

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

IN RE: PUBLIC HEARING CONCERNING  
CONSTRUCTION PERMIT/PSD APPROVAL  
TO CITY, WATER, LIGHT & POWER

WEDNESDAY, MARCH 22, 2006  
7:00 P.M.  
SOUTHEAST HIGH SCHOOL  
2350 E. ASH  
SPRINGFIELD, ILLINOIS

PATKES REPORTING SERVICE  
(217)787-9314

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PANEL MEMBERS:

CRYSTAL MYERS-WILKINS, Hearing Officer  
SHASHI SHAH  
CHRIS ROMAINE

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1 HEARING OFFICER MYERS-WILKINS: Good  
 2 evening, everyone.  
 3 My name is Crystal Myers-Wilkins, and  
 4 I am an attorney with the Illinois EPA,  
 5 Environmental Protection Agency.  
 6 I want to begin by just thanking  
 7 everybody for coming out this evening because the  
 8 EPA recognizes that the public hearings that we have  
 9 are a crucial part of the permit review process, so  
 10 we thank you for your interest in this process.  
 11 I've been designated by the director

12 of the EPA to serve this evening as the hearing  
13 officer in this matter.

14 As the hearing officer, my sole  
15 purpose tonight is to make sure that these  
16 proceedings run properly and according to the rules.  
17 It's my job to answer questions regarding the  
18 procedure, but it's not my job to answer questions  
19 regarding the permit process or the permit itself.

20 This is an informational public  
21 hearing before the Illinois EPA in the matter of a  
22 construction permit/PSD approval for the City,  
23 Water, Light & Power Company.

24 The EPA consideration of this permit

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5

1 application involves issues concerning a proposed  
2 new boiler to replace two existing coal fired  
3 boilers at the CWLP plants.

4 Under the PSD rules, CWLP must use  
5 best available control technology, an acronym that  
6 you may hear throughout the evening, BACT, for  
7 emissions of CO, PM, and sulfuric acid mist from the  
8 new boiler and other new and modified emission units  
9 associated with that boiler.

10 The time now is about 7:13, the date  
11 Wednesday, March 22, 2006, and the purpose of this  
12 hearing is to field questions and comments on the  
13 Illinois EPA's draft permit for CWLP.

14 This public hearing is being held  
15 under the provisions of the Illinois EPA's  
16 procedures for permit and closure plan hearings  
17 which can be found in 35 Illinois Administrative

18 Code Part 166, Subpart A.

19 Copies of these procedures can be  
20 obtained from either myself or, upon request, they  
21 can also be accessed on the web site for the  
22 Illinois Pollution Control Board at  
23 [www.ipcb.state.il.us](http://www.ipcb.state.il.us).

24 An informational public hearing means

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1 that this is strictly an informational hearing. It  
2 is an opportunity for the Illinois EPA to provide  
3 you with information concerning the permit, and it's  
4 also an opportunity for you to provide information  
5 to the Illinois EPA concerning that same permit.  
6 This is not a contested hearing.

7 I would like to explain how tonight's  
8 hearing is going to proceed.

9 First we will have the EPA staff  
10 introduce themselves and identify the  
11 responsibilities at the agency.

12 Then employees of CWLP will introduce  
13 themselves and provide an overview of the project to  
14 be permitted.

15 Following this overview, I will allow  
16 the public to ask questions or provide comments.  
17 You are not required to verbalize your comments.  
18 Written comments are given the same consideration  
19 and may be submitted to the agency at any time  
20 within the public comment period which ends at  
21 midnight April 21, 2006.

22 Although we will continue to accept

23 comments through that date, tonight is the only time  
24 that we will accept oral comments.

7

1 Any person who wants to make an oral  
2 comment may do so as long as the statements are  
3 relevant to the issues that are addressed at the  
4 hearing and that they have indicated on their  
5 registration card that they would like to comment,  
6 so if you have not signed a registration card at  
7 this juncture, please feel free to see Brad at the  
8 back doors, and he will provide you with that  
9 comment card.

10 If you have lengthy comments or  
11 questions, it might be helpful to submit them to me  
12 in writing before the close of the comment period,  
13 and I will ensure that they are included in the  
14 hearing record as exhibits.

15 Please keep your comments and  
16 questions relevant to the issues at hand. If your  
17 comments fall outside the scope of this hearing, I  
18 may ask you to proceed to another issue that is  
19 relevant.

20 All speakers will have the option of  
21 directing questions to the Illinois EPA panel or  
22 they can just make general comments or they can do  
23 both.

24 The applicants are also free to

8

1 answer questions if they are willing to do so but  
2 I'm not in a position to require a response this

3 evening.

4                   Our panel members will make every  
5 attempt to answer the questions presented but I will  
6 not permit the speakers to argue, cross-examine, or  
7 engage in a prolonged dialogue with our panel  
8 tonight.

9                   For the purpose of allowing everyone  
10 to have a chance to comment, I am asking that  
11 groups, organizations, and associations keep their  
12 questions and comments to approximately 15 minutes  
13 and that individuals keep their comments to  
14 approximately five minutes in the interest of time  
15 and to give everyone who desires to speak that  
16 opportunity.

17                   Further, I would like to avoid  
18 unnecessary repetition so if anyone before you has  
19 already presented the same material that is  
20 contained in your written or oral comments, please  
21 skip over these issues when you speak.

22                   Remember, all written comments,  
23 whether or not you say them aloud, will become part  
24 of the official record and will be considered.

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1                   After everyone has had an opportunity  
2 to speak and provided that time permits, we will  
3 allow those who either ran out of time during their  
4 initial comments or have additional comments or  
5 thoughts to speak.

6                   There are some registration cards on  
7 the table. Again, if you have not filled one out,

8 please do so.

9                   Anyone who fills out one of the cards  
10 will also receive a letter announcing the Illinois  
11 EPA's decision. That letter will also direct you to  
12 the web site where you can retrieve all the details  
13 including the agency's responsiveness summary.

14                   The agency's responsiveness summary  
15 will attempt to answer all the relevant questions  
16 raised at this hearing or submitted to me prior to  
17 the close of the comment period.

18                   The responsiveness summary, the  
19 transcript, and the final permit will all be  
20 available online or you can sign up to receive a  
21 mailed copy.

22                   Printed copies of these documents  
23 will also be available at one or more local  
24 libraries.

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10

1                   The written record in this matter  
2 will close again April 21st, midnight, 2006.  
3 Therefore, I would accept all written comments as  
4 long as they are postmarked by midnight on that  
5 date.

6                   During the comment period, all  
7 relevant comments, documents or data will also be  
8 placed into the hearing record as exhibits.

9                   Please send all written documents or  
10 data to my attention at the following address:  
11 Crystal Myers-wilkins, Hearing Officer, Illinois  
12 Environmental Protection Agency, 1021 North Grand  
13 Avenue East, Post Office Box 19276, Springfield,

14 Illinois, zip 62794.

15 This address was also listed on the  
16 public notice for this hearing this evening.

17 For those who will be making comments  
18 or asking questions this evening, I want to remind  
19 you that we do have a court reporter making a  
20 verbatim record of these proceedings for the purpose  
21 of creating an administrative record.

22 For her benefit, please keep the  
23 general background noise level in this room to a  
24 minimum so that she can hear and properly record

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11

1 everything said, and let's show respect for the  
2 individual who has the floor.

3 Also, please keep in mind that any  
4 comments from those other than the person at the  
5 microphone will not be recorded by the court  
6 reporter and will simply be a disruption of this  
7 process.

8 This rule applies not only when  
9 audience members are speaking but also when the  
10 panel from the Illinois EPA is speaking.

11 when it's your turn to speak, please  
12 speak clearly, slowly, and into the microphone so  
13 that the court reporter can understand what you are  
14 saying.

15 when you begin to speak, state your  
16 name and, if applicable, any governmental body,  
17 organization or association that you represent.

18 For the benefit of the court

19 reporter, we ask that you spell your last name.  
20 People who have requested to speak will be called  
21 upon in the order in which they've registered to  
22 make a statement.

23 Now, unless I've missed something  
24 regarding preliminary information, we will begin

12

1 with introductions from the Illinois EPA panel, and  
2 that will be followed by introductions from CWLP,  
3 and that will be followed by comments.

4 MR. ROMAINE: Good evening. My name  
5 is Chris Romaine. I'm manager of the Construction  
6 Permit Unit in the Air Permit Section.

7 I don't have that much to say in  
8 terms of introductory remarks. I simply want to  
9 welcome everybody for coming tonight. Your presence  
10 is what makes this hearing productive. We look  
11 forward to hearing your comments and your questions.

12 And I also want to let you know that  
13 I have taken advantage of tonight's hearing -- we  
14 have a number of members of the staff of the Air  
15 Permit Section here tonight in addition to Brad  
16 Frost who welcomed you, so I have taken advantage of  
17 tonight's hearing, because it is in Springfield, as  
18 an opportunity to remind people in the Permit  
19 Section that even though we issue permits to sources  
20 of pollution, we process applications, issue permits  
21 for these sources, we actually work for the public,  
22 and there's nothing like a public hearing to remind  
23 people who we actually work for.

24 So that's why you're here. Bruce,  
Page 9

1 George, Bob, Bob, Kevin, Minesh, Jason, Mike, Mike,  
2 and German.

3 why don't you just stand up so people  
4 can recognize you if they have questions later on.

5 With that, I will turn over the  
6 microphone to you, Shashi.

7 MR. SHAH: My name is Shashi Shah,  
8 and I work in the Bureau of Air in the Permit  
9 Section.

10 Good evening, ladies and gentlemen.  
11 My name is Shashi Shah. I am a permit engineer in  
12 the Bureau of Air, Permit Section.

13 I'd like to give you a brief  
14 description of the project being discussed tonight.

15 City, Water, Light & Power,  
16 abbreviated CWLP, has requested an air pollution  
17 control permit from the Illinois Environmental  
18 Protection Agency to construct a new coal-fired  
19 boiler, Dallman Unit 4, at its existing power plant  
20 adjacent to Lake Springfield located at 3100  
21 Stevenson Drive in Springfield.

22 The new boiler would serve a new  
23 generator with a nominal capacity of 250-megawatts.

24 The proposed new boiler would replace

1 two existing coal-fired boilers at the plant,  
2 Lakeside Units 7 and 8.

3 The emissions of the new boiler would

4 be controlled by a number of devices and techniques.  
5 Low NOx combustion technology and selective  
6 catalytic reduction would be used for control of  
7 nitrogen oxide emissions. A scrubber would be used  
8 for control of sulfur dioxide emissions. For carbon  
9 monoxide, the new boiler would use good combustion  
10 practices.

