

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

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STATE OF ILLINOIS
Pollution Control Board

ELECTRIC ENERGY, INCORPORATED,)
)
Petitioner,)
)
v.) PCB 2006-65
) (Air – Permit Appeal)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Respondent.)

NOTICE


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

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

Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
Suite 11-500
100 West Randolph Street
Chicago, Illinois 60601

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

MAR 31 2006

STATE OF ILLINOIS
Pollution Control Board

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

ELECTRIC ENERGY, INCORPORATED,)
)
 Petitioner,)
)
 v.)
)
 ILLINOIS ENVIRONMENTAL)
 PROTECTION AGENCY,)
)
 Respondent.)

PCB 2006-65
(Air – Permit Appeal)

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 Electric Energy, Incorporated. (“Electric Energy”) on September 29, 2005. The permit authorized the operation of an electrical power generation facility known as the Joppa Stream Electric Station. The facility is located at 1200 Portland Road in Joppa, 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, Electric Energy’s permit application materials, various draft permits issued for public

comment, correspondence between the Illinois EPA and both Electric Energy and the United States Environmental Protection Agency, public comments received during the multiple public comment periods, various construction and operating permits issued to Electric Energy, 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."

Contents of the Administrative Record

1999 Public Notice. **[Pages 1-32]**

Miscellaneous documents pertaining to Draft Permit and Public Notice. **[Pages 33-128]**

Preliminary Responsiveness Summary, dated August 15, 2005. **[Pages 129-172]**

Proposed Permit (USEPA Review) Revised Proposed Permit, dated August 2005. **[Pages 173-283]**

Proposed Permit (USEPA Review) Proposed CAAPP Permit, dated October 12, 2003. **[Pages 284-374]**

Extension Denial Letter notifying that the comments must be postmarked by August 1, 2005. **[Page 375]**

Coal-Fired CAAPP Repreproposed Notification. **[Page 376]**

Draft Revised Proposed Permit, dated July 2005. **[Pages 377-487]**

Coal-Fired Revised Proposed CAAPP Notification. **[Page 488]**

Revised Proposed CAAPP Permit Draft, dated December 2004. **[Pages 489-584]**

July 19, 2005, Letter. **[Pages 585-590]**

August 15, 2005, Letter. **[Pages 591-596]**

Final Permit and Calculation Sheet, dated September 2005. **[Pages 597-716]**

September 29, 2005, Letter. **[Pages 717-723]**

Final Responsiveness Summary. **[Pages 724-767]**

*In the Matter of Particulate Emission Limitations, Rule 203(g)(1) and 202(b) of Chapter 2, Rule 82-1, June 30, 1988. **[Pages 768-811]***

Letter from Terence H Larbes, Manager, Engineering Services, Electric Energy, Inc., to Donald E. Sutton, Permit Section, Illinois EPA, dated September 7, 1995, attached application for a Clean Air Act Title V Operating Permit for the Joppa Steam Electric Station, I.D. No. 127855AAC, including Letter from William H. Sheppard, Vice President, Electric Energy, Inc. to Donald Sutton, dated September 9, 2002, and attachments concerning Hydrochloric Acid storage tank. **[Pages 812-1374]**

127 885 AAC 09 0120 - Electric Energy **[Pages 1375-1774]**

- * Compliance Certification for Electric Energy, dated received September 8, 1995. **[Pages 1375-1379]**
- * Fee Determination for CAAPP Permit, dated received September 8, 1995. **[Pages 1380-1381]**
- * Application for CAAPP Permit, dated received September 8, 1995. **[Pages 1382-1386]**
- * Note from Kim Bolt, Illinois EPA, to Mike Elbl, Illinois EPA, dated October 17, 1995. **[Page 1387]**
- * CAAPP Application Completeness Determination and Source Fee Determination, dated October 23, 1995. **[Pages 1388-1390]**
- * Cost Estimates for NOx Emissions Reduction for All Coal-Fired Utility Boilers, date updated 3/5/97. **[Page 1391]**

