

BEFORE THE  
ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF: )  
)  
Amendments to 35 Ill. Adm. Code )  
Part 214, Sulfur Limitations, ) DOCKET R 15-21  
Part 217, Nitrogen Oxides ) (Rulemaking-Air)  
Emissions, and Part 225, )  
Control of Emissions from Large )  
Combustion Sources. )

Public hearing held, pursuant to notice, on  
Wednesday, July 8, 2015, at the hour of 9:00 a.m. at  
1021 N. Grand Avenue East, Springfield, Illinois,  
before DANIEL ROBERTSON, duly appointed Hearing  
Officer.

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REPORTER: LAUREL A. PATKES, CSR #084-001340

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BOARD MEMBERS:

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JERRY KEENAN  
JASON JAMES, Board Attorney

BOARD'S TECHNICAL UNIT:

ANAND RAO  
ALISA LIU

APPEARANCES:

DANA VETTERHOFFER  
IEPA Assistant Counsel  
1021 N. Grand Avenue East  
Springfield, Illinois 62794  
(217)782-5544  
Dana.Vetterhoffer@illinois.gov

appearing on behalf of IEPA;

ABBY ALLGIRE  
Legal Counsel  
215 E. Adams Street  
Springfield, Illinois 62701  
(217)522-5512  
aallgire@ierg.org

appearing on behalf of Illinois  
Environmental Regulatory Group;

SCHIFF HARDIN LLP  
STEPHEN J. BONEBRAKE  
6600 Sears Tower  
Chicago, Illinois 60606  
(312)258-5646  
sbonebrake@schiffhardin.com

appearing on behalf of Midwest  
Generation.

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EPA STAFF:

DAVID BLOOMBERG  
RORY DAVIS  
JEFFREY SPRAGUE  
JACKIE SIMS

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PROCEEDINGS

HEARING OFFICER ROBERTSON: Good morning, everyone.

My name is Daniel Robertson, and I have been appointed by the Board to serve as the hearing officer in this proceeding entitled In the Matter of Amendments to 35 Illinois Administrative Code Part 214, Sulfur Limitations, Part 217, Nitrogen Oxides Emissions, and Part 225, Control of Emissions from Large Combustion Sources.

This proceeding is listed as R15-21 in the Board's docket.

With me today to my right is the presiding board member, Jennifer Burke, and next to her we have members of the Board's Technical Unit Anand Rao and Alisa Liu, and also with us today to my left we have the Board's Chairman, Deanna Glosser.

Next to her, we have Board Member Carrie Zalewski, Board Member Jerry O'Leary, Board Member Jerry Keenan, and also an attorney for the Board, Jason James.

First, thank you everyone for coming out today. It looks like we have quite a

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1 sizeable crowd. We appreciate you all taking the  
2 time out of your day to come and be a part of this  
3 proceeding.

4 This rulemaking was filed  
5 pursuant to Sections 4, 10, 27, 28 and 28.2 of the  
6 Environmental Protection Act.

7 On May 7th, the Board granted  
8 the Illinois Environmental Protection Agency's  
9 motion for expedited review and proceeded to first  
10 notice without substantive comments on the merits of  
11 the proposal.

12 This is the first of three  
13 public hearings that the Board will hold.

14 The second will take place in  
15 Joliet on July 29th, and the third will take place  
16 in Pekin on August 4th.

17 All of this information is  
18 also available on the Board's website at any time.

19 The purpose of today's hearing  
20 is to hear testimony from the proponent, the  
21 Illinois Environmental Protection Agency.

22 The Agency was the only one  
23 that prefiled testimony for today. However, the  
24 Board and the Illinois Environmental Regulatory

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1 Group also filed questions for the Agency, and  
2 yesterday afternoon, the Agency did file three  
3 documents.

4 They filed responses to IERG's  
5 prefiled questions, responses to the Board  
6 questions, and also a second motion to amend the  
7 proposal, and all of these, for anyone interested,  
8 we do have copies on the desk by the door. Please  
9 help yourself.

10 During the hearing I ask that  
11 you please note any question asked by a board member  
12 or staff is intended to help build a complete record  
13 for the Board's decision and not intended to express  
14 any preconceived notion or bias.

15 Also today, anyone who did not  
16 prefile testimony or questions will still be allowed  
17 to offer either with time permitting.

18 Likewise, any members of the  
19 public who wish to speak on the record will be given  
20 an opportunity to offer public comment later, and if  
21 you do not wish to offer a public comment, I mean,  
22 if you do not wish to speak today but wish to offer  
23 a public comment, you can also file a written  
24 comment with the Board.

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1                   So today we will begin with  
2 testimony from the Agency followed by prefiled  
3 questions of IERG and the Board.

4                   At that point, anyone else who  
5 wishes to specifically ask questions of the Agency  
6 will then be given the opportunity to do so, and  
7 once the Agency has completed testifying, anyone  
8 else who wishes to testify will also be allowed to,  
9 and once testimony is complete, time will be  
10 provided for anyone who wishes to offer a public  
11 comment on the record, and we do have sign-up sheets  
12 on, again, the table by the door for anyone who  
13 wishes to sign up to either testify or offer public  
14 comment. We'll begin with the people who sign up,  
15 and then anyone else in the room will still be  
16 allowed to speak afterwards.

17                   Can everyone hear me okay in  
18 the back? Just checking. Okay. Thank you.

19                   Giving testimony, I just ask  
20 if you wish to ask a question, please put your hand  
21 up and just wait to be acknowledged, and once  
22 acknowledged, if you can state your name and if you  
23 represent anyone before beginning your question.

24                   Also, please speak loudly and



1 clearly so that the court reporter is able to get  
2 down everything that you have to say.

3 Before we start, are there any  
4 questions just on any of the procedural matters?

5 Seeing none, would any members  
6 of the Board like to make any opening statements?

7 Seeing no statements, at this  
8 point, I'd like to ask the Agency to please  
9 introduce itself and its witnesses for the record.

10 Thank you.

11 MS. VETTERHOFFER: Good morning.  
12 My name is Dana Vetterhoffer, and I'm assistant  
13 counsel for the Illinois Environmental Protection  
14 Agency.

15 With me today to my left are  
16 David Bloomberg who is the manager of the Air  
17 Quality Planning Section in the Illinois EPA's  
18 Bureau of Air, Rory Davis who is an environmental  
19 protection engineer in the Air Quality Planning  
20 Section, and Jeff Sprague who is the Modeling Unit  
21 Manager in the Air Quality Planning Section.

22 To my right is Jackie Sims who  
23 is the Regulatory Unit Manager in the Air Quality  
24 Planning Section.

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1 Mr. Bloomberg, Mr. Davis and  
2 Mr. Sprague are available today to answer questions  
3 regarding the Agency's rulemaking proposal which is  
4 intended to control emissions of sulfur dioxide in  
5 and around areas designated as nonattainment with  
6 respect to the 2010 Sulfur Dioxide National Ambient  
7 Air Quality Standard.

8 Before proceeding with  
9 questions, I'd like to move that Rory Davis's  
10 prefiled testimony be entered into the record as an  
11 exhibit as if read.

12 HEARING OFFICER ROBERTSON: Are  
13 there any objections to the motion?

14 Seeing no objections at this  
15 time, I'm going to enter the prefiled testimony of  
16 Rory Davis as Agency Exhibit A to this proceeding.

17 (Whereupon Agency Exhibit A was  
18 marked for identification as of  
19 this date.)

20 (Whereupon Agency Exhibit A was  
21 admitted into evidence at this  
22 time.)

23 HEARING OFFICER ROBERTSON: Would  
24 the Agency like to make any opening statements at

1 this time?

2 MS. VETTERHOFFER: No, not at this  
3 time. Thank you.

4 HEARING OFFICER ROBERTSON: And is  
5 there anyone else that would like to introduce  
6 themselves at this point for the record?

