

MAR 31 2006

STATE OF ILLINOIS
Pollution Control Board

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS**

MIDWEST GENERATION, LLC,)
JOLIET GENERATING STATION,)
)
 Petitioner,)
)
v.)
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
 Respondent.)

PCB 2006-58
(CAAPP Permit Appeal)

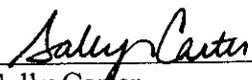
To: Dorothy Gunn, Clerk
Illinois Pollution Control Board
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

Bradley P. Halloran
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233 South Wacker Drive
Chicago, Illinois 60606

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board the **ADMINISTRATIVE RECORD** of the Respondent, Illinois Environmental Protection Agency, a copy of which is herewith served upon the assigned Hearing Office and the attorney for the Petitioner.

Respectfully submitted by,



Sally Carter
Assistant Counsel

Dated: March 29, 2006
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

RECEIVED
CLERK'S OFFICE

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STATE OF ILLINOIS
Pollution Control Board

MIDWEST GENERATION, LLC,)
JOLIET GENERATING STATION,)
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Petitioner,)
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v.)
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ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
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Respondent.)

PCB 2006-58
(CAAPP Permit Appeal)

ADMINISTRATIVE RECORD

The Respondent, Illinois Environmental Protection Agency ("Illinois EPA"), by and through its attorneys in accordance with the Illinois Pollution Control Board's ("Board") Order of February 16, 2006, files its Administrative Record ("Administrative Record") in this cause.

Acting in accordance with its authority under the CAAPP provisions of the Illinois Environmental Protection Act (hereinafter "Act"), 415 ILCS 5/39.5(2004), the Illinois EPA issued a CAAPP permit to Midwest Generation on September 29, 2005. The permit authorized the operation of an electrical power generation facility known as the Joliet Generating Station. The facility is located at 1800 Channahon Road Road in Joliet, Illinois. On November 2, 2005, Petitioner filed a petition before the Board challenging certain permit conditions contained within the Clean Air Act Permit Program ("CAAPP") permit issued by the Illinois EPA.

In accordance with the Board's February 16, 2006, Order, a hard copy of the Administrative Record and four copies of the Administrative Record on compact discs are filed with the Board. The Administrative Record consists of, among other things,

Midwest Generation's permit application materials, various draft permits issued for public comment, correspondence between the Illinois EPA and both Midwest Generation and the United States Environmental Protection Agency, public comments received during the multiple public comment periods, various construction and operating permits issued to Midwest Generation, internal agency memorandums, and miscellaneous general reference materials.

Given the considerable amount of paginated materials and the resources required to provide the Administrative Record to the Board and opposing counsel, the Illinois EPA generally did not copy duplicative materials (e.g., general reference and Electric Energy - AUGI model documents) for each of the twenty-one records for the related CAAPP appeals. As the General Reference Material is applicable to all twenty-two appeals, the Illinois EPA has provided one hard copy of the General Reference Materials and four copies of the General Reference Materials on compact discs with the Board for all the related appeals. These documents are listed at the end of this Administrative Record under the heading "General Materials."

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Proposed Permit (USEPA Review) Revised Proposed Permit, dated August 2005. **[Pages 513-655]**

Proposed Permit (USEPA Review) Proposed CAAPP Permit, dated October 6, 2003. **[Pages 656-792]**

Extension Denial Letter notifying that the comments must be postmarked by August 1, 2005. **[Page 793]**

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Draft Revised Proposed Permit, dated July 2005. **[Pages 795-936]**

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Revised Proposed CAAPP Permit Draft, dated December 2004. **[Pages 938-1091]**

July 19, 2005, Letter. **[Pages 1092-1097]**

August 15, 2005, Letter. **[Pages 1098-1103]**

Final Permit and Calculation Sheet, dated September 2005. **[Pages 1104-1266]**

September 29, 2005, Letter. **[Pages 1267-1273]**

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Miscellaneous Correspondence & Application Material. **[Pages 1318-1391]**