11 For particulate matter, the boiler  
12 would be equipped with a fabric filter or a baghouse  
13 and a wet electrostatic precipitator.

14 For sulfuric acid mist, control would  
15 be provided by the combination of the scrubber and  
16 the wet electrostatic precipitator.

17 The new boiler would be subject to  
18 and have to comply with emission standards for new  
19 utility boilers under the federal New Source  
20 Performance Standards.

21 This project is not considered a  
22 major project for emissions of sulfur dioxide and  
23 nitrogen oxide. This is due to the measures and  
24 control equipment being used for nitrogen oxide and

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15

1 for sulfur dioxide emissions.

2 As a result, the project will result  
3 in a net decrease in emissions of nitrogen oxides  
4 and sulfur dioxide after considering the actual  
5 decrease in emissions that will occur from the  
6 shutdown of the two existing Lakeside units.

7 The proposed project would be a major  
8 project for emissions of carbon monoxide,  
9 particulate matter, and sulfuric acid mist because

10 the permitted emissions of these pollutants would be  
11 greater than significant emission thresholds.

12 For these pollutants, the proposed  
13 project must use best available control technology.  
14 The Illinois EPA has determined that the control  
15 measures being used on the boiler for carbon  
16 monoxide, particulate matters, and sulfuric mist  
17 will provide best available control technology.

18 Other units that are part of the  
19 project would also use appropriate work practices,  
20 control devices, and equipment design for control of  
21 particulate matter emissions.

22 Illinois EPA's initial review  
23 concludes that these proposed measures would provide  
24 best available control technology.

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16

1 CWLP submitted air quality analyses  
2 for the proposed project. These analyses show that  
3 the proposed project would not violate national  
4 ambient air quality standards or prevention of  
5 significant deterioration increments.

6 National ambient air quality  
7 standards are the standards for pollutant  
8 concentration in the air established by USEPA to be  
9 protective of public health and welfare.

10 Increments are additional standards  
11 under the prevention of significant deterioration  
12 rules that protect air quality from significant  
13 deterioration.

14 The analyses show that the proposed

15 project would not have significant impacts for  
16 carbon monoxide.

17 For particulate matter, the analyses  
18 show that the proposed project would not cause  
19 violations of the national ambient air quality  
20 standards or the increments.

21 In summary, the agency has reviewed  
22 the application submitted by CWLP and has determined  
23 that it complies with applicable state and federal  
24 standards.

17

1 The agency has prepared a draft of a  
2 construction permit that sets out the conditions  
3 that we propose to place on the proposed project.

4 In particular, continuous sulfur  
5 dioxide, nitrogen oxide, and opacity monitors would  
6 be installed in the stack of the boiler.

7 As a power plant, these monitors must  
8 be operated in accordance with the protocols of the  
9 Federal Acid Rain Program.

10 The permit would also require  
11 continuous monitoring for particulate matter as a  
12 compliance assurance method.

13 In closing, the agency is proposing  
14 to grant a construction permit for the proposed  
15 project, and we welcome any comments from the  
16 public.

17 HEARING OFFICER MYERS-WILKINS:  
18 Before we take comments from the public, we will  
19 allow CWLP to give a basic overview of the project.

20 MR. MURRAY: Thank you, Madame

21 Hearing Officer.

22 My name is William Murray, and I'm a  
23 regulatory affairs manager for the City of  
24 Springfield, City, Water, Light & Power.

18

1 I'd like to start by introducing the  
2 rest of our project team that's here tonight that's  
3 been working on this project from initial  
4 conceptions to permit application and then working  
5 with the agency.

6 First, Jay Bartlett, our chief  
7 utility engineer. Jay is in actual charge of all  
8 electric department operations.

9 Brian Fitzgerald is the project  
10 manager. He's an engineer. He's our lead project  
11 engineer on this team.

12 Next to Jay we have Mary Hanauer who  
13 is with Burns McDonnell. She was instrumental in  
14 putting our permit application together and  
15 coordinating all the modeling that needed to be  
16 done.

17 We have Dave Farris who is our  
18 environmental health and safety manager, and PJ  
19 Becker next to him who's with our environmental  
20 staff.

21 We've got another one around here  
22 somewhere, Sky Wilmore -- there he is -- who is also  
23 with our environmental staff.

24 I'd like to thank all of them for the

1 work that they've contributed to this project.

2 I'd also like to welcome you all  
3 here. I'm going to give a little overview of what  
4 City, Water, Light & Power does and kind of a  
5 description of our generating capabilities. I think  
6 that's important for those of you that are from out  
7 of town and not familiar with us from a day-to-day  
8 standpoint.

9 we have been in the retail electric  
10 business since about 1917. We currently have a  
11 service area of about 70 square miles. That would  
12 take in the city limits of Springfield, the villages  
13 of Jerome, Southern View, and City of Leland Grove.

14 we also serve an unincorporated area  
15 south of the city between the city proper and Lake  
16 Springfield. We serve unincorporated areas adjacent  
17 to the lake on the south side of the lake.

18 That service territory comprises  
19 about 134,000 people. We have about 69,000 retail  
20 electric customers, actually a little over that.

21 we also are the full requirements  
22 supplier to the Villages of Chatham and Riverton who  
23 operate their own distribution system for electric  
24 purposes in the same manner we do.

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1 we employ slightly over 700 people in  
2 our operations here in Springfield.

3 As I said, we've been in the business  
4 for quite some time, and actually, the city started  
5 out with an electrical plant on the Sangamon River

6 in the early 1900s providing street lighting and  
7 electricity to city facilities before it got into  
8 the retail business.

9 we also operated a water plant at  
10 that site, and as the city grew, the capacity and  
11 the water quality from that location came into  
12 question, and the city fathers embarked on a project  
13 to construct Lake Springfield, and in connection  
14 with that project, they conceived a power plant site  
15 at the lake which is now 3100 Stevenson Drive.

16 It was sort of a rural area at that  
17 time remote from the city, but that is where they  
18 constructed the Lakeside plant and that plant  
19 eventually went on to house eight boilers and seven  
20 turbines.

21 Now, today, the Lakeside plant only  
22 consists of Boilers 7 and 8. Those two units are  
23 each approximately 38 megawatts and came on line  
24 commercially in 1958 and 1962 respectively.

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21

1 we have a Dallman plant that sits  
2 south of the Lakeside plant. Dallman 1 and 2 are  
3 each about 86 megawatts, and they came on line in  
4 1968 and 1972 respectively.

5 Dallman 3, which is what we call our  
6 newest unit, actually came on line in 1978, and so  
7 it's approaching 30 years in age.

8 The scrubber that serves that unit  
9 actually was not completed until 1980. It was sort  
10 of a retrofit project that kind of lagged the

11 initial construction plant.

12 That's our coal fleet. We haven't  
13 put any new ones in since that on the coal side.

14 with regard to control equipment on  
15 that side, Lakeside only has particulate control for  
16 electric with electrostatic precipitator, and Unit 7  
17 has some degree of NOx control with some over fire  
18 air that we added in a clean coal technology project  
19 back in the late 1980s.

20 The Dallman Units 1 and 2 were  
21 equipped with a scrubber in 2001 for SO2 control and  
22 were then equipped two, well, three years ago, two  
23 years running now with selective catalytic reduction  
24 systems for NOx control.

22

1 Dallman 3 of course has the scrubber,  
2 and it has the SCR system for NOx control installed  
3 at the same time.

4 The precipitators on all these units,  
5 the scrubbers and the NOx control equipment also  
6 serve to control to some degree mercury emissions  
7 from each of those plants.

8 In 1997, we added a combustion  
9 turbine at Interstate. This is our most recent  
10 unit. It's 128 megawatts, and it runs on fuel oil  
11 and natural gas.

12 We had two smaller turbines that were  
13 installed in the 1970s, the factory turbine in 1973  
14 which was 21 megawatts, it's diesel-fired, and the  
15 Reynolds combustion turbine in 1970 which is  
16 17 megawatts, also diesel-fired.

17 All our coal units and Interstate are  
18 part of the acid rain program. It's a CAAPP and  
19 trade program governing SO2 allowances, so we have a  
20 compliance program that involves requiring you to  
21 hold allowances equal to your emissions.

22 All our coal units, Interstate and  
23 the factory gas turbine, are also subject to the Nox  
24 SIP call program which is an ozone season program

23

1 that runs from May 1st to September 30th, and we  
2 have to have allowances equal to our emissions on  
3 those units for those programs.

4 Now, the coal supply for our units  
5 all comes from the Viper coal mine in Elkhart,  
6 Illinois which is about 23 miles up the Interstate  
7 from the power plant site.

8 All our coal is washed. All our coal  
9 is delivered by truck. We have no capabilities at  
10 the site to take unit trains which is typically what  
11 you would take delivery on from western coal or  
12 bottom river basin coal or low sulfur coal, whatever  
13 you want to refer to it.

14 We also, of course, are not served by  
15 any waterway system that would allow barged coal.

16 We also do not have room to expand at  
17 our site that would allow delivery of coal, so our  
18 fuel supply is very limited.

19 Our contract also gives the mine the  
20 right to supply any new units that replace existing  
21 units that were in effect at the time the contract

22 was entered into in 1980.

23 In terms of our utilization, our  
24 Lakeside units probably use about 10 to 15 percent

24

1 of our coal supply in a year. We range from 1.1  
2 million to 1.2 million tons of coal utilization a  
3 year.

4 Our Dallman 3 unit is about 550,000  
5 tons, and the remaining coal is used at Dallman  
6 Units 1 and 2.

7 We also have a program where we  
8 combust expired seed corn at our cyclone units which  
9 would be the Lakeside units or Dallman 1 and 2. We  
10 do that in the non-ozone season because the seeds  
11 could affect the catalyst in the SCR in the  
12 combustion process.

13 I'd like to talk a little bit about  
14 unit dispatch. That's when units are turned on and  
15 turned off.

16 There's various considerations that  
17 we go through in determining when to run units.  
18 They depend upon unit efficiencies and economics and  
19 unit size, load and customer demand which is also  
20 weather-related. Whether it's going to be hot or  
21 cold usually means whether or not we're going to  
22 have greater demand on our resources.

23 Emission costs from those CAAPP and  
24 trade allowance programs are also considered. This

25

1 is particularly so with regard to the Lakeside units  
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2 which has no controls for SO2 and very little  
3 control for NOx emissions.

