

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

ILLINOIS POWER HOLDINGS, LLC and	)	
AMERENENERGY MEDINA VALLEY	)	
COGEN, LLC;	)	
	)	
Petitioners,	)	
	)	
AMEREN ENERGY	)	
RESOURCES, LLC	)	
	)	PCB No. 14-10
Co-Petitioner,	)	(Variance – Air)
	)	
v.	)	
	)	
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Respondent.	)	

**NOTICE OF FILING**

To: ALL PERSONS ON THE ATTACHED SERVICE LIST

Please take notice that today we have electronically filed with the Office of the Clerk of the Illinois Pollution Control Board **Petitioners' and Co-Petitioner's Response to Illinois Pollution Control Board's Questions Set Forth in Hearing Officer Order of September 12, 2013**, copies of which are herewith served upon you.

/s/ Claire A. Manning

Claire A. Manning

Dated: September 16, 2013

**BROWN, HAY & STEPHENS, LLP**

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ILLINOIS ENVIRONMENTAL )	
PROTECTION AGENCY, )	
)	
Respondent. )	

**PETITIONERS' AND CO-PETITIONER'S RESPONSE TO ILLINOIS POLLUTION CONTROL BOARD'S QUESTIONS SET FORTH IN HEARING OFFICER ORDER OF SEPTEMBER 12, 2013**

Petitioners Illinois Power Holdings, LLC (“IPH”) and AmerenEnergy Medina Valley Cogen, LLC (“Medina Valley”) and Co-Petitioner Ameren Energy Resources, LLC (“AER”) provide the following response to questions posed by the Illinois Pollution Control Board in a Hearing Officer Order dated September 12, 2013.

**QUESTIONS FOR PETITIONERS**

**Annual Emissions**

1. *Petitioners present Tables 1 and 2 in Exhibit 10 of the petition to demonstrate a “net benefit to the environment” of 74,303 tons in reduced SO<sub>2</sub> emissions from 2010 through 2020, and 7,778 tons in reduced SO<sub>2</sub> emissions from 2013 through 2020. Pet. Exh. 10.*
  - (a) *Petitioners state that IPH and Ameren anticipate closing on the transaction in the fourth quarter of 2013. Pet. at 31. Please present a revised version of Table 2 in the petition that takes into account only the emissions attributable to the*

*fourth quarter of 2013 through the end of 2020 and the emission reductions attributable to retirement of E.D. Edwards Unit 1 as early as 2017.*

- (b) *In PCB 12-126, Ameren Energy Resources (AER) provided a table showing the projected emissions during the years 2013 through 2019 using a revised heat input and emission reductions to reflect the closures of the Meredosia and Hutsonville plants. See PCB 12-126 AER's Resp. to [IPCB] Technical Unit's Questions filed July 30, 2012 at 8-9, Table 2. Please provide a similar table for projected emissions from the fourth quarter of 2013 through the end of 2020 that also includes the projected retirement of E.D. Edwards Unit 1 as early as 2017.*

**RESPONSE:**

The Tables, with some modifications explained below, are attached as Attachment A (responsive to 1.a) and Attachment B (responsive to 1.b). The Petitioners and Co-Petitioner understand from the nature of the Board's question that these Tables would begin with the period of Petitioners' ownership of the plants. In preparing the Petition, Petitioners and Co-Petitioner took the very same approach and methodology approved by the Board in the AER variance, as developed through discussions AER had with IEPA in advance of its filing (and as developed by IPH with IEPA in advance of this filing). Thus, in a very real sense, the environmental benefits recognized by the Board in granting the variance to the MPS Group in PCB 12-126 would continue under IPH's ownership of the five operating plants in the MPS Group, as shown in Tables 1 and 2 of the Petition (Pet., Ex. 10-1 and 2). However, the Board's question focuses solely on the period of time of IPH's ownership, and Petitioners believe that to be the wrong regulatory analysis. Nonetheless, in furtherance of its environmental commitment, IPH would agree to accept as an additional condition of the variance order a cap on tonnage SO<sub>2</sub> emissions over the period 4th Quarter 2013 - 2020 to ensure that the environmental benefit identified in the Petition (i.e., a reduction of SO<sub>2</sub> emissions of 7,778 tons) is achieved solely during the IPH ownership period. Specifically, as identified in the attached tables, provided in response to

questions 1(a) and 1(b), IPH proposes to accept a cap of 327,996 tons of SO<sub>2</sub> over the period 4th Quarter 2013 – 2020, which is 7,778 tons below the MPS baseline SO<sub>2</sub> tons. Such a cap is significantly more stringent than the terms of the existing variance.

IPH will meet the proposed emission cap at the end of the variance term by a variety of methods, many of which have been identified in the Petition but were not quantified, and are not quantifiable, due to the difficulty in doing so at this time. For example, the additional commitments recommended by the IEPA and accepted by IPH, use of low sulfur coal, operation of the Duck Creek and Coffeen FGD systems at 98% removal efficiency, and closure of Edwards Unit 1 (see answer to question 3), are expected to result in additional SO<sub>2</sub> emission reductions during the term of the variance.

The construction of the FGD system at Newton also will garner emission reductions in advance of the end of the variance term, which have not been provided for in Tables 1 and 2 of the Petition (Pet. Ex. 10-1 and 2). Construction will not be immediate, as each unit must be non-operational during the installation of its FGD system. Thus, emission reductions will occur during the final phase of construction. On the basis of the above, as well as other methods, including management of unit utilization, IPH believes it can agree to the emission cap proposed in the attached Tables, which would demonstrate an environmental benefit during the period 4th Quarter 2013 – 2020 that equates to the environmental benefit identified in Table 2 of the Petition. (Pet. Ex. 10-2).

Although not directly responsive to the Board's question, IPH would be remiss if it did not also point out, as IEPA advised the Board in the IEPA Recommendation, that IPH and Dynegy executed a Memorandum of Agreement ("MOA") with the IEPA on September 4, 2013.

The MOA memorializes the commitment to close E.D. Edwards Unit 1 and, as well, provides the following environmental benefits:

- Implementation of Advanced Gas Path Technology at Kendall Power Station; and
- Permanent Retirement of the air permits for the Stallings and Oglesby Combustion Turbine Facilities.

This MOA again demonstrates IPH and Dynegy's commitment to environmental progress.

2. ***In response to question #1 in the August 14, 2013 Hearing Officer Order, petitioners state, "While Petitioners fully expect that emissions will be consistent with the numbers provided in Table 2, Petitioners at this time do not support annual emission caps relative to the MPS Group . . . ." Pet. Resp. to Aug. 14, 2013 Hearing Officer Order. Please comment on whether the current air permits for the five operating stations in the MPS Group include a limitation on heat input, operating hours, or mass emissions.***

**RESPONSE:**

The five operating stations in the MPS Group are permitted for operation at 100% capacity, 8760 hours per year and do not have heat input or operating hour restrictions. However, all of the plants have air permits with mass emissions limits for SO<sub>2</sub> in accordance with state regulations (Coffeen, Edwards and Joppa; lb/hr limit on a plant-wide basis) or federal regulations (Duck Creek and Newton; NSPS Subpart D emission rate limits on a unit basis; the Newton Unit 2 primary air duct burners are also subject to pounds per hour and ton per year limits). The relevant conditions of the air permits for the five operating stations in the MPS Group, responsive to question 2, are provided as Attachment C.

