

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

DYNEGY MIDWEST GENERATION, LLC,)
)
Petitioner,)
) PCB 12-135
v.) (Variance-Air)
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Respondent.)

NOTICE

To: John Therriault, Assistant Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601-3218


Kathleen C. Bassi
Stephen J. Bonebrake
233 South Wacker Drive, Suite 6600
Chicago, IL 60606

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

PLEASE TAKE NOTICE that I have today filed with the Office of the Pollution Control Board the RECOMMENDATION of the Illinois Environmental Protection Agency, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: 
Dana Vetternoffer
Assistant Counsel
Division of Legal Counsel

DATED: July 23, 2012
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ILLINOIS ENVIRONMENTAL)	
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RECOMMENDATION

The Illinois Environmental Protection Agency (“Illinois EPA” or “Agency”), by its attorney, hereby responds to the Petition for Variance (“Petition”) of Dynegy Midwest Generation, LLC (“DMG” or “Petitioner”) from certain provisions of the Illinois Multi-Pollutant Standard (“MPS”) set forth in 35 Ill. Adm. Code 225.233(f)(2) from the date of the Illinois Pollution Control Board’s (“Board”) order until April 1, 2015. Pursuant to Section 37(a) of the Illinois Environmental Protection Act (“Act”) [415 ILCS 5/37(a) (2010)] and 35 Ill. Adm. Code 104.216, the Illinois EPA neither supports nor objects to the Board granting DMG’s petition as specified in this Recommendation. In support of its recommendation, the Illinois EPA states as follows.

I. PROCEDURAL HISTORY

1. On June 8, 2012, DMG filed its Petition with the Board, requesting a variance from provisions in the MPS that prohibit owners or operators of Electric Generating Units (“EGUs”) in an MPS Group from selling, trading to, or otherwise exchanging with any person sulfur dioxide (“SO₂”) allowances that would otherwise be available for sale or trade as a result of actions taken to comply with the SO₂ emission standards in 35 Ill. Adm. Code 225.233(e)(2). Specifically, DMG requests a variance for vintage year 2013 and 2014 SO₂ allowances allocated

to EGUs under the Cross-State Air Pollution Rule (“CSAPR”). DMG also requests a variance from the requirement that DMG surrender excess SO₂ allowances to the Illinois EPA. DMG requests the variance for its entire MPS Group, consisting of EGUs at the Baldwin Energy Complex in Randolph County (“Baldwin”), the Havana Power Station in Mason County (“Havana”), the Hennepin Power Station in Putnam County (“Hennepin”), the Wood River Power Station in Madison County (“Wood River”), and the Vermilion Power Station in Vermilion County (“Vermilion”) (while Vermilion has been permanently retired, DMG states that it includes the station in its Petition “because of any possible ambiguity regarding Vermilion’s continued membership in the DMG MPS Group”).

2. Pursuant to the Board’s procedural rules, the Illinois EPA must provide public notice of any petition for variance within 14 days after the filing of the petition. 35 Ill. Adm. Code 104.214(a); *See also*, 415 ILCS 5/37(a) (2010). Additionally, the Illinois EPA must provide written notice of a petition to the County State’s Attorney, the Chairman of the County Board, each member of the General Assembly from the legislative district affected, and any person in the county who has in writing requested notice of variance petitions. 35 Ill. Adm. Code 104.214(b). Pursuant to these requirements, the Illinois EPA published notice of DMG’s Petition in the *Alton Telegraph* on June 19, 2012; the *Danville Commercial News* on June 19, 2012; the *Granville Putnam County Record* on June 20, 2012; the *Havana Mason County Democrat* on June 20, 2012; and the *Red Bud North County News* on June 21, 2012. Consistent with Section 104.214(b), the Illinois EPA mailed notice of the Petition on June 19, 2012.

3. Section 104.214(f) of the Board’s procedural rules provides, “Within 21 days after the publication of notice, the Agency must file with the Board a certification of publication that states the date on which the notice was published and must attach a copy of the published

notice.” 35 Ill. Adm. Code 104.214(f). In accordance with this requirement, the Illinois EPA filed a certification of publication with the Board on July 9, 2012.

