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STATE OF ILLINOIS
Pollution Control Board

Illinois Pollution Control Board
Docket # R01-10

Ms. Dorothy Gunn, Clerk
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60602

*R01-10
PC #189*

Dear Ms. Gunn:

The following are recommendations for actions that we believe can be accomplished by administrative order of the Director of the Illinois Environmental Protection Agency for all gas or oil powered electrical generation facilities seeking permit approval in the State of Illinois:

1. Maintain a reliable up-to-date source of data including:
 - Existing Capacity throughout MAIN
 - Projected Need throughout MAIN
 - Detailed Projected Capacity throughout MAIN (including status of both Environmental approvals and local zoning approvals)

This report should be posted on the IEPA web site and be available in written form to be sent out to anyone who requests the information. [The data should be readily available from the MAIN offices.]

2. Create a additional form of information to be provided to the agency by each applicant seeking an air pollution construction permit for a gas or oil fueled power generation facility. The new information to be requested of these applicants should include:
 - Analysis of the chemistry of the water from any proposed private well sources including whether the water contains radon, barium, arsenic, etc.
 - Detailed outline of what water will be used for in the operation of the facility, the quantities proposed to be used on an hourly, daily and annual basis with an analysis of alternatives available for each of the proposed uses of water.
 - Detailed outline of how much wastewater will be produced by the operation of the facility on an hourly, daily and annual basis; what the constituents of the wastewater will be; what treatment will occur on the site of the facility; and where the water will be discharged. This should include an analysis of alternatives available for each of the proposed wastewater treatments included.
 - For all emission data submitted in the application, the applicant shall provide actual test data from all sites using the same turbine.
 - For all air modeling done, the point of maximum impact for each pollutant modeled must be shown on a map of the area surrounding the proposed facility and clearly identified including the actual level of

concentration for each of these points of maximum impact.

– The serial numbers of the turbines proposed for the facility.

– Modeling shall be done using the months of May through September for those facilities proposing to operate on a part-time basis including using the average temperatures, humidity, wind conditions, weather conditions, etc. that occur during these months only and not annual averages.

3. Institute a permit fee structure to cover the costs of the review of the applications.
4. Require a noise construction/operation permit to be filed simultaneously with any air construction permit and require joint issuance of the permits.
5. Require that any significant modification or additions of information by the applicant after the closing of the public record would necessitate at a minimum a new public notice with a public hearing if a request is made for one.
6. Post all permit applications on the IEPA web site.
7. Develop new air modeling parameters based on the proposed months of operation of these facilities and not on annual averages.
8. Require that the applicant submit a list of adjacent property owners within 500 feet of the proposed facility and a list of municipalities within one and a half miles of the proposed facility. IEPA would then send the public notice of hearing to these lists.
9. All information submitted by the applicant as well as all staff correspondence to the applicant and any air modeling analysis done by IEPA staff shall be maintained in a public file that is available for public inspection at the Springfield offices. This public record file shall be available for inspection at any time that the office is open.

Please forward this communication onto the Board and have it included in the public record for this docket.

Sincerely,

Concerned Citizens of Lake County and
Liberty Prairie Conservancy