

Pamela F. Faggert
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December 15, 2008

Mr. John Therriault
Assistant Clerk
Clerk's Office
Illinois Pollution Control Board
100 W. Randolph St., Suite 11-500
Chicago, IL 60601

Pct 7

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DEC 22 2008
STATE OF ILLINOIS
Pollution Control Board

207-19
Re: R07-18 - *Illinois Register*, October 31, 2008 - Proposed Rule under Title 35, Part 217,
Nitrogen Oxides Emissions, Subpart Q of the Illinois Pollution Control Board Regulations
– Stationary Reciprocating Internal Combustion Engines and Turbines

Dear Mr. Therriault:

Dominion owns and operates electric generating facilities in eleven states, including the 1200 megawatt coal-fired Kincaid Generation LLC power plant, located in Kincaid, Illinois. Dominion also owns a 50% interest in the 1400-megawatt natural gas-fired Elwood Energy, LLC combustion turbine plant, located in Will County, Illinois.

Dominion supports regulations designed to facilitate attainment of the National Ambient Air Quality Standards and is supportive of the proposed nitrogen oxides restrictions for reciprocating internal combustion engines and turbines located in ozone nonattainment areas in the Chicago and Metro East areas of Illinois.

Dominion's Elwood facility was permitted under PSD (Prevention of Significant Deterioration) Permit ID No. 197808AAG in February 1999, which was amended in 2000 under PSD Permit ID No. 197035AAH. In addition to the PSD permits, Elwood is subject to the federal Acid Rain Program under 40 CFR Parts 75 and 76, the Illinois Title V Clean Air Act Permit Program (CAAPP), the federal New Source Performance Standards (NSPS) under 40 CFR Part 60, Subpart GG, the Illinois NO_x Trading Program under 35 IAC Part 217, Subpart W and the Illinois ERMS (Emissions Reduction Market System) for VOM (Volatile Organic Matter) emissions under 35 IAC Part 205.

Under the PSD permits, the Elwood turbines are subject to year-round NO_x emissions limitations that are more stringent than the limits in the proposed Subpart Q regulations for Stationary Reciprocating Internal Combustion Engines and Turbines. The Subpart Q proposal seeks to limit NO_x emissions from gas-fired turbines to 42 ppm (parts per million). The Elwood permits limit NO_x emissions to 15 ppm for turbines 1 – 4 and 9 ppm for turbines 5 – 9.

The federal and state permit programs all have separate and distinct monitoring, reporting and recordkeeping requirements. The PSD and NSPS programs also require extensive testing of the turbines. The Acid Rain Program and the NO_x Trading Program require continuous emissions monitoring systems (CEMS) and periodic quality assurance procedures. Each of these programs requires emissions, deviation or allowance reports with the one or more of the following frequencies: annually, semi-annually, seasonally, quarterly, monthly or “promptly”.

The proposed Subpart Q regulations would require additional monitoring, reporting and recordkeeping requirements, although sources with operational CEMS (like the Elwood facility) fully satisfy many of these requirements. Nevertheless, there are additional recordkeeping requirements associated with the proposed Maintenance Plan under §217.388(d) of the proposal. There are also requirements to maintain records of hours of operation, daily fuel use, monitoring deviations, a plan for inspection and maintenance, a log of all inspections and maintenance, and identification of any periods during which data were not collected, including the reasons and the corrective actions taken under proposed §217.396(a)).

Given the extremely low NO_x emissions limitations already in effect at Elwood, coupled with the current level of monitoring, reporting and recordkeeping required by the other air quality programs to which Elwood is subject, there is no practical reason or environmental benefit to imposing yet another program on a facility like Elwood. Dominion urges the Illinois Pollution Control Board to adopt provisions as part of this rulemaking that specifically exclude facilities that are already well-controlled and adequately monitored, like Elwood, from additional regulation.

Thank you for your consideration of these issues. If you have any questions, please contact Bob Asplund at (804)273-3012.

Respectfully,

A handwritten signature in black ink that reads "Pamela F. Faggert". The signature is written in a cursive style with a large initial "P".

Pamela F. Faggert