3. ***IEPA's Recommendation suggested three additional conditions for the variance. See Agency Rec. at 30. Please comment on including these conditions in the requested variance.***

**RESPONSE:**

The IEPA's recommendation sought the following commitments from IPH and, additionally, requested that the Board include those commitments as variance conditions. The conditions are as follows:

- i. Petitioner IPH must operate the existing FGD systems at the Duck Creek and Coffeen Energy Centers at an SO<sub>2</sub> removal rate of at least 98 percent;
- ii. Petitioner IPH must continue to burn low sulfur coal (no more than 0.55 sulfur/mmBtu) from the Powder River Basin at the E. D. Edwards, Joppa and Newton Energy Centers; and
- iii. Petitioner IPH must permanently retire E.D. Edwards Unit 1 as soon as MISO allows E.D. Edwards Unit 1 to be retired (as early as 2017).

IPH consents to include each of these commitments as variance conditions for which IPH is responsible. As the Hearing Officer's Order did not provide sufficient time for IPH and IEPA to discuss appropriate language to make these conditions enforceable, IPH will propose such language in its Post-Hearing Comments, following discussions with IEPA.

4. *Assume for purposes of this question that the Board grants the variance requested in this matter and petitioners timely accept it. Please address the legal effect on such a variance if after its acceptance the transaction through which IPH would acquire AER's active coal-fired power plants never closes.*

**RESPONSE:**

Petitioners and Co-Petitioner anticipate that at the time the Board grants the requested variance, there will be no remaining contractual conditions or regulatory approvals which would preclude the closing of the transaction. Petitioners and Co-Petitioner continue to believe that the Federal Energy Regulatory Commission ("FERC") will approve the transaction in the fourth quarter of 2013. As such, closing is expected to occur shortly after the Board issues its order. At

closing, the Petitioners will execute a signed certificate of acceptance. Consistent with 35 Ill. Adm. Code 104.240, the signed acceptance renders all terms and conditions of the variance relief granted in the Board's order in docket PCB 14-10 as effective, enforceable, final and binding. The signed certificate of acceptance will be filed with the Board and served on the Agency. Upon execution of the certificate of acceptance, the order granting variance relief in docket PCB 12-126 will be superseded by the order granting variance relief in docket PCB 14-10 and the order in docket PCB 12-126 will be void. A draft of the acceptance form is included for the Board's use as Attachment D. Further, Conditions 1 and 2 of the proposed Board order can be modified as follows:

1. ~~If at any time~~ Illinois Power Holdings, LLC (IPH) ~~acquires ownership or control of the five operating power stations in the Ameren MPS Group,~~ IPH must assure compliance with Condition 2 of this Order and must comply with an overall SO<sub>2</sub> annual emission rate of 0.35 lb/mmBtu through December 31, 2019, and beginning January 1, 2020, must comply with an overall SO<sub>2</sub> annual emission rate of 0.23 lb/mmBtu.
2. ~~At any time~~ AmerenEnergy Medina Valley Cogen, LLC ~~acquires ownership or control of the Meredosia and Hutsonville Power Stations,~~ it shall not operate the electrical generating units at the Meredosia and Hutsonville Power Stations ~~these plants~~ until after December 31, 2020. The FutureGen project at the Meredosia Energy Center is exempt from this restriction.

Assuming hypothetically that the transaction does not close, the certificate of acceptance would not be executed, and AER would continue to own the active and inactive energy centers and would continue to comply with the order issued in PCB 12-126.

5. ***The first condition in petitioners' proposed variance order begins as follows: "If at any time [IPH] acquires ownership or control of the five operating power stations in***

*the Ameren MPS group, IPH must assure compliance . . . .” Pet. at 69. Please address whether this contingency or threshold includes approval by the Federal Energy Regulatory Commission of the transaction by which IPH would acquire AER’s active coal-fired power plants.*

**RESPONSE:**

FERC approval of the transaction is a mandatory regulatory and contractual condition. Such approval is pending and expected, as the Applicants have satisfied FERC’s criteria for the transfer of ownership of the active coal plants to Dynegy and the inactive coal plants to Medina Valley. Again, the certification of acceptance of the variance will not be executed until after FERC approval occurs.

Respectfully submitted,

**ILLINOIS POWER HOLDINGS, LLC**

**AMEREN ENERGY RESOURCES, LLC  
and AMERENENERGY MEDINA  
VALLEY COGEN, LLC**

By: /s/ Claire A. Manning  
One of Its Attorneys

By: /s/ Renee Cipriano  
One of Their Attorneys

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[aantonioli@schiffhardin.com](mailto:aantonioli@schiffhardin.com)



**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on this 16th day of September, 2013, I have served electronically the attached **Petitioners' and Co-Petitioner's Response to Illinois Pollution Control Board's Questions Set Forth in Hearing Officer Order of September 12, 2013**, upon the following persons:

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

and by first class mail, postage affixed upon:

Carol Webb, Hearing Officer  
Illinois Pollution Control Board  
1021 North Grand Avenue, East  
Springfield, Illinois 62794-9276

Gina Roccaforte, Assistant Counsel  
Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue, East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

Faith E. Bugel  
Andrew Armstrong  
Environmental Law & Policy Center  
35 E. Wacker Drive  
Chicago, Illinois 60601

/s/ Claire A. Manning  
Claire A. Manning


**AFFIDAVIT OF DANIEL P. THOMPSON**

My name is Daniel P. Thompson. I am Vice President and General Manager for Dynegy Midwest Generation, LLC (“DMG”), an indirect, wholly owned subsidiary of Dynegy Inc. (“Dynegy”). I also serve as Vice President of Illinois Power Holdings, LLC (“IPH”), which is also an indirect, wholly owned subsidiary of Dynegy. My business address is 604 Pierce Blvd., O’Fallon, Illinois, 62269. I make this affidavit based on personal knowledge or on knowledge I have obtained through inquiry of individuals employed by Dynegy or its affiliates.

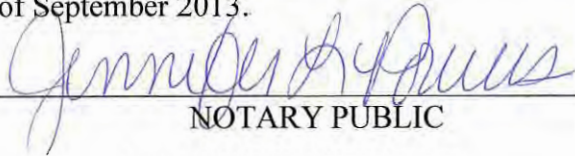
As Vice President of DMG, I am responsible for the safe and efficient operation of Dynegy’s coal-fired electric generating fleet in Illinois. My responsibilities include oversight of environmental compliance at Dynegy’s Illinois coal fleet. Subject to the IPH-Ameren transaction closing, this responsibility will include the five plants in the Ameren MPS Group that are the subject of the requested variance. I have reviewed the Board’s questions that have been presented in the Hearing Officer Order dated September 12, 2013. I have also reviewed the Petitioners’ responses to those questions, have assisted in their development, and concur in these responses. To the best of my knowledge and belief, the facts contained therein are true and correct.