4. To date, the Illinois EPA has received no written comments and no requests for hearing. The Illinois EPA is aware, however, that the Environmental Law & Policy Center, Natural Resources Defense Council, Sierra Club, and Respiratory Health Association submitted a joint public comment to the Board on July 12, 2012.

5. The Illinois EPA is required to make a recommendation to the Board on the disposition of a petition for variance within forty-five (45) days of the filing of the petition or any amendment thereto or thirty (30) days before a scheduled hearing. 35 Ill. Adm. Code 104.216.

II. BACKGROUND REGARDING FACILITIES IN DMG’S MPS GROUP

6. DMG explains in its Petition that it currently owns and operates four coal-fired electricity generating power plants in Illinois (excluding the retired Vermilion Power Station) with principal emissions consisting of SO₂. Petition at 4. Generally, coal-fired power plants also emit nitrogen oxides (“NO_x”), particulate matter (“PM”), and mercury. Petition at 5. The Illinois EPA accepts and incorporates by reference DMG’s description of the facilities in Exhibit 3 of the Petition.

7. DMG indicates that it controls SO₂ emissions at its coal-fired power plants through the use of low sulfur, Powder River Basin coal. Petition at 4. DMG also operates spray dryer absorbers (dry scrubbers) with fabric filter systems on two Baldwin units and is constructing similar control devices on the third Baldwin unit, which will be operational by December 31, 2012. Petition at 5. DMG has installed a dry scrubber on Havana Unit 6, which will also be operational by December 31, 2012. Petition at 5; *See* Petition at 4-6 for a more detailed description of DMG’s control strategies for NO_x, PM, and mercury.

8. To the best of the Illinois EPA's knowledge, there are no state air pollution enforcement actions against DMG currently pending before the Board.

9. Other pending permits associated with the facilities in DMG's MPS Group are as follows:

Baldwin Energy Complex

On September 29, 2005, the Illinois EPA issued a Clean Air Act Permit Program ("CAAPP") permit to DMG for Baldwin. This permit was appealed at PCB 06-063 and is currently stayed.

On March 3, 2008, the Illinois EPA issued a construction permit to DMG, authorizing the installation of a baghouse, scrubber, and sorbent injection system for Unit 3 at Baldwin. This permit was appealed at PCB 08-66 and is partially stayed.

On June 19, 2008, the Illinois EPA issued a construction permit to DMG, authorizing the installation of a baghouse, scrubber, and sorbent injection systems for Units 1 and 2 at Baldwin. This permit was appealed at PCB 09-9 and is partially stayed.

Havana Power Station

On September 29, 2005, the Illinois EPA issued a CAAPP permit to DMG for Havana. This permit was appealed at PCB 06-071 and is stayed.

On April 16, 2007, the Illinois EPA issued a construction permit to DMG, authorizing the installation of a baghouse, scrubber, and sorbent injection system for Unit 6 at Havana. This permit was appealed at PCB 07-115 and is partially stayed.

Hennepin Power Station

On September 29, 2005, the Illinois EPA issued a CAAPP permit to DMG for Hennepin. This permit was appealed at PCB 06-072 and is stayed.

On May 29, 2007, the Illinois EPA issued a construction permit to DMG, authorizing the installation of a baghouse and sorbent injection systems for Units 1 and 2 at Hennepin. This permit was appealed at PCB 07-123 and is partially stayed.

Wood River Power Station

On September 29, 2005, the Illinois EPA issued a CAAPP permit to DMG for Wood River. This permit was appealed at PCB 06-074 and is stayed.

On June 12, 2008, the Illinois EPA issued a construction permit to DMG, authorizing the installation of a sorbent injection system for Unit 5 at Wood River. This permit was appealed at PCB 09-6 and is partially stayed.

Vermilion Power Station

On September 29, 2005, the Illinois EPA issued a CAAPP permit to DMG for Vermilion. This permit was appealed at PCB 06-073 and is stayed.