- * Letter from Bharat Mathur to Scott Miller, dated August 24, 1994. **[Page 1318]**
- * Application for CAAPP Permit, dated received September 7, 1995. **[Pages 1319-1323]**
- * Fee Determination for CAAPP Permit, dated received September 7, 1995. **[Pages 1324-1325]**
- * Compliance Certification, dated received September 7, 1995. **[Page 1326-1334]**
- * Telephone Log Sheet, dated September 14 and 18, 1995. **[Page 1335]**
- * Completeness Review Sheet, Application Deemed Incomplete, dated October 11, 1995. **[Pages 1336-1337]**
- * CAAPP Application Completeness Determination and Source Fee Determination, Determination dated October 23, 1995. **[Pages 1338-1340]**
- * Cost Estimates for NO_x Emissions Reduction for All Coal-Fired Utility Boilers, date updated 3/5/97. **[Page 1341]**
- * Request for Ownership Change for CAAPP Permit, dated January 9, 2000. **[Pages 1342-1346]**

- * National Emission Standards for Hazardous Air Pollutants for 40 CFR Part 63 NESHAP, Section 112J, Affected Sources Initial Notification Report, dated received April 24, 2002. **[Pages 1347-1348]**
- * Letter from Basil G. Constantelos, Director of Environmental, Health and Safety, Midwest Generation, to Clean Air Markets Official, USEPA, regarding Revised NOx Budget Account Certificate of Representation Forms, dated May 31, 2002, and attachments. **[Pages 1349-1358]**
- * Power Plant Initiative - February 2003, dated 2/3/03. **[Pages 1359-1360]**
- * Letter from Basil G. Constantelos to Jim Ross, Manager, Permit Section, Illinois EPA, regarding Notification of NOx Averaging for Compliance with IAC 217 Subpart V and Submittal of Form 640-CAAPP, dated April 3, 2003, and attachment. **[Pages 1361-1380]**
- * Memorandum from David Kolaz to Renee Cipriano regarding Approval for Public Hearings for Coal-Fired Power Plant Permits, dated June 2, 2003. **[Pages 1381-1382]**
- * Email from Jim Ross, Acting Permit Section Manager, Illinois EPA to Stacey Coburn, USEPA, regarding comments on CAAPP permits, dated 7/10/03 9:10 AM. **[Page 1383]**
- * Letter from Basil Constantelos to Jim Ross regarding NOx SIP Call and Application for Budget Permit for Electrical Generating Units, dated July 15, 2003, and attachment. **[Pages 1384-1389]**
- * Information concerning Greenhouse Gases, dated 7/31/03. **[Pages 1390-1391]**

Letter from Basil Constantelos to John Cashman, Permit Section, Illinois EPA, regarding Joliet Title V Application Certification Resubmittal, dated August 27, 2003, and attached Title V Permit Application for Joliet Generation Station, dated September 20, 2002. **[Pages 1392-2556]**

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- * Letter from Basil Constantelos to John Cashman, Permit Section, Illinois EPA, regarding Joliet Title V Application Certification Resubmittal, dated August 27, 2003, and attachments. **[Pages 2557-2570]**
- * Handwritten notes of Laurel Kroack regarding Title V permits, dated November 21, 2003. **[Pages 2571-2572]**

- * Facsimile from Keith Harley to Julie Armitage, dated November 24, 2003. **[Pages 2573-2578]**
- * Note and attachment from Chris Romaine to Dave Kolaz, dated 12/10/03. **[Pages 2579-2586]**
- * Email from Bruce Nilles to Renee Cipriano and David Kolaz dated 1/12/2004 including "Draft 1.12.03" and handwritten notes of Laurel Kroack. **[Pages 2587-2588]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM, with handwritten notes. **[Pages 2589-2590]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM. **[Page 2591]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Laurel Kroack. **[Page 2592]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Chris Romaine. **[Pages 2593-2599]**
- * Handwritten notes of Laurel Kroack beginning "Enviros & Title V Power Plants," dated 2/3/2004. **[Pages 2600-2601]**
- * Meeting sign-in sheet, dated 2/4/04. **[Page 2602]**
- * Memorandum from Laurel Kroack to Renee Cipriano regarding Title V permits for coal-fired power plants, including Midwest Generation, dated February 4, 2004. **[Pages 2603-2606]**
- * Email from Chris Romaine to Natalie Locke and Steve Whitworth, dated 2/19/2004, 2:41 PM. **[Page 2607]**
- * Handwritten notes of Manish Patel regarding meeting with USEPA on coal-fired power plant CAAPPs dated 2/24/04, 1:30 PM. **[Page 2608]**
- * Handwritten notes of Manish Patel regarding conference call with coal-utility facilities, dated 2/25/04, 1:30 PM. **[Page 2609]**
- * Handwritten notes regarding call with USEPA for MidGen coal fired CAAPP, dated 3/2/04. **[Page 2610]**
- * Facsimile "Midwest Generation L.L.C., Voluntary Opacity Improvement Protocol, dated April 22, 2004. **[Pages 2611-2612]**