- * Telephone Log Sheet, dated March 18, 1997 through June 24, 1997. **[Page 1392]**
- * Facsimile from Bruce Parker, Electric Energy, to Brad Kohlmeyer, Illinois EPA, regarding Emission Factor Data, dated May 2, 1997. **[Pages 1393-1397]**
- * Letter from Terence H. Larbes, Manager, Technical Services, Electric Energy, to Brad Kohlmeyer, responding to request for additional information on Title V Permit Application, dated May 12, 1997. **[Pages 1398-1430]**
- * Letter from Donald Sutton to Bruce Parker and attached Preliminary Draft Title V- Clean Air Act Permit Program (CAAPP) Operating Permit, dated June 25, 1997, and attachment. **[Pages 1431-1481]**
- * Letter from Donald Sutton to Terence H. Larbes, Electric Energy, regarding Preliminary Draft Title V- Clean Air Act Permit Program Operating Permit, dated July 3, 1997. **[Page 1482]**
- * Letter from Terence Larbes to Donald Sutton requesting extension to provide comments, dated July 7, 1997. **[Page 1483]**
- * Facsimile from Bruce Parker to Donald Sutton providing comments on Preliminary Draft CAAPP operating permit submitted on June 25, 1997, dated August 13, 1997. **[Pages 1484-1498]**
- * Letter from William A. Murray, Regulatory Affairs Manager, Office of Public Utilities, City of Springfield, Illinois, to Donald Sutton regarding Air Utility Group of Illinois (AUGI) Meeting, dated August 14, 1997. **[Pages 1499-1500]**
- * Memorandum from Brad Kohlmeyer to Don Sutton, Chris Romaine, Mike Elbl and Shashi Shah regarding comments received on Electric Energy Draft, dated August 20, 1997. **[Pages 1501-1509]**
- * Memorandum from Brad Kohlmeyer to Don Sutton, Chris Romaine, Mike Elbl, Utility Analysts regarding AUGI concerns, dated September 9, 1997. **[Pages 1510-1513]**
- * Letter from William Murray to Donald Sutton regarding AUGI Meeting, dated September 9, 1997. **[Pages 1514-1515]**
- * Letter from Donald Sutton to Terence Larbes regarding Comments and revisions regarding the Preliminary Draft Title V - CAAPP Operating Permit, dated October 15, 1997. **[Pages 1516-1523]**
- * Handwritten notes of unknown author regarding meeting with Electric Energy, dated October 27, 1997. **[Pages 1524-1525]**

- * Facsimile from Bruce Parker to Mike Elbl providing Comments on Second Draft Title V Permit, dated December 12, 1997. **[Pages 1526-1537]**
- * Letter to Donald Sutton providing Comments on Version 2 of the Preliminary Draft Title V Permit, dated December 12, 1997. **[Pages 1538-1548]**
- * Letter from Donald Sutton to William Murray regarding December 8, 1997 Letter, dated January 28, 1998. **[Pages 1549-1556]**
- * Handwritten notes of Chris Romaine regarding likely meeting with Electric Energy, undated. **[Pages 1557-1558]**
- * Letter to Donald Sutton regarding Comments on the Preliminary Draft Title V Permit dated 12/25/97, dated February 4, 1998. **[Pages 1559-1566]**
- * Facsimile from Bruce Parker to Chris Romaine regarding changes agreed to in meeting of 2/26/98 between IEPA and Illinois Utilities, dated February 26, 1998. **[Pages 1567-1569]**
- * Facsimile from Bruce Parker to Chris Romaine providing comments on the latest draft permit, dated June 26, 1998. **[Pages 1570-1576]**
- * Facsimile from Chris Romaine to Bruce Parker dated 5/12/99, 1:30 pm. **[Pages 1577-1582]**
- * Letter from Robert L. Powers, Vice President, to Donald Sutton responding to Mr. Romaine's facsimile of 5/12/99, dated May 20, 1999. **[Page 1583]**
- * Memorandum from Donald Sutton to Bharat Mathur, Chief, Bureau of Air, Illinois EPA regarding Proposed CAAPP Prototype Permit Electric Utilities, dated August 4, 1999. **[Pages 1584-1587]**
- * Letter from William H. Sheppard, Plant Manager, Electric Energy, to Donald Sutton regarding permit fees, dated November 23, 1999, and attachment. **[Pages 1588-1592]**
- * Electric Energy, Inc. Monthly Excess Opacity Report Summary, April, May and June 2002. **[Page 1593]**
- * Email from Rick Diericx, Dynegy, to AUGI Meeting Participants, regarding June 5, AUGI Meeting, dated 5/10/2002 9:33 AM. **[Page 1594]**
- * Letter from Michael O. Wadlington, Alternate Authorized Account Representative, Electric Energy to Donald Sutton regarding NOx Budget Permit, dated December 2, 2002, and attachment. **[Pages 1595-1601]**