4 Another thing that you have to  
5 realize in the dispatch consideration is that units  
6 don't run at full loads 24 hours a day seven days a  
7 week. They don't run when they're on at full load  
8 all the time. They run less at night and more  
9 during the day, so these are all considerations that  
10 you have to have when you dispatch.

11 Now, our typical dispatch order would  
12 be Dallman 3 first, that's our base load unit,  
13 followed by the two other Dallman units, the  
14 Lakeside units, and then the combustion turbines  
15 depending upon fuel cost and other factors and when  
16 they would come on on a particular day, but that's  
17 the typical dispatch order for our system.

18 I'd like to talk now a little bit  
19 more about the Dallman 4 project as it was alluded  
20 to by the agency.

21 One element in this project is  
22 retirement of Lakeside 7 and 8. Again, these are  
23 uncontrolled units for the most part in terms of the  
24 major pollutants that we have to consider with

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1 existing clean air requirements and the requirements  
2 that we know are coming down the road; most  
3 specifically, the mercury rules, whether it be the  
4 federal rule or the proposed state rule, and the  
5 CAIR rule which is going to require further  
6 reductions of NOx both on an annual basis and an

7 ozone season basis starting in 2009 and further  
8 reductions of SO2 starting in 2010 and actually down  
9 even further on both of those pollutants in 2015.

10 So we are faced with this decision of  
11 what to do with the Lakeside units, and the logical  
12 conclusion that we came to from a technical and  
13 economical standpoint, the age of the units, they're  
14 going to be 50 years old soon, was that they retire  
15 them.

16 That gave us another planning point.  
17 We need to make some decision about replacing that  
18 amount of generation.

19 We've spent a number of years, we  
20 probably started around the turn of the century  
21 right after we got Y2K put to bed, on planning for  
22 what we're here for tonight.

23 Some of the things that we considered  
24 initially in our planning is, of course, the age of

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27

1 all our other units. As I said before, our newest  
2 coal unit came on line in 1978. It's not a new unit  
3 by any stretch of the imagination.

4 We also had to consider our load  
5 growth, both historical and what we projected out  
6 for the next 15 years, at least from our planning  
7 horizon.

8 We also had to look at factors of  
9 whether we wanted to import electricity from sources  
10 remote to Springfield and examine the transmission  
11 risks and the issues in that type of consideration.

12 We also had to consider sites where

13 you might build new generation.

14 In looking at all these general  
15 things, we concluded that it was most feasible for  
16 us to add base load generation.

17 what base load generation is, we  
18 needed to look at putting in a plant that would be  
19 our first dispatched unit, our most efficient and  
20 our cleanest. It would run most of the time and  
21 hopefully serve the needs that we needed to have  
22 addressed based on our analysis.

23 what we then embarked on, we hired a  
24 consultant to do a study to see whether our existing

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1 plant site could accommodate new generation, and by  
2 doing that, they looked at footprints for different  
3 technologies and also examined the transmission  
4 export capability that we had from that site.

5 we received a satisfactory conclusion  
6 from that study, and all these studies were  
7 presented to the utilities committee, the city  
8 council. All the contracts to hire these firms to  
9 do the studies were discussed in city council  
10 meetings and in utility meetings and were addressed  
11 in the media throughout this process.

12 Once we had determined that we could  
13 fit a plant at our site, we then hired another  
14 consultant, another engineering firm, Black &  
15 veatch, to do an analysis of generation alternatives  
16 that could be utilized at that site.

17 we reviewed and they reviewed

18 different technologies including IGCC, pulverized  
19 coal, fluidized bed coal plant, gas combustions or  
20 combined cycle combustion technology, and different  
21 unit sizes, 200 megawatts, 300 megawatts, and then  
22 also did technical and economic cost feasibility  
23 studies regarding the different technologies.

24 we also analyzed on site and off site

29

1 locations. we looked at partnering in other  
2 announced or projected projects that were going  
3 around the state.

4 Also during this time we had visits  
5 with several or a couple of the developers that were  
6 proposing wind projects and took all this under our  
7 advisement in terms of coming up with a  
8 recommendation for the city council.

9 That recommendation turned out to be  
10 Dallman 4, the project we're here discussing  
11 tonight.

12 The report recommended that the best  
13 option for the city was a pulverized unit at our  
14 existing generating station.

15 The biggest issue that actually was  
16 discussed politically and in public when this  
17 decision came out was whether it should be a  
18 300-megawatt plant or a 200-megawatt plant.

19 while our permit application is for  
20 250-megawatt plant, the technology that we are  
21 actual settling on is a 200-megawatt unit.

22 HEARING OFFICER MYERS-WILKINS:  
23 Mr. Murray, if you can begin wrapping up.

24

MR. MURRAY: Okay. Shashi has

30

1 actually done most of the remaining part, but I  
2 would like to point out that this plant will have no  
3 thermal discharge at Lake Springfield. It's going  
4 to be served by a cooling tower, and that coupled  
5 with the retirement of Lakeside would reduce the  
6 heat loading to the lake. We think that's a very  
7 beneficial point of this project.

8 we're also going to have a dry ash  
9 handling system for this project. They're going to  
10 have a spray dryer absorber system to handle various  
11 wastewater streams from this plant and the other  
12 Dallman units.

13 we're going to use existing coal  
14 delivery system, limestone delivery and handling  
15 system, and we're going to have a new synthetic  
16 handling system for all the Dallman units.

17 Our project schedule is to be done in  
18 June of 2009, at least for initial startup and  
19 running of the unit.

20 This is very important to us because  
21 of all the air regulations that are supposed to kick  
22 in at that time and will enable us to remain in  
23 compliance very easily with all those regulations.  
24 That would be mercury and the NOx in 2009 and the

31

1 SO2 requirements in 2010.

2 Dallman 4 will be our base load unit.

3 This will reduce the utilization of the other  
4 Dallman units.

5 The total emissions from these plants  
6 will be less than actually is projected in our  
7 application.

8 The analysis that is done for BACT  
9 assumes that the new unit runs at maximum load all  
10 the time and of course that's not going to be the  
11 case, so the emission reductions are going to be  
12 greater.

13 Project delays would be very  
14 significant for us both in the terms of cost and in  
15 terms of our ability to adequately and safely meet  
16 the compliance standards that we need to do starting  
17 in 2009.

18 HEARING OFFICER MYERS-WILKINS: Thank  
19 you.

20 Diane Hughes?

21 Could you please state your first and  
22 last name and spell your last name and who you're  
23 affiliated with?

24 MS. HUGHES: My name is Diane Lopez

□

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1 Hughes (H-u-g-h-e-s), and I am a member of the  
2 Sierra Club in Springfield, the Sangamon Valley  
3 Group. I'm also a community member. I'm a  
4 registered nurse, and I've worked as a nurse for  
5 over 15 years. Before I worked, I was raising my  
6 kids so I was at home.

7 As a professional community member,  
8 I'm very concerned about those in our community who

9 have asthma, heart disease, and other respiratory  
10 conditions.

11 while I understand that this plant  
12 will be a cleaner plant, a much cleaner plant, coal  
13 burning power plants are not clean by definition.  
14 There is technology out there that can be used to  
15 supplement coal burning power plants, reduce the  
16 emissions, and still provide safe and clean energy,  
17 so that's kind of what my focus is.

18 I'm very concerned about health. A  
19 great percentage of the terminally ill patients that  
20 I've worked with -- I've worked in hospice over the  
21 past seven years -- have had lung cancer. Lung  
22 cancer is the most prevalent form of cancer that we  
23 see. Most of our patients, a good percentage of  
24 them had either lung cancer or other end stage

□

33

1 respiratory illness.

2 I've seen people when they've been  
3 struggling to catch their breath and fear that  
4 they're going to die from suffocation. It's a very  
5 unpleasant disease in its later stages. I've seen  
6 people who have asthma, who have difficulty, need to  
7 go to the emergency room, not only adults but  
8 children, and how they handle that kind of illness.  
9 School time missed. People with respiratory illness  
10 miss work time. People with lung cancer and people  
11 with other heart lung diseases that are affected by  
12 the quality of the air we breathe also miss work  
13 time.

14 I guess I also want to say that  
15 people are concerned about this particular matter  
16 and its effect on global warming. Two weeks ago I  
17 was in a faith-based conference on global warning  
18 among other issues, and one of the facts that was  
19 pointed out is that if we don't control global  
20 warming, by the end of the century, our climate and  
21 agricultural atmosphere I guess you could say will  
22 be the same as what we find in east Texas right now,  
23 and you know that corn doesn't grow in east Texas,  
24 and the other things that are planted in central

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1 Illinois can't grow in that kind of environment.

2 I think for the health of our  
3 children and for the health of those in the future,  
4 we really need to look at this particular power  
5 plant and how we conduct it.

6 I also am concerned that there may be  
7 people who aren't here tonight because they thought  
8 that this was all decided.

9 It isn't decided. There are a number  
10 of things that needs to take place before the permit  
11 is approved, so I hope that those who care about our  
12 environment will let others know that they can write  
13 to the EPA and share their concerns.

14 Thanks very much.

15 HEARING OFFICER MYERS-WILKINS: Thank  
16 you.

17 Becky Clayborn?

18 MS. CLAYBORN: Thank you for having  
19 this public hearing tonight. I really appreciate

20 it.

21 My name is Becky Clayborn  
22 (C-l-a-y-b-o-r-n). I'm a regional representative  
23 with the Sierra Club.

24 This is a perfect example, as Chris

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1 was saying earlier, of the public process which is  
2 exactly what our communities and our democracy is  
3 built upon, and I've mentioned to the CWLP guys  
4 before, we can have different opinions and still sit  
5 in a room and hear each other's opinions, and I'm  
6 really happy that the IEPA has these opportunities  
7 for the public to come out and express their  
8 opinions about such an important, really important  
9 issue.

10 As I said, I'm a regional  
11 representative with the Sierra Club. We represent  
12 about 25,000 members in the State of Illinois, and  
13 we oppose this project as presently proposed and ask  
14 that the IEPA deny all such permits for new  
15 coal-fired power plants that are using old dirty  
16 technology.

17 We're seeing across the Midwest a  
18 rush of new coal-fired power plants being proposed,  
19 130 across the entire United States, over half of  
20 them in the upper Midwest, and 15 of them, the most  
21 of any state, are being proposed here in Illinois.  
22 That's not power for us for the most part. It's  
23 power that's being produced here and we get to keep  
24 the pollution.

1                   Unfortunately, CWLP is being  
2 critiqued by Sierra Club because every time one of  
3 these new coal-fired power plants is built, is  
4 permitted, we're setting a precedent for the next  
5 new coal-fired power plant.