On May 30, 2006, the Illinois EPA issued a construction permit to DMG, authorizing the installation of a baghouse and sorbent injection systems for Units 1 and 2 at Vermilion. This permit was appealed at PCB 06-194 and is partially stayed.

DMG explains that the Vermilion Power Station was permanently retired effective November 17, 2011, and that the permits above have been withdrawn. Petition at Exhibit 3, Table 1-v.

III. RELIEF REQUESTED

10. DMG requests relief from the requirements in Section 225.233(f)(2) of the MPS, set forth below, for vintage year 2013 and 2014 CSAPR SO₂ allowances:

Section 225.233 Multi-Pollutant Standards (MPS)

.....

f) Requirements for NO_x and SO₂ Allowances.

.....

2) The owners or operators of EGUs in an MPS Group must not sell or trade to any person or otherwise exchange with or give to any person SO₂ allowances allocated to the EGUs in the MPS Group for vintage years 2013 and beyond that would otherwise be available for sale or trade as a result of actions taken to comply with the standards in subsection (e) of this Section. Such allowances that are not retired for compliance, or otherwise surrendered pursuant to a consent decree to which the State of Illinois is a party, must be surrendered to the Agency on an annual basis, beginning in calendar year 2014. This provision does not apply to the use, sale, exchange, gift, or trade of allowances among the EGUs in an MPS Group.

11. If granted, the variance will allow DMG to sell or trade excess vintage year 2013 and 2014 CSAPR SO₂ allowances, and eliminate the requirement that DMG surrender such allowances to the Illinois EPA. DMG stresses in its Petition that it does not seek changes to any other requirements set forth in the MPS, including SO₂, NO_x, and mercury reduction requirements and provisions requiring the installation and operation of emission control devices on DMG's coal-fired EGUs. Petition at 22. DMG also explains that the variance will have no effect on Acid Rain Program SO₂ allowances. Petition at 22.

IV. FACTS PRESENTED IN THE PETITION

12. Pursuant to 35 Ill. Adm. Code 104.216(a), the Illinois EPA conducted an investigation of the facts alleged in DMG's Petition, which included discussions with representatives of DMG as well as with the United States Environmental Protection Agency ("USEPA"). To the extent of the information currently available to the Illinois EPA, the Illinois EPA does not disagree with the facts set forth in DMG's Petition, except where otherwise noted in its Recommendation.

13. As discussed *supra*, the Illinois EPA has not received any public comments to

date regarding the Petition, but has reviewed the public comment recently submitted to the Board.

V. ENVIRONMENTAL IMPACT

14. Section 104.216(b)(2) of the Board's rules requires that the Illinois EPA state the location of the nearest air monitoring station, where applicable. 35 Ill. Adm. Code 104.216(b)(2). The Illinois EPA confirms the locations of the air monitoring stations relative to DMG's facilities as set forth in Exhibit 4 of the Petition.

15. DMG states in its Petition that the requested relief will not result in an environmental detriment. Petition at 23. DMG explains that the CSAPR is intended to replace the Clean Air Interstate Rule ("CAIR"), the trading program in place at the time the MPS was negotiated and subsequently promulgated (and the trading program currently reinstated pending resolution of legal challenges to the CSAPR). Petition at 12-13, 15. Dynegy argues that the CSAPR's cap-and-trade program, and its associated constraints and requirements, ensures the elimination of each subject state's significant contribution to nonattainment and interference with maintenance of air quality standards. Petition at 23 (citing statements made by USEPA regarding the adequacy of the CSAPR to ensure that such standards will be met). DMG indicates that the CSAPR "imposes cap-and-trade programs on EGUs within each affected state that cap emissions of SO₂ and NO_x at levels to eliminate that state's contribution to nonattainment in, or interference with maintenance of attainment status by, down-wind areas with respect to the [National Ambient Air Quality Standards] for PM_{2.5} and ozone." Petition at 12. The CSAPR contains its own restrictions for allowance trading to ensure that emission reductions occur both in Illinois as well as in other states whose emissions impact air quality in Illinois. Petition at 14. Such restrictions are based on extensive air modeling performed by USEPA in developing the

CSAPR, modeling that was not performed for the MPS. Petition at 14.

