

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

In the Matter Of:	)	
	)	
EXELON GENERATION LLC,	)	
Petitioner,	)	
	)	
v.	)	PCB NO. 2014-123
	)	
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
Respondent.	)	

**NOTICE OF FILING**

**TO:** Office of the Clerk of the  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph Street, Suite 11-500  
Chicago, Illinois 60601

Office of Legal Services  
Illinois Department of Natural Resources  
One Natural Resources Way  
Springfield IL 62702-1271

Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield IL 62794-9276

**PLEASE TAKE NOTICE** that on the 23rd day of May, 2014, **Exelon Generation LLC's Response to Illinois EPA Recommendation** was filed with the Office of the Clerk of the Illinois Pollution Control Board.

Respectfully submitted,

EXELON GENERATION LLC

By: Alan P. Bielawski-11240  
One of its attorneys

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**EXELON GENERATION LLC'S RESPONSE TO ILLINOIS EPA RECOMMENDATION**

Pursuant to 35 Ill. Adm. Code 106.1145(c), Exelon Generation LLC ("Exelon") submits the following response to the Recommendation of the Illinois Environmental Protection Agency ("Recommendation") to the Illinois Pollution Control Board ("Board") regarding Exelon's Petition to Approve Alternate Thermal Effluent Limitations ("Petition") for Exelon's Quad Cities Nuclear Generating Station ("Quad Cities Station").

**INTRODUCTION**

Exelon filed its Petition with the Board on April 2, 2014. In accordance with the requirements of 35 Ill. Adm. Code 106.1145, the Illinois Environmental Protection Agency ("Illinois EPA") filed its Recommendation on May 19, 2014. The Recommendation states that Exelon has met the requirements for requesting alternative thermal relief under 35 Ill. Adm. Code 106.1100 et seq., and has satisfied the early screening and detailed plan of study requirements of Sections 106.1115 and 106.1120. The Recommendation also identifies the agencies that were informed of and participated in the development of the plan of study for the Quad Cities Station thermal assessment. Finally, Illinois EPA states that that the Board should

grant the relief requested by Exelon in its Petition, and recommends that Exelon be required to conduct two additional studies as a condition to the grant of such relief. As explained below, Exelon is willing to agree to Illinois EPA's proposed conditions.

### **EXELON RESPONSE**

#### **1. Black Crappie, White Crappie and Sauger Decreases**

The first condition recommended by Illinois EPA concerns the apparent decrease in the number of white crappie, black crappie and sauger observed in Pool 14 of the Mississippi River (the pool into which Quad Cities Station discharges). The 316(a) Demonstration Exelon submitted in support of the alternative thermal limits for Quad Cities Station states that a decrease in the numbers of these species was observed both upstream and downstream of the Quad Cities discharge, which indicates that the decrease is attributable to factors other than the plant's thermal effluent. The 316(a) Demonstration postulates that the observed decrease may be attributable to the fact that the habitat conditions at the fixed-location fish sampling sites used for the Quad Cities Station studies, as well as similar habitats in Pool 14, have changed, and are no longer preferred areas for these species.

Illinois EPA's Recommendation states that the grant of the thermal relief requested by Exelon should be conditioned upon Exelon being required to study white crappie, black crappie and sauger in Pool 14 to further investigate the causes of the apparent decrease in the numbers of these species. Exelon has discussed this proposed condition with Illinois EPA. Exelon and Illinois EPA have agreed that, as a condition to the grant of the thermal relief requested in the Petition, Exelon will conduct a study of white crappie, black crappie and sauger populations in Pool 14. The study will be conducted during the initial NPDES permit cycle that the alternative thermal limits for Quad Cities Station are in effect. Illinois EPA and Exelon also have agreed

that the study will examine fish population data obtained from the Bellevue Field Station Long Term Resource Monitoring Program, conducted in Pool 13 of the Mississippi River (just upstream of Pool 14), to evaluate the white crappie, black crappie and sauger population trends in Pool 13.<sup>1</sup> Information and conclusions derived from the study will be available for the subsequent NPDES permit renewal review, at which time the alternative thermal effluent limits for Quad Cities Station also will be subject to review and renewal, pursuant to 35 Ill. Adm. Code 106.1180.

## 2. Calendar Year Excursion Hour Renewal Trigger

The second condition recommended by Illinois EPA concerns Exelon's request that the allotment of excursion hours for Quad Cities Station be renewed each calendar year, instead of on a rolling 12-month basis. Exelon's Petition justified this change on the basis that historical operations show that Quad Cities Station rarely, if ever, uses excursion hours during the winter months, and therefore the potential for adverse impacts associated with using excursion hours late in one year and early the next year was nonexistent. Illinois EPA's Recommendation states that other scenarios that involve using the full 219 hour annual allotment of excursion hours in less than a twelve-month period need to be considered, as well.

Exelon also has discussed this proposed condition with Illinois EPA. Exelon and Illinois EPA agree that in any circumstance, during the course of the next NPDES permit cycle (during which the alternate thermal limits are in effect) that more than 219 excursion hours are used in any 12-month period, Exelon will monitor aquatic life in the Quad Cities Station discharge area to assess possible adverse impacts to biota. As with the other proposed condition discussed

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<sup>1</sup> Because the Bellevue Field Station Long Term Resource Monitoring Program uses random site sampling methods (as opposed to fixed-location sampling) and because Pool 13 does not have any industrial thermal inputs, data obtained from the Program should be very useful in assessing the possible contribution of thermal discharges on the species in question.

above, the results of all such monitoring events will be made available to Illinois EPA in connection with the subsequent NPDES permit renewal review for Quad Cities Station, at which time the calendar year trigger for adding excursion hours also will be subject to review and renewal.

\* \* \* \* \*

Exelon appreciates the opportunity to respond to Illinois EPA's Recommendation, and respectfully renews its request that its Petition be granted by the Board.

Respectfully submitted,

EXELON GENERATION LLC

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One of its attorneys

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**CERTIFICATE OF SERVICE**

I, the undersigned, certify that I have filed the attached Exelon's Response to Illinois EPA Recommendation with:

Office of the Clerk of the Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph Street, Suite 11-500  
Chicago, Illinois 60601

Copies of this filing were also served on the following by U.S. Mail:

Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield IL 62794-9276

Office of Legal Services  
Illinois Department of Natural Resources  
One Natural Resources Way  
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Dated: May 23, 2014



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