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STATE OF ILLINOIS
Pollution Control Board

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS**

**MIDWEST GENERATION, LLC,
FISK GENERATING STATION,**

Petitioner,

v.

**ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,**

Respondent.

PCB 2006-57

(CAAPP Permit Appeal)

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

Bradley P. Halloran
Hearing Officer
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PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board the **ADMINISTRATIVE RECORD** of the Respondent, Illinois Environmental Protection Agency, a copy of which is herewith served upon the assigned Hearing Office and the attorney for the Petitioner.

Respectfully submitted by,



Sally Carter
Assistant Counsel

Dated: March 29, 2006
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

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STATE OF ILLINOIS
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**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
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MIDWEST GENERATION, LLC,)	
FISK GENERATING STATION,)	
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Petitioner,)	
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v.)	PCB 2006-57
)	(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 Midwest Generation on September 29, 2005. The permit authorized the operation of an electrical power generation facility known as the Fisk Generating Station. The facility is located at 1111 West Cermack Road in Chicago, Illinois. On November 2, 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,

Midwest Generation's permit application materials, various draft permits issued for public comment, correspondence between the Illinois EPA and both Midwest Generation and the United States Environmental Protection Agency, public comments received during the multiple public comment periods, various construction and operating permits issued to Midwest Generation, 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 counsel, 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."

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Proposed Permit (USEPA Review) Revised Proposed Permit, dated August 2005. **[Pages 426-584]**

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- * Fee Determination for CAAPP Permit and Compliance Certification, dated received September 7, 1995. **[Pages 1271-1272]**
- * CAAPP Application Completeness Determination and Source Fee Determination, Determination dated September 18, 1995, including Application for CAAPP Permit, dated received September 7, 1995. **[Pages 1273-1291]**
- * Cost Estimates for NOx Emissions Reduction for All Coal-Fired Utility Boilers, date updated 3/5/97. **[Page 1292]**
- * Environmental Air Quality - Fisk Station Fugitive Operating Plan, dated July 11, 2001. **[Pages 1293-1303]**
- * Letter from Basil G. Constantelos, Director of Environmental, Health and Safety, Midwest Generation, to Clean Air Markets Official, USEPA, regarding Revised NOx Budget Account Certificate of Representation Forms, dated May 31, 2002, and attachments. **[Pages 1304-1309]**
- * Letter from Renee Cipriano to Keith Harley regarding public hearings for Crawford and Fisk, dated December 6, 2002. **[Page 1310]**
- * Power Plant Initiative - February 2003, dated 2/3/03. **[Pages 1311-1312]**

Letter from Basil Constantelos to Donald Sutton, Permit Manager, Illinois EPA, regarding Title V Permit Application Complete Update, dated February 14, 2003, and attached Title V Permit Application for the Fisk Generating Station, dated February 11, 2003. **[Pages 1313-1823]**

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- * Letter from Basil Constantelos to Jim Ross, Manager, Permit Section, Illinois EPA regarding Fisk Title V Application - Supplement to CAAPP Application, dated March 27, 2003, and attachments. **[Pages 1824-1846]**
- * Letter from Basil G. Constantelos to Jim Ross, Manager, Permit Section, Illinois EPA, regarding Notification of NOx Averaging for Compliance with IAC 217 Subpart V and Submittal of Form 640-CAAPP, dated April 3, 2003, and attachment. **[Pages 1847-1866]**
- * Memorandum from David Kolaz to Renee Cipriano regarding Approval for Public Hearings for Coal-Fired Power Plant Permits, dated June 2, 2003. **[Pages 1867-1868]**
- * 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 1869]**
- * Letter from Basil Constantelos to Jim Ross regarding NOx SIP Call and Application for Budget Permit for Electrical Generating Units, dated July 15, 2003, and attachment. **[Pages 1870-1876]**
- * Information concerning Greenhouse Gases, dated 7/31/03. **[Pages 1877-1878]**

Memorandum from Pamela Brooks, Air Quality Planning Section, BOA, to Rob Kaleel, Air Quality Planning Section, BOA, regarding Midwest Generation Environmental Justice Study Modeling Analysis, dated November 3, 2003. **[Pages 1879-1884]**