16. DMG also explains that the CAIR addressed only SO₂ allowances already in existence under Title IV of the Clean Air Act; unlike the CSAPR, it did not create any new SO₂ allowances. Petition at 15. DMG argues that it therefore “did not agree to the MPS allowance trading restrictions and MPS-required SO₂ allowance surrenders with respect to the then non-existent and not-yet-even-envisioned CSAPR SO₂ allowances.” Petition at 15. DMG states that, in that regard, the CSAPR represents a “fundamental change to DMG’s and the Agency’s mutual assumptions on which the MPS SO₂ allowance trading restrictions were based.” Petition at 15. Further, unlike the CAIR, the CSAPR trading program does not use Acid Rain Program SO₂ allowances; rather, the CSAPR uses SO₂ allowances specific to the CSAPR program. Petition at 12. DMG argues that, with its limited supply of CSAPR-specific SO₂ allowances and trading restrictions, the CSAPR is “effectively more stringent than the CAIR.” Petition at 12.

17. DMG indicates that, during the requested variance period, it will operate its dry scrubbers, meet its system-wide SO₂ emissions tonnage cap and unit-specific SO₂ emission limits set forth in the Consent Decree, and meet its system-wide SO₂ emission limit for its MPS Group. Petition at 23-24. DMG will not increase its actual SO₂ emission rate or its aggregate annual SO₂ emissions as a result of the requested variance. Petition at 24.

18. Additionally, DMG indicates that it has undertaken several initiatives that have resulted in fewer SO₂ emissions, helping to mitigate the number of SO₂ allowances freed for trading by the requested variance. Petition at 23-24; *See also* Exhibit 8 of the Petition.

19. First, several of DMG’s units have been taken out of service for significant periods of time from 2007 through 2012 in order to install pollution control equipment. During these extended outages the units did not emit any SO₂, reducing actual SO₂ emissions by 6,471

tons. Petition at 24. Similarly, an outage scheduled for the fall of 2012 is projected to reduce actual SO₂ emissions by 1,428 tons. Petition at 24. DMG argues that “pure contemporaneity” of these SO₂ reductions and the requested variance period is “impossible and irrelevant,” as use of the allowances that DMG seeks to trade could occur at any time in the future. Petition at 24.

20. Second, DMG states that it operated its dry scrubbers at Baldwin Units 1 and 3 before their applicable compliance dates, resulting in 3,162 tons of early SO₂ emission reductions. DMG is scheduled to operate its dry scrubber at Baldwin Unit 2 before its applicable deadline as well, projected to provide 325 tons of early SO₂ emissions. Petition at 24.

21. Third, DMG explains that it recently retired Vermilion Units 1 and 2, resulting in 1,685 tons of estimated reductions in 2011, and an ongoing estimated annual reduction of over 2,200 tons of SO₂. DMG indicates that it is also in the process of permanently retiring eight oil-fired boilers at Havana, and three oil/natural gas-fired boilers at Wood River, representing a reduction of over 10,000 tons of SO₂ per year from permitted emission levels. Petition at 25.

22. Finally, DMG states that “relative to the Agency’s air quality modeling to determine compliance with the new 1-hour SO₂ [National Ambient Air Quality Standard], DMG has reduced SO₂ emissions at Wood River Units 4 and 5 by 13,008 tons per year by meeting its Consent Decree SO₂ emission limit of 1.20 lb/mmBtu instead of the state permitted SO₂ emission limit of 1.80 lb/mmBtu that is used by the Agency for those units in its air quality modeling.” Petition at 25.

