



ORIGINAL

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD  
OF THE STATE OF ILLINOIS

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STATE OF ILLINOIS  
Pollution Control Board

THE CITY OF SPRINGFIELD, )  
a municipal corporation, )  
 )  
 Petitioner, )  
 )  
 v. )  
 )  
 ILLINOIS ENVIRONMENTAL )  
 PROTECTION AGENCY, )  
 )  
 Respondent. )

PCB 2006-75  
(CAAPP 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 City of Springfield on September 29, 2005. The permit authorized the operation of an electrical power generation facility known collectively as the Dallman and Lakeside Stations. The facility is located at 3100 Stevenson Drive, in Springfield, 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, City

of Springfield's permit application materials, various draft permits issued for public comment, correspondence between the Illinois EPA and both City of Springfield and the Illinois EPA and the United States Environmental Protection Agency, public comments received during the multiple public comment periods, various construction and operating permits issued to the City of Springfield, 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**

Miscellaneous documents pertaining to Draft Permit and Public Notice. **[Pages 1-163]**

Preliminary Responsiveness Summary, dated August 15, 2005. **[Pages 164-206]**

Proposed Permit (USEPA Review) Revised Proposed Permit, dated August 2005. **[Pages 207-384]**

Proposed Permit (USEPA Review) Proposed CAAPP Permit, dated October 6, 2003. **[Pages 385-544]**

Extension Denial Letter notifying that the comments must be postmarked by August 1, 2005. **[Page 545]**

Coal-Fired CAAPP Repreproposed Notification. **[Page 546]**

Draft Revised Proposed Permit, dated July 2005. **[Pages 547-724]**

Coal-Fired Revised Proposed CAAPP Notification. **[Page 725]**

Revised Proposed CAAPP Permit Draft, dated December 2004. **[Pages 726-893]**

July 19, 2005, Letter. **[Pages 894-899]**

August 15, 2005, Letter. **[Pages 900-905]**

Final Permit and Calculation Sheet, dated September 2005. **[Pages 906-1082]**

September 29, 2005, Letter. **[Pages 1083-1089]**

Final Responsiveness Summary. **[Pages 1090-1133]**

*In the Matter of Particulate Emission Limitations, Rule 203(g)(1) and 202(b) of Chapter 2, Rule 82-1, June 30, 1988. [Pages 1134-1177]*

Letter from William A. Murray, Regulatory Affairs Manager, Office of Public Utilities, City of Springfield, to Donald Sutton and Application for CAAPP Permit, dated received September 7, 1995. **[Pages 1178-1518]**

167 120 AA0 95 09 0091 **[Pages 1519-1745]**

- \* Application for CAAPP Permit, dated received September 7, 1997. **[Pages 1519-1523]**
- \* Fee Determination for CAAPP Permit, dated received September 7, 1997. **[Pages 1524-1525]**
- \* Compliance Certification, dated received September 7, 1997. **[Pages 1526-1531]**
- \* Supplemental Form Air Pollution Control Equipment Electrostatic Precipitator (260F). **[Pages 1532-1535]**
- \* Applicable Rules-Supplement Dallman 31/32, Lakeside 7&8, Exhibit 240-A. **[Pages 1536-1537]**
- \* Applicable Rules-Supplement Dallman Unit 33, Exhibit 240-A. **[Pages 1538-1541]**
- \* Telephone Log Sheet, dated September 29, 1995. **[Page 1542]**
- \* CAAPP Application Completeness Determination and Source Fee Determination, dated October 6, 1995. **[Pages 1543-1548]**