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- * Handwritten notes of Laurel Kroack regarding Title V permits, dated November 21, 2003. **[Pages 1885-1886]**
- * Facsimile from Keith Harley to Julie Armitage, dated November 24, 2003. **[Pages 1887-1892]**
- * Note and attachment from Chris Romaine to Dave Kolaz, dated 12/10/03. **[Pages 1893-1900]**

- * Email from Bruce Nilles to Renee Cipriano and David Kolaz dated 1/12/2004 including “Draft 1.12.03” and handwritten notes of Laurel Kroack. **[Pages 1901-1902]**
- * Letter from Basil Constantelos to Julie Armitage regarding Fisk Station Auxillary Boiler, dated February 2, 2004. **[Page 1903]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM, with handwritten notes. **[Pages 1904-1905]**
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- * Handwritten notes of Laurel Kroack beginning “Enviros & Title V Power Plants,” dated 2/3/2004. **[Pages 1915-1916]**
- * Meeting sign-in sheet, dated 2/4/04. **[Page 1917]**
- * Memorandum from Laurel Kroack to Renee Cipriano regarding Title V permits for coal-fired power plants, including Midwest Generation, dated February 4, 2004. **[Pages 1918-1921]**
- * Email from Chris Romaine to Natalie Locke and Steve Whitworth, dated 2/19/2004, 2:41 PM. **[Page 1922]**
- * Handwritten notes of Manish Patel regarding meeting with USEPA on coal-fired power plant CAAPPs dated 2/24/04, 1:30 PM. **[Page 1923]**
- * Handwritten notes of Manish Patel regarding conference call with coal-utility facilities, dated 2/25/04, 1:30 PM. **[Page 1924]**
- * Handwritten notes regarding call with USEPA for MidGen coal fired CAAPP, dated 3/2/04. **[Page 1925]**
- * Facsimile “Midwest Generation L.L.C., Voluntary Opacity Improvement Protocol, dated April 22, 2004. **[Pages 1926-1927]**
- * Memorandum from David Kolaz to Renee Cipriano regarding status and time line for Title V Power Plant Issuance, dated April 28, 2004. **[Pages 1928-1929]**

- * Handwritten notes of Laurel Kroack regarding meeting with USEPA concerning power plant permits, dated 5/6/04. **[Pages 1930-1932]**
- * Handwritten notes of Chris Romaine beginning “ ‘Midwest Generation’ - IEPA - USEPA,” dated 5-6-04. **[Pages 1933-1934]**
- * 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 1935-1958]**
- * Memorandum from Laurel Kroack to Cheryl Newton regarding Utility Permit Issuance Timeline, dated June 1, 2004. **[Page 1959]**
- * Email from Manish Patel to Chris Romaine, John Cashman and Kunj Patel regarding Utility CAAPP permits dated 6/16/2004 and handwritten notes of Manish Patel. **[Page 1960]**
- * Electronic mail from Chris Romaine to Sarah Marshall, USEPA, regarding NSPS, Boilers Db, dated 6/26/04 3:36 PM. **[Page 1961]**
- * 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 1962-1975]**
- * Facsimile cover sheet from Chris Romaine to Stacey Coburn regarding Parametric Monitoring Plan for the Auxillary Boiler, dated 6/29/04. **[Pages 1976-1977]**
- * Facsimile from Chris Romaine to Stacey Coburn providing draft turbine language, dated 6/29/04. **[Pages 1978-2003]**
- * Facsimile cover sheet from Chris Romaine to Stacey Coburn, dated 6/29/04. **[Page 2004]**
- * Facsimile from Chris Romaine to Basil Constantelos regarding fly ash, approximately July 2004. **[Pages 2005-2007]**
- * 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 2008]**
- * Handwritten notes of Laurel Kroack regarding Title V, dated 8/30/04. **[Pages 2009-2011]**
- * Letter from Basil Constantelos to Donald Sutton regarding Fisk Station Unit 19, Sulfur Trioxide (SO₃) Flue Gas Conditioning Trial Test, dated September 27, 2004. **[Pages 2012-2014]**