23. In summary, DMG argues that the aggregate of DMG’s one-time actual and projected actual SO₂ emission reductions (13,071 tons) and its ongoing emission reductions from unit retirements and emissions below permitted emission rates used in the Illinois EPA’s modeling (up to approximately 32,722 tons annually) exceeds the number of SO₂ emission

allowances affected by the granting of the variance (approximately 20,000 SO₂ allowances/tons in 2013 and possibly again in 2014, assuming those are the first two years of the CSAPR).
Petition at 25-26.

24. The Illinois EPA believes that there is assurance that air quality will not be detrimentally impacted if the variance is granted, as a result of creditable emission reduction measures taken by DMG and the fact that the CSAPR is by design more stringent than the CAIR and will impose sufficient trading restrictions. The CSAPR is generally considered more stringent than the CAIR due to tighter timing and a greater amount of required emission reductions; further, the CSAPR does not allow the use of allowances from other trading programs, and contains trading restrictions for CSAPR allowances. The Illinois EPA recognizes that such trading restrictions were developed based on modeling performed by the USEPA to ensure that a sufficient level of emission reductions occur in Illinois and in other states impacting regional air quality. Therefore, the Illinois EPA believes that sufficient trading restrictions will continue to apply through the CSAPR in the event this variance is granted.

25. The Illinois EPA does not dispute that actions taken by DMG resulted in significant SO₂ emission reductions beyond those otherwise required. The amount of SO₂ emission reductions set forth by DMG above are consistent with the data currently available to, and reviewed by, the Illinois EPA during the course of its investigation of DMG's Petition. In particular, the emission reductions that have occurred or will occur as a result of unit shutdowns, units being taken out of service for significant periods of time, and early compliance with applicable requirements are quantifiable and creditable.

VI. ARBITRARY AND UNREASONABLE HARDSHIP

26. In considering whether to grant or deny a variance pursuant to Section 35(a) of the Act, the Board is required to determine whether the Petitioner has shown that it would suffer an arbitrary or unreasonable hardship if required to comply with the regulation or permit requirement at issue. 415 ILCS 5/35(a) (2010). The Board's rules require that Illinois EPA estimate the cost that compliance would impose on the petitioner and on others, as well as the injury that the grant of the variance would impose on the public. 35 Ill. Adm. Code 104.216(b)(5).

27. DMG does not claim an inability to comply with the requirements set forth in the MPS as the basis for its requested relief. Instead, DMG argues that "surrendering, during the first two years of implementation of the CSAPR, a large quantity of SO₂ allowances with significant economic value generated by DMG's significant capital investments in SO₂ pollution control equipment deprives DMG of that [value], causing DMG unreasonable hardship." Petition at 17. DMG estimates that it will have approximately 23,000 excess allocated vintage year 2013 CSAPR SO₂ allowances, and that an inability to sell or trade such allowances is a significant lost opportunity. Petition at 18-19. While the monetary value of the allowances is uncertain, as the CSAPR is stayed and there is currently no active market for CSAPR SO₂ allowances, DMG estimates the potential value as between \$9.2 million (\$400 per ton) and \$57.5 million (\$2,500 per ton) when the CSAPR is reinstated. Petition at 19, Footnote 28.

28. DMG claims that the inability to sell or trade excess SO₂ allowances interferes with the "robust SO₂ allowance trading market" intended by the CSAPR, and damages the ability of DMG and Illinois industry to stay competitive with industry in other states where trading restrictions like those in the MPS do not exist. Petition at 20. DMG states that it is an

independent power producer and thus does not have a rate base; it competes directly against other electricity generators in the regional electricity generation market. Petition at 21. DMG further states that natural gas prices declined significantly since 2008, and that EGUs face the likelihood of incurring substantial additional costs in complying with various other new rules, including greenhouse gas emission standards and more stringent air quality standards. Petition at 21. DMG indicates that selling or trading excess SO₂ allowances would allow DMG to offset some of the costs of compliance with the MPS and Consent Decree and the lost margin due to market economics. Petition at 21.