- * Email from Steven C. Whitworth to Chris Romaine regarding possible dates for a meeting, dated December 6, 2002, 7:54 AM. **[Pages 1602-1603]**
- * Power Plant Initiative - February 2003, dated 2/3/03. **[Pages 1604-1605]**
- * Facsimile from Chris Romaine to Bruce Parker, dated 3/11/03, 2:00 (1:50). **[Pages 1606-1607]**
- * Facsimile from Bruce Parker to Chris Romaine regarding Precipitator Readings, dated March 12, 2003. **[Page 1609]**
- * Memorandum from David Kolaz to Renee Cipriano regarding Approval for Public Hearings for Coal-Fired Power Plant Permits, dated June 2, 2003. **[Pages 1610-1611]**
- * 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 1612]**
- * Letter from William Sheppard to Donald Sutton regarding change in ownership, dated July 28, 2003. **[Page 1613]**
- * Information concerning Greenhouse Gases, dated 7/31/03. **[Pages 1614-1615]**
- * Handwritten notes of Laurel Kroack regarding Title V permits, dated November 21, 2003. **[Pages 1616-1617]**
- * Facsimile from Keith Harley to Julie Armitage, dated November 24, 2003. **[Pages 1618-1623]**
- * Note and attachment from Chris Romaine to Dave Kolaz, dated 12/10/03. **[Pages 1624-1631]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM, with handwritten notes. **[Pages 1632-1633]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM. **[Page 1634]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Laurel Kroack. **[Page 1635]**
- * Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Chris Romaine. **[Pages 1636-1642]**

- * Handwritten notes of Laurel Kroack beginning “Enviros & Title V Power Plants,” dated 2/3/2004. **[Pages 1643-1644]**
- * Memorandum from Laurel Kroack to Renee Cipriano regarding Title V permits for coal-fired power plants, including Midwest Generation, dated February 4, 2004. **[Pages 1645-1648]**
- * Email from Chris Romaine to Natalie Locke and Steve Whitworth, dated 2/19/2004, 2:41 PM. **[Page 1649]**
- * Handwritten notes of Manish Patel regarding meeting with USEPA on coal-fired power plant CAAPPs dated 2/24/04, 1:30 PM. **[Page 1650]**
- * Handwritten notes of Manish Patel regarding conference call with coal-utility facilities, dated 2/25/04, 1:30 PM. **[Page 1651]**
- * Memorandum from David Kolaz to Renee Cipriano regarding status and time line for Title V Power Plant Issuance, dated April 28, 2004. **[Pages 1652-1653]**
- * Handwritten notes of Laurel Kroack regarding meeting with USEPA concerning power plant permits, dated 5/6/04. **[Pages 1654-1656]**
- * 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 1657-1680]**
- * Memorandum from Laurel Kroack to Cheryl Newton regarding Utility Permit Issuance Timeline, dated June 1, 2004. **[Page 1681]**
- * 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 1682-1695]**
- * Facsimile cover sheet from Chris Romaine to Stacey Coburn, dated 6/29/04. **[Page 1696]**
- * 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 1697]**
- * Handwritten notes of Laurel Kroack regarding Title V, dated 8/30/04. **[Pages 1698-1700]**
- * Letter from Bharat Mathur, Acting Regional Administrator, USEPA, to Renee Cipriano, Illinois EPA, dated December 2, 2004. **[Pages 1701-1703]**

- * 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 1704]**
 - * 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 1705-1706]**
 - * Letter from Donald Sutton to American Bottom Conservancy, et al., dated January 13, 2005, responding to letter dated January 6, 2005. **[Pages 1707-1717]**
 - * Letter from Laurel Kroack, Acting Chief, Bureau of Air, Illinois EPA, to Steve Rothblat, USEPA, dated January 18, 2005. **[Pages 1718-1725]**
 - * Handwritten notes of Laurel Kroack regarding utility, title V, dated 1/26/05. **[Pages 1726-1727]**
 - * Notes of Laurel Kroack regarding March 21, 2005, call with feds. **[Pages 1728-1729]**
 - * Notes of Julie Armitage regarding May 10, 2005, meeting with the feds. **[Pages 1730-1735]**
 - * List of Michael Reed, dated June 9, 2005. **[Page 1736]**
 - * Draft Instructions, dated June 23, 2005. **[Pages 1737-1747]**
 - * Note and attachments from Michael Reed to Chris Romaine, dated July 17, 2005. **[Pages 1748-1759]**
 - * Miscellaneous documents regarding request for extension of time to comment on the Preliminary Responsiveness Summary and Draft Revised Proposed Title V Permits. **[Pages 1760-1766]**
 - * Handwritten notes of Michael Reed, dated August 1, 2005. **[Pages 1767-1771]**
 - * Notes of Michael Reed regarding feds conference call, dated September 16, 2005. **[Pages 1772-1773]**
 - * Handwritten notes of Laurel Kroack, dated September 23, 2005. **[Page 1774]**
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- Miscellaneous Emails Relevant to Electric Energy. **[Pages 1924-1940]**
- Miscellaneous Undated Notes of Illinois EPA Staff. **[Pages 1941-2001]**

