

Electronic Filing - Received, Clerk's Office, August 25, 2008

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
WATER QUALITY STANDARDS AND) R08-9
EFFLUENT LIMITATIONS FOR THE) (Rulemaking – Water)
CHICAGO AREA WATERWAY SYSTEM)
AND LOWER DES PLAINES RIVER)
PROPOSED AMENDMENTS TO 35 ILL.)
ADM. CODE 301, 302, 303, and 304)

NOTICE OF FILING

TO:

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

Marie Tipsord, Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, IL 60601

Deborah J. Williams, Assistant Counsel
Stefanie N. Diers, Assistant Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

Persons included on the attached
SERVICE LIST

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the
Pollution Control Board STEPAN COMPANY'S PRE-FILED QUESTIONS FOR MIDWEST
GENERATION WITNESS JULIA WOZNIAK, a copy of which is herewith served upon you.

STEPAN COMPANY



Jennifer A. Simon

Date: August 25, 2008

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CERTIFICATE OF SERVICE

I, the undersigned, certify that on this 25th day of August, 2008, I have served electronically the attached STEPAN COMPANY'S PRE-FILED QUESTIONS FOR MIDWEST GENERATION WITNESS JULIA WOZNAK, and NOTICE OF FILING upon the following person:

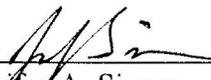
John Therriault, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, IL 60601

and by U.S. Mail, first class postage prepaid, to the following persons:

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Chicago, IL 60601

Deborah J. Williams, Assistant Counsel
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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
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WATER QUALITY STANDARDS AND) R08-9
EFFLUENT LIMITATIONS FOR THE) (Rulemaking – Water)
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ADM. CODE 301, 302, 303, and 304)

Pre-filed Questions for Midwest Generation Witness Julia Wozniak

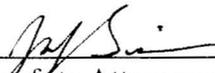
1. Explain what is meant by the term “derating” as referenced in your testimony concerning how MWGen maintains compliance with the thermal water quality standards.
2. For the recent past, provide additional information concerning the frequency with which MWGen has employed “derating” to maintain compliance with the thermal water quality standards, including to what extent these deratings have occurred during periods where the ambient atmospheric temperature was above 90 degrees Fahrenheit and provide estimates concerning the estimated number of households that equate to the amount of the derating taken by MWGen.
3. Why hasn't MWGen installed cooling towers at the other MWGen Plants, namely Fisk, Crawford and Will County, in addition to the cooling towers installed at the Joliet Plant?
4. Explain what is meant by the phrase the “design maximum temperature rise in the cooling water” in your description of the Joliet Facilities.
5. In your description of the Joliet cooling towers, you state that “[t]hey are ‘helper cooling towers’ which are not designed for long-term, continuous runs.” Why weren't the cooling towers designed for long-term, continuous runs?
6. What do you mean when you state that the Joliet cooling towers “are capable of cooling approximately one-third of Units 7&8's total design discharge.” Why can't the Joliet cooling towers cool more than this portion of the discharge?
7. Why doesn't MWGen have to use the cooling towers in the winter months?
8. You state in your pre-filed testimony that: “Generally, the towers are used when the circulating water discharge temperature exceeds 93°F for an extended period of time. The towers do not work efficiently when the temperature of the station condenser discharge flow is less than 90°F or when the dew point temperature (*i.e.*, temperature to

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which the air must be cooled at constant pressure for it to become saturated) approaches 78-80°F.” Please explain further what you mean by the these statements.

9. You state in your pre-filed testimony that: “Based on my experience and first hand observations through the UIW Studies, the Adjusted Standards provide an adequate level of protection for the aquatic community below I-55 and provide a more representative normal, seasonal fluctuation than either the Secondary Contact or the General Use numeric standards.” What is the experience and first-hand observations you are referring to?
10. You state in your pre-filed testimony that: “Ambient stream temperature is largely associated with the volume of flow in the river. MWGen’s compliance efforts are therefore largely dictated by the upstream flow manipulations and perturbations in the CAWS that in turn affect the volume of flow to the Upper Dresden Pool.” Please explain the basis for your statement that the volume of flow is largely associated with ambient stream temperature and what you mean by your reference to “upstream flow manipulations and perturbations in the CAWS”, including how these actions affect the volume of flow to the Upper Dresden Pool.
11. With regard to the thermodynamic model that MWGen runs to monitor compliance with thermal water quality standards, how often is the model run during the summer months?
12. With regard to Attachment 4, the water flow graphs, to your testimony, please explain in greater detail what these graphs show and why they are representative of the flows in the Upper Dresden Pool? As to the flow graph showing flow changes in July 2008, have such significant flow changes been seen at other times?
13. With regard to your testimony that “[f]low conditions at any given time cannot be predicted with great precision and flow does not follow any type of normal trend,” Explain why flow conditions “cannot be predicted with great precision” and why this is relevant to the thermal water quality standards for the CAWS and/or LDP? Also, please explain what is mean by the statement that “flow does not follow any type of normal trend.”
14. With regard to the LDP UAA stakeholder process, your testimony states that MWGen provided extensive comments that General Use thermal standards were not justified based on the lack of adequate habitat to support an aquatic community that justified such stringent thermal standards, was there discussion during the LDP UAA stakeholder process concerning the habitat issue and if so, what was the outcome of that or those discussions?
15. With regard to the draft UAA Report on the LDP, you testify that MWGen’s comments regarding the draft report raised substantive issues that were ignored as part of the revised UAA report, what are the substantive issues that you are referring to?

STEPAN COMPANY



One of its Attorneys

Date: August 25, 2008

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