16047663	IL EPA
17-179-0004	Tazewell	Pekin	Fire Station #3 272 Derby	Peoria, IL	+40.55646017 -89.65402807	IL EPA
17-185-0001	Wabash	Mount Carmel	Division St.	Gibson County, IN-Mt. Carmel, IL	+38.397276 -87.773631	Indiana
17-195-0110	Whiteside	Sterling	Sauk Medical Clinic 705 West 3rd St.	Sterling Steal Co.	+41.788383 -89.706728	IL EPA
17-197-1011	Will	Braidwood	Com Ed Training Center 36400 S. Essex Rd.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.22153707 -88.19096718	IL EPA
17-197-1002	Will	Joliet	Pershing Elementary School Midland & Campbell Sts.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.52688509 -88.11647381	IL EPA
17-201-2001	Winnebago	Loves Park	Maple Elementary School 1405 Maple Ave.	Rockford, IL	+42.33498222 -89.0377748	IL EPA
17-201-0011	Winnebago	Rockford	City Hall 425 E. State	Rockford, IL	+42.26767353 -89.08785092	IL EPA
17-201-0013	Winnebago	Rockford	Health Department 201 Division St.	Rockford, IL	+42.26308105 -89.09276716	IL EPA
17-201-0110	Winnebago	Rockford	J. Rubin & Company 305 Peoples Ave.	Gunite Corporation	+42.240867 -89.091467	IL EPA



Table A4

## 2011 Monitoring Directory

AQS ID	City	CO	CO2	NO2	Ozone	PM10	PM2.5	PM2.5 AQI	PM2.5 Speciation	SO2	VOC	Toxics	TSP Pb, Metals	Wind System	Solar	Meteorological
17-001-0007	Quincy															
17-019-0004	Champaign															
17-019-0006	Champaign N. Walnut															
17-019-0007	Thomasboro															
17-019-1001	Bondville															
17-031-0001	Alsip															
17-031-0022	Chicago Washington High School					C										
17-031-0026	Chicago Cernak Pump Station															
17-031-0032	Chicago South Water Filtration															
17-031-0042	Chicago Willis Tower															
17-031-0050	Chicago Southeast Police Station															
17-031-0052	Chicago Mayfair Pump Station															
17-031-0057	Chicago Springfield Pump Station															
17-031-0060	Chicago Carver High School															
17-031-0063	Chicago CTA Building															
17-031-0064	Chicago University of Chicago															
17-031-0072	Chicago Jardine Water Plant															
17-031-0076	Chicago Com Ed Maintenance															
17-031-0110	Chicago Perez Elementary															
17-031-1003	Chicago Taft High School															
17-031-1016	Lyons Township					C										
17-031-1601	Lemont															
Active Monitor	Site/Monitor Installed	Site/Monitor Removed				C = Continuous PM10 T = Trace level monitor										



Table A4

## 2011 Monitoring Directory

AQS ID	City	CO	CO2	NO2	Ozone	PM10	PM2.5	PM2.5 AQI	PM2.5 Speciation	SO2	VOC	Toxics	TSP Pb, Metals	Wind System	Solar	Meteorological
17-031-1901	Midlothian															
17-031-2001	Blue Island															
17-031-3103	Schiller Park															
17-031-3301	Summit															
17-031-4002	Cicero Cook County Trailer															
17-031-6005	Cicero Liberty School															
17-031-4007	Des Plaines															
17-031-4201	Northbrook <sup>1</sup>	T								T						
17-031-6003	Maywood 4 <sup>th</sup> District Court															
17-031-6004	Maywood Com Ed Maintenance															
17-031-6006	Maywood 4 <sup>th</sup> District Court															
17-031-7002	Evanston															
17-043-4002	Naperville															
17-043-6001	Lisle															
17-049-1001	Effingham															
17-065-0002	Knight Prairie															
17-077-0004	Carbondale															
17-083-1001	Jerseyville															
17-089-0003	Elgin McKinley School															
17-089-0005	Elgin Larsen Jr. High School															
17-089-0007	Aurora															
17-097-1002	Waukegan															
Active Monitor	Site/Monitor Installed	Site/Monitor Removed				C = Continuous PM10 T = Trace level monitor 1 = Northbrook also measures NOy and black carbon										



