

APR 17 2006

STATE OF ILLINOIS
Pollution Control Board

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

SOUTHERN ILLINOIS POWER)
COOPERATIVE,)
)
 Petitioner,)
)
 v.)
 ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
 Respondent.)

PCB 2006-61
(CAAPP Permit Appeal)

NOTICE

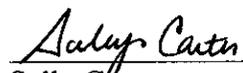
To: Dorothy Gunn, Clerk
Illinois Pollution Control Board
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
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Sheldon A. Zabel
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Schiff Hardin, LLP
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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: April 14, 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

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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 Southern Illinois Power Cooperative ("SIPCo") on September 29, 2005. The permit authorized the operation of an electrical power generation facility known as the Marion Generating Station. The facility is located at 10825 Lake of Egypt Road in Marion, 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,

SIPCo's permit application materials, various draft permits issued for public comment, correspondence between the Illinois EPA and both SIPCo and United States Environmental Protection Agency, public comments received during the multiple public comment periods, various construction and operating permits issued to SIPCo, 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."

Contents of the Administrative Record

Miscellaneous documents pertaining to Draft Permit and Public Notice. **[Pages 1-199]**

Preliminary Responsiveness Summary, dated August 15, 2005. **[Pages 200-243]**

Proposed Permit (USEPA Review) Revised Proposed Permit, dated August 2005. **[Pages 244-432]**

Proposed Permit (USEPA Review) Proposed CAAPP Permit, dated June 9, 2003. **[Pages 433-606]**

Extension Denial Letter notifying that the comments must be postmarked by August 1, 2005. **[Page 607]**

Coal-Fired CAAPP Repreproposed Notification. **[Page 608]**

Draft Revised Proposed Permit, dated July 2005. **[Pages 609-797]**

Coal-Fired Revised Proposed CAAPP Notification. **[Page 798]**

Revised Proposed CAAPP Permit Draft, dated December 2004. **[Pages 799-981]**

July 19, 2005, Letter. **[Pages 982-987]**

August 15, 2005, Letter. **[Pages 988-993]**

Final Permit and Calculation Sheet, dated September 2005. **[Pages 994-1189]**

September 29, 2005, Letter. **[Pages 1190-1196]**

Final Responsiveness Summary. **[Pages 1197-1240]**

1990 Clean Air Act: Title V Permit Application, Southern Illinois Power Cooperative, Marion, Illinois, Submitted September 6, 1995 by Leonard F. Hopkins, P.E. **[Pages 1241-1675]**

199 856 AAC 03 95 09 0124 **[Pages 1676-1901]**

- * Compliance Certification, dated received September 8, 1995. **[Pages 1676-1680]**
- * Fee Determination for CAAPP Permit, dated received September 8, 1995. **[Pages 1681-1682]**
- * Application for CAAPP Permit, dated received September 8, 1995. **[Pages 1683-1687]**
- * Telephone Log Sheet, dated October 3, 1995. **[Page 1688]**
- * Letter from Leonard Hopkins to Mike Elbl, Air Pollution Permits, providing a signed 200-CAAPP form, dated October 16, 1995, and attachment. **[Pages 1689-1690]**
- * Completeness Review Sheet, Application Deemed Incomplete, dated October 20, 1995. **[Pages 1691-1692]**
- * CAAPP Application Completeness Determination and Fee Determination, Determination dated October 23, 1995. **[Pages 1693-1698]**
- * Cost Estimates for NOx Emissions Reduction for All Coal-Fired Utility Boilers, date updated 3/5/97. **[Page 1699]**
- * Power Plant Initiative - February 2003, dated 2/3/03. **[Pages 1700-1701]**