- * Memorandum from David Kolaz to Renee Cipriano regarding status and time line for Title V Power Plant Issuance, dated April 28, 2004. **[Pages 2613-2614]**
- * Handwritten notes of Laurel Kroack regarding meeting with USEPA concerning power plant permits, dated 5/6/04. **[Pages 2615-2617]**
- * Handwritten notes of Chris Romaine beginning “ ‘Midwest Generation’- IEPA - USEPA,” dated 5-6-04. **[Pages 2618-2619]**
- * Facsimile from Bill Constantelos to Dave Kolaz, dated May 10, 2004, and attached letter to Renee Cipriano from Fred McCluskey, dated May 10, 2004. **[Pages 2620-2643]**
- * Memorandum from Laurel Kroack to Cheryl Newton regarding Utility Permit Issuance Timeline, dated June 1, 2004. **[Page 2644]**
- * Mail from Manish Patel to Chris Romaine, John Cashman and Kunj Patel regarding Utility CAAPP permits dated 6/16/2004 and handwritten notes of Manish Patel. **[Page 2645]**
- * Facsimile from Chris Romaine to Stacey Coburn, USEPA, Region V, dated 6/29/04, providing facsimile from Basil Constantelos to Dave Kolaz, dated May 10, 2004, and attachments. **[Pages 2646-2659]**
- * Facsimile cover sheet from Chris Romaine to Stacey Coburn, dated 6/29/04. **[Page 2660]**
- * Email from Chris Romaine to John Cashman, Ross Cooper, Kunj Patel and Manish Patel, dated 7/24/04, 5:08 AM, with handwritten notes from Chris Romaine. **[Page 2661]**
- * Handwritten notes of Laurel Kroack regarding Title V, dated 8/30/04. **[Pages 2662-2664]**
- * Letter from Bharat Mathur, Acting Regional Administrator, USEPA, to Renee Cipriano, Illinois EPA, dated December 2, 2004. **[Pages 2665-2667]**
- * Email from Chris Romaine to Manish Patel regarding Power Plant CAAPP Permits, dated 12/7/2004, 4:14 AM, and handwritten notes of Manish Patel. **[Page 2668]**
- * Letter from American Bottom Conservancy, et al. to Renee Cipriano regarding procedure to issue Title V permits for coal-fired power plants, dated January 6, 2005. **[Pages 2669-2670]**

- * Letter from Donald Sutton to American Bottom Conservancy, et al., dated January 13, 2005, responding to letter dated January 6, 2005. **[Pages 2671-2682]**
- * Letter from Laurel Kroack, Acting Chief, Bureau of Air, Illinois EPA, to Steve Rothblat, USEPA, dated January 18, 2005. **[Pages 2683-2690]**
- * Handwritten notes of Laurel Kroack regarding utility, title V, dated 1/26/05. **[Pages 2691-2692]**
- * Notes of Laurel Kroack regarding March 21, 2005, call with feds. **[Pages 2693-2694]**
- * Notes of Julie Armitage regarding May 10, 2005, meeting with the feds. **[Pages 2695-2700]**

Letter from Basil Constantelos to Donald Sutton regarding Joliet Station Title V Application Update, dated May 24, 2005, and attached Title V Permit Application Update-Revision, revised May 20, 2005. **[Pages 2701-2873]**