7 Anyone else who may want to  
8 make an opening statement?

9 Seeing none, we'll now move on  
10 to testimony starting with the Agency so you may  
11 proceed.

12 MS. VETTERHOFFER: I don't believe  
13 any of the panel intended to give any statement, but  
14 they are ready to answer any questions that anyone  
15 might have, and because there might be one or more  
16 that could answer the same question, it might be a  
17 good idea to swear them in as a panel, and then the  
18 appropriate person can answer.

19 HEARING OFFICER ROBERTSON: Would  
20 the court reporter please swear in the witnesses?

21 (Whereupon the witnesses were  
22 sworn by the reporter.)

23 HEARING OFFICER ROBERTSON: Did the  
24 Agency wish to enter any of yesterday's findings as

1 exhibits?

2 MS. VETTERHOFFER: Yes. The Agency  
3 wishes to enter both its responses to IERG's  
4 prefiled questions, the Illinois Environmental  
5 Regulatory Group.

6 HEARING OFFICER ROBERTSON: Would  
7 you mind trying to speak up a little bit louder for  
8 the people in the back?

9 MS. VETTERHOFFER: Sure.

10 HEARING OFFICER ROBERTSON: Thank  
11 you.

12 MS. VETTERHOFFER:  
13 We'd like to move as an  
14 Exhibit our responses to the Illinois Environmental  
15 Regulatory Group's prefiled questions and the  
16 Agency's responses to the Board's prefiled  
17 questions.

18 HEARING OFFICER ROBERTSON: Are  
19 there any objections to the Agency's motion?

20 Seeing none, do you have  
21 copies?

22 And I again note there are  
23 copies of these on the table in the back there.

24 MS. VETTERHOFFER: I will most

1 likely have to get a copy off the back table also.

2 HEARING OFFICER ROBERTSON: Okay.

3 (Whereupon Ms. Vetterhoffer  
4 handed a document to the Hearing  
5 Officer.)

6 HEARING OFFICER ROBERTSON: At this  
7 point, I will make the Agency's responses to IERG's  
8 prefiled questions as Agency Exhibit B.

9 (Whereupon Agency Exhibit B was  
10 marked for identification as of  
11 this date.)

12 HEARING OFFICER ROBERTSON: And I  
13 will make the Agency's responses to the Board's  
14 prefiled questions as Agency Exhibit C.

15 (Whereupon Agency Exhibit C was  
16 marked for identification as of  
17 this date.)

18 HEARING OFFICER ROBERTSON: And  
19 copies of these are also available on the Board's  
20 website.

21 (Whereupon Agency Exhibits B and  
22 C were admitted into evidence at  
23 this time.)

24 HEARING OFFICER ROBERTSON: At this

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1 time, I'd like to move to IERG and see if you had  
2 any follow-up questions that you would like to ask.

3 MS. ALLGIRE: Good morning, Hearing  
4 Officer Robertson, Chairman Glosser, and Presiding  
5 Board Member Burke. I'm Abby Allgire with the  
6 Illinois Environmental Regulatory Group.

7 Thank you for the opportunity  
8 to provide questions and follow-up questions.

9 Just to ask in advance, will  
10 the Agency witnesses be available at the next  
11 hearings for more questions?

12 MS. VETTERHOFFER: Yes;  
13 Mr. Bloomberg will be and Mr. Davis will be.

14 MS. ALLGIRE: Okay. Thank you.

15 And thank you to the Agency  
16 for filing your answers to our questions in advance.

17 (Mr. Bloomberg will be answering  
18 the majority of the questions so  
19 he will be given the Answer  
20 symbol, and when another staff  
21 member needs to answer, his name  
22 will be filled in.)  
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DAVID BLOOMBERG

called as a witness herein, having been previously sworn on his oath, was examined and testified as follows:

EXAMINATION

BY MS. VETTERHOFFER:

Q. Starting with question 4, there was a Part A and B. To follow up with that, were there compliance measures in place prior to this rule requiring records like these to be kept?

**A. I'm not sure off the top of my head. I can't recall any, but I would need to look at the rules to double check.**

**There might have been federal requirements that I just don't know right now.**

Q. Okay. Could you have maybe an answer for that then at the next hearing for us?

**A. Yes, or we will respond in writing before then.**

Q. Great. Thank you.

And also, to follow up with that, so if a facility has a 100-gallon tank and the only record in their possession indicates that they

1 received or they purchased 90 gallons in the last  
2 few years that are for sure at the ultralow sulfur  
3 diesel fuel, would that be indicative of compliance  
4 even though there could be ten gallons that maybe  
5 aren't in there or that we're unaware of?

6 **A. The recordkeeping requirement begins**  
7 **January 1, 2017, so it's not clear to me that should**  
8 **an inspector visit such a source, they would even**  
9 **necessarily look at the older, but if it were new,**  
10 **then the inspector would look at that and, you know,**  
11 **base their compliance determination on the available**  
12 **records.**

13 Q. So the inspector is only going to  
14 look for records that are in their possession  
15 specifically as of January 1, 2017, anything that  
16 they might have prior?

17 **A. I can't say specifically what an**  
18 **inspector will look for.**

19 In my experience, you know, an  
20 inspector will look at available credible evidence,  
21 but what the rule requires is that they monitor  
22 their compliance using, or demonstrate it, using the  
23 records of the fuel purchase.

24 Q. Okay. Let's move on to question 7.



1                   So to follow up with the answers  
2 you already provided, were the continuous emissions  
3 monitors an option for compliance when the 1972 rule  
4 was promulgated?

5                   **A.           I don't know. I'm not sure when**  
6 **sulfur dioxides CEMS became in common use.**  
7 **Different types of CEMS have come into being or come**  
8 **into common use at different timeframes, and I just**  
9 **don't know.**

10                  Q.           Okay. Could you also file, you know,  
11 either submit an answer or let us know an answer for  
12 that at the next hearing?

13                  **A.           We'll see what we can find out.**

14                  Q.           Okay. Thank you.

15                                Do you know of other test  
16 methods that were used when the rule was proposed in  
17 1972?

18                  **A.           I do not.**

19                  Q.           So for our purposes, the only thing  
20 we for sure know was used at that time was the stack  
21 test?

22                  **A.           I can't say that I for sure know**  
23 **that. I would say it's probable, but that's the**  
24 **best I can give you.**

1           Q.           Moving on to question 8, has the  
2 Agency considered that some facilities have CEMS  
3 calibrated to a more stringent standard?

4           **A.           The Agency has been made aware of**  
5 **that. The Agency has not been provided with**  
6 **specific evidence that this would bias a CEMS**  
7 **reading in any way.**

8           Q.           So if a facility with the continuous  
9 emissions monitors has the CEMS calibrated to  
10 determine compliance with the more stringent SO2  
11 standard or SO2 limit, how would the Agency  
12 determine compliance in relation to the SO2  
13 standard?

14          **A.           Again, we have not been provided**  
15 **specific evidence that this would interfere with**  
16 **determining compliance with the 2000 ppm level.**

17          Q.           Okay. We'll move on to question 9,  
18 please.

19                        So in regards to your response  
20 to question 9, is it the case that the Agency must  
21 approve all stack test plans used to establish  
22 compliance with 214.301?

23          **A.           The Agency has the opportunity to**  
24 **approve such stack test plans. It is not a mandate**

1 **that the Agency approve it.**

2 Q. So in part of your response to  
3 question 9, you stated that a source could opt to  
4 perform a five-hour stack test, but that would not  
5 mean that compliance is determined on a 15-hour  
6 block average basis.

7 Wouldn't the Agency have to  
8 approve a stack test plan that proposed to perform  
9 three five-hour stack tests to show compliance with  
10 214.301?

11 **A. Again, we wouldn't have to approve**  
12 **it. The source is required to submit it to us. We**  
13 **review them as we can, and...**

14 **I'm sorry. Could you repeat the**  
15 **rest of the question?**

16 Q. Wouldn't the Agency have to approve a  
17 stack test plan that proposed to perform three  
18 five-hour stack tests to show compliance?

