

Illinois Environmental Protection Agency

Bureau of Air

Permit Section

August 8, 2012

Responses to Comments on the
Draft CAAPP Operating Permit for
Ameren Energy, Inc.
for a peaking plant
in Elgin, Illinois

Source Identification No. 031438ABC

Application No. 03080009

BACKGROUND

On March 20, 2009 the Illinois EPA, Bureau of Air issued a CAAPP operating permit renewal application for Ameren Energy peaking plant in Elgin, IL. On April 23, 2009, Ameren appealed the permit. IEPA submitted an administrative amendment, a minor modification, and a significant modification for public comment on March 28, 2012 with changes to address resolution of the appeal.

The public comment period on the significant modification to the CAAPP permit closed on April 27, 2012. Comments were received from USEPA, Region 5. The Illinois EPA has prepared this document, which addresses significant comments to accompany the submittal of proposed CAAPP permit.

COMMENTS WITH RESPONSES

Comments from USEPA

- 1. The Statement of Basis (Project Summary) does not adequately explain the relationship between the draft CAAPP permit and previous CAAPP operating permits issued by Illinois EPA to the facility. From our discussions with Illinois EPA, we understand that the draft CAAPP permit is a significant modification to CAAPP Permit No. 03080009, issued March 20, 2009. However, a discussion of such a relationship is missing from both the draft CAAPP permit and the Project Summary. At a minimum, the Project Summary needs to clearly explain:**
 - a. the requirements of the original permit that are being changed and why they are being changed;**
 - b. whether or not any newly applicable requirements (since the last permit was issued) are being addressed in the significant modification; and**
 - c. the current compliance status of the source with respect to all applicable requirements.**

The statement of basis has been rewritten to address each item (1a, b, and c) above in the USEPA comments.

- a. The conditions of the CAAPP permit that have been changed expanded to include a discussion regarding those changes. These discussions can be found in Section VI of the SOB. It also, in the introduction of the statement of basis, discussed the appeal and those conditions subject to the significant modification process.
- b. The appeal did not challenge any applicability determinations and therefore the Agency did not change any applicable requirements. In addition, for those Sections

of the permit containing conditions that were modified and subject to the sig mod procedures, there were no newly applicable requirements to include. This has been in discussed in the SOB.

- c. The source is currently in compliance with all applicable requirements at the time of the issuance of this permit. This discussion can be found in Section IV of the SOB. Of note, this part of the SOB has always been in the SOB and the current status of compliance has not changed since the last permitting action.

2. Neither the draft CAAPP permit nor the Project Summary addresses the applicability of CAAPP permitting requirements to greenhouse gas (GHG) emissions from the source. Condition 5.1.1. states that the source is a major source of nitrogen oxides (NOx) and carbon monoxide (CO). Please clarify whether or not the source is also major for GHGs.

When this permit was renewed in 2009, GHGs were not subject to regulation and therefore there were no permitting requirements. Therefore, GHGs were not addressed in the renewal. However, the statement of basis has been rewritten to address the item above. It discusses major source status and applicable requirements, if any.

3. The draft CAAPP permit provides conflicting information on how compliance with certain numerical emission limits will be demonstrated. According to Condition 7.1.6(b)(i), compliance with the hourly emission limits in Condition 7.1.6(b)(i) shall be based on average emissions determined by emissions testing (3-run average) or emissions monitoring (24-hour average). Condition 7.1.6(c) explains that compliance with the annual limits in Condition 7.1.6(b)(iii) will be based on monthly emissions data, which will presumably be based on the same data used to verify compliance with Condition 7.1.6(b)(i). However, the testing requirements in Condition 7.1.7 appear to only apply to NOx, Oxygen and opacity. Test methods and procedures have not been specified for CO, SO₂, volatile organic material (VOM) and PM/PM₁₀, which makes it difficult to determine how the source will demonstrate compliance with CO, SO₂, VOM and PM/PM₁₀ emission limits as required by Condition 7.1.6(b)(i). Moreover, Conditions 7.1.6(e) and 7.1.12(e)(ii) appear to suggest that the source can use other options (besides stack testing) for demonstrating compliance with the numerical emission limits. Please clarify how compliance with the numerical emission limits in Conditions 7.1.6(b)(i) and 7.1.6(b)(iii) will be demonstrated.

These conditions were not appealed by the source and were therefore not part of the significant modification. As a result, the Illinois EPA is constrained from modifying these conditions as part of this permitting action.