- * Memorandum from David Kolaz to Renee Cipriano regarding Approval for Public Hearings for Coal-Fired Power Plant Permits, dated June 2, 2003. **[Pages 1702-1703]**
- * 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 1704]**
- * Letter from Richard G. Myott, Planning and Environmental Department Manager, SIPCo, to USEPA, Clean Air Markets Division, regarding permanent shutdown of Marion Unit 1, Unit 2 and Unit 3, dated July 24, 2003, and attachment. **[Pages 1705-1711]**
- * Information concerning Greenhouse Gases, dated 7/31/03. **[Pages 1712-1713]**
- * Handwritten notes of Laurel Kroack regarding Title V permits, dated November 21, 2003. **[Pages 1714-1715]**
- * Facsimile from Keith Harley to Julie Armitage, dated November 24, 2003. **[Pages 1716-1721]**
- * Note and attachment from Chris Romaine to Dave Kolaz, dated 12/10/03. **[Pages 1722-1729]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM, with handwritten notes. **[Pages 1730-1731]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM. **[Page 1732]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Laurel Kroack. **[Page 1733]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Chris Romaine. **[Pages 1734-1740]**
- * Handwritten notes of Laurel Kroack beginning "Enviros & Title V Power Plants," dated 2/3/2004. **[Pages 1741-1742]**
- * Memorandum from Laurel Kroack to Renee Cipriano regarding Title V permits for coal-fired power plants, including Midwest Generation, dated February 4, 2004. **[Pages 1743-1746]**
- * Email from Chris Romaine to Natalie Locke and Steve Whitworth, dated 2/19/2004, 2:41 PM. **[Page 1747]**

- * Handwritten notes of Manish Patel regarding meeting with USEPA on coal-fired power plant CAAPPs dated 2/24/04, 1:30 PM. **[Page 1748]**
- * Handwritten notes of Manish Patel regarding conference call with coal-utility facilities, dated 2/25/04, 1:30 PM. **[Page 1749]**
- * Memorandum from David Kolaz to Renee Cipriano regarding status and time line for Title V Power Plant Issuance, dated April 28, 2004. **[Pages 1750-1751]**
- * Handwritten notes of Laurel Kroack regarding meeting with USEPA concerning power plant permits, dated 5/6/04. **[Pages 1752-1754]**
- * 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 1755-1778]**
- * Memorandum from Laurel Kroack to Cheryl Newton regarding Utility Permit Issuance Timeline, dated June 1, 2004. **[Page 1779]**
- * 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 1780-1793]**
- * Facsimile from Chris Romaine to Stacey Coburn providing draft turbine language, dated 6/29/04. **[Pages 1794-1819]**
- * Facsimile cover sheet from Chris Romaine to Stacey Coburn, dated 6/29/04. **[Page 1820]**
- * 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 1821]**
- * Handwritten notes of Laurel Kroack regarding Title V, dated 8/30/04. **[Pages 1822-1824]**
- * Letter from Bharat Mathur, Acting Regional Administrator, USEPA, to Renee Cipriano, Illinois EPA, dated December 2, 2004. **[Pages 1825-1827]**
- * 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 1828]**
- * 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 1829-1830]**

- * Letter from Donald Sutton to American Bottom Conservancy, et al., dated January 13, 2005, responding to letter dated January 6, 2005. **[Pages 1831-1842]**
 - * Letter from Laurel Kroack, Acting Chief, Bureau of Air, Illinois EPA, to Steve Rothblat, USEPA, dated January 18, 2005. **[Pages 1843-1850]**
 - * Handwritten notes of Laurel Kroack regarding utility, title V, dated 1/26/05. **[Pages 1851-1852]**
 - * Notes of Laurel Kroack regarding March 21, 2005, call with feds. **[Pages 1853-1854]**
 - * Notes of Julie Armitage regarding May 10, 2005, meeting with the feds. **[Pages 1855-1860]**
 - * List of Michael Reed, dated June 9, 2005. **[Page 1861]**
 - * SIPCo Releases Facility Report, dated June 13, 2005. **[Pages 1862-1863]**
 - * Draft Instructions, dated June 23, 2005. **[Pages 1864-1874]**
 - * Note and attachments from Michael Reed to Chris Romaine, dated July 17, 2005. **[Pages 1875-1886]**
 - * Miscellaneous documents regarding request for extension of time to comment on the Preliminary Responsiveness Summary and Draft Revised Proposed Title V Permits. **[Pages 1887-1893]**
 - * Handwritten notes of Michael Reed, dated August 1, 2005. **[Pages 1894-1898]**
 - * Notes of Michael Reed regarding feds conference call, dated September 16, 2005. **[Pages 1899-1900]**
 - * Handwritten notes of Laurel Kroack, dated September 23, 2005. **[Page 1901]**
- Model Permit Developments, Summer 2003. **[Pages 1902-2050]**
- Miscellaneous Emails Relevant to SIPCo. **[Pages 2051-2715]**
- Miscellaneous Undated Notes of Illinois EPA Staff. **[Pages 2716-2778]**
- Miscellaneous Undated Documents Likely Generated by Illinois EPA. **[Pages 2779-2832]**
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Miscellaneous Lists or Drafting Documents. [Pages 3011-3166]