19 **A. So I answered most of it, but if a**  
20 **source had a good reason for doing it over a lengthy**  
21 **time period, then I doubt there would be a reason to**  
22 **object to it.**

23 Q. So has the Agency ever received such  
24 a proposal?

1           **A.           I don't know.**

2           Q.           So if the Agency doesn't submit a  
3 formal approval of that plan but also doesn't submit  
4 a formal objection, then is it considered approved?

5           **A.           No.**

6           Q.           So what would the procedure be there?  
7 If you didn't submit a formal approval or a formal  
8 objection for the plan, what would happen?

9           **A.           The source would be expected to  
10 continue to do their stack test.**

11                           **It is the source's  
12 responsibility to perform the stack test properly  
13 using the proper methods.**

14                           **So, for example, if someone sent  
15 us a plan and put something that went against the  
16 regulations within that plan and the Agency didn't  
17 notice it, that is not an excuse for the source to  
18 go against the regulations and requirements.**

19           Q.           So then what would be the I guess  
20 hour limit for the stack test that they would fall  
21 back on at that point?

22                           So if I'm not using my three  
23 five-hour stack test since I haven't received a  
24 formal approval, how many hours long would my stack

1 test be?

2 **A. It's a minimum of one hour. I am not**  
3 **specifically aware that there is a maximum, not**  
4 **anything that has come up at least to my level.**

5 Q. If it's a minimum of one hour, my  
6 five-hour stack test though would fall in that,  
7 correct?

8 **A. Yes. Five hours is more than one**  
9 **hour.**

10 Q. So if I submitted this three  
11 five-hour stack test plan and I haven't received an  
12 approval or a rejection so I follow three five-hour  
13 stack tests because that is more than one hour, are  
14 you able to then deny the results to that stack test  
15 since you didn't approve the five hours?

16 **A. The reasons for rejecting a stack**  
17 **test would include that it was done improperly.**

18 **So, for example, if you as a**  
19 **company decided you were going to do it for five**  
20 **hours because you knew that the first hour and a**  
21 **half and the last hour and a half of whatever**  
22 **process you were testing have much lower emissions,**  
23 **than the middle couple of hours, then it is possible**  
24 **we would reject that because the purpose of you**

1 **going five hours was basically to try and trick us,**  
2 **and the idea of a stack test is to test at your**  
3 **maximum usual operating conditions.**

4 Q. So is the standard that the Agency is  
5 proposing at 214.301 only to apply to maximum  
6 operation?

7 **A. We're not proposing a new standard in**  
8 **214.301. That's an old standard.**

9 Q. So does that old standard then only  
10 apply to your maximum operations because I know you  
11 said the test is for the maximum?

12 **A. The standard is your -- I mean,**  
13 **that's the requirement that you stay below that, so**  
14 **certainly, if your maximum operations went over**  
15 **that, you need to make changes.**

16 Q. So is there a scenario in which you  
17 could envision the Agency approving someone's plan  
18 that was three five-hour stack tests?

19 **A. I could imagine it, yes.**

20 Q. I think that's all on that question  
21 so we'll move to question 10.

22 The Agency responded to IERG's  
23 question 10(b) in part by stating USEPA's response  
24 acknowledges that a stack test, when properly

1 performed, is still an adequate estimate for a  
2 unit's emissions rate, but USEPA did not indicate  
3 that a stack test is an appropriate method of  
4 determining compliance for units with CEMS.

5 Is it correct that the footnote  
6 IERG references in its question is in a section  
7 titled "Averaging Times for SO2 Emissions Limits" of  
8 a USEPA document referenced in the Agency's  
9 technical support document?

10 **A. Yes, but it was talking about a**  
11 **different type of averaging. The type of averaging**  
12 **that we believe they were talking about there**  
13 **relates to modeling.**

14 So, for example, there is one  
15 source in this rulemaking that has a 30-day average,  
16 and because of that in the modeling, we had to model  
17 at a significantly higher pound per hour emission  
18 rate to account for the fact that they were  
19 averaging.

20 It is our understanding that  
21 that footnote relates to a situation like that where  
22 someone may have asked USEPA, whether external or  
23 internal, if someone is doing three stack tests and  
24 averaging them, does that mean that whatever that

1 **stack test emission rate is, it has to be bumped up**  
2 **for the modeling.**

3 **And so that was USEPA clarifying**  
4 **no, that is not the purpose of that type of**  
5 **averaging.**

6 Q. So the point of our question I guess,  
7 is it correct that the, I guess the USEPA in that  
8 document was not relating stack testing to CEMS?

9 **A. I do not believe they were trying to**  
10 **equate that.**

11 Q. Is it also correct that the footnote  
12 was appended to a sentence that states, "Therefore,  
13 as a general matter, the EPA would expect that any  
14 emission limit with an averaging time longer than  
15 one hour would need to reflect a downward adjustment  
16 to compensate for the loss of stringency inherent in  
17 applying a longer term average limit."

18 **A. I don't know.**

19 Q. In this context then, would you argue  
20 that USEPA's footnote is not about the suitability  
21 of stack test results over CEM results but instead  
22 conveys the message that the approximately  
23 three-hour average results from stack tests can be  
24 used in dispersion modeling runs as a one-hour



1 average as opposed to needing a downward adjustment  
2 to compensate for the loss of stringency inherent in  
3 applying a longer term average limit?

4 **A. I believe what you said is the same**  
5 **as what I said, I think.**

6 Q. Then last is question 11.

7 After 11(c), is the Agency aware  
8 of any instance where the 2000 ppm standard was the  
9 basis for a modeled emission?

10 **A. (By Mr. Sprague) The answer is yes,**  
11 **but I can't cite you a specific example at this**  
12 **time.**

13 Q. Could you give us a specific example  
14 to file in writing or bring to the next hearing?

15 **A. (By Mr. Sprague) Yeah, we can track**  
16 **that down for you.**

17 Q. Thank you.

18 The Agency responded to IERG's  
19 questions 11(d) and 11(e) in part by stating that  
20 the 2000 ppm limit is a concentration limit and may  
21 be more stringent than other applicable SO<sub>2</sub>  
22 emissions limits.

23 Do you have an example of a  
24 process where the 2000 ppm limit promulgated on

1 April 3, 1972 is more stringent than the other  
2 applicable state or federal SO2 limits?

3 **A. (Mr. Bloomberg answering again) The**  
4 **examples we were thinking of were trying to**  
5 **compare -- for example, if your permit has a monthly**  
6 **limit of SO2 and let's say that monthly limit is**  
7 **30,000 pounds and something happens and you emit**  
8 **20,000 pounds in one hour due to some sort of**  
9 **malfunction, emitting 20,000 pounds through a single**  
10 **stack is going to be higher than the 2000 ppm but**  
11 **you haven't exceeded your monthly limit, so it**  
12 **balances in that way.**

13 Q. So in your view, is it possible that  
14 a 2000 ppm sulfur dioxide concentration measured at  
15 maximum permitted operating capacity for a process  
16 could have a higher corresponding pound per hour  
17 emissions rate than a 2000 ppm sulfur dioxide  
18 emission rate measured at 50 percent capacity?

19 **A. Could you repeat that?**

20 Q. Is it possible that a 2000 ppm SO2  
21 concentration measured at maximum permitted  
22 operating capacity for a process could have a higher  
23 corresponding pound per hour emissions rate than a  
24 2000 ppm SO2 emission rate measured at 50 percent

1 capacity?