6                   These coal-fired power plants for the  
7 most part are not clean. They're not using the  
8 state of the art technology that they could be  
9 using. Gasification is a really new but really  
10 exciting possibility for coal that has a lot less  
11 emissions from burning the coal, but we believe that  
12 Springfield can be an example, can be a leader in  
13 this state for a cleaner energy future for Illinois  
14 but not with a new coal-fired power plant using  
15 older technology that's three times the size of the  
16 power plant that they're shutting down.

17                   The Lakeside plant is about  
18 75 megawatts and the new plant is going to be about  
19 200 megawatts, and there will be more pollution.  
20 Even though it's a cleaner, newer plant, it's three  
21 times the size of the old plant, so there will be  
22 more pollution added to the atmosphere.

23                   One of the pollutants that we're  
24 concerned about is the particulate matter that's

1 going to be coming out of the plant. There's going  
2 to be 500 tons per year added to the atmosphere,  
3 more than what we're already experiencing here in  
4 Springfield with the Lakeside plant.

5                   That's really a concern for us  
6 because according to American Lung Association, in  
7 the county, there's already 14,000 people suffering  
8 from asthma. Those people are going to be affected  
9 even more so by the particulate matter that's coming  
10 out of this power plant, the additional particulate  
11 matter.

12                   In Illinois, there's a million people  
13 with asthma. I'm sure every person in here knows  
14 somebody, either a family member or a friend, that  
15 suffers from asthma, and it's not fun, and the  
16 numbers are rising, and these are the kind of issues  
17 that can aggravate asthma.

18                   The 2005 data from the USEPA shows  
19 that Sangamon County actually didn't meet the EPA  
20 air quality standards for PM 2.5.

21                   This is a number that the EPA sets,  
22 USEPA sets, to show, okay, you can't go over this  
23 number and still have a healthy community.

24                   Sangamon County went over that number

□

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1 in 2005 for particulate matter, the really, really  
2 small particulate matter that causes heart attacks,  
3 causes lung disease, causes asthma and causes death.

4                   We shouldn't be adding to the  
5 particulate matter in the area if we already can't  
6 meet the particulate matter standards in Sangamon  
7 County. If anything, we should be decreasing the PM  
8 emissions.

9                   I was wondering if the EPA could

10 comment on that.

11 Have you come across this before?

12 How do you handle this issue if they're not in  
13 compliance or haven't met the standard for the past  
14 year?

15 MR. ROMAINE: Well, as we've set  
16 forth in the project summary, Sangamon County is in  
17 compliance with the PM 2.5 air quality standard.  
18 Compliance with the ambient air quality standard is  
19 determined on a three-year average, and for the  
20 three-year average, we're about ten percent below  
21 the ambient air quality standard, so Sangamon County  
22 is in compliance.

23 MS. CLAYBORN: I understand that, but  
24 last year, just the data for 2005, the number for PM

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1 2.5 was above the standard.

2 MR. ROMAINE: It wasn't, because the  
3 standard -- PM 2.5 is original pollutant. It varies  
4 from year to year based on the weather, the amount  
5 of energy demands, a variety of factors.

6 When USEPA went through its process  
7 of evaluating the appropriate forum to set the  
8 ambient air quality standard, it established a  
9 standard in which it was appropriate to look at an  
10 average of annual data, not simply a single year's  
11 worth of data.

12 MS. CLAYBORN: Yeah, I understand  
13 that, but I guess if we're seeing a trend and  
14 increase in PM 2.5, even if it hasn't for the past  
15 three years gone over, I think it's notable that the

16 numbers are going up and it was over the standard  
17 for last year.

18 MR. ROMAINE: I guess our position is  
19 there are a number of programs going into effect  
20 that have been alluded to including the Clean Air  
21 Interstate Rule that are going to have drastic  
22 effects on reducing emissions of precursor compounds  
23 that contribute to formation of PM 2.5.

24 we are working strenuously to come up

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1 with an attainment strategy that will bring places  
2 like the urban core in the Chicago area into  
3 attainment. Those measures will also have secondary  
4 benefits for places like Springfield which are much  
5 less urbanized than Chicago or St. Louis.

6 MS. CLAYBORN: Thank you.

7 we still have a concern with that,  
8 and actually, I would urge the EPA to have some sort  
9 of a standard in place for when an area is getting  
10 close to, I mean, this is really close to crossing  
11 that line, and is it really appropriate to be adding  
12 500 tons of total PM to an area if it's not meeting  
13 the standard.

14 That's all. I would just urge the  
15 IEPA to address that.

16 MR. ROMAINE: I guess my other simple  
17 answer is that this program results in an overall  
18 decrease in precursors to PM 2.5. The sulfur  
19 dioxide emissions are being reduced by over 5,000  
20 tons which is ten times the increase that

21 theoretically would occur using this worst case  
22 arithmetic that's used to evaluate what the change  
23 in emissions is.

24 As Mr. Murray has explained, we

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1 didn't take into account the fact that this new unit  
2 will likely result in reduced utilization of the  
3 existing Dallman units. We took the simple  
4 evaluation and said what has actually been emitted  
5 from the Lakeside units, what will be there no more,  
6 what are we permitting this new unit for, assuming  
7 it operates continuously, and that's the type of  
8 arithmetic that shows the 500 ton increase.

9 The actual increase for particulate  
10 matter could be substantially less than that, and as  
11 I said, the arithmetic that was used to evaluate the  
12 change in SO2 emissions is a definite.

13 If, in fact, this unit operates less,  
14 we will have, 5,500, 6,000 tons, even more  
15 reductions in sulfur dioxide emissions.

16 MS. CLAYBORN: Well, and I'd like to  
17 point out that in terms of the netting exercise in  
18 general, Sierra Club doesn't see that as an  
19 appropriate way to determine what type of emissions  
20 should come out of this new plant because this  
21 plant, the Lakeside unit, would have to be shut down  
22 or be brought up to compliance.

23 That plant has been there for 50  
24 years and has had a free ride, has not had to comply

1 with the majority of the new clean air standards.  
2 It's has had a free ride.

3                   So the fact that it has to be shut  
4 down, they're not shutting it down out of the  
5 goodness of their heart. They're shutting it down  
6 because these new regulations that are coming into  
7 play in 2009 and 2010 are going to make them either  
8 clean the plant up or shut it down.

9                   They've decided to shut it down  
10 because it costs too much to clean it up I'm  
11 assuming.

12                   However, this new plant needs to be,  
13 the emissions from this new plant need to be  
14 determined on what this new plant is emitting, not  
15 determined by how much they're going to be getting  
16 rid of with the old Lakeside plant.

17                   And I know that that's not how the  
18 law works, but we are saying, Sierra Club is saying  
19 that we think that that's not the right way to do  
20 business when an old plant is going to have to shut  
21 down regardless of building this new plant.

22                   which brings me to another point  
23 which is we heard Mr. Murray talk about what type of  
24 options they looked at, and I heard coal, coal,

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1 coal, and coal. Oh, wait. We did talk to some wind  
2 people. I did hear that too.

3                   we're concerned that building a plant  
4 three times the size of the one that's being shut  
5 down is really over relying on coal for

6 Springfield's power.

7                   The State of Illinois is CWLP's  
8 biggest customer. The State of Illinois is striving  
9 to have a renewable energy portfolio standard put  
10 into place throughout the state that would be eight  
11 percent. Eight percent of all energy would have to  
12 come from a renewable source.

13                   The State of Illinois buildings here,  
14 the IEPA building in Springfield, they can't buy  
15 renewable energy because CWLP doesn't have that as  
16 an option.

17                   I'm sure that being an environmental  
18 organization that you guys would want to be able to  
19 buy renewable energy from your energy provider which  
20 brings me to the fact that 400 megawatts of wind is  
21 being produced or being put into place just up the  
22 road in Bloomington. It's a wind farm that's going  
23 to be built and up and running by 2007.

24                   That's a really good opportunity.

□

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1 The citizens of Springfield really have this  
2 opportunity to get the municipal utility to invest  
3 in this cleaner type of energy, and I'm not saying  
4 that I would want all of the energy coming from  
5 wind. I know that's not possible. However, it  
6 doesn't all have to come from coal.

7                   And I'll just point out again,  
8 because you guys are listening now, I think IEPA  
9 would like to buy some of their power from a  
10 renewable source, and you can't right now because  
11 CWLP doesn't have any renewables.

12 Good. They heard it that time.

13 HEARING OFFICER MYERS-WILKINS:

14 Ms. Clayborn, if you can begin wrapping up.

15 MS. CLAYBORN: Yes.

16 One last thing that I wanted to bring  
17 up about the netting exercise is that the numbers  
18 that were used by CWLP was the 2002-2003 numbers.  
19 That was the data being used for their netting  
20 exercises, and it's our belief that when you use the  
21 2004-2005 more current data, that NOx numbers will  
22 actually increase, where CWLP using the 2002-2003  
23 numbers showed that it would decrease.

24 If the NOx numbers increase, then that

□

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1 means they would have to have a BACT determination  
2 for NOx is my understanding.

3 MR. ROMAINE: As a legal matter, that  
4 isn't correct.

5 As a practical matter, that is a very  
6 reasonable position for you to take.

7 MS. CLAYBORN: Why as a legal matter?  
8 I thought they had to use the two years prior to  
9 construction?

10 MR. ROMAINE: In fact, under the  
11 federal prevention of significant deterioration  
12 rules, a source can go back longer than that.

13 MS. CLAYBORN: Will you address that  
14 in the responsiveness summary?

15 MR. ROMAINE: Yes, I will thank.

16 MS. CLAYBORN: Thank you.

17 And actually, we ask that in the name  
18 of air quality for Illinois that you require the  
19 most recent data, 2004-2005, to be used in  
20 determining whether the emissions go up or down for  
21 NOx since there is a discrepancy.

22 And finally, my last comment, this  
23 permit does not address at all global warming  
24 emissions which I understand by law it doesn't have

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1 to right now, but the proposed plant, if it's built,  
2 would be the largest new source of global warming  
3 emissions in this state. It has no opportunity to  
4 control or mitigate its global warming emissions,  
5 and there should be a serious concern by the  
6 taxpayers, by the ratepayers that in the future,  
7 global warming emissions are going to be regulated,  
8 and at some point, you're going to have to pay for  
9 how much global warming emissions you're putting  
10 into the air, so your rates are going to go up.