29. The Illinois EPA has no evidence that the MPS trading restrictions will or will not “interfere” with the robust SO₂ allowance trading market intended by the CSAPR, or that any such restrictions will damage the ability of DMG and Illinois industry to stay competitive with other states. The Illinois EPA does, however, agree that EGUs face the possibility of incurring substantial additional costs in complying with other new rules, while at the same time having to compete with near-historic low natural gas prices.

30. Based on the information currently available to it, the Illinois EPA is unable to estimate the cost of DMG’s compliance with the trading restrictions in the MPS, although the Illinois EPA does not dispute the potential economic value of the CSAPR SO₂ allowances at issue. The Illinois EPA does not believe that any injury to the public will result from the granting of the variance, particularly considering DMG’s SO₂ emission reductions, and as DMG is required to comply with the more stringent CSAPR requirements, including all applicable trading restrictions set forth in the CSAPR.

VII. CONSISTENCY WITH FEDERAL LAW

31. Pursuant to Section 35 of the Act [415 ILCS 5/35 (2010)] and 35 Ill. Adm. Code

104.208(a), all petitions for variances must be consistent with federal law. DMG states in its Petition that “[t]here is no federal law that prohibits DMG from otherwise selling or trading SO₂ allowances under the CSAPR that are in excess of the MPS SO₂ emission standards.” DMG states that the granting of the variance does not implicate, or conflict with, any federal law, and that the MPS has not been approved by USEPA as part of Illinois’ State Implementation Plan (“SIP”). Petition at 27-28.

32. The Illinois EPA agrees that there is currently no federal authority that precludes granting the instant variance request, and that the proposed variance does not implicate Illinois’ SIP.

VIII. COMPLIANCE PLAN

33. Pursuant to Section 104.204(f) of the Board’s rules, the Petitioner is required to present a detailed compliance plan in the Petition for Variance. 35 Ill. Adm. Code 104.204(f).

34. DMG requests that the term of the variance begin on the date of the Board’s order and terminate on April 1, 2015. DMG proposes that the following conditions apply to the variance:

A. During the term of the variance, DMG shall not be subject to the requirements of Section 225.233(f)(2) relative to vintage 2013 and 2014 CSAPR SO₂ allowances.

B. During the term of the variance, DMG shall comply with all other applicable MPS requirements, as otherwise required.

C. Upon termination of the variance, DMG shall comply with all applicable MPS requirements, including Section 225.233(f)(2).

DMG proposes the following compliance plan:

Within 60 days after termination of the variance, DMG shall prepare and submit to the Agency a report identifying the amount [of] SO₂ emissions from its coal-fired power plants during the term of this variance and the tons of SO₂ removed by DMG's spray dry absorbers during the term of the variance.

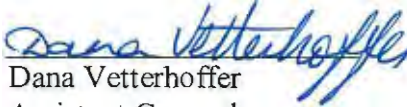
IX. RECOMMENDATION AND CONCLUSION

35. Section 37(a) of the Act and Section 104.216(b)(11) of the Board's rules require that Illinois EPA make a recommendation to the Board as to the disposition of the petition. 415 ILCS 5/37(a) (2010) and 35 Ill. Adm. Code 104.216(b)(11). The burden of proof in a variance proceeding is on the Petitioner to demonstrate that compliance with the rule or regulation would impose an arbitrary or unreasonable hardship. *See*, 415 ILCS 5/35(a) (2010) and 35 Ill. Adm. Code 104.238.

36. For the reasons set forth above, the Illinois EPA neither supports nor objects to the Board granting DMG's Petition as specified in this Recommendation.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: 
Dana Vetterhoffer
Assistant Counsel

DATED: July 23, 2012

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CERTIFICATE OF SERVICE


I, the undersigned, an attorney, state that I have served electronically the attached RECOMMENDATION of the Illinois Environmental Protection Agency upon the following persons:

To: John Therriault, Assistant Clerk
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James R. Thompson Center
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Chicago, Illinois 60601-3218

Kathleen C. Bassi
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ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: 
Dana Vetterhoffer
Assistant Counsel
Division of Legal Counsel

DATED: July 23, 2012

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