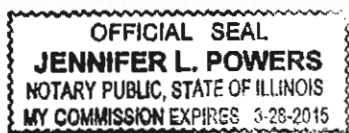
FURTHER, Affiant sayeth not.

DATED: Sept 16, 2013

  
\_\_\_\_\_  
Daniel P. Thompson

Subscribed and sworn to  
before me this 16th day  
of September 2013.

  
\_\_\_\_\_  
NOTARY PUBLIC



ATTACHMENT A

Response Table 1(a)

Year	Baseline Heat Input MMBtu	MPS SO2 Rate lb/MMBtu	MPS Baseline SO2 Tons	Variance SO2 Rate lb/MMBtu	Variance SO2 Tons	SO2 Reduced Tons (1)	Net Variance SO2 Tons	Cumulative Reductions in SO2 Variance Tons
2013 - 4thQ	83,443,376	0.50	20,861	0.35	14,603	2,032	12,571	8,290
2014	340,446,252	0.43	73,196	0.35	59,578	8,289	51,289	30,197
2015	340,446,252	0.25	42,556	0.35	59,578	8,289	51,289	21,464
2016	340,446,252	0.25	42,556	0.35	59,578	8,289	51,289	12,730
2017	340,446,252	0.23	39,151	0.35	59,578	9,792	49,786	2,096
2018	340,446,252	0.23	39,151	0.35	59,578	9,792	49,786	(8,539)
2019	340,446,252	0.23	39,151	0.35	59,578	9,792	49,786	(19,174)
2020	340,446,252	0.23	39,151	0.23	39,151	9,792	29,359	(9,382)
Total			335,774		411,222	66,067	345,155	(9,382)
<b>Net Total with IPH Emissions Cap</b>			<b>335,774</b>				<b>327,996</b>	<b>7,778</b>

Note for the "Cumulative Reductions in SO2 Variance Tons" column, a positive number indicates an emission decrease (benefit).

(1) Reduced tons shown for 2013-2020 are based on not operating Hutsonville and Meredosia. Reduced tons in 2017-2020 are less nearly two times (1.8) worst-case potential SO2 emissions from FutureGen 2.0. Tons shown for 2013-2016 do not include any SO2 emissions for FutureGen 2.0 because FutureGen 2.0 is not scheduled to begin operations until mid-2017. Beginning in 2017, reduced tons shown include the emissions reductions attributable to the projected retirement of E.D. Edwards Unit 1 (as early as 2017).

**ATTACHMENT B**

Response Table 1(b)

Year	Baseline Heat Input MMBtu	MPS SO2 Rate lb/MMBtu	MPS Baseline SO2 Tons	Variance SO2 Rate lb/MMBtu	Adjusted Heat Input MMBtu	Variance SO2 Tons	Cumulative Reductions in SO2 Variance Tons
2013 - 4thQ	83,443,376	0.50	20,861	0.35	76,472,105	13,383	7478
2014	340,446,252	0.43	73,196	0.35	312,003,694	54,601	26,074
2015	340,446,252	0.25	42,556	0.35	312,003,694	54,601	14,029
2016	340,446,252	0.25	42,556	0.35	312,003,694	54,601	1,984
2017	340,446,252	0.23	39,151	0.35	302,724,215	52,977	(11,842)
2018	340,446,252	0.23	39,151	0.35	302,724,215	52,977	(25,667)
2019	340,446,252	0.23	39,151	0.35	302,724,215	52,977	(39,492)
2020	340,446,252	0.23	39,151	0.23	302,724,215	34,813	(35,154)
Total			335,774			370,928	(35,154)
<b>Net Total with IPH Emissions Cap</b>			<b>335,774</b>			<b>327,996</b>	<b>7,778</b>

Note for the "Cumulative Reductions in SO2 Variance Tons" column, a positive number indicates an emission decrease (benefit).

Table includes the projected retirement of E.D. Edwards Unit 1 as early as 2017.

ATTACHMENT C

2011 received 1/7/2012

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

P.O. Box 19506, SPRINGFIELD, ILLINOIS 62794-9506

RENEE CIPRIANO, DIRECTOR

217/782-2113

**OPERATING PERMIT - REVISED**

PERMITTEE

Ameren Energy Generating Company (CIPS)  
Attn: Michael L. Menne, Manager Environmental, Safety and Health  
1901 Chouteau Avenue  
P.O. Box 66149, MC602  
St. Louis, Missouri 63166-6149

Application No.: 73010724

I.D. No.: 143805AAG

Applicant's Designation:

Date Received: June 10, 2004

Subject: E.D. Edwards Station

Date Issued: July 1, 2004

Expiration Date: June 30, 2005

Location: AES Edwards Station, 7800 South Cilco Lane, Bartonville, Peoria County

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of Boiler Nos. 1, 2, and 3 with electrostatic precipitators, low NO<sub>x</sub> burner combustion system, flue gas conditioning systems, fuel handling facilities, and fuel storage tanks as described in the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. The average SO<sub>2</sub> emissions from Boilers 1, 2 and 3 as a group shall not exceed 4.71 lb/mmBtu of actual heat input, on a daily basis, pursuant to 35 IAC 214.561(a).
- b. The average SO<sub>2</sub> emissions from each boiler shall not exceed 6.6 pounds of SO<sub>2</sub> per mmBtu of actual heat input on a daily basis, pursuant to 35 IAC 214.561(b).
- c. SO<sub>2</sub> emissions from Boilers 1, 2 and 3, as a group, shall not exceed 34,613 pounds per hour, on a 24-hour average basis, pursuant to 35 IAC 214.561(c).

Note: The above limit reflects a site-specific determination of the applicable limit adopted by the Illinois Pollution Control Board in Regulatory Proceeding R02-21.

- 2. Emissions of particulate matter from the boilers shall not exceed the following limits in any one-hour period:

	<u>Limit (lb/mmBtu)</u>	<u>Rule</u>
Boiler 1	0.20*	35 IAC 212.203(a)
Boiler 2	0.15*	35 IAC 212.203(a)
Boiler 3	0.10	35 IAC 212.202

\* This limit reflects a site-specific determination of the applicable limit adopted by the Illinois Pollution Control Board in Regulatory Proceeding R02-1.



