

STATE OF ILLINOIS)
)
COUNTY OF MONTGOMERY) SS:

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CENTRAL ILLINOIS PUBLIC SERVICE CO.)
)
)
Petitioner,)
)
vs.)
)
ENVIRONMENTAL PROTECTION AGENCY,)
)
Respondent.)

PCB 74-175

NOTICE

TO: Lehman D. Krause
Hearing Officer
413 N. 85th Street
East St. Louis, Illinois 62203

Sorling, Catron & Hardin
626 Illinois Building
Springfield, Illinois 62701

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

ENVIRONMENTAL PROTECTION AGENCY
STATE OF ILLINOIS

By: Michael Ginsberg
Michael Ginsberg, Attorney
Enforcement Section
Division of Air Pollution Control

DATE: July 29, 1974

2200 Churchill Road
Springfield, Illinois 62706
217/782-7326

STATE OF ILLINOIS)
) SS.
COUNTY OF SANGAMON)

PROOF OF SERVICE

I, the undersigned, being duly sworn on oath, depose and state that I have served the attached document(s) upon the person(s) whom said document(s) is are directed, by placing a copy of same in an envelope addressed to Lehman B. Krause, Hearing Officer, 415 N. 85th Street, East St. Louis, Illinois 62205 and Sorling, Catron & Hardin, 820 Illinois Building, Springfield, Illinois 62701 and mailing same with sufficient postage affixed, certified mail, return receipt requested; said envelope being deposited in the United States Mail, Springfield, Illinois, on

July 29, 1974.

Sandy Vost

TESTED AND SWORN TO before me
this 29th day of July, 1974.

Mary E. Helen Hayes

NOTARY PUBLIC

My Commission Expires October 31, 1976.

STATE OF ILLINOIS)
) SS:
COUNTY OF MONTGOMERY)

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CENTRAL ILLINOIS PUBLIC SERVICE COMPANY,)
))
 Petitioner,))
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 v.) PCB 74-175
))
ENVIRONMENTAL PROTECTION AGENCY,))
))
 Respondent.)

R E C C M M E N D A T I O N

The following is the report of investigation and Recommendation by the ENVIRONMENTAL PROTECTION AGENCY (hereinafter "Agency") in the above-entitled matter:

INTRODUCTION:

1) The Petition for Variance for the Coffeen power generating plant was received by the Agency on May 9, 1974. On May 16, 1974, the Pollution Control Board entered an order requiring Petitioner to file additional information within forty-five (45) days of the date of the above-mentioned order. The Board further stated that the ninety (90) day period by which it must render a decision will not begin to run until the additional information is filed. By letter dated July 19, 1974, Petitioner filed additional information pursuant to the May 16, 1974 Order of the Pollution Control Board.

Description of Facility

2) The Coffeen power generating station is located in a relatively isolated area in south central Montgomery County. The Agency estimates that there are approximately ten dwellings within a one mile radius of the stack. The town of

Coffeen (population 640) is approximately three miles north of the power plant.

The power plant is a mine mouth, steam, electric plant consisting of two units. Unit 1 has a rated capacity of 375 mw and Unit 2 has a rated capacity of 575 mw. Both cyclone boilers vent to a common 500 foot stack.

Relief Sought

3) Central Illinois Public Service Company, Coffeen Station, requests a Variance from Rule 204 of Chapter 2, Part II of the Regulations of the Pollution Control Board to continue operation of the generating station without a compliance plan to bring said facility into compliance with Rule 204. Petitioner proposes that it monitor the Coffeen area to validate a model performed by consultant to show that its generating facility does not violate federally promulgated air quality standards. Further, Petitioner requests that this Variance be extended to allow Petitioner time to evaluate alternative compliance plans to bring this plant into compliance with Rule 204. Petitioner does not state how much time it requires to develop a compliance plan. The Agency is of the opinion that Petitioner is requesting an open ended Variance with no real attempt to propose any compliance plan to reduce the impact of this station on the surrounding area. The questions which Petitioner states must be answered (Petition, page 10)--the legal problems associated with the contract at Coffeen and the availability of a suitable coal supply--all lead the Agency to conclude that these questions may remain unanswerable for an indefinite period of time.