2 **A. I'm not sure where the capacity comes**  
3 **in, but because 2000 ppm is concentration-based, you**  
4 **can, if you're putting more air through, you can**  
5 **have two different sources both of which have 2000**  
6 **ppm but one of which has a higher pound per hour**  
7 **limit or, I'm sorry, emission than the other.**

8 **Q. So could the same source with a stack**  
9 **test at 2000 ppm measure differently than the same**  
10 **source using a CEM that has a lower rate on it or a**  
11 **lower standard?**

12 **A. I don't understand the question.**

13 **Q. So for a stack test, if a source is**  
14 **operating at maximum, the 2000 ppm limit, could that**  
15 **same source, using their CEMS, be at 50 percent**  
16 **capacity and have different outcomes?**

17 **A. I'm still not quite sure I understand**  
18 **the question but I'm going to take a shot at it.**

19 **The CEMS measures continuously,**  
20 **so it is certainly possible, since the CEMS is**  
21 **measuring in theory 24/7/52, that it will have a**  
22 **different reading at some given time than a**  
23 **particular one time stack test which is a snapshot.**

24 **I'm not sure if that answers**

1 **your question.**

2 Q. Okay. So could the concentration,  
3 the pound per hour be higher?

4 **A. Pound per hour isn't concentration.**

5 Q. Well, okay.

6 So could the pound per hour be  
7 higher on a stack test that's running at the maximum  
8 and falls at the 2000 ppm than the same source  
9 running at 50 percent for a CEMS testing at 2000  
10 ppm?

11 **A. It may be theoretically possible. I**  
12 **can't think of a situation like that. I can't say**  
13 **it would never happen but I can't say it would.**

14 MS. ALLGIRE: I think that's all  
15 the follow-up questions we have. Thank you.

16 HEARING OFFICER ROBERTSON: Thank  
17 you.

18 At this stage, does anyone  
19 else have questions specifically for the Agency as  
20 witnesses?

21 Go ahead.

22 MR. BONEBRAKE: Good morning,  
23 Hearing Officer Robinson, Presiding Board Member  
24 Burke and the rest of the board members and staff.

1 My name is Steve Bonebrake, and I'm with the law  
2 firm of Schiff Hardin. I represent the company  
3 Midwest Generation.

4 I have just a couple follow-up  
5 questions that relate to questions raised by the  
6 IERG attorney.

7  
8 EXAMINATION

9 BY MR. BONEBRAKE:

10 Q. The first question relates to  
11 Section 214.301, Chairman, and there was some  
12 discussion about this provision in the prior  
13 questions and answers, and my question for IEPA was  
14 simply, what was the purpose of adding the one-hour  
15 period reference to that sentence?

16 A. **There's a combination of reasons.**

17 **For one, just to clarify because**  
18 **the stack test methodology has a minimum one-hour**  
19 **timeframe. So when people would ask, you know,**  
20 **what's our averaging time, it related back to the**  
21 **stack test in general.**

22 **And the second reason is that**  
23 **the 2010 sulfur dioxide standard is a one-hour**  
24 **standard.**

1 Q. In a related question as far as stack  
2 testing, let's assume a three-hour stack test, is it  
3 the Agency's intent to compare the composite  
4 three-hour average against the one-hour standard or  
5 is each hour of the stack test to be compared  
6 against the one-hour standard?

7 A. I need you to clarify the question.

8 There would never be a single  
9 three-hour stack test. There might be three  
10 one-hour stack tests or more, or three three-hour  
11 stack tests.

12 Q. Okay.

13 A. So I wasn't sure what...

14 Q. Let's assume three three-hour stack  
15 tests.

16 A. Okay.

17 Q. In that scenario, would the composite  
18 three-hour average from each stack test be compared  
19 to the one-hour average or would each hour of the  
20 stack test be compared against the one-hour average?

21 A. It would be the composite.

22 Q. For a facility using the CEMS, is  
23 each hour of the CEMS data compared against the  
24 standard?

1           **A.           Yes.**

2           Q.           So does that effectively mean that  
3 CEMS yield a more stringent standard than a stack  
4 test?

5           **A.           It would be a more accurate reading**  
6 **because CEMS are ongoing, as I said earlier, 24/7/52**  
7 **in theory, but the standard itself is the same.**

8           Q.           The standard itself is the same, but  
9 the averaging periods between the CEMS and the stack  
10 test could be different?

11          **A.           (By Mr. Davis) I think to clarify,**  
12 **we're not comparing three one-hour test runs to**  
13 **three hours of a CEMS because a CEMS has every hour**  
14 **recorded.**

15                               **When you start talking about**  
16 **stack test, the stack testing methods allow for a**  
17 **minimum of three one-hour test runs, okay? So you**  
18 **could have a greater length of time, say an hour and**  
19 **a half or two hours or five hours as a hypothetical.**  
20 **You could have four test runs.**

21                               **So the number of test runs and**  
22 **the length of those test runs are set in order to**  
23 **have an adequate measure of what the emissions are**  
24 **from that source and not necessarily meant to be a**

1 three-hour average of what those emissions are.

2 So the result of the stack test  
3 is what the Agency would assume are the emissions  
4 from that unit in, well, it's hours going backward,  
5 but in all the hours going backward, it's an  
6 adequate test for what we can assume the emissions  
7 were in the hours before the stack test because  
8 compliance is based on the stack test and not a  
9 number of hours from that test.

10 So our hypothetical of a greater  
11 number of hours just would point to -- you would  
12 think that a greater number of hours or a greater  
13 number of test runs would increase the accuracy of  
14 your test. So an increase in accuracy should not be  
15 equated with the loss of stringency if you were to  
16 have CEMS.

17 So if you did five hours of  
18 testing, we would think that was more accurate than  
19 three hours but not necessarily that a CEMS should  
20 then be allowed a five-hour average because they're  
21 not related in our opinion.

22 A. (By Mr. Bloomberg) Let me add to  
23 that. When he said, you know, a five-hour average  
24 would be considered to be more accurate, that is



1 **presuming a consistent emission rate.**

2 **In the example I gave earlier**  
3 **where a source had lower emissions at the beginning**  
4 **and the end, the Agency would frown upon trying to**  
5 **use a longer stack test to sneak in under the limit.**

6 Q. I had another question pertaining to  
7 a different section of the SO2 rule proposal, and  
8 it's 214.603. It's again related to timing, and I  
9 would ask that someone from the Agency just describe  
10 for us what was meant by the reference to clock hour  
11 in the introductory sentence in 214.603.

12 HEARING OFFICER ROBERTSON: Sir,  
13 could I ask that you speak up? People in the back  
14 can't hear the questions.

15 Thank you.

16 A. (Mr. Bloomberg answering again) A  
17 clock hour would be an hour on the clock, from 12 to  
18 1, from 1 to 2.

19 So, for example, when it's  
20 referred to as a calendar day, it would be, you  
21 know, a specific day on the calendar.

22 Similarly, a clock hour would be  
23 a specific hour from the top of the hour to the end  
24 of the hour.

1 Q. And let me present the hypothetical  
2 just to make sure I understand the answer.

3 Let's say a unit were to start  
4 up at 11:50 a.m.

5 In that case, would the pounds  
6 of emissions from 11:50 a.m. until noon be compared  
7 against the pound per hour standard?

8 **A. Yes.**

9 Q. And then the next full hour from noon  
10 to 1 would be comparing to pound per hour standard?

11 **A. Yes.**

12 Q. Thank you for that clarification.

13 And then a general question for  
14 the Agency and I saw some related questions.

15 Does the Agency have an  
16 understanding of the total number of sources in  
17 Illinois that would be regulated under the proposed  
18 SO2 rules at issue today?

19 **A. So you're asking not just the ones  
20 listed in 603 but also the fuel standard?**

21 Q. That's correct.

22 **A. The total number would be  
23 approximately those listed in Appendix A of the  
24 technical support document.**

1 Q. And do you recall what that  
2 approximate number is, Mr. Bloomberg?

3 A. I believe it's around 700.

4 Q. So the Agency found it necessary and  
5 appropriate to regulate 700 some odd sources to make  
6 an adequate submittal to USEPA for attainment  
7 demonstrations, is that correct?