Page 2

3. Except as provided by Conditions 1 and 2, emissions and opacity from the boilers shall comply with the standards of general applicability for existing coal-fired boiler including the new requirements of the NO<sub>x</sub> trading Program.
- 4a. The Permittee shall submit a quarterly excess emission report of emissions in excess of those allowed by Title 35 Subtitle B for each boiler as indicated in 35 Ill. Adm. Code 201.405. This report shall be postmarked within forty-five days after the end of each calendar quarter and shall be based on data from the Continuous Emissions Monitor System (CEMS).
  - i. Excess emission and monitor performance reporting shall include the following:
    - A. The starting date and time of the excess emissions;
    - B. The duration of the excess emissions;
    - C. The magnitude of the excess emissions;
    - D. The cause of the excess emissions; if known;
    - E. Corrective actions taken to lessen the emissions; and
    - F. The operating status of the monitoring system including the dates and times of any periods during which it was inoperative.
  - ii. This report shall be effective beginning with the first Quarter, 1995 (January 1st through March 31st, 1995)
  - iii. If there were no excess emissions during the reporting period, the report shall so state and include information about the operating status of the monitoring equipment during that period.
- b. All records produced by the continuous systems shall be retained by the Permittee for a period of not less than two (2) years.
- 5a. Operation in excess of applicable opacity, particulate matter, and carbon monoxide emission standards, is allowed during periods of startup, malfunction, and breakdown.
  - b. The Permittee shall keep a record of each startup, including information as to the length of time that such operation exceeded applicable standards and limitations, and a justification for the length of startup.
  - c. The Permittee shall notify the Illinois EPA's Regional Office by telephone as soon as possible during normal working hours upon the occurrence of excess emissions due to malfunctions or breakdowns. The Permittee shall comply with all reasonable and safe directives of the Regional Office regarding such malfunctions and breakdowns.

Page 3

- d. The Permittee shall maintain records of excess emissions during malfunctions and breakdowns. As a minimum, these records shall include:
  - i. The date and duration of the malfunction or breakdown.
  - ii. A full and detailed explanation of the cause for such emissions.
  - iii. The type and quantity of contaminants emitted.
  - iv. The measures used to reduce the quantity of emissions and the duration of the occurrence.
  - v. The steps taken to prevent similar malfunctions or breakdowns and/or to reduce their frequency and severity.
- e. The Permittee shall retain the records required by this special condition for a period of at least two (2) years following an event. These records shall be maintained at a readily accessible location at the plant and shall be made available to representatives of the Illinois EPA during normal working and/or operating hours.
- f. The Permittee shall not continue operation during malfunction or breakdown beyond such time as is necessary to prevent injury to persons or severe damage to equipment or to provide essential services.
- 6a. Organic liquid by-products or waste materials other than those permitted by Condition 6(b) and (c) shall not be burned in Boilers 1, 2, and 3 without written permission from this Illinois EPA.
- b. Waste oils fitting the following description may be burned in the above referenced boilers:
  - i. Lubricating oil from coal mills, coal handling machinery, fan motors, pumps, turbines, and internal combustion engines.
  - ii. Hydraulic fluids.
  - iii. Mineral oil dielectric fluids containing less than two (2) ppm PCBs.
  - iv. Used grease.
- c. Boiler chemical cleaning wastes may be burned in the above referenced boilers.
- d. The Permittee shall analyze, on an annual basis, a representative sample of the materials listed in Condition 6(b) above for arsenic, chromium, cadmium, lead, flash point, total halogens, and heat content.
- e. The Permittee shall analyze, on an annual basis, a representative sample of the materials listed in Condition 6(c) above for pH, flash point, heat content, total halogens, arsenic, barium, mercury, chromium, lead, selenium, and silver.

Page 4

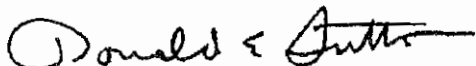
- f. None of the waste materials described in Conditions 6(b) and (c) shall be hazardous.
- 7a. i. Upon written request by the Illinois EPA, the particulate matter concentrations in the effluent streams of Boiler(s) shall be measured by an approved testing service, during conditions which are representative of full load.
- ii. The following methods and procedures shall be used for testing of emissions, unless another method is approved by the Illinois EPA: Refer to 40 CFR 60, Appendix A for USEPA test methods.
- |                           |                |
|---------------------------|----------------|
| Location of Sample Points | USEPA Method 1 |
| Gas Flow and Velocity     | USEPA Method 2 |
| Particulate Matter        | USEPA Method 5 |
- b. Prior to carrying out these tests, the Illinois EPA - Air Compliance Section and Illinois EPA - Air Regional Field Office, shall be notified a minimum of thirty (30) days prior to the expected date of these tests and further notified a minimum of five (5) working days prior to the test of the exact date, time, and place of these tests, to enable the Illinois EPA to witness these tests.
- i. Illinois EPA - Air Compliance Section
- Illinois Environmental Protection Agency  
Bureau of Air  
Compliance & Enforcement Section (MC 40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276
- ii. Illinois EPA - Air Regional Field Office
- Illinois Environmental Protection Agency  
Division of Air Pollution Control  
5415 North University  
Peoria, Illinois 61614
- c. Three (3) copies of the Final Report(s) for these tests shall be submitted to the Illinois EPA within 14 days of the compiling and finalizing of the test results.
8. The Illinois EPA shall be allowed to sample all coal at the station and shall be furnished replicate coal samples upon request.
- 9a. This permit allows for the burning of sub bituminous coal from Powder River Basin (PRB) in the boilers (not to exceed 120 days) of operational and emissions testing purposes, as described in the Permittee's letter of June 4, 2004, such that the boiler continues to comply with applicable rules and regulations governing air pollution and with the conditions set forth in this operating permit.

Page 5

- b. i. The Permittee shall notify the Illinois EPA in writing at least fourteen (14) days prior to initial burning of any coal from a new mine. This notification shall be sent to the Illinois EPA's Regional Office and the Illinois EPA's Source Emission Test Specialist and shall include as a minimum: Information regarding fuel analyses, quantities and types of fuel(s) to be burned, planned start time and date, duration of test period, and a description of the test plan. The duration of any test burn shall not exceed 120 days unless the Illinois EPA has approved a longer period.
- ii. Notwithstanding the 120-day period specified above, the Permittee may conduct an evaluation or trial burn of sub bituminous coal from the Powder River Basin until July 30, 2004.
- c. Prior to revising this operating permit to allow for the continued burning of coal from a new mine in significant amount or a specific alternative fuel, the Illinois EPA may require appropriate emission testing to be carried out in accordance with the provisions of Condition 7.

It should be noted that this permit has been revised to address changes in the coal supply to the boilers and reflect current emission standards for the boilers.

If you have any questions on this permit, please contact Kunj Patel at 217/782-2113.



Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:KP:jar

cc: Region 2



STATE OF ILLINOIS  
 ENVIRONMENTAL PROTECTION AGENCY  
 DIVISION OF AIR POLLUTION CONTROL  
 P.O. BOX 19506  
 SPRINGFIELD, ILLINOIS 62794-9506

STANDARD CONDITIONS  
 FOR  
 OPERATING PERMITS

May, 1993

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special permit conditions(s).

