

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CALPINE CORPORATION)	
(ZION ENERGY CENTER),)	
)	
Petitioner,)	
)	
)	PCB 16-112
)	(Variance-Air)
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent.)	

NOTICE

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

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/ Charles E. Matoesian
Assistant Counsel

DATED: September 22, 2016
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276
217/782-5544

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APPEARANCE

The undersigned hereby enters his appearance as an attorney on behalf of the Illinois Environmental Protection Agency.

Respectfully submitted,

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ANSWERS TO ILLINOIS POLLUTION CONTROL BOARD QUESTIONS

The Illinois Environmental Protection Agency (“Illinois EPA”) hereby files these answers to questions posed by the Illinois Pollution Control Board in its Order dated September 1, 2016. The questions are quoted below, with Illinois EPA’s responses in bold.

Answers of the Illinois EPA to Questions Posed by the Board

1. As described above, Zion Energy Center could contribute to an exceedance of SO₂ NAAQS under the variance. If granted, Illinois EPA must submit Calpine’s variance to the U.S. Environmental Protection Agency for approval.

In Illinois EPA’s judgment, if Zion could contribute to an exceedance of the SO₂ NAAQS, would USEPA approve the requested variance? Would the variance affect Illinois’ obligations under the Clean Air Act?

The Illinois EPA has modeled Zion Energy Center’s potential additional emissions due to this variance, and has found that the source will not cause nonattainment of the SO₂ NAAQS. While it is true that any emissions of SO₂ can be considered to “contribute” to an exceedance, the amount of emissions in this case is very small and does not cause any concern for the Illinois EPA.

Any variance that must be submitted to USEPA as a State Implementation Plan revision will “affect Illinois’ obligations under the Clean Air Act.” However, this variance is not expected to otherwise affect Illinois’ obligations. The Agency expects that the variance will be approvable to USEPA.

2. Illinois EPA agreed to model SO₂ air quality related to Midwest Generation’s coal-fired power plant in Waukegan, Lake County. Illinois EPA is required to submit its modeling results to USEPA by January 13, 2017.

Is the Zion Energy Center located within the area being investigated and modeled for this purpose?

Yes, the Zion Energy Center is located within the modeling domain (30-kilometer radius) for the Midwest Generation - Waukegan Generating Station.

Are SO₂ emissions from Zion being modeled for this or any other future SO₂ nonattainment area designation recommendation?

Because of its very low SO₂ emissions, the modeling protocol submitted to USEPA, as required under the Data Requirements Rule, does not include the Zion Energy Center as a background source that will be discretely modeled. Rather, the small amount of emissions from this facility will be incorporated via monitored background concentrations.

Has Illinois EPA identified Zion as a culpable source to any area currently being investigated and modeled for a future SO₂ area designation?

No.

Information Related to Questions Posed to Zion by the Board

In addition, although several questions were addressed to Zion, to the extent Zion may not have access to the required information, the Illinois EPA answers as follows.

In response to the third bullet point under question number one of the “BOARD QUESTIONS FOR CALPINE CORPORATION,” the following areas are “currently in nonattainment for SO₂”:

- a. Lemont Nonattainment Area - Lemont Township (Cook County), Lockport Township (Will County), and DuPage Township (Will County)**
- b. Pekin Nonattainment Area - Pekin Township (Tazewell County), Cincinnati Township (Tazewell County), and Hollis Township (Peoria County)**
- c. Alton Nonattainment Area - Within Alton Township, the area east of Corporal Belchik Memorial Expressway, south of East Broadway, south of Route 3, and north of Route 143 (Madison County)**
- d. Williamson Nonattainment Area - Williamson County**

In response to the last bullet point under question number one of the “BOARD QUESTIONS FOR CALPINE CORPORATION,” the following areas will be modeled for “future SO₂ area designation recommendations.” The radius of each modeling domain will depend on individual factors affecting each area, and range from 15 kilometers to 50 kilometers.

- a. Kincaid Generation LLC (Christian County)**
- b. Rain CII Carbon LLC (Crawford County)**
- c. Midwest Generation LLC – Waukegan (Lake County)**

**d. Dynegy Midwest Generation – Baldwin (Randolph County) and Prairie State
Generating Station (Washington County)**

**e. U.S. Steel – Granite City Works / Gateway Energy & Coke Company
(Madison County)**

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, the undersigned, an attorney, affirm that I have served the attached Appearance and Answers to Pollution Control Board Questions of the Illinois Environmental Protection Agency upon the following person(s) by e-mailing it to the e-mail address(es) indicated below:

Bradley Halloran, Hearing Officer
Illinois Pollution Control Board
brad.halloran@illinois.gov

Heidi M. Whidden
Dir., Env. Svcs. East Region
Calpine
hwhidden@calpine.com

Richard M. Saines
BAKER & McKENZIE
Richard.M.Saines@bakernet.com

I affirm that my e-mail address is charles.matoesian@illinois.gov; the number of pages in the email transmission is 6; and the e-mail transmission took place today before 5:00 p.m.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
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By: /s/ Charles E. Matoesian
Assistant Counsel

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