8 A. For the attainment demonstration and  
9 for the other reasons discussed such as in some of  
10 our responses to the questions that we filed  
11 yesterday.

12 MR. BONEBRAKE: I had a question  
13 relating to IEPA's answer to No. 28 of the Board's  
14 questions, and I didn't mean to preempt the Board's  
15 follow-up on its own question, so I could ask the  
16 question now or wait for whatever follow-up the  
17 Board staff may have.

18 HEARING OFFICER ROBERTSON: You can  
19 go ahead and ask the question now.

20 Q. BY MR. BONEBRAKE: With respect to  
21 the answer to No. 28, I just wanted to make sure I  
22 understood correctly that the IEPA is currently  
23 assessing other areas in the State of Illinois for  
24 potential additional requirements for SO2

1 attainment?

2 **A. We are currently assessing areas to**  
3 **determine whether we will recommend to USEPA that**  
4 **they be designated as nonattainment or not.**

5 Q. And how many areas are currently  
6 being assessed?

7 **A. (By Mr. Sprague) Five areas plus**  
8 **we'll be conferring with adjoining states on several**  
9 **power plants that they have in terms of the**  
10 **recommended attainment or nonattainment status for**  
11 **those areas.**

12 Q. And can you tell us which or identify  
13 for us, please, those five areas?

14 **A. (By Mr. Sprague) If I can recall**  
15 **from memory here, the Hennepin Power Station in**  
16 **Hennepin, the SIPCO Power Plant in Marion, the Joppa**  
17 **Steam Plant down in Joppa, the power plant over**  
18 **in -- oh, the Wood River Power Plant as well down in**  
19 **Alton or East Alton, and then in Jasper**  
20 **County...what's the name of it. I always forget**  
21 **this one. Oh, the Newton Power Plant in Jasper**  
22 **County.**

23 Q. And are those areas currently being  
24 assessed pursuant to the consent decree between

1 USEPA and the Sierra Club?

2 **A. (By Mr. Sprague) Yes.**

3 Q. And has USEPA dictated to the IEPA  
4 that it make such assessments?

5 **A. (Returning to Mr. Bloomberg**  
6 **answering) I don't believe they told us**  
7 **specifically we have to make the assessments, but if**  
8 **we don't, they will.**

9 **Is that correct?**

10 MR. SPRAGUE: Yeah.

11 Q. And has that communication been in  
12 writing?

13 **A. Yes.**

14 Q. And is that writing publicly  
15 available?

16 **A. I believe so. I believe, if I'm not**  
17 **mistaken, that the USEPA posted the letters on their**  
18 **website at one time. I'm not a hundred percent**  
19 **certain of that.**

20 Q. When you say the USEPA website, do  
21 you know specifically or more specifically what  
22 website?

23 **A. No.**

24 Q. And IEPA has provided a summary of

1 the timeframe for future anticipated designation  
2 decisions in response to question 28, right?

3 **A. Yes.**

4 Q. And does IEPA anticipate that in  
5 addition to the five areas that had been identified  
6 that it will assess other areas in the state as well  
7 for potential nonattainment designations?

8 **A. After the consent decree areas, then**  
9 **yes, there will be other areas based on the final**  
10 **data requirements rule when that comes out from the**  
11 **USEPA.**

12 Q. And do you have an understanding of  
13 when that rule may come out from USEPA?

14 **A. (By Mr. Sprague) Sometime later this**  
15 **year.**

16 Q. So do you have a sense of when that  
17 additional designation decision would be made beyond  
18 the five that you already identified?

19 **A. (Returning to Mr. Bloomberg**  
20 **answering) I think January 2017 is our**  
21 **understanding unless that changes for USEPA. We**  
22 **have to submit the new recommendations based on any**  
23 **further modeling.**

24 Q. And IEPA's answer on page 16, and

1 it's the fourth bullet down following the January  
2 2017 reference refers to new monitoring sites.

3 Do you see that, Mr. Bloomberg?

4 **A. Yes.**

5 Q. Does IEPA plan new monitoring sites  
6 at this point in time?

7 **A. We do not. Any new monitoring would**  
8 **be organized by sources if they choose to go the**  
9 **monitoring route.**

10 A little bit of background for  
11 those who may not know, there is the option for  
12 determining the new nonattainment areas of either  
13 using monitoring or using modeling.

14 What the Agency has told sources  
15 is that if they went to use monitoring to determine  
16 it, then they need to approach us, and they will  
17 need to pay for the monitors, and we will work  
18 together to ensure that the monitors are properly  
19 cited. That is an option.

20 One source has indicated that  
21 they may go that route. Nobody has committed that  
22 they will definitely go that route.

23 Q. And has USEPA communicated to IEPA  
24 that in the absence of additional monitoring sites

1 that designation recommendations will need to be  
2 made based upon modeling?

3 **A. Yes.**

4 Q. And Mr. Bloomberg, are you aware of  
5 any legal challenges to the use of modeling to make  
6 nonattainment designations?

7 **A. I am not specifically aware of legal  
8 challenges.**

9 **I do know that there are some  
10 companies outside the State of Illinois that have  
11 made claims that in certain situations, the models  
12 overestimate emissions.**

13 **I have not seen any  
14 documentation or evidence of those claims. I am  
15 just aware of them.**

16 MR. BONEBRAKE: Thank you. I have  
17 no further questions at this point.

18 HEARING OFFICER ROBERTSON: Thank  
19 you.

20 Does anybody else have any  
21 questions for the Agency's witnesses?

22 Seeing nobody, do any members  
23 of the Board or Board's technical staff have any  
24 questions?



1 MS. LIU: I guess I might just say  
2 thank you very much for preparing the answers for  
3 the hearing today.

4 MR. BLOOMBERG: You're welcome.

5 MR. RAO: I'd just like to let you  
6 know we don't have any questions right now. It  
7 looks like you've answered most of our questions,  
8 but we're going to take another look at it, and if  
9 we do have any, we'll send those questions to you  
10 before the next hearing.

11 HEARING OFFICER ROBERTSON: Well,  
12 seeing no more questions, thank you to the Agency  
13 and its witnesses for your time today and  
14 testifying.

15 Pardon me for a second while I  
16 get the sheets in the back.

17 We have quite a few people  
18 signed up for public comments but the testimony  
19 sheet specifically is blank.

20 Before we get to public  
21 comments, is there anyone else who wished to testify  
22 today?

23 Seeing no one, let's just take  
24 a quick ten-minute recess before we begin public

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1 comments.

2 It is 10:05. We'll be back at  
3 10:15 and we'll begin public comments. Thank you  
4 all.

5 (Recess taken.)

6 HEARING OFFICER ROBERTSON: Okay.  
7 We're going back on the record. It is 10:17 or so.  
8 We have completed testimony for the day, and we are  
9 now going to move on to public comments.

10 I again note for the record we  
11 have a number of people here. I thank you all for  
12 coming in.

13 We're going to start with  
14 those who signed their names on the public comment  
15 sheet. I apologize in advance. As you can hear, I  
16 speak a bit funny. I might butcher the  
17 pronunciation of your names.

18 After the people that have  
19 signed up have spoken, we will then allow time for  
20 any comments for anyone who has not signed up.

21 For the sake of the record, I  
22 ask that when you offer public comment, if you can  
23 step up to the podium over here on the right-hand  
24 side and again just state your name, spell it if

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1 necessary, and if you are here on behalf of anyone,  
2 please state so too, and then just speak clearly and  
3 loudly so the room can hear you and also so that the  
4 court reporter can take down everything that you  
5 have to say.

6 So we'll begin with Bob  
7 Jorgensen.

8 MR. JORGENSEN: I appreciate the  
9 opportunity to speak. I'd like to thank the Board  
10 for taking public comment, something I always  
11 believe is very important to do.