1. The issuance of this permit does not release the Permittee from compliance with state and federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or with applicable local laws, ordinances and regulations.
2. The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be ground for revocation under 35 Ill. Adm. Code 201.166.
3.
  - a. The Permittee shall not authorize, cause, direct or allow any modification, as defined in 35 Ill. Adm. Code 201.102, of equipment, operations or practices which are reflected in the permit application as submitted unless a new application or request for revision of the existing permit is filed with the Illinois EPA and unless a new permit or revision of the existing permit(s) is issued for such modification.
  - b. This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted location(s) or if all equipment is removed, notwithstanding the expiration date specified on the permit.
4. The Permittee shall allow any duly authorized agent of the Illinois EPA, upon the presentation of credentials, at reasonable times:
  - a. To enter the Permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit;
  - b. To have access to and to copy any records required to be kept under the terms and conditions of this permit;
  - c. To inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit;
  - d. To obtain and remove samples of any discharge or emission of pollutants; and
  - e. To enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring or recording any activity, discharge or emission authorized by this permit.
5. The issuance of this permit:
  - a. Shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are located;

L 532-0224

090-005

APC 161 Rev. March, 2001

PRINTED ON RECYCLED PAPER

## Directory Environmental Protection Agency Bureau of Air

May 22, 2003

*For assistance in preparing a permit application, contact the Permit Section:*

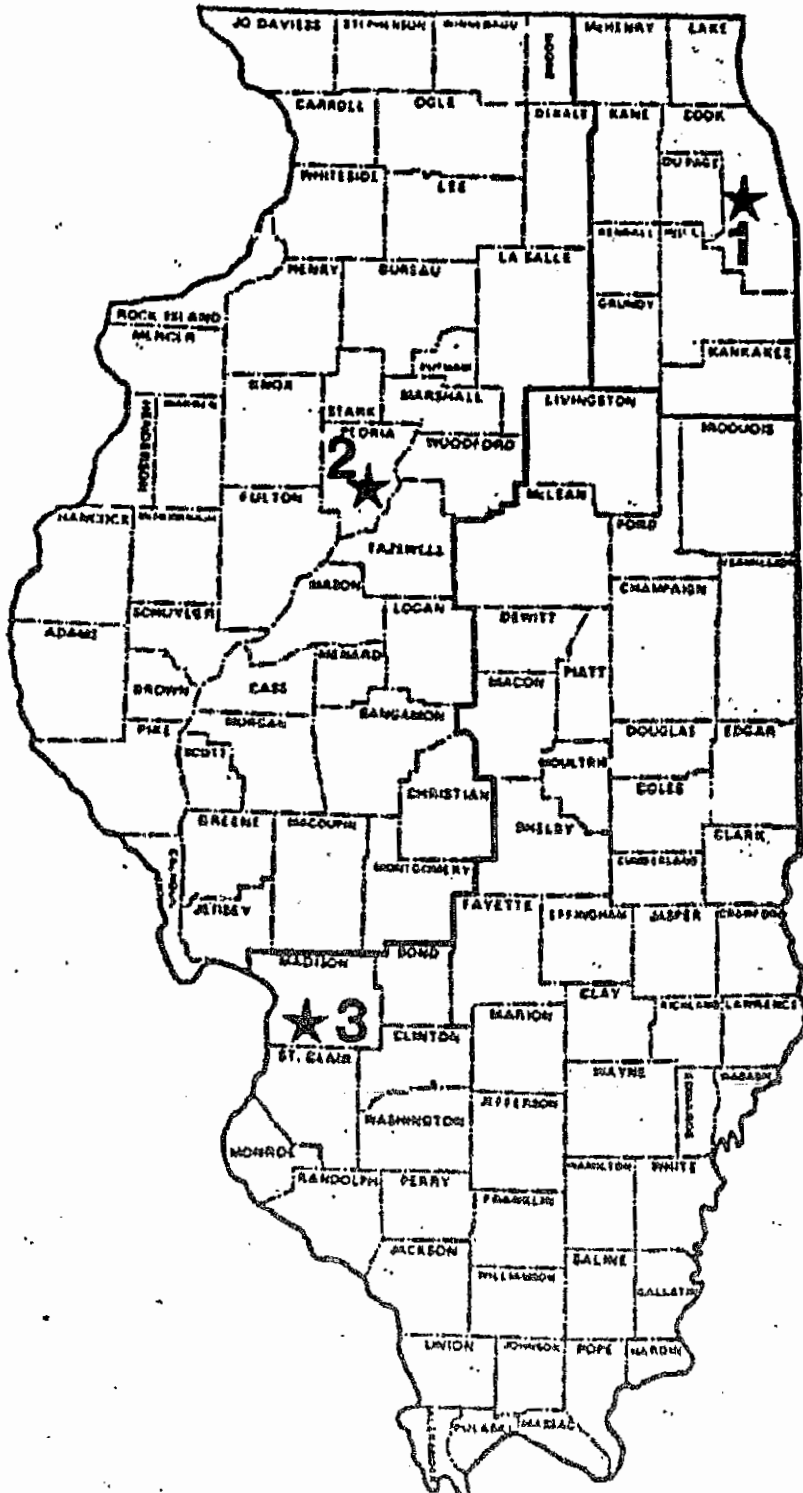
**Illinois EPA**  
Division of Air Pollution Control  
Permit Section  
1021 N. Grand Ave E.  
P.O. Box 19506  
Springfield, Illinois 62794-9506  
217/782-2113

*Or contact a regional office of the Field Operations Section. The regional offices and their areas of responsibility are shown on the map. The addresses and telephone numbers of the regional offices are as follows:*

**Illinois EPA**  
Region 1  
Bureau of Air, FOS  
9511 West Harrison  
Des Plaines, Illinois 60016  
847/294-4000

**Illinois EPA**  
Region 2  
5415 North University  
Peoria, Illinois 61614  
309/693-5461

**Illinois EPA**  
Region 3  
2009 Mall Street  
Collinsville, Illinois 62234  
618/346-5120



Received 10-4-2005 SCW  
File: AQ 3.1.16.1

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. Box 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

217/782-2113

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE

AmerenEnergy Resources Generating Company  
Attn: Michael L. Menne  
1901 Chouteau Avenue  
St. Louis, Missouri 63101

Application No.: 95070026

I.D. No.: 143805AAG

Applicant's Designation:

Date Received: July 10, 1995

Operation of: Electrical Power Generation at Edwards plant

Date Issued: September 29, 2005

Expiration Date<sup>1</sup>: September 29, 2010


Source Location: 7800 South CILCO Lane, Bartonville, Peoria County

Responsible Official: Gregory T. Russell, Manager Edwards Power Station

This permit is hereby granted to the above-designated Permittee to OPERATE an electrical power generation station, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

The current federal Acid Rain Permit issued to AmerenEnergy Resources Generating Company by the Illinois EPA for this source is incorporated into this CAAPP permit (See Attachment 5).

If you have any questions concerning this permit, please contact the Utility Unit at 217/782-2113 (217/782-9143 TTD).



Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:MNP:jar

cc: Illinois EPA, FOS, Region 2  
USEPA

<sup>1</sup> Except addressed in Condition 8.7 of this permit.