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Documentation Relative to Proceedings Before the Administrator, USEPA. [Pages 4112-4458]

Startup, Combustion Evaluations & Alternative Fuel Memorandums [Pages 4459-4466]

- * 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 4459-4461]
- * Memorandum from Michael Reed to Power Plant File regarding Provisions Requiring Combustion Evaluations, dated September 23, 2005. [Pages 4462-4463]
- * 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 4464-4466]

Comments Specific to SIPCo [Pages 4467-5330]

- * Letter from Leonard Hopkins to Donald Sutton providing comments of SIPCo to the draft CAAPP permit, dated September 26, 2003, and attachments. [Pages 4467-4665]
- * Electronic mail from Leonard Hopkins to Donald Sutton providing comments of SIPCo to the draft CAAPP permit, dated September 26, 2003, and attachments. [Pages 4666-4852]
- * Electronic mail from Stacey Coburn, USEPA to Roston Cooper, Syed Rizwan and Jim Ross, Illinois EPA, providing comments on Southern Illinois Coop proposed CAAPP 95090124, dated 11/24/2003, 5:06 PM. [Page 4853]
- * Electronic mail from Richard Myott to Charles Matoesian providing Comments on the Revised Proposed Permit for the Marion Generating Station, dated 1/18/05 1:17 PM. [Pages 4854-4856]

- * Letter from Richard Myott to Charles Matoesian providing Comments on the Revised Proposed Permit for the Marion Generating Station, dated January 18, 2005. **[Pages 4857-5313]**
- * Electronic mail exchange between Chris Romaine and Leonard Hopkins regarding request for additional days to provide comments to CAAPP permits, dated 7/20/05-7/24/05. **[Page 5314]**
- * Letter from Charles Matoesian to Leonard Hopkins regarding Request for Extension of Time for Commenting on Proposed Title V Permits Posted on July 19, 2005, dated July 28, 2005. **[Page 5315]**
- * Letter from Richard Myott to Charles Matoesian providing comments on the Draft Revised Proposed Permits Posted July 19, 2005, and on the Preliminary Responsiveness Summary, dated August 1, 2005. **[Pages 5316-5330]**

General Comments **[Pages 5331-6268]**

- * Comments of the Sierra Club and American Bottom Conservancy, Summer 2003. **[Pages 5331-5369]**
- * 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 5370-5384]**
- * 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 5385-5387]**
- * Email from Verna Owen to Mr. Holmstead, dated 12/14/2004 12:09:23 PM. **[Pages 5388-5389]**
- * 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 5390-5775]**
- * 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 5776-6161]**
- * 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 6162-6268]**

Proceedings in the US District Court. [Pages 6269-6309]

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Design of Flexible Air Permits [Pages 6440-6494]

September 28, 1982 Bennett Memorandum [Pages 6495-6497]

February 15, 1983 Bennett Memorandum [Pages 6498-6502]

Limiting PTE in New Source Permitting, June 13, 1989 [Pages 6503-6514]

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January 15, 1997, Title V Guidance [Pages 6518-6524]

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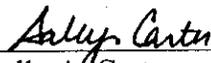
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Respectfully submitted by,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,



Sally A. Carter
Assistant Counsel

Illinois Environmental Protection Agency
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CERTIFICATE OF SERVICE

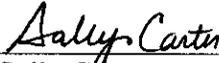
I hereby certify that on the 14th day of April 2006, I did send, via CMS Courier,
the following instrument entitled **ADMINISTRATIVE RECORD** to:

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

I further hereby certify that on the 12th day of April 2006, I did send, 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

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