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FESOP NOx Averaging Permits. **[Pages 3194-3197]**

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Documentation Relative to Proceedings Before the Administrator, USEPA. **[Pages 3262-3609]**

Startup, Combustion Evaluations, & Alternative Fuel Memorandums **[Pages 3610-3617]**

- * 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 3610-3612]**
- * Memorandum from Michael Reed to Power Plant File regarding Provisions Requiring Combustion Evaluations, dated September 23, 2005. **[Pages 3613-3614]**
- * 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 3615-3617]**

Comments specific to Electric Energy **[Pages 3618-3665]**

- * USEPA Comments on Draft CAAPP for Electric Energy, Inc., Joppa Steam, dated September 23, 1998. **[Pages 3618-3623]**
- * Letter from Rick Diericx, Air Group Leader, Illinois Power to Chris Romaine regarding Comments on Electric Energy Inc. CAAPP Permit, dated June 17, 1999. **[Pages 3624-3631]**
- * Email from Bruce Parker to Chris Romaine regarding comments on Title V permit draft, dated September 11, 2002, 9:02 AM. **[Page 3632]**

- * Email from Bruce Parker to Chris Romaine regarding additional draft permit comments, dated September 11, 2002, 9:17 AM. **[Page 3633]**
- * Letter from Terence Larbes to Brad Frost, Illinois EPA, providing comment dated October 16, 2002. **[Page 3634]**
- * Letter from Aric D. Diericx, Chairperson, AUGI, to Brad Frost and attached comments, dated October 25, 2002. **[Pages 3635-3639]**
- * Letter from Glenn Landers, Sierra Club Cleveland Office, to Brad Frost, Illinois EPA, dated October 25, 2002. **[Pages 3640-3642]**
- * Email from Acevedo Jorge, United States EPA (USEPA) to Chris Romaine regarding Electric Energy Comments, dated 11/22/2002 4:59 PM. **[Page 3643]**
- * Email from Acevedo Jorge, United States EPA (USEPA) to Chris Romaine regarding Electric Energy Comments, dated 11/26/2002 4:56 PM. **[Pages 3644-3645]**
- * Email from Acevedo Jorge, United States EPA (USEPA) to Chris Romaine regarding Electric Energy Comments, dated 12/5/2002 5:46 PM. **[Pages 3646-3647]**
- * Letter from Terence Larbes to Charles Matoesian, Illinois EPA, providing comments to permit, dated January 13, 2005. **[Pages 3648-3654]**
- * Letter from David Rieser, McGuire Woods 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 26, 2005. **[Pages 3655-3656]**
- * Letter from Charles Matoesian to David Rieser regarding Request for Extension of Time for Commenting on Proposed Title V Permits Posted on July 19, 2005, dated July 28, 2005. **[Page 3657]**
- * Letter from Terence Larbes to Charles Matoesian providing comments on the CAAPP permit, dated August 1, 2005. **[Pages 3658-3665]**

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- * Comments of the Sierra Club and American Bottom Conservancy, Summer 2003. **[Pages 3666-3704]**
- * 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 3705-3719**]

- * 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 3720-3722**]
- * Email from Verna Owen to Mr. Holmstead, dated 12/14/2004 12:09:23 PM. [**Pages 3723-3724**]
- * 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 3725-4110**]
- * 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 4111-4496**]
- * 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 4497-4603**]

Proceedings in the US District Court. [**Pages 4604-4645**]

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Startup, Shutdown Guidance: January 28, 1993 [**Pages 4834-4836**]

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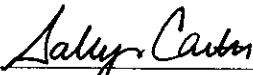
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Respectfully submitted by,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,



Sally A. Carter
Assistant Counsel

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217)782-5544

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of March 2006, I did send, by ^{CMS Courier}~~first class mail~~,
~~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

James T. Harrington
David L. Rieser
McGuire Woods, LLP
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Sally Carter
Assistant Counsel