7.1.4 Applicable Emission Standards

- a. The affected boilers shall comply with the standard in Condition 5.2.2(b) [35 IAC 212.123], which addresses the opacity of the emission of smoke or other particulate matter from the affected boilers.
- b.
  - i. The emissions of PM from affected boiler 1 shall not exceed 0.20 lb/mmBtu of actual heat input in any one hour period, pursuant to 35 IAC 212.203. This standard applies because the affected boiler qualifies for the alternative standard provided by this rule, as recognized by the Illinois Pollution Control Board in Regulatory Proceeding R82-1. In particular, in accordance with 35 IAC 212.203(a), as of April 14, 1972, this boiler had an hourly emission rate based on the stricter of the original design or equipment performance test conditions that was less than 0.20 lb/mmBtu of actual heat input, i.e., 0.15 lb/mmBtu. Thereafter, under this rule, the emission rate is not allowed to degrade by more than 0.05 lb/mmBtu from the base emission rate, resulting in an emission standard of 0.20 lb/mmBtu.
  - ii. The emissions of PM from the affected boiler 2 shall not exceed 0.15 lb/mmBtu of actual heat input in any one hour period, pursuant to 35 IAC 212.203, as also recognized by the Illinois Pollution Control Board in Regulatory Proceeding R82-1. As of April 14, 1972, this boiler had an hourly emission rate of 0.10 lb/mmBtu. Thereafter, under this rule, the emission rate is not allowed to degrade by more than 0.05 lb/mmBtu from the base emission rate, resulting in an emission standard of 0.15 lb/mmBtu.
  - iii. The emissions of PM from affected boiler 3 shall not exceed 0.10 lb/mmBtu of actual heat input in any one hour period, pursuant to 35 IAC 212.202.
- c.
  - i. The average SO<sub>2</sub> emissions from the affected boilers as a group shall not exceed 4.71 lb/mmBtu of actual heat input, on a daily basis, pursuant to 35 IAC 214.561(a).

The average SO<sub>2</sub> emissions from any one affected boiler may not exceed 6.6 pounds of SO<sub>2</sub> per mmBtu of actual heat input on a daily basis, pursuant to 35 IAC 214.561(b).

SO<sub>2</sub> emissions for all three affected boilers, as a group, may not exceed 34,613 pounds of SO<sub>2</sub> per hour, on a 24-hour average basis, pursuant to 35 IAC 214.561(c).



217/782-2113

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE

Electric Energy, Inc.  
Attn: Manager, Technical Services  
2100 Portland Road  
Post Office Box 165  
Joppa, Illinois 62953

<u>Application No.:</u> 95090120	<u>I.D. No.:</u> 127855AAC
<u>Applicant's Designation:</u> JOPPA STEAM	<u>Date Received:</u> September 8, 1995
<u>Operation of:</u> Electric Power Plant	
<u>Date Issued:</u> September 29, 2005	<u>Expiration Date</u> <sup>1</sup> : September 29, 2010
<u>Source Location:</u> 2100 Portland Road, Joppa, Massac County	
<u>Responsible Official:</u> Terence H Larbes, Manager, Technical Services	

This permit is hereby granted to the above-designated Permittee to OPERATE the Electric Energy, Inc. Joppa Steam Electric Station, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

The current federal Acid Rain Permit issued to Joppa Steam by the Illinois EPA for this source is incorporated into this CAAPP permit (Refer to Attachment 5).

If you have any questions concerning this permit, please contact the Utility Unit at 217/782-2113 (217/782-9143 TDD).

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:MNP:jar

cc: Illinois EPA, FOS, Region 3  
USEPA

<sup>1</sup> Except as addressed in Condition 8.7 of this permit.

- v. This authorization does not relieve the Permittee from the continuing obligation to minimize excess emissions during malfunction or breakdown. As provided by 35 IAC 201.265, an authorization in a permit for continued operation with excess emissions during malfunction and breakdown does not shield the Permittee from enforcement for any such violation and only constitutes a prima facie defense to such an enforcement action provided that the Permittee has fully complied with all terms and conditions connected with such authorization.

7.1.4 Applicable Emission Standards

- a. The emissions of PM from each affected boiler shall not exceed 0.19 lb/mmBtu of actual heat input in any one hour period, pursuant to 35 IAC 212.203. This standard applies because affected boilers qualify for the alternative standard provided by this rule, as recognized by the Illinois Pollution Control Board in Regulatory Proceeding R82-1. In particular, in accordance with 35 IAC 212.203(a), as of April 14, 1972, the affected boilers had hourly emission rates based on the stricter of the original design or equipment performance test conditions that were less than 0.20 lb/mmBtu of actual heat input, i.e., 0.14 lb/mmBtu. Thereafter, under this rule, the emission rates are not allowed to degrade by more than 0.05 lb/mmBtu from the base emission rate, resulting in an emission standard of 0.19 lb/mmBtu.
- b. The total emissions of SO<sub>2</sub> from the affected boilers shall not exceed 36,865 lb/hour, pursuant to 35 IAC 214.182 and 214.184. These are the SO<sub>2</sub> emissions allowed by the following formula in 35 IAC 214.184, as selected by the Permittee, which when applied to the boilers at the source results in a total allowable SO<sub>2</sub> emission rate of 36,865 lb/hr:

$$E = 0.2222H^2$$

Where:

E = Total emissions of SO<sub>2</sub>, in pounds per hour, from all fuel combustion emission units owned or operated by such person and located within 1 mile from the center point of any such unit\*;

H =  $P_1H_1 + P_2H_2 + \dots P_nH_n$  and



7.0 UNIT SPECIFIC CONDITIONS

7.1 Coal Fired Boilers - Subject to NSPS, 40 CFR 60 Subpart D

7.1.1 Description

The Permittee operates two coal-fired boilers for electric generation. The boilers are currently operated for base load generation, normally operating for weeks at a time between startups. The boilers, which were built in 1972 and 1975, have nominal capacities of 5,500 mmBtu/hour each and served by separate stacks. These boilers also have the capability to fire at various modes such as combination of coal and fuel oil as their principal fuel. In addition to coal, these boilers fire fuel oil as auxiliary fuel during startup and for flame stabilization. Periodically small amounts of used oil or boiler cleaning residue are fired with the coal in these boilers.

Nitrogen oxide (NOx) emissions from the boilers are controlled by low-NOx burners and overfire air systems. In addition, boiler 2 is equipped with a duct burner for the primary air supply to facilitate control of NOx. Particulate matter (PM) emissions are controlled by electrostatic precipitators (ESP) equipped with Flue Gas Conditioning (FGC) systems. The FGC systems are operated on an as needed basis.

7.1.2 List of Emission Units and Air Pollution Control Equipment

These unit-specific conditions address the following emission units:

Boiler	Description	Control Equipment
Boiler 1 NB-1	Coal-fired Boiler Nominal 5,500 mmBtu/hr	Low NOx Burners with Overfire Air, and ESP with FGC
Boiler 2 NB-2	Coal-fired Boiler Nominal 5,500 mmBtu/hr	Primary Air Duct Burners, Low NOx Burners with Overfire Air, and ESP with FGC

7.1.3 Applicability Provisions

- a. i. An "affected boiler" for the purpose of these unit-specific conditions is a boiler described in Conditions 7.1.1 and 7.1.2.
- ii. The affected boilers are also "affected facilities" for purposes of the New Source Performance Standards (NSPS) for Fossil-Fuel Fired Steam Generators for Which Construction Is Commenced After August 17, 1971, pursuant to 40 CFR 60.40. As affected facilities, the boilers are also subject to applicable requirements of the NSPS, 40 CFR 60 Subpart D and related requirements in the NSPS, 40 CFR 60 Subpart A, General Provisions.