Applicable Rules and Regulations

4) Rule 204(c)(1)(B)(i) limits SO₂ emissions from Petitioner's facility to 6.0 lb/10⁶BTU of heat input. Petitioner states its present SO₂ emissions are 7.37 lb/10⁶BTU. Rule 204(c) puts a mass emission limitation on existing facilities.

Petitioner's mass SO₂ emissions are 71.306 lbs of SO₂ per hour. Rule 204(e) requires a reduction of mass SO₂ emissions to 55.555 lbs of SO₂ per hour. Based on these emission rates, Petitioner must reduce SO₂ emissions approximately 23% to achieve compliance with all provisions of Rule 204.

5) Petitioner is not requesting a Variance from Rule 203 for particulates. Tests on the Unit No. 1 precipitator show the unit to be in compliance with Rule 203. A fire which occurred in the Unit 2 precipitator severely damaged its interior. Petitioner took Unit 2 out of service on May 22, 1974 for an annual maintenance period. At that time, Petitioner has stated it will make repairs to the Unit No. 2 precipitator and the Agency presumes that it will comply with Rule 203(g) by May 30, 1975.

Compliance Alternatives

6) Petitioner has investigated the following alternatives:

- a) Flue gas desulfurization
- b) Coal washing
- c) Low sulfur coal

For one reason or another, Petitioner has rejected all alternative compliance methods. The Agency is of the opinion that flue gas desulfurization (fgd) is available and could be installed on Petitioner's plant. Petitioner has not supplied enough data on coal washing, but the Agency is of the opinion that there are methods to reduce the sulfur in coal and still maintain the integrity of the coal. Petitioner states it is investigating the use of low sulfur coal. However, the Agency is of the opinion that Petitioner has had ample time to investigate the use of low sulfur coal. The Agency is of the opinion that blending facilities could be installed to serve the Coffeen plant and obtain a proper blend to achieve compliance with all of Rule 204.

The Agency is insistent that some compliance program be developed. Coal gasification is an alternative which is attractive to some utilities in Illinois but

has not been addressed by Petitioner as even being a practicable alternative.

Monitoring

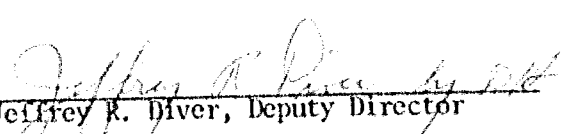
7) Petitioner proposes to monitor around Coffeen to validate its model. This effort may validate a model, but it will not lead to eventual compliance. Petitioner does not even propose a supplemental control system as outlined in 38 FR, No. 178, p. 25697 which could be an interim method of achieving compliance while permanent controls are installed.

RECOMMENDATION:

8) The Agency recommends that the Variance be denied for lack of any definite compliance plan.

The Agency reserves the right to amend its Recommendation pending the close of the record in this matter.

ENVIRONMENTAL PROTECTION AGENCY


Jeffrey R. Diver, Deputy Director

Dated: July 25, 1971

Carl A. Soeling
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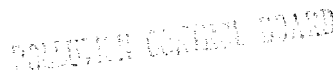
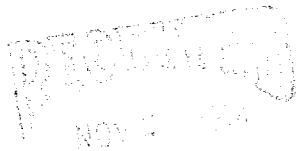
Area Code 217

Telephone 523-4535

544-3485

B. Lacey Catron, Jr.
(219-44-1050)

November 20, 1974



Miss Christan L. Moffett
Clerk, Pollution Control Board
309 West Washington Street
Chicago, Illinois 60606

Dear Miss Moffett:

In re: Central Illinois Public Service Company vs. EPA,
No. PCB 74-175 (Variance)

We hereby withdraw our petition for variance in the above case involving the Coffeen plant of our client, Central Illinois Public Service Company.

We now have information that we are not in violation and will file a new operating permit application with supporting data.

Yours truly,

tlc:pmj

cc: Mr. Michael Ginsberg
Mr. Lehman D. Krause
Mr. James T. Birkett