- * Letter from Bharat Mathur, Acting Regional Administrator, USEPA, to Renee Cipriano, Illinois EPA, dated December 2, 2004. **[Pages 2015-2017]**
- * 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 2018]**
- * 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 2019-2020]**
- * Letter from Donald Sutton to American Bottom Conservancy, et al., dated January 13, 2005, responding to letter dated January 6, 2005. **[Pages 2021-2032]**
- * Letter from Laurel Kroack, Acting Chief, Bureau of Air, Illinois EPA, to Steve Rothblat, USEPA, dated January 18, 2005. **[Pages 2033-2040]**
- * Handwritten notes of Laurel Kroack regarding utility, title V, dated 1/26/05. **[Pages 2041-2042]**
- * Facsimile from Chris Romaine to Genevieve Damico, dated 3/9/05. **[Pages 2043-2088]**
- * Notes of Laurel Kroack regarding March 21, 2005, call with feds. **[Pages 2089-2090]**
- * Notes of Julie Armitage regarding May 10, 2005, meeting with the feds. **[Pages 2091-2096]**
- * List of Michael Reed, dated June 9, 2005. **[Page 2097]**
- * Draft Instructions, dated June 23, 2005. **[Pages 2098-2108]**
- * Note and attachments from Michael Reed to Chris Romaine, dated July 17, 2005. **[Pages 2109-2120]**
- * Miscellaneous documents regarding request for extension of time to comment on the Preliminary Responsiveness Summary and Draft Revised Proposed Title V Permits. **[Pages 2121-2127]**
- * Handwritten notes of Michael Reed, dated August 1, 2005. **[Pages 2128-2132]**

Letter from Basil Constantelos to Donald Sutton regarding Fisk Station Title V Application Update, dated August 2, 2005, and attached Title V Permit Application Update-Revision 1, revised July 29, 2005. **[Pages 2133-2167]**

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- * Notes of Michael Reed regarding feds conference call, dated September 16, 2005. **[Pages 2168-2169]**
- * Email exchange between Chris Romaine and Bill Constantelos regarding testing of PM emissions, dated 9/20/05-9/23/05. **[Pages 2170-2171]**
- * Handwritten notes of Laurel Kroack, dated September 23, 2005. **[Page 2172]**

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Documentation Relative to Proceedings Before the Administrator, USEPA. **[Pages 4699-5165]**

Miscellaneous documents pertaining to Midwest Generation's response to the USEPA's Section 114(a) of the Clean Air Act request including the trade secret appeal pending before the Illinois Pollution Control Board, *Midwest Generation EME, LLC v. Illinois EPA, PCB 4-185*. For purposes of this administrative record, the Illinois EPA requests

that the Board take judicial notice of the administrative record previously filed before the Board in *PCB 4-185*. **[Pages 5166-5467]**

Miscellaneous documents pertaining to Commonwealth Edison's response to the USEPA's Section 114(a) of the Clean Air Act request including the trade secret appeal pending before the Illinois Pollution Control Board, *Commonwealth Edison Company v. Illinois EPA, PCB 4-215*. For purposes of this administrative record, the Illinois EPA requests that the Board take judicial notice of the administrative record previously filed before the Board in *PCB 4-215*. **[Pages 5468-5509]**

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- * 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 5510-5512]**
- * Memorandum from Michael Reed to Power Plant File regarding Provisions Requiring Combustion Evaluations, dated September 23, 2005. **[Pages 5513-5514]**
- * 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 5515-5517]**

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- * Letter from Keith Harley, Attorney at Law, to Renee Cipriano, Director, Illinois EPA, regarding Fisk CAAPP, dated August 11, 2003. **[Pages 5518-5530]**
- * Letter from Fred W. McCluskey, Vice President of Technical Services and Partnership Management, Midwest Generation, to Charles Matoesian, Hearing Officer, regarding Comments on the Draft Title V Permit for the Fisk Generating Station, dated September 24, 2003, and attachments. **[Pages 5531-5726]**
- * Comments of the Illinois Environmental and Public Health Organizations on Final Draft CAAPP Permit Midwest Generation EME, LLC, Fisk Generating Station, dated September 26, 2003. **[Pages 5727-6003]**
- * Letter from N. Marcia Jimenez, Commissioner, Chicago Department of Environment, providing comments to the Fisk CAAPP, dated September 26, 2003. **[Pages 6004-6005]**
- * Letter from Basil Constantelos to Charles Matoesian regarding Comments on the Proposed Title V Permit for the Fisk Generating Station, dated November 20, 2003, and attachments. **[Pages 6006-6138]**