- v. This authorization does not relieve the Permittee from the continuing obligation to minimize excess emissions during malfunction or breakdown. As provided by 35 IAC 201.265, an authorization in a permit for continued operation with excess emissions during malfunction and breakdown does not shield the Permittee from enforcement for any such violation and only constitutes a prima facie defense to such an enforcement action provided that the Permittee has fully complied with all terms and conditions connected with such authorization.

7.1.4 Applicable Emission Standards

a. Federal NSPS standards

- i. The affected boilers are subject to New Source Performance Standards (NSPS) for Fossil Fuel Fired Steam Generators, 40 CFR 60, Subparts A and D.
- ii. Pursuant to the NSPS, emissions from each affected boiler shall not exceed the following emission standards:

Pollutant	<u>(lb/mmBtu)</u>	<u>Standard Rule</u>
PM	0.10	40 CFR 60.42(a)(1)
SO <sub>2</sub>	1.20	40 CFR 60.43(a)(2)
NO <sub>x</sub>	0.70	40 CFR 60.44(a)(3)

- iii. Opacity from each affected boiler shall not exceed 20 percent, as measured on a six minute average, except for one 6 minute period per hour of not more than 27 percent pursuant to NSPS, 40 CFR 60.42(a)(2).
  - iv. Pursuant to 40 CFR 60.8(c) and 60.11(c), the above emission limitations do not apply during startup, malfunction, and shutdown, as defined by 40 CFR 60.2. Notwithstanding this provision, pursuant to 40 CFR 60.7(b) and (c), exceedances of these limitations during startup, malfunction, and shutdown are still subject to recordkeeping and reporting requirements under the NSPS.
- b. The emissions of PM from each affected boiler shall not exceed 0.10 lb/mmBtu of actual heat input in any one hour period, pursuant to 35 IAC 212.204.
  - c. The emissions of SO<sub>2</sub> from each affected boiler shall not exceed 1.2 lb/mmBtu of actual heat input, pursuant to 35 IAC 214.121(a).

- b. i. The only fuels fired in the primary air duct burners of affected boiler 2 shall be natural gas and distillate fuel oil. [T1]
- ii. A. The fuel usage of the primary air duct burners of affected boiler 2 shall not exceed 250 gallons/hour, total. [T1]
- B. The total annual fuel consumption by the primary air duct burners of affected boiler 2 shall not exceed 1,610,000 gallons. [T1]
- C. For this purpose, if natural gas is burned, 1,000 standard cubic feet of gas shall be considered equivalent to 7.45 gallons of oil. [T1]
- iii. The emissions of the primary air duct burners of affected boiler 2 shall not exceed the following limitations. [T1]

<u>Pollutant</u>	<u>Limitation</u>	
	<u>Lb/Hr (Each)</u>	<u>Ton/Year (Total)</u>
NOx	5.0	16.1
CO	1.25	4.0
SO <sub>2</sub>	9.94	32.0
PM	0.5	1.6

- iv. Compliance with annual limitations shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

Note: The above requirements were established in Permit 01030065.

7.1.7 Testing Requirements

Pursuant to Section 39.5(7)(d)(ii) of the Act, the Permittee shall have the PM and CO emissions of each affected boiler measured as specified below:

- a. i. PM emission measurements shall be made no later than one year after the effective date of this condition. (Measurements made after December 31, 2003 may satisfy this requirement.)
- ii. PM emission measurements shall be made within 90 days of operating an affected boiler for more than 30 hours total in a calendar quarter at a load\* that is more than 2 percent higher than the greatest load on the boiler, during the most recent set of PM tests on the affected boiler in which compliance is shown (refer to Condition 7.1.7(e)(iii)(D)), provided, however, that the Illinois EPA may



malfunction and breakdown does not shield the Permittee from enforcement for any such violation and only constitutes a prima facie defense to such an enforcement action provided that the Permittee has fully complied with all terms and conditions connected with such authorization.

7.1.4 Applicable Emission Standards

- a. The affected boilers shall comply with the standard in Condition 5.2.2(b) [35 IAC 212.123], which addresses the opacity of the emission of smoke or other particulate matter from the affected boilers.
- b.
  - i. The emissions of PM from the affected boiler 1 (CB1) shall not exceed 0.19 lb/mmBtu of actual heat input in any one hour period, pursuant to 35 IAC 212.203. This standard applies because the affected boiler qualifies for the alternative standard provided by this rule, as recognized by the Illinois Pollution Control Board in Regulatory Proceeding R82-1. In particular, in accordance with 35 IAC 212.203(a), as of April 14, 1972, the affected boilers had an hourly emission rate based on the stricter of the original design or equipment performance test conditions that was less than 0.20 lb/mmBtu of actual heat input, i.e., 0.14 lb/mmBtu. Thereafter, under this rule, the emission rate is not allowed to degrade by more than 0.05 lb/mmBtu from the base emission rate, resulting in an emission standard of 0.19 lb/mmBtu.
  - ii. The emissions of PM from the affected boiler CB2 shall not exceed 0.15 lb/mmBtu of actual heat input in any one hour period, pursuant to 35 IAC 212.203. This standard applies because the affected boiler qualifies for the alternative standard provided by this rule, as recognized by the Illinois Pollution Control Board in Regulatory Proceeding R82-1. In particular, in accordance with 35 IAC 212.203(a), as of April 14, 1972, the affected boiler had an hourly emission rate based on the stricter of the original design or equipment performance test conditions that was less than 0.20 lb/mmBtu of actual heat input, i.e., 0.10 lb/mmBtu. Thereafter, under this rule, the emission rate is not allowed to degrade by more than 0.05 lb/mmBtu from the base emission rate, resulting in an emission standard of 0.15 lb/mmBtu.



- c. The total emission of SO<sub>2</sub> from the affected boilers combined shall not exceed 55,555 lb/hour, pursuant to 35 IAC 214.143, 214.182, and 214.184. These are the SO<sub>2</sub> emissions allowed by the following formula in 35 IAC 214.184, as selected by the Permittee:

$$E = 0.2222 H^2$$

$$H = P_1H_1 + P_2H_2 + \dots + P_nH_n$$

Where:

E = Total emissions of SO<sub>2</sub>, in pounds per hour, from all fuel combustion emission units owned or operated by such person and located within 1 mile from the center point of any such unit.

P<sub>i</sub> = Percentage of total emissions E emitted from emission unit i divided by 100. (Note: P<sub>1</sub> + P<sub>2</sub> + ... + P<sub>n</sub> = 1)

H<sub>i</sub> = Height in feet above grade of stack i. (Note: The height used may not exceed the good engineering practice [GEP] height for such stack. The actual height of the stacks for the affected boilers is 500 ft, but the GEP height is 213 ft.)