Table A4

## 2011 Monitoring Directory

AQS ID	City	CO	CO2	NO2	Ozone	PM10	PM2.5	PM2.5 AQI	PM2.5 Speciation	SO2	VOC	Toxics	TSP Pb, Metals	Wind System	Solar	Meteorological
17-097-1007	Zion															
17-099-0007	Oglesby					C										
17-111-0001	Cary															
17-113-2003	Normal															
17-115-0013	Decatur IEPA Trailer															
17-115-0110	Decatur Mueller															
17-117-0002	Nilwood															
17-119-0008	Alton Clara Barton Elementary															
17-119-2009	Alton SIU Dental Clinic															
17-119-0010	Granite City Air Products															
17-119-0024	Granite City Gateway Medical Center															
17-119-1007	Granite City Fire Station #1					C										
17-119-1009	Maryville															
17-119-1010	South Roxana															
17-119-2007	Edwardsville															
17-119-3007	Wood River															
17-143-0024	Peoria Fire Station #8															
17-143-0036	Peoria Commercial Building															
17-143-0037	Peoria City Office Building															
17-143-0110	Bartonville															
17-143-0210	Mapleton															
17-143-1001	Peoria Heights															
17-157-0001	Houston															
Active Monitor	Site/Monitor Installed	Site/Monitor Removed				C = Continuous PM10 T = Trace level monitor										



Table A4

## 2011 Monitoring Directory

AQS ID	City	CO	CO2	NO2	Ozone	PM10	PM2.5	PM2.5 AQI	PM2.5 Speciation	SO2	VOC	Toxics	TSP Pb, Metals	Wind System	Solar	Meteorological
17-161-3002	Rock Island															
17-163-0010	East St. Louis															
17-163-4001	Swansea															
17-167-0006	Springfield Sewage Treatment Plant															
17-167-0008	Springfield Federal Building															
17-167-0012	Springfield Agricultural Building															
17-167-0013	Springfield Blandoo Building															
17-167-0014	Springfield Illinois Building															
17-179-0004	Pekin															
17-185-0001	Mount Carmel															
17-185-1001	Rural Wabash County															
17-195-0110	Sterling															
17-197-0013	Joliet Water Plant West															
17-197-1002	Joliet Pershing Elementary															
17-197-1011	Braidwood															
17-201-0011	Rockford City Hall															
17-201-0013	Rockford Health Department															
17-201-0110	Rockford J. Rubin & Company															
17-201-2001	Loves Park															
Active Monitor	Site/Monitor Installed	C = Continuous PM10 T = Trace level monitor														



**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

MIDWEST GENERATION, LLC,	)	
	)	
Petitioner,	)	
	)	PCB 13-024
v.	)	(Variance-Air)
	)	
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Respondent.	)	

**CERTIFICATE OF SERVICE**

I, the undersigned, an attorney, state that I have served electronically the attached RECOMMENDATION of the Illinois Environmental Protection Agency upon the following persons:

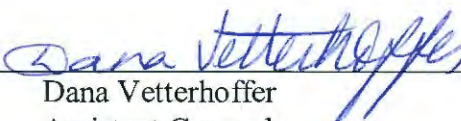
To: John Therriault, Assistant Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph, Suite 11-500  
Chicago, Illinois 60601-3218

Kathleen C. Bassi  
Stephen J. Bonebrake  
Andrew N. Sawula  
233 South Wacker Drive, Suite 6600  
Chicago, IL 60606

Bradley Halloran, Hearing Officer  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph, Suite 11-500  
Chicago, Illinois 60601

Christopher Foley  
500 West Madison Street, Suite 2640  
Chicago, Illinois 60661

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By:   
Dana Vetterhoffer  
Assistant Counsel  
Division of Legal Counsel

DATED: January 10, 2013

1021 N. Grand Ave. East  
P.O. Box 19276  
Springfield, IL 62794-9276  
(217) 782-5544