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STATE OF ILLINOIS  
Pollution Control Board

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD  
OF THE STATE OF ILLINOIS

AMEREN ENERGY	)	
GENERATING COMPANY,	)	
NEWTON POWER STATION,	)	
	)	
Petitioner,	)	
	)	
v.	)	PCB 20066-68
	)	(CAAPP Permit Appeal)
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Respondent.	)	

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 Ameren Energy Resources Generating Company ("Ameren") on September 29, 2005. The permit authorized the operation of an electrical power generation facility known as the Newton Power Station. The facility is located at 6725 North 500<sup>th</sup> Street in Newton, Illinois. On November 3, 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, Ameren's permit application materials, various draft permits issued for public comment, correspondence between the Illinois EPA and both Ameren and the United States Environmental Protection Agency, public comments received during the multiple public comment periods, various construction and operating permits issued to Ameren, 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 copies, 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 1-106]**

Preliminary Responsiveness Summary, dated August 15, 2005. **[Pages 107-150]**

Proposed Permit (USEPA Review) Revised Proposed Permit, dated August 2005. **[Pages 151-268]**

Proposed Permit (USEPA Review) Proposed CAAPP Permit, dated October 12, 2003. **[Pages 269-373]**

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

Coal-Fired CAAPP Repreproposed Notification. **[Page 374]**

Draft Revised Proposed Permit, dated July 2005. **[Pages 375-493]**

Coal-Fired Revised Proposed CAAPP Notification. **[Page 494]**

Revised Proposed CAAPP Permit Draft, dated December 2004. **[Pages 495-608]**

July 19, 2005, Letter. **[Pages 609-614]**

August 15, 2005, Letter. **[Pages 615-620]**

Final Permit and Calculation Sheet, dated September 2005. **[Pages 621-743]**

September 29, 2005, Letter. **[Pages 744-750]**

Final Responsiveness Summary. **[Pages 751-794]**

Initial CAAPP Permit Application including Letter from Michael L. Menne, Vice President, Environmental Safety and Health, Ameren, to Donald Sutton, P.E., Illinois EPA, regarding Supplement to the Title V Operating Permit Application for the Newton Power Station, dated May 27, 2003. **[Pages 795-1099]**

079 808 AAA 03 95 09 0066 **[Pages 1100-1310]**

- \* Application for CAAPP Permit, dated received September 7, 1995. **[Pages 1100-1104]**
- \* Fee Determination for CAAPP Permit, dated received September 7, 1995. **[Pages 1105-1106]**
- \* Compliance Certification, dated received September 7, 1995. **[Pages 1107-1111]**
- \* Delegation of Authority for Responsible Official to a Representative, dated received September 7, 1995. **[Pages 1112-1113]**
- \* Completeness Review Sheet, Application Deemed Incomplete, dated September 13, 1995. **[Pages 1114-1115]**
- \* CAAPP Application Completeness Determination and Source Fee Determination, dated September 18, 1995. **[Pages 1116-1121]**
- \* Cost Estimates for NOx Emissions Reduction for All Coal-Fired Utility Boilers, date updated 3/5/97. **[Page 1122]**

- \* Letter from Thomas E. Siedhoff, Manager, Environmental, Safety and Health, Ameren to Donald Sutton regarding Title V Permit Fees, dated December 9, 1999, and attachment. **[Pages 1123-1127]**
- \* Letter from Donald Sutton to Michael Menne regarding change of name, dated September 26, 2000. **[Page 1128]**
- \* Power Plant Initiative - February 2003, dated 2/3/03. **[Pages 1129-1130]**
- \* Letter from Michael L. Menne, Vice President, Environmental, Safety and Health, Ameren to Donald Sutton regarding CAAPP Application Forms for 35 IAC Part 217 Subparts V and W, dated May 16, 2003, and attachment. **[Pages 1131-1135]**
- \* Memorandum from David Kolaz to Renee Cipriano regarding Approval for Public Hearings for Coal-Fired Power Plant Permits, dated June 2, 2003. **[Pages 1136-1137]**
- \* Email from Steven Whitworth to Manish Patel regarding nominal capacity of plants, dated 6/27/03, 4:12 PM. **[Page 1138]**
- \* 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 1139]**
- \* Information concerning Greenhouse Gases, dated 7/31/03. **[Pages 1140-1141]**
- \* Handwritten notes of Manish Patel regarding Utility CAAPP meeting with Ameren/Dynegy, dated 9/18/03. 10:30 AM. **[Pages 1142-1143]**
- \* Letter from Michael Menne to Donald Sutton regarding Supplement to the Title V Operating Permit Application for the Newton Power Station, dated October 27, 2003, and attachment. **[Pages 1144-1149]**
- \* Handwritten notes of Laurel Kroack regarding Title V permits, dated November 21, 2003. **[Pages 1150-1151]**
- \* Facsimile from Keith Harley to Julie Armitage, dated November 24, 2003. **[Pages 1152-1157]**
- \* Note and attachment from Chris Romaine to Dave Kolaz, dated 12/10/03. **[Pages 1158-1165]**
- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM, with handwritten notes. **[Pages 1166-1167]**
- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM. **[Page 1168]**

- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Laurel Kroack. **[Page 1169]**
- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Chris Romaine. **[Pages 1170-1176]**
- \* Handwritten notes of Laurel Kroack beginning "Enviros & Title V Power Plants," dated 2/3/2004. **[Pages 1177-1178]**
- \* Memorandum from Laurel Kroack to Renee Cipriano regarding Title V permits for coal-fired power plants, including Midwest Generation, dated February 4, 2004. **[Pages 1179-1182]**
- \* Email from Chris Romaine to Natalie Locke and Steve Whitworth, dated 2/19/2004, 2:41 PM. **[Page 1183]**
- \* Handwritten notes of Manish Patel regarding meeting with USEPA on coal-fired power plant CAAPPs dated 2/24/04, 1:30 PM. **[Page 1184]**
- \* Handwritten notes of Manish Patel regarding conference call with coal-utility facilities, dated 2/25/04, 1:30 PM. **[Page 1185]**
- \* Memorandum from David Kolaz to Renee Cipriano regarding status and time line for Title V Power Plant Issuance, dated April 28, 2004. **[Pages 1186-1187]**
- \* Handwritten notes of Laurel Kroack regarding meeting with USEPA concerning power plant permits, dated 5/6/04. **[Pages 1188-1190]**
- \* 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 1191-1214]**
- \* Memorandum from Laurel Kroack to Cheryl Newton regarding Utility Permit Issuance Timeline, dated June 1, 2004. **[Page 1215]**
- \* 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 1216-1229]**
- \* Facsimile cover sheet from Chris Romaine to Stacey Coburn, dated 6/29/04. **[Page 1230]**
- \* 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 1231]**

- \* Handwritten notes of Laurel Kroack regarding Title V, dated 8/30/04. **[Pages 1232-1234]**
- \* Letter from Bharat Mathur, Acting Regional Administrator, USEPA, to Renee Cipriano, Illinois EPA, dated December 2, 2004. **[Pages 1235-1237]**
- \* 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 1238]**
- \* 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 1239-1240]**
- \* Letter from Donald Sutton to American Bottom Conservancy, et al., dated January 13, 2005, responding to letter dated January 6, 2005. **[Pages 1241-1252]**
- \* Letter from Laurel Kroack, Acting Chief, Bureau of Air, Illinois EPA, to Steve Rothblat, USEPA, dated January 18, 2005. **[Pages 1253-1260]**
- \* Handwritten notes of Laurel Kroack regarding utility, title V, dated 1/26/05. **[Pages 1261-1262]**
- \* Notes of Laurel Kroack regarding March 21, 2005, call with feds. **[Pages 1263-1264]**
- \* Notes of Julie Armitage regarding May 10, 2005, meeting with the feds. **[Pages 1265-1270]**
- \* List of Michael Reed, dated June 9, 2005. **[Page 1271]**
- \* Draft Instructions, dated June 23, 2005. **[Pages 1272-1282]**
- \* Note and attachments from Michael Reed to Chris Romaine, dated July 17, 2005. **[Pages 1283-1294]**
- \* Miscellaneous documents regarding request for extension of time to comment on the Preliminary Responsiveness Summary and Draft Revised Proposed Title V Permits. **[Pages 1295-1301]**
- \* Handwritten notes of Michael Reed, dated August 1, 2005. **[Pages 1302-1306]**
- \* Notes of Michael Reed regarding feds conference call, dated September 16, 2005. **[Pages 1307-1308]**