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- * Letter from Basil Constantelos to Donald Sutton regarding Joliet Station Title V Application Update, dated May 24, 2005, and attachments. **[Page 2874]**
- * List of Michael Reed, dated June 9, 2005. **[Page 2875]**
- * Draft Instructions, dated June 23, 2005. **[Pages 2876-2886]**
- * Note and attachments from Michael Reed to Chris Romaine, dated July 17, 2005. **[Pages 2887-2898]**
- * Miscellaneous documents regarding request for extension of time to comment on the Preliminary Responsiveness Summary and Draft Revised Proposed Title V Permits. **[Pages 2899-2904]**
- * Handwritten notes of Michael Reed, dated August 1, 2005. **[Pages 2905-2909]**
- * Notes of Michael Reed regarding feds conference call, dated September 16, 2005. **[Pages 2910-2911]**
- * Email exchange between Chris Romaine and Bill Constantelos regarding testing of PM emissions, dated 9/20/05-9/23/05. **[Pages 2912-2913]**
- * Handwritten notes of Laurel Kroack, dated September 23, 2005. **[Page 2914]**

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Documentation Relative to Proceedings Before the Administrator, USEPA. **[Pages 5417-5855]**

Miscellaneous documents pertaining to Midwest Generation's response to the USEPA's Section 114(a) of the Clean Air Act request including the trade secret appeal pending before the Illinois Pollution Control Board, *Midwest Generation EME, LLC v. Illinois EPA, PCB 4-185*. For purposes of this administrative record, the Illinois EPA requests that the Board take judicial notice of the administrative record previously filed before the Board in *PCB 4-185*. **[Pages 5856-6158]**

Miscellaneous documents pertaining to Commonwealth Edison's response to the USEPA's Section 114(a) of the Clean Air Act request including the trade secret appeal pending before the Illinois Pollution Control Board, *Commonwealth Edison Company v. Illinois EPA, PCB 4-215*. For purposes of this administrative record, the Illinois EPA requests that the Board take judicial notice of the administrative record previously filed before the Board in *PCB 4-215*. **[Pages 6159-6200]**

Startup, Combustion Evaluation & Alternative Fuel Memorandums. **[Pages 6201-6208]**

- * Memorandum from Michael T. Reed, CAAPP Unit Manager, to Power Plant File regarding Provisions Requiring Detailed Records of Startups After a Certain Timeframe, dated September 23, 2005. **[Pages 6201-6203]**
- * Memorandum from Michael Reed to Power Plant File regarding Provisions Requiring Combustion Evaluations, dated September 23, 2005. **[Pages 6204-6205]**
- * Memorandum from Chris Romaine, Manager, Utility Unit to Power Plant File regarding Provisions for Burning Materials Other Than Coal in Power Boilers, dated September 28, 2005. **[Pages 6206-6208]**

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- * Letter from Keith Harley, Chicago Legal Clinic, to Renee Cipriano, Director, Illinois EPA, requesting public notice for Joliet, dated March 5, 2003. **[Pages 6209-6210]**
- * Letter from Fred W. McCluskey, Vice President of Technical Services and Partnership Management, Midwest Generation, to Charles Matoesian, Hearing Officer, regarding Comments on the Draft Title V Permit for the Crawford Generating Station, dated September 24, 2003, and attachments. **[Pages 6211-6394]**
- * Letter from Keith Harley, Chicago Legal Clinic, to Charles Matoesian, Illinois EPA, Hearing Officer, providing comments to the Joliet permit, dated September 25, 2003, and attachments. **[Pages 6395-6744]**
- * Letter from Basil Constantelos to Charles Matoesian regarding Comments on the Proposed Title V Permit for the Joliet Generating Station, dated November 20, 2003, and attachments. **[Pages 6745-6871]**
- * Electronic mail from Stacey Coburn, Region V, USEPA, to John Cashman, Jim Ross and Rizwan Syed, dated 11/24/2003, 4:48 PM. **[Page 6872]**
- * Letter from Fred W. McCluskey, Vice-President, Technical Services and Partnership Management, Midwest Generation, to Charles Matoesian regarding Supplement Comments for the Crawford Generating Station, dated January 17, 2005, and attachments. **[Pages 6873-7062]**