12 Just very briefly, I do have  
13 health issues. I've had open heart surgery. I've  
14 had two valves replaced. I had a bypass. I have  
15 been in for two procedures to regulate the  
16 irregularities in my heart rhythm so I do have  
17 health issues that are related to pollution. Part  
18 of the pollution comes from these coal plants that  
19 we're talking about today.

20 I also wanted to say that I am  
21 the chairperson of East Peoria Green. I do live in  
22 a nonattainment area which is Tazewell County. I  
23 live in the City of East Peoria, and we're a group  
24 that works with the city on everything

1 environmental.

2 My problems are some things  
3 that other members have asked about already. I  
4 think we need exact dates. I think we need exact  
5 monitoring -- when are some of these different  
6 facilities going to put in pollution controls, what  
7 exactly are they going to do, what's going to be the  
8 first day that it's going to be monitored, instead  
9 of just having just a real nebulous, oh, yeah, we're  
10 going to get around to doing that. One of these  
11 days we'll be in attainment.

12 So I think we need exact  
13 things.

14 My other is with the 30-day  
15 averaging, you know, that seems crazy. If you're  
16 getting spikes like they said in the pollution, it's  
17 going to affect me. It's going to affect everybody  
18 if you take any number and average it out over 30  
19 days, and my example would be that I'm on Coumadin  
20 for my heart problems. If I took all my medications  
21 and averaged them out over 30 days, that means I  
22 could take all of my monthly medications on one day  
23 and that it would average out over 30 days that I  
24 would have taken the right dosages, but of course

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1 I'd be dead from taking all my medications on one  
2 day.

3 I just don't see that a 30-day  
4 averaging is a good thing. I think it's harmful to  
5 everyone's health as well as my own. So I thank you  
6 very much for the time to speak and your listening,  
7 and thank you again.

8 HEARING OFFICER ROBERTSON: Thank  
9 you, Mr. Jorgensen.

10 Next we have Phil Tool.

11 MR. TOOL: I'm going to waive my  
12 comment for today. I'll see you later though.

13 HEARING OFFICER ROBERTSON: Thank  
14 you.

15 Chris Krusa.

16 MR. KRUSA: I want to thank  
17 Mr. Chairman and the Board for allowing us this  
18 opportunity to give some comment.

19 My name is Chris Krusa.  
20 That's C-h-r-i-s. Last nem is K-r-u-s-a.

21 My wife and I have been living  
22 in Glen Carbon in Metro-East for the past several  
23 years. I retired from the U.S. Maritime  
24 Administration, U.S. DOT in early 2006, and now I'm

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1 a member of the local Piasa Palisades Group of the  
2 Sierra Club, and I've been applying my expertise in  
3 dealing with critical emissions issues in  
4 Metro-East.

5 As a citizen of Metro-East, I  
6 know how important air quality standards are, and  
7 I'm here to request that you withhold approval of  
8 the proposed nonattainment plan for the one-hour  
9 Sulfur Dioxide National Ambient Air Quality  
10 Standards until the draft rule is strengthened in  
11 several areas.

12 I note EPA's website  
13 information that states, "Current scientific  
14 evidence links short-term exposures to SO<sub>2</sub> (sulfur  
15 dioxide) ranging from five minutes to 24 hours with  
16 an array of adverse respiratory affects including  
17 bronchoconstriction and increased asthma symptoms."

18 Air pollution, and in  
19 particular the high incidence of asthma-related  
20 illness reported in our area, is of great concern in  
21 the Metro-East area. We are dealing with emissions  
22 that come across the river from the Missouri side of  
23 the Mississippi and from our own coal-powered plant  
24 about 30 miles upriver.

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1                   This is a continuing problem  
2 that needs to be addressed vigorously by our  
3 designated state authorities, planners, and  
4 legislators.

5                   I thank you for allowing me to  
6 comment.

7                   HEARING OFFICER ROBERTSON: Thank  
8 you.

9                   Next we have Norm Brown.

10                  MR. BROWN: I have no comments.

11                  HEARING OFFICER ROBERTSON: Okay.  
12 Thank you.

13                  Next we have Virginia  
14 Woulfe-Beile.

15                  MS. WOULFE-BEILE: Good morning.  
16 I'd like to thank the Illinois Pollution Control  
17 Board for inviting our comments today.

18                  My name is Virginia  
19 Woulfe-Beile (W-o-u-l-f-e - B-e-i-l-e.)

20                  Thanks again for inviting me  
21 to speak, and I just want to say that I live in an  
22 Illinois coal community also in the Metro-East in  
23 the Alton area.

24                  You know, as an Illinois

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1 citizen and just a citizen of the United States, I  
2 think everyone deserves to breathe clean air. I  
3 follow the EPA air quality alerts, and I have  
4 several family members that suffer from asthma,  
5 COPD, and, you know, there are days when you can't  
6 do anything outside or have any activities, and I  
7 just think that it's very important for us to be  
8 very aware of what is being emitted into the air and  
9 what we are breathing into our lungs.

10 So at this time, I am just  
11 here to request that you withhold the approval of  
12 the proposed nonattainment plan for the one-hour  
13 sulfur dioxide ambient air quality standards until  
14 the draft rule is strengthened in several areas.

15 Thanks very much.

16 HEARING OFFICER ROBERTSON: Thank  
17 you.

18 Next we have Faith Bugel.

19 MS. BUGEL: Good morning, members  
20 of the Board, Hearing Officer.

21 My name is Faith Bugel;  
22 F-a-i-t-h B-u-g-e-l, and I'm an attorney  
23 representing the Sierra Club here today. We have  
24 some comments, and I do have some questions in my



1 comments for the Agency, and we expect to follow up  
2 in writing with these questions as well.

3 First we have a concern  
4 regarding the 30-day average for Powerton. Similar  
5 to a previous commenter, Mr. Jorgensen, it strikes  
6 us as questionable how a 30-day average can be used  
7 as a limit for a short-term one-hour rule and how  
8 that 30-day average will protect against short-term  
9 one hour spikes of SO<sub>2</sub>.

10 I would ask that the Agency  
11 provide a further explanation, more detailed  
12 explanation as to how the 30-day average at 3,452  
13 pounds per hour will prevent short-term one-hour  
14 spikes of SO<sub>2</sub> that would exceed the standard, the  
15 National Ambient Air Quality Standard.

16 Second, regarding that, there  
17 was no justification included for why Powerton  
18 cannot meet a one-hour average while EPA guidance  
19 indicated that if a 30-day average is used, a  
20 justification as to why the source can't meet a  
21 one-hour average must be included, and, in fact, the  
22 only time that a 30-day average is appropriate is,  
23 in fact, where it's physically impossible for the  
24 source to meet a one-hour average.

1                   Considering that Midwest  
2                   Generation owns multiple coal plants in the State of  
3                   Illinois, including the Will County plant, and the  
4                   Will County plant can meet a one-hour average, we  
5                   find it questionable that Powerton cannot meet a  
6                   one-hour average.

7                   In addition, there needs to be  
8                   the appropriate conversion factor where a 30-day  
9                   average is used instead, and we would ask the Agency  
10                  to explain what conversion factor it used and why  
11                  that conversion factor is appropriate.

12                  By my own calculations...and I  
13                  am a lawyer; I was told there would be no math...but  
14                  by my own calculations, the Agency used 6,000 pounds  
15                  per hour as what it modeled for Powerton's 30-day  
16                  average.

17                  My question would be, will the  
18                  30-day average allow spikes above 6,000 pounds per  
19                  hour?

20                  If the 30-day average of 3,452  
21                  pounds per hour does allow spikes above 6,000 pounds  
22                  per hour, then those spikes need to be modeled, and  
23                  we need that modeling to provide assurance that even  
24                  with those spikes, the short-term one-hour standard

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1 will still be met.