11 In the interest of time, I will stop,  
12 but I do ask that when we go back around that I can  
13 come back up.

14 Thank you.

15 HEARING OFFICER MYERS-WILKINS: Thank  
16 you.

17 Roger Ricketts?

18 MR. RICKETTS: Yes. My name is Roger  
19 Ricketts (R-i-c-k-e-t-t-s). I am a member of the  
20 Sierra Club here in Springfield and live here in  
21 Springfield.

22 My concern is efficiency.

23                   We do have a very effective agency  
24 that produces electrical power that's as clean as

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1 they can make it and markets it at a good rate to  
2 the city residents of Springfield, but we don't have  
3 a company here. We have a part of the city  
4 government, and I think their responsibility is not  
5 to produce energy efficiently and sell as much as of  
6 it they can to the residents. Their responsibility  
7 as part of the city government is to reduce the  
8 citizens expenditure for power.

9                   And I think we've missed on the issue  
10 of efficiency. It doesn't seem to have been  
11 addressed whether efficiency could meet some of  
12 these needs.

13                   In other jurisdictions such as  
14 Wisconsin or California, they have to establish that  
15 conservation efficiency will not meet the needs.  
16 Here that's glossed over.

17                   That's okay maybe for a private  
18 utility but here we have part of the city government  
19 glossing over what efficiency can do.

20                   If you spend \$200 for electricity,  
21 that money is gone forever. If you spend \$200 for  
22 insulation, you have that money.

23                   I have a house that's old, and I'm  
24 sure I have insulation that's 50 or 70 years old. I

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1 have paper in my walls that they put in to save

2 energy.

3 CWLP has an office which does some of  
4 those activities but not anywhere near what could be  
5 done. why is that not part of the evaluation for  
6 what the city, part of the City of Springfield is  
7 doing for its citizens.

8 I think there's a lot of other things  
9 that could be done that we're not looking at.

10 why are they not making loans to  
11 consumers so that we could put solar panels on our  
12 roof or wind turbines? why don't they have meters  
13 that could run backwards so we get credit for power  
14 that we produce in our house? why don't they have  
15 night metering so we could wash clothes at night and  
16 save money and use up some of the electricity that  
17 they recognize as being generated without a source?

18 These are things that should be done  
19 for the citizens of Springfield because this is our  
20 utility.

21 In many communities, it's been shown  
22 that efficiency planning can reduce consumption by  
23 ten percent.

24 Again, we're planning a power company

□

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1 that we have no plans for efficiency.

2 If we were all using the better, more  
3 efficient light bulbs, how much electricity could we  
4 save? I'm not sure we could ever get everybody but  
5 what if we increased it by ten percent.

6 The fact that there's been no  
7 planning for these kinds of issues by a city

8 department that's supposed to be protecting us as  
9 residents of the City of Springfield, that's the  
10 part that's discouraging.

11 we talked about jobs. It's very  
12 clear that we'd have more jobs in Springfield  
13 retrofitting houses than we will by digging lots of  
14 coal and burning it very quickly.

15 why can't we look when we talk about  
16 jobs, which we hear about from the coal association  
17 all the time, but nobody is there to say  
18 retrofitting is a source of jobs as well.

19 we need to think about the people who  
20 need jobs in Springfield who could be employed doing  
21 these kinds of things and save energy long term and  
22 save them money long term and protect the  
23 environment.

24 why can't there be co-generation with

□

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1 the State of Illinois. The State of Illinois has a  
2 power plant that produces heat for some of the state  
3 buildings. why can't that also produce electricity.

4 why can't we have better street  
5 lighting or at least discuss that possibility as  
6 meeting our needs.

7 why can't we have some renewables.  
8 we have no renewables. I mean, the City of Chicago  
9 is close, I don't know if they'll get there but  
10 they're close to producing eight percent renewables.  
11 we as a city utility are producing no renewables.

12 I don't know how we as a city can let

13 that go on.

14 Much of what we need could have been  
15 produced as part of this project. We have no per  
16 capita utilization that I can find on the web of  
17 what's going to happen in the next 20 years, what  
18 they project is happening. They may have it in  
19 their files but why can't that be made available to  
20 the consumers.

21 There's much more information, and if  
22 this was planned in a comprehensive way at meeting  
23 the needs of the citizens of Springfield and  
24 becoming an efficient power company producing power

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1 efficiently, then we'd be much better off as  
2 citizens of Springfield.

3 Thank you.

4 HEARING OFFICER MYERS-WILKINS: Thank  
5 you.

6 David Gurnsey?

7 MR. GURNSEY: My name is David  
8 Gurnsey (G-u-r-n-s-e-y). I am a citizen of  
9 Springfield. I am a ratepayer for CWLP. I'm a  
10 union rep for the IBEW.

11 We represent about 400 construction  
12 workers and about 160 utility workers in Springfield  
13 and the surrounding area.

14 This plant needs to move forward. As  
15 a ratepayer, I applaud CWLP management for planning  
16 for the future to secure our energy needs as the  
17 market grows.

18 The way electricity is transmitted  
Page 41

19 now with deregulation, there's no guarantee that a  
20 small municipal utility like CWLP will be able to  
21 buy efficiently through the marketplace when the  
22 needs are high and plants are down for maintenance  
23 or whatever. It happened in California a few years  
24 ago. It could happen here.

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1 This plant guarantees that citizens  
2 of Springfield and the ratepayers of CWLP will have  
3 affordable and as clean as possible commercial  
4 electricity.

5 Some of the technologies that  
6 Ms. Clayborn has alluded to are not commercially  
7 proven. As a ratepayer, everyone knows where their  
8 natural gas bills were this winter. I cannot afford  
9 and many people in Springfield could not afford to  
10 risk a technology that's not proven commercially.

11 This is the best thing for the  
12 citizens of Springfield. I urge the EPA to  
13 expeditiously approve this permit so we can get the  
14 dirty power plants at Lakeside shut down and this  
15 new one online.

16 Thank you.

17 HEARING OFFICER MYERS-WILKINS: Thank  
18 you.

19 David Burns?

20 MR. BURNS: Hello. My name is David  
21 Burns (B-u-r-n-s). I'm the business manager of  
22 International Brotherhood of Electrical workers  
23 Local Union 193 here in Springfield.

1 EPA to push forward with this project. We think  
2 it's good for the city.

3 Springfield and its citizens are in a  
4 unique situation. For years, and like they were  
5 saying tonight, since 1917, they've had their own  
6 utility, and from the days of when you get Edison  
7 and you get those folks putting things together,  
8 technology is advanced.

9 I believe strongly that Jay Bartlett  
10 and his crew have put together a powerhouse that  
11 will utilize the latest technology to make this  
12 thing as clean as possible, and the citizens of this  
13 town that own the utility will have the lowest rates  
14 because, as my assistant David Gurnsey just said,  
15 there's no guarantee out there in the long run.  
16 This way, the citizens have got control of what's  
17 going to take place with their electrical cost.

18 It also will provide jobs that are  
19 needed throughout, and we urge you strongly to move  
20 forward with this.

21 Thank you.

22 HEARING OFFICER MYERS-WILKINS: Thank  
23 you, sir.

24 Gary Shepherd?

1 MR. SHEPHERD: I'm Gary Shepherd  
2 (S-h-e-p-h-e-r-d). I'm also a member of Local 193  
3 in Springfield, right now an unemployed member of

4 Local 193 in Springfield.

5 This power plant will bring a lot of  
6 jobs to this area not only for me but a lot of these  
7 young guys sitting over here and their families.

8 I know I love the air I breathe and  
9 the environment. That's all a good concern, and  
10 I'm anxious to see a lot of these new technologies  
11 take place, but right now, this power plant is  
12 needed.

13 I don't know how much of that 200  
14 megawatts is actually going to be used at one time.  
15 I don't think it's probably all going to be, the  
16 total capacity, once that 75 watter is shut down,  
17 but I'm sure it's not going to be running full bore  
18 all the time.

19 My brother lives at the lake. We go  
20 fishing out by his house all the time. Right now  
21 with the dirty plant that's there, I don't really  
22 notice what's going on. I know that it's in the  
23 air, but I've lived here all my life and I don't  
24 have any heart problems. My mom is 85 years old.

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1 She's doing well also.

2 I urge the city to continue with  
3 their project.

4 HEARING OFFICER MYERS-WILKINS: Thank  
5 you.

6 Phil Gonet?

7 MR. GONET: Hi. My name is Phil  
8 Gonet. I'm the president of the Illinois Coal

9 Association. Gonet is G-o-n-e-t.  
10 On behalf of the Illinois Coal  
11 Association, I am here this evening to support the  
12 plan of City, Water, Light & Power to construct a  
13 200-megawatt power plant at its Dallman site in  
14 Springfield.

15 CWLP is to be commended for its  
16 continued commitment to Illinois coal, one of the  
17 state's most abundant resources.

18 CWLP has proven that emission control  
19 systems can be economically installed and operated  
20 to burn Illinois coal and meet or exceed federal  
21 clean air standards.

22 Today, residents of Springfield enjoy  
23 the lowest electric rates in the state while sulfur  
24 dioxide and nitrogen oxide emissions have been

□

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1 reduced beyond required levels.

2 Moreover, these efforts mean that  
3 hundreds of direct coal mining jobs and thousands of  
4 spinoff jobs will stay right here in Illinois.

5 The proposed Dallman 4 power plant  
6 will replace two Lakeside units that will be  
7 retired. These units are too small and too old to  
8 install the necessary pollution control equipment to  
9 meet federal emission requirements. Therefore, the  
10 new plant will cause a significant decrease in  
11 sulfur dioxide and nitrogen oxides in Springfield.

12 Electric restructuring nationwide has  
13 brought unprecedented price volatility to wholesale  
14 power markets. Experience has shown that being a

15 bit long on capacity during peak periods is far more  
16 prudent than being short. The timing of the new  
17 project is critical for the future energy security  
18 for the City of Springfield.

19 Speaking of timing, I would like to  
20 point out that this hearing is taking place 16  
21 months after City, Water, Light & Power filed its  
22 application for this construction permit. It is  
23 unfortunate that this project has been delayed since  
24 it will result in drastically reduced levels of SO<sub>2</sub>

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1 and NO<sub>x</sub> emissions.

2 Also, this delay now makes it nearly  
3 impossible for CWLP to meet the new clean air  
4 standards by 2010. This is going to end up costing  
5 our ratepayers -- and I happen to be one here in  
6 Springfield -- more money as well in rates.

