

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

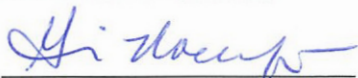
ILLINOIS POWER HOLDINGS, LLC and	)	
AMERENENERGY MEDINA VALLEY	)	
COGEN, LLC,	)	
	)	
Petitioners,	)	
	)	
AMEREN ENERGY RESOURCES, LLC,	)	
	)	PCB 14-10
Co-Petitioner,	)	(Variance - Air)
	)	
v.	)	
	)	
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Respondent.	)	

**NOTICE**

TO: John Therriault, Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph St., Suite 11-500  
Chicago, IL 60601

**SEE ATTACHED SERVICE LIST**

PLEASE TAKE NOTICE that I have today filed with the Office of the Pollution Control Board the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S RESPONSE TO THE ILLINOIS POLLUTION CONTROL BOARD'S QUESTION, a copy of which is herewith served upon you.

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY  
By:   
Gina Roccaforte  
Assistant Counsel  
Division of Legal Counsel

DATED: September 16, 2013

1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
217.782.5444  
217.782.9143 (TDD)

**THIS FILING IS SUBMITTED  
ON RECYCLED PAPER**

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

ILLINOIS POWER HOLDINGS, LLC and	)	
AMERENENERGY MEDINA VALLEY	)	
COGEN, LLC,	)	
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Co-Petitioner,	)	(Variance - Air)
	)	
v.	)	
	)	
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Respondent.	)	

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S RESPONSE TO THE ILLINOIS POLLUTION CONTROL BOARD'S QUESTION**

NOW COMES the Illinois Environmental Protection Agency ("Illinois EPA"), by its attorney, and pursuant to the Hearing Officer's Order dated September 12, 2013, respectfully submits the Illinois EPA's Response to the Illinois Pollution Control Board's follow-up question provided in Attachment A of that Order.

**QUESTION FOR THE AGENCY**

**SIP Revisions**

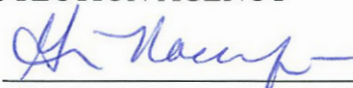
6. ***Please comment on whether SIP revisions that would include the requested variance would require assessing annual mass emissions under the variance. If so, please comment on the merits of including an annual mass emissions cap consistent with petitioners' projections in Table 2 of the petition along with the proposed mitigation SO<sub>2</sub> emission rate in the variance conditions (as mentioned in the August 14, 2013 Hearing Officer Order question #1).***

Yes, as was required in the SIP revision for the previously granted Ameren variance, the Illinois EPA would need to assess annual mass SO<sub>2</sub> emissions in a revised SIP revision for the requested variance. However, there is no increase in SO<sub>2</sub> emissions from the requested variance over what is currently allowed in the variance previously granted to Ameren. Therefore, the Illinois EPA does not need to rely upon any annual mass emissions cap associated with the requested variance for approval of a SIP revision. In

fact, the Illinois EPA believes that the additional SO<sub>2</sub> reductions from the shutdown of E.D. Edwards Unit 1 will provide even greater SO<sub>2</sub> reductions than those contained in the previous SIP submittal for the already granted Ameren variance.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: 

Gina Roccaforte  
Assistant Counsel  
Division of Legal Counsel

DATED: September 16, 2013

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

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

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 AMERENENERGY MEDINA VALLEY )  
 COGEN, LLC, )  
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 Petitioners, )  
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 AMEREN ENERGY RESOURCES, LLC, )  
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 Co-Petitioner, )  
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 v. )  
 )  
 ILLINOIS ENVIRONMENTAL )  
 PROTECTION AGENCY, )  
 )  
 Respondent. )

PCB 14-10  
(Variance - Air)

**AFFIDAVIT**

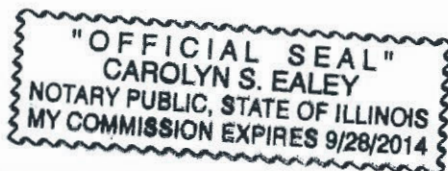
I, Jim Ross, under oath, hereby state that I am the Manager of the Division of Air Pollution Control in the Bureau of Air of the Illinois Environmental Protection Agency. I assisted in preparing and have reviewed the Illinois Environmental Protection Agency's Response to the Illinois Pollution Control Board's Question and the facts stated therein are true and correct to the best of my knowledge and belief.

  
 \_\_\_\_\_  
 Jim Ross  
 Manager  
 Division of Air Pollution Control  
 Bureau of Air  
 Illinois Environmental Protection Agency

SUBSCRIBED AND SWORN TO BEFORE ME

This 16<sup>th</sup> day of September, 2013

  
 \_\_\_\_\_  
 Notary Public



STATE OF ILLINOIS	)	
	)	
COUNTY OF SANGAMON	)	SS
	)	
	)	

**CERTIFICATE OF SERVICE**

I, the undersigned, an attorney, state that I have served electronically the attached ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S RESPONSE TO THE ILLINOIS POLLUTION CONTROL BOARD'S QUESTION upon the following person:

John Therriault, Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph St., Suite 11-500  
Chicago, IL 60601

and electronically and by mailing it by first-class mail from Springfield, Illinois, with sufficient postage affixed to the following persons:

SEE ATTACHED SERVICE LIST

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,



Gina Roccaforte  
Assistant Counsel  
Division of Legal Counsel

DATED: September 16, 2013

1021 North Grand Avenue East  
P.O. Box 19276  
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217.782.9143 (TDD)

**SERVICE LIST**

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