- * Electronic mail from Stacey Coburn, USEPA Region 5, to John Cashman, Rizwan Syed and Jim Ross, Illinois EPA, providing comments on the proposed CAAPP for Midwest Generation Fisk, dated 11/24/03 4:45:11 PM. **[Page 6139]**
- * Letter from Fred W. McCluskey, Vice-President, Technical Services and Partnership Management, Midwest Generation, to Charles Matoesian regarding Supplement Comments for the Fisk Generating Station, dated January 17, 2005, and attachments. **[Pages 6140-6324]**

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- * Letter from Keith Harley to Renee Cipriano regarding Request for Public Hearing, Fisk and Crawford Generating Stations, Title V Permit, dated October 15, 2002. **[Pages 6325-6326]**
- * Email from Scott Miller to John Cashman regarding Title V permit comments - Joliet continued, Fisk and Crawford, dated 6/25/03 8:19 AM. **[Pages 6327-6328]**
- * Electronic mail from Britt Willey to Brad Frost concerning Public Comment on Title Five Permits, dated 8/20/03 9:01 AM. **[Page 6329]**
- * Electronic mail from Diarmuid Donnellan to Brad Frost concerning Title five permits, dated 8/20/2003 12:10 PM. **[Page 6330]**
- * Electronic mail from Margaret Queeney to Brad Frost providing Public Comment concerning Fisk and Crawford, dated 8/20/03 4:27PM. **[Page 6331]**
- * Electronic mail from Nicholas Monsour to Brad Frost providing public comment on coal fired power plants, dated 8/20/03 7:24 PM. **[Page 6332]**
- * Public Comment from Allan J. Lindrup, Chair, Green Sanctuary Group, to Charles Matoesian, dated September 10, 2003. **[Pages 6333-6334]**
- * Letter from Kathleen C., Bassi, Sonnenschein Nath & Rosenthal LLP, to Charles Matoesian, regarding CAAPP Permit Hearings for Midwest Generation Electrical Generating Stations, dated September 19, 2003. **[Pages 6335-6336]**
- * Letter from Citizens Against Ruining the Environment to Charles Matoesian regarding Midwest Generation EME, LLC Title V/CAAP/ Title I Permit Application, dated received September 29, 2003. **[Pages 6337-6342]**
- * Letter from Basil Constantelos 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. **[Page 6343]**

- * Letter from Charles Matoesian to Basil Constantelos regarding Request for Extension of Time for Commenting on Proposed Title V Permits Posted On July 19, 2005, dated July 28, 2005. **[Page 6344]**
- * Letter from Faith E. Bugel, American Lung Association of Metropolitan Chicago, Citizens Against Ruining the Environment, Environmental Law & Policy Center, Illinois Public Interest Research Group, Lake County Conservation Alliance, Little Village Environmental Justice Organization, to Charles Matoesian, regarding Comments on the Draft Revised Proposed CAAPP Permits for Fisk and Crawford, dated August 1, 2005. **[Pages 6345-6349]**
- * Letter from Fred McCluskey to Charles Matoesian regarding Comments on the Draft Revised Proposed Permits Posted July 19, 2005, and on the Preliminary Responsiveness Summary, dated August 1, 2005. **[Pages 6350-6372]**
- * Letter from Keith Harley, Chicago Legal Clinic, to Charles Matoesian regarding CAAPP Permits for the Fisk, Crawford, Will County, Joliet and Waukegan Coal-Fired Power Plants, dated August 1, 2005. **[Pages 6373-6502]**

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- * Comments of the Sierra Club and American Bottom Conservancy, Summer 2003. **[Pages 6503-6541]**
- * 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 6542-6556]**
- * 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 6557-6559]**
- * Email from Verna Owen to Mr. Holmstead, dated 12/14/2004 12:09:23 PM. **[Pages 6560-6561]**
- * 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 6562-6949]**
- * 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 6950-7335]**

- * 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 7336-7448]**

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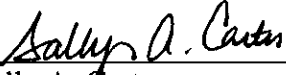
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Respectfully submitted by,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,



Sally A. Carter
Assistant Counsel

Illinois Environmental Protection Agency
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Springfield, Illinois 62794-9276
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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of March 2006, I did send, by ~~first class mail~~, *CMS Courier*, postage prepaid, one (1) original and four (4) copies of the following instrument entitled

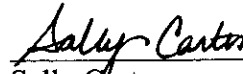
ADMINISTRATIVE RECORD to:

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

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