7 Residents of Springfield have been  
8 accustomed to getting reliable energy at very low  
9 costs from City, Water, Light & Power in the past.  
10 In fact, our residents have been used to some  
11 excellent service, and I think for those of you that  
12 are out of town, you might be surprised what this  
13 side of town looked like just a week ago, and it's  
14 to the men and woman, many of them here in this  
15 room, that we're here because they restored power  
16 after two very terrible and powerful tornadoes  
17 ripped through our town, and I want to thank you  
18 guys and women for doing the job. Thanks.

19 (Applause)

20 MR. GONET: But that's a service that  
21 we've come to expect here in Springfield.

22 This new project will assure the  
23 city's energy independence at reasonable prices for  
24 the next half century. Moreover, the project will

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1 result in cleaner air as emissions from current  
2 levels will be reduced and all federal air standards  
3 will be met .

4 I urge the Illinois EPA to issue the  
5 final construction permit for the Dallman 4 power  
6 plant so this important project can move forward.

7 Thank you for the opportunity to  
8 participate here this evening.

9 HEARING OFFICER MYERS-WILKINS: Thank  
10 you.

11 Jennifer Sublett?

12 MS. SUBLETT: Hello. My name is  
13 Jennifer Sublett (S-u-b-l-e-t-t). I am a citizen of  
14 Springfield and also a CWLP customer.

15 I wanted to point out something about  
16 some of the previous comments by Mr. Burns and some  
17 others about how we have low utility rates, which is  
18 probably the case if you compare us statewide, but  
19 what no one has mentioned is that if this plant  
20 moves forward, our utility rates are expected to  
21 increase by 34 percent. For every \$100, you spend  
22 on your utility bill now, add another 34 to that.

23 The City of Springfield recently  
24 passed an indoor smoking ban yet those same aldermen

1 have given the go ahead to this power plant without  
2 considering the effects of more air pollution and  
3 more emissions to our health including the risk of  
4 more frequent and more severe asthma attacks.

5 This proposed power plant does not  
6 include the use of any renewable sources of energy.  
7 Wind power for instance produces no harmful air  
8 emissions and is completely renewable unlike coal as  
9 a source of power.

10 Illinois also ranked sixth in the  
11 nation for emissions of mercury from coal-fired  
12 power plants. That's based on the USEPA's 2003  
13 data.

14 As most people may know, every single  
15 lake, river and stream in Illinois currently has a  
16 fish consumption advisory due to mercury pollution  
17 which recommends limiting fish consumption from our  
18 local waters due to health concerns from the  
19 mercury.

20 I think that our community, CWLP, and  
21 our city council can do better using the cleanest  
22 available coal plant technology such as an IGCC or  
23 gasification plant.

24 I do see many union members here

□

1 tonight which is great, and I would like to remind  
2 the audience that construction of an IGCC plant or a  
3 wind farm plant or other sources would also create  
4 construction jobs here in Springfield.

5 In closing, I'd like to remind the  
6 audience members that this proposed plant will be  
7 owned by the City of Springfield and to speak to  
8 your aldermen about using a cleaner source of power  
9 and including clean renewable energy sources as  
10 well.

11 This permit should not move forward  
12 as currently requested.

13 Thank you.

14 HEARING OFFICER MYERS-WILKINS: Thank  
15 you.

16 Jim Kane?

17 MR. KANE: Hello. My name is Jim  
18 Kane, and I'm a ratepayer in Springfield. I don't  
19 represent anybody except fellow ratepayers.

20 I've lived in Springfield most of my  
21 life and enjoyed the low rates, and even with that  
22 increase that the young lady mentioned just a minute  
23 ago, we'll still have some of the lowest rates in  
24 the State of Illinois. Trust me, I live outside of

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1 Springfield now, and I pay some of the higher rates  
2 in the State of Illinois.

3 I've worked on other projects where  
4 they bring in more efficient things, and I'm  
5 assuming that's what they're going to do with the  
6 newer plant. It will be the primary plant, and not  
7 only will you phase out the two older plants and get  
8 rid of those, but you'll also reduce the amount of  
9 emissions that you'll have in the existing plants,  
10 you know, because you'll be primarily using the more

11 efficient one.

12 Now, as far as particulates that  
13 cause cancer, my in-laws, they lived in Mt. Pulaski  
14 which is nowhere near any power plant but both of  
15 them died of cancer but it was mostly because of  
16 cigarettes they smoked.

17 I can't say anything about power  
18 plants being your major cause of cancer but I think  
19 it's probably something else.

20 Thank you.

21 HEARING OFFICER MYERS-WILKINS: Thank  
22 you.

23 Bill Crook?

24 MR. CROOK: My name is Bill Crook.

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1 Last name is spelled C-r-o-o-k. I've lived in  
2 Springfield all my life, and my concern is that when  
3 this plant was proposed, which was right after the  
4 year 2000, there was some awareness of global  
5 warming. It was a topic but I think our awareness  
6 has increased.

7 Tonight when I was listening to the  
8 car radio driving over here, a fellow who had  
9 written a book on global warming was talking about  
10 it. When we look ahead 50 years from now, it is  
11 going to be a serious problem to address.

12 As far as this power plant goes, sure  
13 it's going to be more efficient than the old plants.  
14 When I was growing up I remember smelling the sulfur  
15 dioxide all over Springfield, and it was horrible.

16 We've come a long way since then, but  
17 I want to look ahead 50 years in the future now and  
18 I want to see nonpolluting energy sources that we  
19 can see on the horizon, but we need a commitment to  
20 those.

21 I think we could ask 10 to 20 percent  
22 of our electric generation should come from  
23 renewable sources like wind, solar power, or  
24 geothermal hydroelectric. I know not everything is

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1 practical in this geography we have here.  
2 Everything is flat here, but just the same, I'd like  
3 to see a vision for the future, and we don't need  
4 such a big plant if we can reduce our peak demand,  
5 and we need commitment to a green sustainable  
6 future, and I'd like to ask the EPA to look at  
7 reducing the size of this plant and considering  
8 generation from other renewable sources.

9 Thank you.

10 HEARING OFFICER MYERS-WILKINS: Tom  
11 Guthrie?

12 MR. GUTHRIE: I'm Tom Guthrie  
13 (G-u-t-h-r-i-e), and I don't have any statement. I  
14 just have a couple questions as clarification.

15 From what I understand, the proposed  
16 plant is going to be a larger generating facility  
17 than what we're closing down but at the same time,  
18 it's going to be newer technology, and with the  
19 dispatching, the older units now will not run as  
20 much as they are currently running.

21 In looking at this, does that not  
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22 mean that our overall emissions are going to  
23 decrease? That's my question. That's what I'm  
24 trying to figure out as I sat here.

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1 MR. ROMAINE: Certain pollutants will  
2 certainly decrease. Given the difference in control  
3 technology between the units that are being shut  
4 down and the new unit, emissions will certainly  
5 decrease for sulfur dioxide emissions. Emissions of  
6 some pollutants will certainly decrease given the  
7 difference in control technology. For example,  
8 emissions of sulfur dioxide will decrease.

9 In terms of the change in particulate  
10 matter emissions, there will certainly be an  
11 immediate decrease in particulate matter emissions  
12 as you've described.

13 However, this plant is being built to  
14 address future demand, and at some point in the  
15 future, it would be reasonable to expect that with  
16 the growth of Springfield, there would be an  
17 increase in particulate matter emissions.

18 MR. GUTHRIE: Thank you.

19 HEARING OFFICER MYERS-WILKINS: Thank  
20 you.

21 Yatty Eli? Matty Eli?

22 Okay. That has concluded our  
23 registered commenters.

24 Becky Clayborn would like to speak

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1 further, so at this point, we'll take a few comments  
2 if there are comments, and then we'll bring this  
3 hearing to a close.

4 Becky?

5 MR. ROMAINE: well, is there anybody  
6 else? Before Becky speaks, is there anybody who  
7 hasn't signed up?

8 HEARING OFFICER MYERS-WILKINS: Is  
9 there anyone else interested in speaking or  
10 commenting?

11 MR. CREWS: Hi. Damon Crews  
12 (C-r-e-w-s), IBEW member.

13 I've also been an asthmatic for 25  
14 years; went to two or three specialists, and it's  
15 kind of funny, they've never mentioned particulates  
16 from a power plant or anything like that, but it  
17 seems like seasonal changes it.

18 So my big point I guess is if this is  
19 such a big issue, why hasn't a doctor ever brought  
20 that up to me or anybody else that's been an  
21 asthmatic?

22 It seems like they're trying to  
23 better the pollution in the Springfield area, and,  
24 you know, I'd just like to make the point I'm an

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1 asthmatic, and I'm all for this power plant.

2 Thanks.

3 HEARING OFFICER MYERS-WILKINS: Thank  
4 you.

5 Is there anyone else?

6 MS. KINSELLA: Hi. I'm Carrie  
Page 53

7 Kinsella (K-i-n-s-e-l-l-a). I'm a member of the  
8 local Sierra Club as well, and I just wanted to add  
9 my voice to some others here.

10 They mentioned earlier that as part  
11 of the process, an analysis of the alternatives  
12 including IGGC or gasification as well as wind power  
13 was conducted, yet coal-fired, the traditional  
14 method, the dirtier method was determined to be in  
15 Springfield's best interests.

16 I'd like to see a greater emphasis on  
17 exploration of cleaner renewable energy sources,  
18 ones that promote air quality in our community.  
19 This can be effectively combined with the focus on  
20 consumer conservation efforts. There are things  
21 that we can do as individuals to be more energy  
22 efficient and impact the community's needs.

23 We also need to consider the  
24 magnitude of this proposed power plant. This is an

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1 increase from 75 megawatts to 250 megawatts. That's  
2 fairly significant, and again, this is a coal-fired  
3 power plant. It's not the cleanest energy source.

4 I've heard citizens talk tonight  
5 about financial concerns, and we can all appreciate  
6 that money is important. However, our rates are  
7 anticipated to go up 34 percent, and in addition to  
8 that, CWLP plans to sell off the additional power  
9 generator.

10 Thank you.

11 HEARING OFFICER MYERS-WILKINS: Thank

12 you.

13 MS. HAMMER: Hi everybody. My name  
14 is Ann Hammer. I am currently a graduate student at  
15 the University of Illinois-Springfield in the  
16 environmental studies program. We have a class here  
17 who's representing environmental issues.

18 Some of the things that I've heard  
19 tonight are specifically economic based, and I feel  
20 that building a power plant just in order to save  
21 jobs, and I don't want to offend anybody, but I  
22 think that's looking more at today, and power is  
23 something that we're going to have to deal with for  
24 the rest of our lives, for the rest of human

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1 history, and we need to start thinking about ways  
2 that are going to be sustainable such as wind power.