2 Third, I would ask, there is a  
3 fence line receptor. I believe it's in Column O of  
4 the Pekin spreadsheet, and at that fence line  
5 receptor, there is an impact of 196.2415 micrograms  
6 per meter cubed which is right at the limit of  
7 attainment. If with modeling of 6,000 pounds per  
8 hour we have that impact right at the edge of  
9 attainment at that fence line receptor, again, my  
10 question would be if the 30-day average allows  
11 spikes above 6,000 pounds per hour, can the Agency  
12 still demonstrate that with those spikes there will  
13 not be an exceedance at the Pekin fence line  
14 receptor in Column O of the spreadsheet.

15 Moving on, our next concern is  
16 about the substitution of Will county for Joliet 5  
17 in the multi-pollutant standard or the combined  
18 pollutant standard.

19 First of all, I think my  
20 question would be does this belong in this  
21 rulemaking. Does this belong in the SO2  
22 nonattainment SIP.

23 That agreement, that  
24 regulation came about out of setting mercury

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1 standards for the State of Illinois and setting SO2  
2 and NOx standards for the State of Illinois under  
3 the Clean Air Interstate Rulemaking, and those  
4 rulemakings seem to be neither here nor there in  
5 this rulemaking. Those were many years old, I  
6 believe eight years old at this point, and there was  
7 also an agreement in that rulemaking, and I know  
8 this Board has heard me talk about this before but I  
9 will repeat myself.

10 Our concern is that there was  
11 an agreement. That agreement allowed Midwest  
12 Generation leniency under the mercury rule in return  
13 for commitments for NOx and SO2. Midwest Gen has  
14 already availed itself, it has received that  
15 lenience, that more lenient schedule in return for  
16 NOx and SO2 commitments.

17 It seems like if Midwest  
18 Generation already received that benefit, it should  
19 hold up its end of the deal.

20 Its end of the deal included  
21 FGD, flue gas desulfurization. My understanding,  
22 it's meeting that commitment by dry sorbent  
23 injection, but it made a commitment to include flue  
24 gas desulfurization on every unit that it continued

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1 to operate except for Joliet 5 which could sometimes  
2 be known as Joliet Unit 6 even though that's very  
3 confusing as these numbers are, but it allowed an  
4 exception for Joliet 5.

5 The presumable reason, and  
6 again, I have searched the record, and I will assure  
7 you, I cannot find any documentation in writing of  
8 this, but the presumable reason for an exception for  
9 Joliet 5 is that it's one of the oldest in its  
10 fleet, that it's one of the least efficient units.  
11 It's operated less, so the presumable reason for it  
12 is that there was a limited life span for that unit,  
13 and then the rest of the fleet had a longer life  
14 span. It made sense that the rest of the fleet  
15 would require SO2 controls but that unit would not  
16 because of its limited life span.

17 Well, that time has come.  
18 That's come to fruition. That unit's limited life  
19 span is leading to its requirement or conversion to  
20 natural gas in the near future. Therefore, it made  
21 sense that the FGD would not be required there but  
22 everywhere else.

23 Well, that was the reason for  
24 the exception. That does not seem to be a good

1 reason to transfer the exception, so that's our  
2 concern.

3 I myself was part of the  
4 negotiations that lead to that deal. I feel like it  
5 is unfair, but, you know, maybe that's sort of a  
6 6-year-old justification, but it does seem like  
7 we had a good faith deal and Midwest Gen is going  
8 back on that deal by unilaterally renegotiating it  
9 with the Agency at this time.

10 Finally, our last concern is  
11 about E.D. Edwards. E.D. Edwards has a permit. Its  
12 permit limit allows a certain level of SO2. Its  
13 actual operations, its actual pollution emissions  
14 under that permit are much lower, so what we're  
15 actually seeing with the new limit that's getting  
16 set under this rulemaking for E.D. Edwards is that  
17 that limit is above what its emissions in reality  
18 have been.

19 So what we are getting is not  
20 necessarily a reduction in fact in SO2 from Edwards,  
21 but we are only seeing a reduction on paper. Permit  
22 limit is being moved down. It's always been  
23 operating below that permit limit and will continue  
24 to operate below that permit limit.

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1                   So our question for the Agency  
2                   is based on that understanding of where emissions  
3                   really have been in fact, how is the attainment for  
4                   Pekin, Tazewell County, going to be achieved if E.D.  
5                   Edwards, one of the biggest sources in the county,  
6                   is making a reduction but making a reduction only on  
7                   paper and not in reality of its SO2 emissions.

8                   I know this is a serious  
9                   concern for the members of the community that, in  
10                  fact, live in Pekin and Peoria and Tazewell County  
11                  who are concerned about their air quality and  
12                  whether there will be a real benefit from this rule  
13                  in terms of short-term SO2 emissions or only a  
14                  benefit on paper.

15                  Thank you for the opportunity  
16                  to comment today.

17                  HEARING OFFICER ROBERTSON: Thank  
18                  you.

19                  Next we have Joyce  
20                  Blumenshine.

21                  MS. BLUMENSHINE: Good morning. My  
22                  name is Joyce (J-o-y-c-e), last name Blumenshine  
23                  (B-l-u-m-e-n-s-h-i-n-e).

24                  Thank you very much to the

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1 Board for your time.

2 I'm a citizen, a volunteer  
3 concerned about health, environment, and our quality  
4 of life from Peoria, Illinois. I've lived in Peoria  
5 over 36 years, and we are in the beautiful Illinois  
6 River Valley but in a unique geographic situation  
7 where the prevailing winds bring the air from not  
8 only the Powerton Plant which is just downriver on  
9 the Tazewell County Pekin side but the Edwards plant  
10 which is just upriver from Pekin, and then going on  
11 up is Hennepin. Below that is Havana. We are in  
12 this corridor of coal-fired power plant impacts, and  
13 sulfur dioxide is a real concern for me.

14 I urge you, please, to  
15 withhold your approval of this rule until it is  
16 strengthened. I ask you that because we know SO2  
17 has much more serious health impacts than we did  
18 ten, twenty years ago.

19 My mother has COPD. On air  
20 quality concern days, she'd take three or four  
21 steps, I have to hold her in my arms.

22 If you have a family member  
23 who suffers from breathing problems, this is near to  
24 and dear to your heart.



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1                   You on the Pollution Control  
2 Board are our citizen advocates I hope and consumer  
3 concerned people but also industry regulators that  
4 can make the difference in the future for all of us  
5 and the quality of our lives.

6                   The "Toll on Health" study  
7 from the Powerton Plant shows 29 deaths, over 400  
8 asthma attacks. Those are real to those of us who  
9 have family members who suffer, and if you don't do  
10 something to control the pollution and the strength  
11 of these rules, please require the Agency to  
12 strengthen these rules.

13                   At Powerton, the mention of a  
14 concern that -- I understood this to be a one-hour  
15 spike of SO2 regulation. How can they be allowed to  
16 have a 30-day average? I just don't as a citizen  
17 understand how that could be approved.

18                   Please require a one-hour  
19 application for Powerton for the interest of the  
20 people in the communities. There's a prison not far  
21 from there. There is public health and recreation  
22 along the river. People water ski. These air  
23 impacts are local severe issues for us, and when you  
24 average them out or if you look at a fleet issue, it

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1 just defies my understanding as a citizen how that  
2 really addresses what these EPA rules are supposed  
3 to obtain.

4 And we appreciate the work of  
5 IEPA, and it's a difficult job, but how many years  
6 have we had these exceedances of sulfur dioxide, and  
7 now we have the knowledge of what those fine  
8 particles do and how severe it is.

9 And it's the same for Edwards.  
10 Edwards is about 12 miles from where I live. I'm  
11 going down that way all the time for friends who  
12 live actually along the river, and at Edwards, we  
13 know there have not been the upgrades that have been  
14 done to other fleets. Why this can get delayed so  
15 long again as a citizen I do not understand.