- d. The emissions of CO from each affected boiler shall not to exceed 200 ppm, corrected to 50 percent excess air, pursuant to 35 IAC 216.121.
- e. The affected boilers are subject a NO<sub>x</sub> emission standard pursuant to Section 407 of the Clean Air Act and 40 CFR Part 76, as addressed in Condition 6.2.2 and Attachment 5 of this permit.
- f. The affected boilers are each subject to the following requirements related to NO<sub>x</sub> emissions pursuant to 35 IAC Part 217 Subpart V:
- i. During each ozone control period (May 1 through September 30):
- A. The emissions of NO<sub>x</sub> from an affected boiler shall not exceed 0.25 lb/mmBtu of actual heat input based on a ozone control period average for that unit, pursuant to 35 IAC 217.706(a), or
- B. If the Permittee elects to participate in a NO<sub>x</sub> averaging plan, the emissions of NO<sub>x</sub> from the affected boiler and other

Received 10-4-2005 SCW  
File: AQ 3.1.15.1.1

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

ROD R. BLAGOJEVICH, GOVERNOR DOUGLAS P. SCOTT, DIRECTOR

217/782-2113

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE

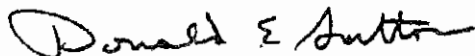
AmerenEnergy Resources Generating Company  
Attn: Michael L. Menne  
1901 Chouteau Avenue  
St. Louis, Illinois 63103

<u>Application No.:</u> 95070025	<u>I.D. No.:</u> 057801AAA
<u>Applicant's Designation:</u>	<u>Date Received:</u> July 10, 1995
<u>Operation of:</u> Electrical Power Generation at Duck Creek Plant	
<u>Date Issued:</u> September 29, 2005	<u>Expiration Date<sup>1</sup>:</u> September 29, 2010
<u>Source Location:</u> 17751 North Cilco Road, Canton, Fulton County	
<u>Responsible Official:</u> James L. Luckey III, Manager, Duck Creek Power Station	

This permit is hereby granted to the above-designated Permittee to OPERATE an electrical power generation station, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

The current federal Acid Rain Permit issued to AmerenEnergy Resources Generating Company by the Illinois EPA for this source is incorporated into this CAAPP permit (See Attachment 5).

If you have any questions concerning this permit, please contact the Utility Unit at 217/782-2113 (217/782-9143 TTD).



Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:MNP:jar

cc: Illinois EPA, FOS, Region 2  
USEPA

<sup>1</sup> Except as addressed in Condition 8.7 of this permit.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Coal Fired Boiler - Subject to NSPS, 40 CFR 60, Subpart D

7.1.1 Description

The Permittee operates a coal-fired boiler for electric generation. The boiler is currently operated for base load generation, normally operating for weeks at a time between startups. The boiler, which was built in 1976, has a nominal capacity of 3713 mmBtu/hour. This boiler also has the capability to fire at various modes such as combination of coal, petroleum coke, and fuel oil as its principal fuel. In addition to coal, the boiler fires fuel oil as an auxiliary fuel during startup and for flame stabilization. Periodically small amounts of used oil or boiler cleaning residue are fired with the coal in this boiler.

Nitrogen oxide (NOx) emissions from the boiler are controlled by low-NOx burners and a selective catalytic reduction (SCR) system. Particulate matter (PM) emissions are controlled by an electrostatic precipitator (ESP). Sulfur dioxide (SO<sub>2</sub>) emissions are controlled by a flue gas desulfurization (FGD) scrubber system. The Permittee currently plans to operate the SCR and FGD on an as needed basis to comply with applicable NOx and SO<sub>2</sub> emission standards.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Unit I.D.	Description	Emission Control Equipment
Boiler B-1	Riley Stoker Boiler Nom. 3,713 mmBtu/hr (1976)	LNB, SCR, ESP and FGD

7.1.3 Applicability Provisions

- a. i. The "affected boiler" for the purpose of these unit-specific conditions is the boiler described in Conditions 7.1.1 and 7.1.2.
- ii. The affected boiler is also an "affected facility" for purposes of the New Source Performance Standards (NSPS) for Fossil-Fuel Fired Steam Generators for Which Construction Is Commenced After August 17, 1971, pursuant to 40 CFR 60.40. As an affected facility, the boiler is subject to applicable requirements of the NSPS, 40 CFR 60 Subpart D and related requirements in the NSPS, 40 CFR 60 Subpart A, General Provisions.

b. Startup Provisions

Subject to the following terms and conditions, the Permittee is authorized to operate the affected boiler in violation of the applicable standards in Condition

7.1.4 Applicable Emission Standards

a. Federal emission standards

i. The affected boiler is subject to the New Source Performance Standards (NSPS) for Fossil Fuel Fired Steam Generators, 40 CFR 60 D.

ii. Pursuant to the NSPS, emissions from the affected boiler shall not exceed the following emission standards:

<u>Pollutant</u>	<u>(lbs/mmBtu)</u>	<u>Standard Rule</u>
PM	0.10	40 CFR 60.42 (a) (1)
SO <sub>2</sub>	1.2	40 CFR 60.43 (a) (2)
NOx	0.70	40 CFR 60.44 (a) (3)

iii. Opacity from the affected boiler shall not exceed 20 percent, as measured on a six minute average, except for one 6 minute period per hour of not more than 27 percent pursuant to the NSPS, 40 CFR 60.42(a) (2).

iv. A. Pursuant to 40 CFR 60.8(c) and 60.11(c), the above emission limitations do not apply during startup, malfunction, and shutdown, as defined by 40 CFR 60.2. Notwithstanding this provision, pursuant to 40 CFR 60.7(b) and (c), exceedances of these limitations during startup, malfunction, and shutdown are still subject to recordkeeping and reporting requirements under the NSPS.

B. At all times, the Permittee shall maintain and operate the affected boiler, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions, as required pursuant to the NSPS, 40 CFR 60.11(d).

b. The emissions of PM from the affected boiler shall not exceed 0.10 lb/mmBtu of actual heat input in any one hour period, pursuant to 35 IAC 212.204.

c. The emissions of SO<sub>2</sub> from the affected boiler shall not exceed 1.2 lb/mmBtu of actual heat input in any one hour period, pursuant to 35 IAC 214.121(a).

d. The emissions of CO from the affected boiler shall not exceed 200 ppm, corrected to 50 percent excess air, pursuant to 35 IAC 216.121.

**ATTACHMENT D**

**CERTIFICATE OF ACCEPTANCE AND NOTICE OF CLOSING**

On \_\_\_\_\_, Ameren Corporation and Illinois Power Holdings, LLC closed the transaction referenced in the Order of the Illinois Pollution Control Board dated \_\_\_\_\_.

I (We), \_\_\_\_\_, having read the opinion and order of the Illinois Pollution Control Board in docket PCB 14-10, dated \_\_\_\_\_, understand and accept the opinion and order, realizing that this acceptance renders all terms and conditions of the variance set forth in that order binding and enforceable.

ILLINOIS POWER HOLDINGS, LLC

By: \_\_\_\_\_

Authorized Agent

Title: \_\_\_\_\_

Date: \_\_\_\_\_

MEDINA VALLEY COGEN, LLC

By: \_\_\_\_\_

Authorized Agent

Title: \_\_\_\_\_

Date: \_\_\_\_\_