3 Excuse me. I'm really nervous.

4 We have to start thinking about what  
5 the future is going to be. This plant is going to  
6 be around for 50 years. We have to start thinking  
7 about the price of coal and the availability of coal  
8 and what that's going to be doing to us.

9 Some of the health issues that we're  
10 starting to see now are going to be compounded as  
11 the future goes on. 50 years is a lot of time, and  
12 our population is going to be growing quite a bit  
13 over this time period, and by using so much more  
14 coal, we're going to be just expanding, and we're  
15 going to be making these problems worse it seems  
16 like, the particular problems, the sulfur dioxide  
17 and all that kind of stuff.

18                   So I guess my point is that I think  
19 we should start looking into renewable energies, and  
20 I think we have this opportunity here today and in  
21 this permit process to really make a difference.

22                   Some other people have said that this  
23 is the time to do it, and I think that's basically  
24 what I'm saying.

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1                   I'm sorry. I kind of lost my  
2 concentration.

3                   HEARING OFFICER MYERS-WILKINS: Thank  
4 you.

5                   MR. CORMIER: Hello. My name is Chip  
6 Cormier (C-o-r-m-i-e-r). I've been on both sides of  
7 this game. I dug the coal for 16 years out at  
8 Peabody 10, and now I'm a union electrician with  
9 Local 193.

10                  Everybody keeps bringing up the fact  
11 that a 75-megawatt power plant is going to go down  
12 and a 200-megawatt is going in its place, but the  
13 one thing that nobody brought up here is, much like  
14 the Lake 2 project that keeps getting stalled and  
15 stalled and stalled, do you think they're going to  
16 quit building on the west side? Do you think  
17 they're going to quit building all the stores and  
18 the wal-Marts and everything else that requires  
19 power? Do you think the grid of City, Water, Light  
20 & Power is not going to continue to get bigger and  
21 bigger and bigger?

22                  There will be a need in the very near

23 future for a 200-megawatt station in this town, and  
24 you just want to look at that number, 75 watt, 200

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1 watt. Oh, there will be a need because they're not  
2 going to stop building.

3 Are you going to stop building your  
4 homes? No.

5 There will be a continued increase in  
6 demand for City, Water, Light & Power generation  
7 capacity, and by burying your head in the sand and  
8 not realizing that you have to have that power, the  
9 ability to generate that power as the need arises,  
10 you will end up like California, and you will have  
11 rolling brownouts, and then you will have a little  
12 different perspective on whether this plant should  
13 have been built or not.

14 I urge you to pass this and go  
15 forward with the construction.

16 HEARING OFFICER MYERS-WILKINS: Thank  
17 you.

18 MR. BULLARD: My name is Clark  
19 Bullard (B-u-l-l-a-r-d).

20 My family has lived in Springfield  
21 for over a hundred years. I myself have been a  
22 homeowner for over 60 years, and I know how much we  
23 rely on power plants, electrical energy, energy to  
24 run everything we need.

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1 I take my hat off to the electricians  
2 for the wonderful job they've done this last week in

3 cleaning up after the tornado. All of the laborers  
4 in Springfield have contributed. I don't think you  
5 guys are going to be out of work if they built a  
6 different type of power plant. We're still going to  
7 use electricity, and the electricity use is going to  
8 expand.

9                   We've used coal forever, since I can  
10 remember and before. There's been a lot of progress  
11 made, and coal has been supplemented, and oil and  
12 gasoline have come in to take its place.

13                   We need energy, but why keep using  
14 our natural resources that are eventually going to  
15 run out. Coal has done a wonderful job, yes, but  
16 it's not going to last forever. Oil is running out  
17 now. We're having gasoline and oil problems. Why  
18 not look to energy production that is not going to  
19 run out.

20                   The sun is going to keep on shining  
21 as long as people live. Wind is going to keep on  
22 blowing, and there's no pollution or health problems  
23 involved in such energy.

24                   Why not make some progress and build

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1 power plants that are going to be usable for another  
2 hundred years instead of having to run out of coal  
3 in another 50 years and have to figure on something  
4 else then. Why not look to the future and build  
5 something a bit more permanent.

6                   Thank you.

7                   HEARING OFFICER MYERS-WILKINS: Thank

8 you.

9 Other comments?

10 MR. TOMASKO: My name is Jim Tomasko  
11 (T-o-m-a-s-k-o). I'm a member of Local 193 also out  
12 of Springfield.

13 I have small children. I hear the  
14 Sierra Club talk about pollution coming up in the  
15 future.

16 I'd really like to know how many  
17 people around here drove in singly in a car tonight.  
18 That's a large pollutant.

19 You know, I'm all for renewable  
20 resources, but I don't hear a solution. I don't  
21 hear a plan on that side, and I think this project  
22 has been going forward since 2000. That's six years  
23 ago. There's been no solution put forward with  
24 that. We have a solution here with CWLP. They have

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1 come up with a powerhouse. They have come up with a  
2 mean. They have come up with new engineering  
3 technology. They're probably going to use the best  
4 available, you know, and cut down on pollution and  
5 everything, that's great.

6 To look towards the future, that  
7 doesn't mean that we have to operate this thing at  
8 100 percent. If there is another renewable energy  
9 resource to come up in the future ten, fifteen years  
10 from now that works at a higher efficiency rate,  
11 that's great. Then we could scale down the plant  
12 and come up with that, wind power or something I  
13 else like that.

14                   There's not been a study. I haven't  
15 heard anybody say anything about a study they've  
16 done on wind power around here.

17                   You know, we just need solutions.  
18 Everybody needs to work together, but I think this  
19 plant right here is the best solution we have for  
20 right now.

21                   It might not agree with everybody and  
22 nobody get along with it but it's what we have right  
23 now, guys.

24                   Unless somebody comes up with

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1 something different and can come up right now with  
2 solutions for it, I don't know, I back this.

3                   Thanks.

4                   HEARING OFFICER MYERS-WILKINS: Thank  
5 you.

6                   MS. EDWARDS: Hi. My name is Jeannie  
7 Edwards. I am a Springfield resident, a CWLP  
8 customer. I'm also a teacher at Springfield High  
9 School. I'm also a graduate student at the  
10 University of Illinois taking the environmental  
11 studies course.

12                   As a group we are kind of sitting  
13 back there discussing, and we just had a few  
14 questions as far as the whole process.

15                   I know that a lot of times it's been  
16 mentioned already that this has been in the works  
17 for a long time and now it's six years later and why  
18 all these questions, so we're kind of wondering from

19 the application process to now, from November of '04  
20 when the plant application was submitted to March of  
21 '06, why does it take so long to have a public  
22 hearing, and is there any solution to that as to  
23 getting that time period smaller so these concerns  
24 can be brought up before the plan is so close to

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1 implementation?

2 MR. ROMAINE: We don't begin this  
3 stage of public involvement until we have completed  
4 our technical review of the application, prepared a  
5 draft permit, and are ready to accept public  
6 comments on our proposed action to issue a permit.

7 We would not be involving the public  
8 if we had decided that the application wasn't  
9 adequate yet, so this is really a public hearing to  
10 get comments on our proposed action on the  
11 application. It isn't a public hearing to really  
12 receive comments on the project as it's been  
13 developed over the years by Springfield CWLP.

14 MS. EDWARDS: Another question we had  
15 for you, are there conditions under which the IEPA  
16 would deny the permit other than if the permit did  
17 not meet current standards? What would it take for  
18 the permit to not be met?

19 MR. ROMAINE: This is a process  
20 that's governed by applicable law and regulations.

21 If the application demonstrates that  
22 the project will comply with applicable law and  
23 regulations, we are obligated to issue the permit  
24 for the project.

1                   So to demonstrate that a permit  
2 shouldn't be issued, we need to have a showing that  
3 in some respect we have overlooked some applicable  
4 requirement and that this project will not be able  
5 to comply with that requirement.

6                   MS. EDWARDS: Okay. And my third and  
7 final question for you is, as the agency of  
8 environmental protection, why does the IEPA not  
9 encourage power companies to look into alternative  
10 energy rather than dirty coal plants?

11                   Is there some form they have to  
12 submit that they've looked into these alternative  
13 energy resources before they can submit their permit  
14 for this or is that not a portion of that?

15                   MR. ROMAINE: That is not something  
16 that we undertake in the context of review of  
17 proposed sources of pollution.

18                   We look at proposed sources of  
19 pollution to determine whether the project would  
20 comply with applicable regulations.

21                   The efforts undertaken by the State  
22 of Illinois to support renewable energy, energy  
23 efficiency, are shared among a number of agencies.  
24 Much more critical for the role of state government

1 in those activities is the Department of Commerce  
2 and Economic Opportunity.

3                   Even though we're called the

4 Environmental Protection Agency, a lot of what our  
5 programs deal with is addressing pollution.

6 MS. BURNS: Thank you.

7 HEARING OFFICER MYERS-WILKINS: Thank  
8 you.

9 Are there any more comments or  
10 questions?

11 MR. WELCH: James Welch, a member of  
12 IBEW 193 also.

13 There's a lot of wind around here. I  
14 froze my tail off yesterday on top of a roof  
15 changing out a service here in Springfield. It was  
16 a windy day. Some days there's no wind. I have a  
17 sail boat also. Some days we'll get out there and  
18 we'll sit.

19 I don't know what the Sierra Club's  
20 idea is for what you do on the days there's no wind.  
21 If that's the whole notion of what the plan is for  
22 the future, we don't want coal, let's use wind,  
23 that's fine. We need electricity every single day  
24 though. That's what a coal-fired power plant will

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1 do, provide power every single day.

2 Others said we have 200 megawatts of  
3 power available. We aren't going to use  
4 200 megawatts every single day. In the future if  
5 you want to use wind power, fine, bring it in when  
6 that technology is available. We'll use  
7 10 megawatts if you can provide another 85 from  
8 wind. That's fine. Anything to reduce our rates,  
9 reduce the effects of our air that we breathe in day

10 to day.

11                   And the younger generation that's  
12 over there, I know that they're advocating for  
13 cleaner air for the future. I would be for my kids  
14 also, so that's something we have to look forward  
15 to.

16                   But really, the benefits, as the  
17 young lady mentioned earlier, for right now we don't  
18 want to build a power plant, I'd be ashamed to, if  
19 we built it right now because we wanted to keep  
20 workers busy or keep electricity going. I'd be  
21 ashamed to do that.