16 We need to have expedited SO2  
17 controls put in at Edwards. That plant really needs  
18 to make an effort and show results on SO2 pollution.  
19 The fact that it's lumped into some, you know,  
20 modeling is not an assurance for us that there will  
21 actually be cleanup, and now that, you know, we hear  
22 the concerns that the standards may be stuck here  
23 without actually making a reduction of what is being  
24 done at Edwards, I do know that they haven't been

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1 running up to full power. A lot of these are  
2 merchant plants, and so we the citizens are  
3 vulnerable and at risk from these spikes in SO2.

4 Please be sure that our  
5 affected areas get the best quality standards.  
6 Please withhold your approval of this proposed  
7 nonattainment plan until IEPA is required to  
8 strengthen these standards, and really, for our  
9 Peoria Valley where the prevailing winds bring all  
10 this and then with air inversion, sometimes it sits,  
11 those spikes have real citizen, family, personal  
12 loved one impacts, and this is the time to deal with  
13 it.

14 Please attend to these issues  
15 and require them to be strengthened.

16 Thank you.

17 HEARING OFFICER ROBERTSON:

18 Ms. Blumenshine, I notice you signed in as Heart of  
19 Illinois Group Sierra Club. Are you speaking on  
20 behalf of the group or as a member or --

21 MS. BLUMENSHINE: Thank you for  
22 mentioning that.

23 I did sign in. I am currently  
24 chair of the Heart of Illinois Group Sierra Club. I

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1 do represent them. I got so nervous I guess that I  
2 didn't even launch into my usual introduction that  
3 Heart of Illinois Sierra Club is centered in Peoria.  
4 We have about a thousand members in 15 counties  
5 across Illinois which includes Peoria County,  
6 Tazewell County where the Powerton plant is, Fulton  
7 County on down to Havana and up north to Hennepin,  
8 so this whole region of Illinois River Valley and  
9 the five power plants. The ones we're focusing on  
10 now are Powerton and Edwards, but that is in our  
11 group area, and I am here speaking on their behalf.

12 Thank you so much. I  
13 appreciate it.

14 HEARING OFFICER ROBERTSON: Thank  
15 you.

16 Next we have Susan Murray.

17 MS. MURRAY: Hi. My name is Susan  
18 Murray. I live in the Alton, Illinois area. I'm  
19 here for the Piasa Palisades Sierra Club.

20 Thank you for the opportunity  
21 to speak.

22 I'm actually going to talk  
23 more on behalf of the many, many people who can't be  
24 here.

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1                   If you can't hear me, raise  
2 your hand.

3                   We have quite a few people  
4 here with Sierra Club who are sporting these fine  
5 T-shirts, but in spite of us that are here, there  
6 are many, many, many more who are not here, and I  
7 would just like to take this opportunity to speak  
8 for two of those people who couldn't be here who did  
9 write in their comments and asked that they could be  
10 heard even though they're not here; Ellen Rendulic  
11 (R-e-n-d-u-l-i-c) and Mary Burnitz (B-u-r-n-i-t-z),  
12 both from Lockport, Illinois, and this is what they  
13 wrote into us.

14                   We are currently in an SO2  
15 nonattainment area. This designation comes because  
16 our air quality does not meet the air quality  
17 standards for SO2.

18                   Since 1995, we've relayed  
19 stories of the negative health effects and how our  
20 lives are adversarial affected by the soot and  
21 pollution of the chemical and coal-fired power  
22 plants.

23                   We are requesting that the  
24 IPCB withhold approval of the proposed nonattainment

1 plan for the one-hour SO2 air quality standard until  
2 the draft rule includes the most stringent possible  
3 regulations to protect the citizens' health.

4 HEARING OFFICER ROBERTSON: Thank  
5 you.

6 And am I correct that the  
7 spelling of your last name is M-u-r-r-a-y?

8 MS. MURRAY: Yes.

9 HEARING OFFICER ROBERTSON: Okay.  
10 Thank you.

11 So that's the end of those who  
12 signed up for public comment.

13 Is there anyone else who would  
14 like to make a statement today?

15 Okay. Seeing nobody, we'll  
16 move on.

17 The Board has a couple items  
18 it would like to address.

19 First, we have some copies or  
20 we had some copies of two letters on the back table.  
21 I'm glad to see they're getting used. These letters  
22 are communication between the Board and the  
23 Department of Commerce and Economic Opportunity,  
24 which I'll abbreviate DCEO, regarding the Board's

1 request for an economic impact study and the DCEO's  
2 response.

3 In its letter, DCEO stated  
4 that it was unable to undertake such an economic  
5 impact study at this time.

6 Did anyone have any comments  
7 on the Board or DCEO letters?

8 Seeing none, on May 26th, the  
9 Joint Committee on Administrative Rules, or JCAR,  
10 filed a request for an analysis of economic and  
11 budgetary effects of this rulemaking, and on  
12 May 21st, JCAR also submitted its first notice  
13 version of the rules for use in creating the Board's  
14 second notice changes.

15 These documents are available  
16 on the Board's website.

17 Is there anyone who would like  
18 to make a comment on either of those documents?

19 Seeing none, for both the JCAR  
20 filings and DCEO letters, anyone is welcome to file  
21 any comments with the Board.

22 We also ask if the Agency can  
23 respond to JCAR's request on analysis of economic  
24 and budgetary effects.

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1 We're going to begin wrapping  
2 up.

3 Is there anyone else who would  
4 like to offer any comments on anything today?

5 Seeing no one, do any members  
6 of the Board have any final comments?

7 Seeing none, under the  
8 Administrative Procedures Act, the Board is required  
9 to provide at least 45 days from the date of first  
10 notice publication for any persons to file a public  
11 comment on the Board's first notice proposal.

12 This first notice was  
13 published in the Illinois Register on May 22nd, and  
14 we will be allowing public comments on the first  
15 notice proposal up until July 24th, and any comments  
16 on this first hearing would also be due on that  
17 date.

18 I again note for anyone in  
19 attendance, if you have any additional questions on  
20 anything that happened today, any of the Agency  
21 filings that came in yesterday afternoon, you are  
22 still welcome to file any comments on any of that  
23 with the Board, and you can also follow up at one of  
24 the next two hearings if you so choose to.



1                   Okay. So pursuant to the  
2 Board's May 7, 2015 hearing officer order, the next  
3 hearing in this matter is scheduled for Wednesday.  
4 That is completely incorrect. It's not Wednesday,  
5 July 9th. It's Wednesday, July 29th, at 10 a.m. in  
6 the County Board Chambers, Will County Executive  
7 Office, 2nd Floor, located at 302 North Chicago  
8 Street in Joliet.

9                   Prefiled testimony is due by  
10 July 17th.

11                   Prefiled questions are due  
12 July 24th, and the mailbox rule does not apply,  
13 which means that any filings need to be in the  
14 Board's possession by those dates.

15                   And please note that those  
16 deadlines also apply to the Board's August 4th  
17 hearing in Pekin.

18                   So that's pretty much it. I  
19 just again, lastly, would like to thank everyone who  
20 came out today, the Agency and its witnesses, IERG,  
21 Midwest Generation, Sierra Club, everyone who spoke.  
22 I know it's the middle of the week, bad weather. We  
23 appreciate you guys all taking your time to come out  
24 and participate in this public hearing.

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With that, this hearing is  
adjourned.

Thank you.  
(Which were all of the  
proceedings held at this time.)

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1 STATE OF ILLINOIS )  
 ) SS.  
2 COUNTY OF SANGAMON)

3  
4 CERTIFICATE

5 Laurel A. Patkes, Certified Shorthand  
6 Reporter in and for said County and State, do hereby  
7 certify that I reported in shorthand the foregoing  
8 proceedings and that the foregoing is a true and  
9 correct transcript of my shorthand notes so taken as  
10 aforesaid.

11 I further certify that I am in no way  
12 associated with or related to any of the parties or  
13 attorneys involved herein, nor am I financially  
14 interested in this action.

15 Dated July 9, 2015.

16  
17 Laurel A. Patkes  
Certified Shorthand Reporter  
18  
19  
20  
21  
22  
23  
24

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