- \* Cost Estimates for NO<sub>x</sub> Emissions Reduction for All Coal-Fired Utility Boilers, date updated 3/5/97. **[Page 1549]**
- \* Power Plant Initiative - February 2003, dated 2/3/03. **[Pages 1550-1551]**
- \* Memorandum from David Kolaz to Renee Cipriano regarding Approval for Public Hearings for Coal-Fired Power Plant Permits, dated June 2, 2003. **[Pages 1552-1553]**
- \* 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 1554]**
- \* Information concerning Greenhouse Gases, dated 7/31/03. **[Pages 1555-1556]**
- \* Letter from S. David Farris, CIH, CSP, Environmental Health & Safety Manager, Office of Public Utilities, City of Springfield, Illinois, to Chris Romaine, Illinois EPA, resubmitting NO<sub>x</sub> Averaging (640-CAAPP) and NO<sub>x</sub> Budget Permit (660-CAAPP), dated August 20, 2003, and attachment. **[Pages 1557-1585]**
- \* Handwritten notes of Laurel Kroack regarding Title V permits, dated November 21, 2003. **[Pages 1586-1587]**
- \* Facsimile from Keith Harley to Julie Armitage, dated November 24, 2003. **[Pages 1588-1593]**
- \* Note and attachment from Chris Romaine to Dave Kolaz, dated 12/10/03. **[Pages 1594-1601]**
- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM, with handwritten notes. **[Pages 1602-1603]**
- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM. **[Page 1604]**
- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Laurel Kroack. **[Page 1605]**
- \* Email from Bruce Nilles to Dave Kolaz, dated 2/3/2004, 9:54 AM with handwritten notes of Chris Romaine. **[Pages 1606-1612]**
- \* Handwritten notes of Laurel Kroack beginning “Enviros & Title V Power Plants,” dated 2/3/2004. **[Pages 1613-1614]**

- \* Memorandum from Laurel Kroack to Renee Cipriano regarding Title V permits for coal-fired power plants, including Midwest Generation, dated February 4, 2004. **[Pages 1615-1618]**
- \* Email from Chris Romaine to Natalie Locke and Steve Whitworth, dated 2/19/2004, 2:41 PM. **[Page 1619]**
- \* Handwritten notes of Manish Patel regarding meeting with USEPA on coal-fired power plant CAAPPs dated 2/24/04, 1:30 PM. **[Page 1620]**
- \* Handwritten notes of Manish Patel regarding conference call with coal-utility facilities, dated 2/25/04, 1:30 PM. **[Page 1621]**
- \* Memorandum from David Kolaz to Renee Cipriano regarding status and time line for Title V Power Plant Issuance, dated April 28, 2004. **[Pages 1622-1623]**
- \* Handwritten notes of Laurel Kroack regarding meeting with USEPA concerning power plant permits, dated 5/6/04. **[Pages 1624-1626]**
- \* 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 1627-1650]**
- \* Memorandum from Laurel Kroack to Cheryl Newton regarding Utility Permit Issuance Timeline, dated June 1, 2004. **[Page 1651]**
- \* 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 1652-1665]**
- \* Facsimile cover sheet from Chris Romaine to Stacey Coburn, dated 6/29/04. **[Page 1666]**
- \* 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 1667]**
- \* Handwritten notes of Laurel Kroack regarding Title V, dated 8/30/04. **[Pages 1668-1670]**
- \* Letter from Bharat Mathur, Acting Regional Administrator, USEPA, to Renee Cipriano, Illinois EPA, dated December 2, 2004. **[Pages 1671-1673]**
- \* 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 1674]**