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- * Email from Scott Miller to John Cashman regarding Title V permit conditions - Joliet continued, Fisk and Crawford, dated 6/25/03, 8:19 AM. **[Pages 7063-7064]**

- * Letter from Kathleen C., Bassi, Sonnenschein Nath & Rosenthal LLP, to Charles Matoesian, regarding CAAPP Permit Hearings for Midwest Generation Electrical Generating Stations, dated September 19, 2003. **[Pages 7065-7066]**
- * Letter from Citizens Against Ruining the Environment to Charles Matoesian regarding Midwest Generation EME, LLC Title V/CAAP/ Title I Permit Application, dated received September 29, 2003. **[Pages 7067-7072]**
- * Letter from Basil Constantelos to Brad Frost and Charles Matoesian regarding Request for Extension of Time for Commenting on the Preliminary Responsiveness Summary and Draft Revised Proposed Title V Permits Posted July 19, 2005, dated July 25, 2005. **[Page 7073]**
- * Letter from Charles Matoesian to Basil Constantelos regarding Request for Extension of Time for Commenting on Proposed Title V Permits Posted On July 19, 2005, dated July 28, 2005. **[Page 7074]**
- * Letter from Fred McCluskey to Charles Matoesian regarding Comments on the Draft Revised Proposed Permits Posted July 19, 2005, and on the Preliminary Responsiveness Summary, dated August 1, 2005. **[Pages 7075-7097]**
- * Letter from Keith Harley, Chicago Legal Clinic, to Charles Matoesian regarding CAAPP Permits for the Fisk, Crawford, Will County, Joliet and Waukegan Coal-Fired Power Plants, dated August 1, 2005. **[Pages 7098-7227]**

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- * Comments of the Sierra Club and American Bottom Conservancy, Summer 2003. **[Pages 7228-7266]**
- * Letter from Matthew J. Dunn, Division Chief, Environmental Enforcement/Asbestos Litigation Division, Illinois Attorney General's Office, to Charles Matoesian regarding Coal Powered Generation Plants Title V Permit Applications, dated September 29, 2003. **[Pages 7267-7281]**
- * Email from Stacey Coburn to Chris Romaine regarding Enhanced coal-fired boiler CAAPP permits, dated April 12, 2004, 4:53 PM, and handwritten notes of Manish Patel. **[Pages 7282-7284]**
- * Email from Verna Owen to Mr. Holmstead, dated 12/14/2004 12:09:23 PM. **[Pages 7285-7286]**
- * Letter from Paula Becker Wheeler, Assistant Attorney General, Illinois Attorney General's Office, to Charles Matoesian providing comments to Revised Proposed

CAAPP Permits for 22 Coal-Fired Power Plants, dated January 14, 2005, and attachments. **[Pages 7287-7672]**

- * Letter from Keith Harley, Attorney at Law, Chicago Legal Clinic, Inc., to Charles Matoesian regarding Revised Proposed CAAPP Permits for Coal-Fired Power Plants, dated January 14, 2005, and attachments. **[Pages 7673-8058]**
- * Letter from Ann Alexander, Environmental Counsel to Attorney General Lisa Madigan, to Charles Matoesian regarding Comments on draft revised proposed CAAPP permits, dated August 1, 2005, and attachments. **[Pages 8059-8165]**

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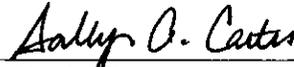
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Respectfully submitted by,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,



Sally A. Carter
Assistant Counsel

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217)782-5544

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of March 2006, I did send, by ^{CMSCourier}~~first class mail~~,
~~postage prepaid~~, one (1) original and four (4) copies of the following instrument entitled

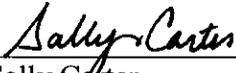
ADMINISTRATIVE RECORD to:

Dorothy Gunn, Clerk
Illinois Pollution Control Board
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

and a true and correct copy of the same foregoing instrument, by First Class Mail with postage thereon fully paid and deposited into the possession of the United States Postal Service, to:

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

Sheldon A. Zabel
Kathleen C. Bassi
Stephen J. Bonebrake
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