22                   But right now, as we mentioned, the  
23 effects are right now, and we have Lakeside, one of  
24 the dirtiest places possibly around. Right now we

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1 have Dallman built in the late '70s they mentioned  
2 earlier. That's what we have right now, and the  
3 technology we have available that CWLP has brought  
4 forth is what we have right now available to us.

5                   So in the right now, we already have  
6 plans to build this power plant approved by the EPA  
7 and by CWLP to be advantageous for us to build this  
8 plant. I think that's the move we ought to go  
9 forward with.

10                   These are people who were trained and  
11 professionals in their fields, people who know what  
12 we should be doing with our environment.

13                   And Sierra Club, I honor you.  
14 Really, you guys are wholeheartedly going after

15 something you believe in. I was a paramedic for a  
16 number of years. I saw people who had asthmatic  
17 diseases and sicknesses. I worked on a number of  
18 those people who died suffocating. I can see that  
19 side of it also, but we really have to focus on the  
20 here and now, and the here and now is that we have a  
21 plan in action, and that should go wholeheartedly  
22 forward.

23 Thank you.

24 HEARING OFFICER MYERS-WILKINS: Is

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1 there anyone else?

2 MS. HUGHES: I spoke before. I don't  
3 want to be the last person to speak. We all come  
4 from where we've been, what we believe, what we do  
5 for a living, what we've seen in our lives, and it's  
6 very hard to not have that be a part of what we feel  
7 about this issue.

8 I did want to say to the gentleman  
9 who has asthma whose doctor didn't associate it with  
10 particulate matter, there are ozone warnings, there  
11 are other warnings that people get in communities  
12 where there are problems with air quality. They  
13 advise that people with respiratory problems don't  
14 go out on those days or protect themselves. So he  
15 may not have said that, but that's a part of what  
16 that's all about.

17 And for anybody who has questions  
18 about studies that have been done, medical studies  
19 that have been done on the association of air  
20 quality with health problems, with respiratory

21 illness and cardiac disease as well, I'd be happy to  
22 provide those. I will be providing them to the IEPA  
23 also.

24 Thank you.

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1 HEARING OFFICER MYERS-WILKINS: Thank  
2 you.

3 MS. CLAYBORN: This is the point when  
4 everybody leaves, right?

5 My name is Becky Clayborn again,  
6 Sierra Club regional representative.

7 I'm so glad that somebody asked what  
8 the solution was because there are a lot of  
9 communities that have a solution to dirty new  
10 coal-fired power plants, and before I get to that  
11 though, I have to point out that, yes, this has been  
12 going on for six years. People have been planning  
13 this for six years, but how many of you knew that it  
14 was going on for six years and how many people --  
15 oh, yeah, because you work for people that will get  
16 jobs for you for the power plants.

17 AUDIENCE COMMENT: We read the paper.

18 MS. CLAYBORN: It's been in the  
19 paper, and I can tell you that the people that I  
20 have talked to that have read about it in the paper  
21 said, oh, it's a done deal, isn't it? There was no  
22 discussion. If there was a discussion, it wasn't  
23 the entire community.

24 The community did not have a good

1 say, a good public participation. The first public  
2 meeting that CWLP gave to the public about the new  
3 power plant was at a Sierra Club meeting for Sierra  
4 Club members.

5                   So I think that it really is  
6 important. I'm not joking when I say public  
7 participation is important. I like to hear  
8 everybody's side of the story, not just mine.

9                   But the solution. Many communities  
10 are finding that energy efficiency practices such as  
11 better building codes, new lights for energy  
12 efficient light bulbs, for stop lights, for street  
13 lights, for lights inside, those types of practices  
14 and insulation of houses, those three things can get  
15 ten percent reduction in energy needs.

16                   I'm not sure what the number is for  
17 how much CWLP needs right now, but isn't it like  
18 500 megawatts that you guys provide? I think.  
19 Okay. So ten percent off of that, okay, that's  
20 50 megawatts, okay, that you don't have to produce.  
21 That's free power.

22                   As soon as you put in these  
23 newfangled technologies that they've got, you save  
24 power, and you don't have to build a plant to make

□

1 that 50 megawatts.

2                   Renewable energy, Austin, Texas has  
3 put into place -- and many communities are doing  
4 this, I'm just picking one -- has put into place  
5 renewable energy requirements so that they have to

6 have 20 percent of their energy come from renewable  
7 energy which is nonpolluting for the most part.

8                   Obviously, every energy has something  
9 that you could find wrong with it, but 20 percent of  
10 the energy would come from a renewable source.

11 That's a hundred megawatts, so that's 150 megawatts  
12 right there that we don't have to build in a  
13 coal-fired power plant.

14                   I think that's a pretty good  
15 solution. I personally would never say don't build  
16 any coal ever but it's not the cleanest coal and  
17 it's a lot bigger than it needs to be. That's the  
18 solution.

19                   And in terms of wind energy, I just  
20 wanted to point out as well that ELPC, Environmental  
21 Law and Policy Center, has done a study of wind  
22 potential in the upper Midwest. In the upper  
23 Midwest states, if all the wind was developed in the  
24 upper Midwest states, it could provide 25 percent of

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1 the entire U.S. needs in energy, 25 percent of  
2 everybody's energy needs. It is feasible.

3                   There's a 400-megawatt plant going in  
4 right up the street, Bloomington. It's not pie in  
5 the sky. It's happening now, and now I'm going to  
6 go on to the boring technical stuff that IEPA likes  
7 to hear about.

8                   The netting exercise that we had  
9 talked about with the NOx, I looked it up, and the  
10 Illinois Administrative Code says that the two-year

11 period which immediately precedes the particular  
12 date... Do you know what I'm talking about?

13 MR. ROMAINE: I do.

14 MS. CLAYBORN: It's 35 AIC 203.104.

15 MR. ROMAINE: That's certainly a set  
16 of the Illinois regulations. However, the  
17 particular regulation that's at issue here dealing  
18 with nitrogen oxide emissions is the federal  
19 prevention of significant deterioration regulations.

20 Certainly we can examine the netting  
21 analysis and make sure that it's been properly  
22 conducted. We certainly would not have any  
23 difficulty if as a result of that CWLP had to commit  
24 to slightly tighter numbers for NOx. That would be

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1 great.

2 MS. CLAYBORN: Okay. Thank you.

3 Another question I had for EPA. In  
4 the application that CWLP gave to you, they had a  
5 list of hazardous air pollutants, emission levels  
6 that they expected. Oh, I'm sorry. They have a  
7 list of hazardous air pollution emissions that were  
8 in their application that had an emission limitation  
9 for those hazardous air pollutants, but it wasn't  
10 actually in the permit when the permit came out, so  
11 the permit application had more HAPs in it than the  
12 actual permit application did.

13 MR. ROMAINE: That's correct. When  
14 we issue permits, we focus in on key pollutants for  
15 dealing with this plant. Since most of the  
16 hazardous air pollutants of concern are particulate

17 matter, we're addressing them through the limit on  
18 particulate matter emissions.

19 There aren't specific control  
20 technologies that are applied for emissions of air  
21 pollutants other than mercury. That is sort of the  
22 exception where it is desirable that a plant  
23 specifically include things such as activated carbon  
24 injection to minimize emissions of mercury.

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1 MS. CLAYBORN: So if a power company  
2 in their permit says we can reach these limits on  
3 these hazardous pollutants, EPA, even if the company  
4 offers that information, it's still not put in the  
5 permit. Can we put it in the permit?

6 MR. ROMAINE: It could be in the  
7 permit. I would have to talk to CWLP whether it  
8 expected those representations of emissions to be  
9 converted into limits in its permit.

10 MS. CLAYBORN: Great.

11 Another issue that we had, a concern  
12 that we had is that the startups and shutdowns are  
13 excluded in the permit. It's not clear what the  
14 emission limits are during the startup/shutdown and  
15 during times of malfunction, and we're concerned  
16 that those periods of time are going to be  
17 overlooked and that there's going to be a  
18 significant amount of emissions that are coming out  
19 during the shutdown periods as they're shutting down  
20 and as they're starting up.

21 MR. ROMAINE: Those emissions are

22 addressed by the permit. However, given the  
23 variable conditions during those periods of time, we  
24 have an alternative approach to dealing with them.

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1 we set limits on the total amount of emissions. We  
2 also have qualitative requirements, work practices  
3 that have to be followed to minimize the emissions  
4 that occur during those transient conditions.

5 MS. CLAYBORN: What part of the  
6 permit, do you know, that addresses that, or can you  
7 just put that in the responsiveness summary?

8 MR. ROMAINE: We can talk later this  
9 evening.

10 MS. CLAYBORN: Thank you.

11 Another concern is the particulate  
12 matter, filterable particulate matter limit that  
13 sets -- sorry. I'm reading my notes.

14 The draft permit has .015 pounds per  
15 million btu for filterable particulate matter, and  
16 there are examples of other permits with a lower  
17 number, and we're going to have these in our  
18 comments, our written comments to you, but I'd like  
19 to point out that Trimble Power Company in Kentucky  
20 and Y Gen 2 in Wyoming has .012. That's the lowest  
21 one that we've seen. And Inter-Mountain Power  
22 Generating Station has .013.

23 Like I said, we'll have that in the  
24 written comments for you, and we'd like you to

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1 address that in the responsiveness summary and

2 hopefully lower the number.

3                   Similarly, H2SO4 limits, we've seen  
4 lower limits in other similar facilities. We'll put  
5 that in the written comments too.

6                   The good combustion control that  
7 keeps being referred to in the permit as the BACT  
8 standard has never been defined anywhere in the  
9 permit, and so we'd like to see a definition of what  
10 good combustion control means and how it's measured  
11 I guess, and I think that's it.

12                   I thank you so much for having this  
13 public hearing and letting us voice our concerns.

14                   Thank you.

15                   HEARING OFFICER MYERS-WILKINS: Thank  
16 you.

17                   Now that everyone has had an  
18 opportunity to express their comments and questions,  
19 at least everyone who has desired to has had that  
20 opportunity, as we bring this meeting to a close, I  
21 just want to remind everyone that the comment period  
22 for this record or for information in this matter  
23 closes on April 21, 2006, so any written comments  
24 must be received by me before midnight on that date

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1 or must be postmarked before midnight.

2                   Copies of exhibits will be available  
3 upon request. The time is now 8:58 or so, and this  
4 meeting is adjourned. Thank you all for coming.

5                   (which were all of the  
6 proceedings held at this time.)



EPA PUB HRG 3-22-06.txt

attorneys involved herein, nor am I financially interested in this action.

Dated this 27th day of March 2006.

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Certified Shorthand Reporter