- \* 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 1675-1676]**
  - \* Letter from Donald Sutton to American Bottom Conservancy, et al., dated January 13, 2005, responding to letter dated January 6, 2005. **[Pages 1677-1688]**
  - \* Letter from Laurel Kroack, Acting Chief, Bureau of Air, Illinois EPA, to Steve Rothblat, USEPA, dated January 18, 2005. **[Pages 1689-1696]**
  - \* Handwritten notes of Laurel Kroack regarding utility, title V, dated 1/26/05. **[Pages 1697-1698]**
  - \* Notes of Laurel Kroack regarding March 21, 2005, call with feds. **[Pages 1699-1700]**
  - \* Notes of Julie Armitage regarding May 10, 2005, meeting with the feds. **[Pages 1701-1706]**
  - \* List of Michael Reed, dated June 9, 2005. **[Page 1707]**
  - \* Draft Instructions, dated June 23, 2005. **[Pages 1708-1718]**
  - \* Note and attachments from Michael Reed to Chris Romaine, dated July 17, 2005. **[Pages 1719-1730]**
  - \* Miscellaneous documents regarding request for extension of time to comment on the Preliminary Responsiveness Summary and Draft Revised Proposed Title V Permits. **[Pages 1731-1737]**
  - \* Handwritten notes of Michael Reed, dated August 1, 2005. **[Pages 1738-1742]**
  - \* Notes of Michael Reed regarding feds conference call, dated September 16, 2005. **[Pages 1743-1744]**
  - \* Handwritten notes of Laurel Kroack, dated September 23, 2005. **[Page 1745]**
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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 3862-3864]**
- \* Memorandum from Michael Reed to Power Plant File regarding Provisions Requiring Combustion Evaluations, dated September 23, 2005. **[Pages 3865-3866]**
- \* 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 3867-3869]**

Comments Specific to City of Springfield **[Pages 3870-4292]**

- \* Email from Tom Tuttle to Ross Cooper regarding City, Water, Light and Power Draft Title V permit comments, dated 9/25/03, 10:17 AM and handwritten notes of Ross Cooper. **[Pages 3870-3910]**
- \* Letter from S. David Farris to Donald Sutton, P.E., Illinois EPA, providing Proposed CAAPP Permit #95090091 Permittee Comments, dated September 29, 2003, and attachments. **[Pages 3911-4070]**
- \* Letter from S. David Farris to Donald Sutton providing Proposed CAAPP Permit #95090091 Permittee Comments, dated January 17, 2005, and attachments. **[Pages 4071-4143]**



- \* Letter from Charles Matoesian to PJ Becker regarding Request for Extension of Time for Commenting on Proposed Title V Permits Posted on July 19, 2005, dated July 28, 2005. **[Page 4144]**
- \* Letter from S. David Farris to Charles Matoesian, Illinois EPA, providing Proposed CAAPP Permit #95090091 Permittee Comments, dated August 1, 2005, and attachments. **[Pages 4145-4292]**

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- \* Comments of the Sierra Club and American Bottom Conservancy, Summer 2003. **[Pages 4293-4331]**
- \* 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 4332-4346]**
- \* 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 4347-4349]**
- \* Email from Verna Owen to Mr. Holmstead, dated 12/14/2004 12:09:23 PM. **[Pages 4350-4351]**
- \* 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 4352-4737]**
- \* 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 4738-5122]**
- \* 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 5123-5235]**

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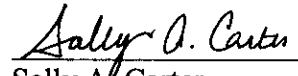
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Respectfully submitted by,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,



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Sally A. Carter  
Assistant Counsel

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P.O. Box 19276  
Springfield, Illinois 62794-9276  
(217)782-5544

**ORIGINAL**  
**CERTIFICATE OF SERVICE**

**RECEIVED**  
CLERK'S OFFICE

APR 18 2006

STATE OF ILLINOIS  
Pollution Control Board

I hereby certify that on the 17<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

I further hereby certify that on the 12<sup>th</sup> day of April 2006, I did send, 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:

Carol Webb  
Hearing Officer  
Illinois Pollution Control Board  
1021 North Grand Avenue East  
P.O. Box 19274  
Springfield, Illinois 62794

Cynthia A. Faur  
Mary A. Gade  
Elizabeth A. Leifel  
Sonnenschein Nath & Rosenthal, LLP  
7800 Sears Tower  
233 South Wacker Drive  
Chicago, Illinois 60606

and a true and correct copy of the same foregoing instrument without accompanying attachments, by First Class Mail with postage thereon fully paid and deposited into the possession of the United States Postal Service, to:

William Murray  
City Water Light & Power  
800 East Monroe Street  
4<sup>th</sup> Floor  
Springfield, IL 62701

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