- \* Email exchange between Chris Romaine and Steve Whitworth, dated 9/20/05-9/23/05. **[Page 1309]**
- \* Handwritten notes of Laurel Kroack, dated September 23, 2005. **[Pages 1310]**
- Model Permit Developments, Summer 2003. **[Pages 1311-1459]**
- Miscellaneous Emails Relevant to Newton. **[Pages 1460-1578]**
- Miscellaneous Undated Notes of Illinois EPA Staff. **[Pages 1579-1642]**
- Miscellaneous Undated Documents Likely Generated by Illinois EPA. **[Pages 1643-1697]**
- Miscellaneous Documents Supplied to USEPA. **[Pages 1698-1875]**
- Miscellaneous Lists or Drafting Documents. **[Pages 1876-1993]**
- Miscellaneous Drafting Documents - Permits. **[Pages 1994-2729]**
- Miscellaneous Opacity Documents. **[Pages 2730-2849]**
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- NSPS Worksheet. **[Page 2854]**
- Construction Permits & Miscellaneous Operating Permits. **[Pages 2855-2975]**
- Documentation Relative to Proceedings Before the Administrator, USEPA. **[Pages 2976-3323]**
- Startup, Combustion Evaluation & Alternative Fuel Memorandums **[Pages 3324-3331]**
- \* 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 3324-3326]**
- \* Memorandum from Michael Reed to Power Plant File regarding Provisions Requiring Combustion Evaluations, dated September 23, 2005. **[Pages 3327-3328]**
- \* 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 3329-3331]**
- Comments specific to Newton **[Page 3332]**



- \* Electronic mail from Steve Whitworth to Brad Frost, Manish Patel and Chris Romaine regarding comments on proposed CAAPP for Newton Power Plant, dated September 26, 2003, 7:39 PM. **[Pages 3332]**

Comments particular to Ameren **[Pages 3333-3363]**

- \* Email from Stacey Coburn, USEPA, to Manish Patel regarding comments on Ameren Title V permits, dated 7/8/03, dated 11:54 AM, and handwritten notes of Manish Patel. **[Pages 3333-3336]**
- \* Letter from Michael Menne to Mr. Charles Matoesian/ Mr. Frost, Illinois EPA, providing Comments on proposed CAAPP Permits, dated January 12, 2005, and attachment. **[Pages 3337-3348]**
- \* Letter from David Reiser 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. **[Pages 3349-3350]**
- \* Letter from Charles Matoesian to Steven Whitworth regarding Request for Extension of Time for Commenting on Proposed Title V Permits Posted on July 19, 2005, dated July 28, 2005. **[Page 3351]**
- \* Letter from Steven C. Whitworth, Supervising Environmental Scientist, Environmental, Safety and Health, Ameren, to Charles Matoesian providing Comments on revised proposed CAAPP Permits, dated August 1, 2005, and attachment. **[Pages 3352-3363]**

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- \* Comments of the Sierra Club and American Bottom Conservancy, Summer 2003. **[Pages 3364-3402]**
- \* 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 3403-3417]**
- \* 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 3410-3420]**
- \* Email from Verna Owen to Mr. Holmstead, dated 12/14/2004 12:09:23 PM. **[Pages 3421-3422]**

- \* 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 3423-3808]**
- \* 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 3809-4192]**
- \* 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 4193-4300]**

Proceedings in the US District Court. **[Pages 4301-4342]**

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November 12, 1981 USEPA Directive **[Pages 4349-4353]**

HPV Matrix Criteria Opacity **[Pages 4354-4364]**

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September 28, 1982 Bennett Memorandum **[Pages 4511-4513]**

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Limiting PTE in New Source Permitting, June 13, 1989 **[Pages 4519-4530]**

Startup, Shutdown Guidance: January 28, 1993 **[Pages 4531-4333]**

January 15, 1997, Title V Guidance **[Pages 4534-4540]**

USEPA Guidance Directed to Ohio EPA **[Pages 4541-4543]**

January 21, 1998 Fuel Flexibility Guidance **[Pages 4544-4554]**

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**General Materials**

Electric Energy - AUGI Model Documents: [Pages 1-2536]

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Early Discussion with AUGI Effect of Flow Rater (Load) on ESP Performance [Pages 13-14]

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#### Emails

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#### Miscellaneous Reference Documents:

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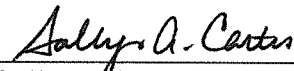
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Respectfully submitted by,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,



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Sally A. Carter  
Assistant Counsel

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APR 13 2006

STATE OF ILLINOIS  
Pollution Control Board

CERTIFICATE OF SERVICE

I hereby certify that on the 12<sup>th</sup> day of April 2006, I did send, via CMS Courier,

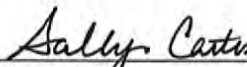
the following instrument entitled **ADMINISTRATIVE RECORD** to:

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

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

James T. Harrington  
David L. Rieser  
McGuire Woods, LLP  
77 West Wacker, Suite 4100  
Chicago, Illinois 60601

  
\_\_\_\_\_  
Sally Carter  
Assistant Counsel