

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

In conjunction with its CAAPP application, the source also requests an Acid Rain Phase II Permit. The acid rain permit contains provisions related to sulfur dioxide (SO<sub>2</sub>) emissions and requires the owners and operators to hold SO<sub>2</sub> allowances to account for SO<sub>2</sub> emissions. An allowance is a limited authorization to emit up to one ton of SO<sub>2</sub> during or after a specified calendar year. Although this plant was not eligible for an allowance allocated by USEPA, the owners or operators may obtain SO<sub>2</sub> allowances to cover emissions from other sources under a marketable allowance program.

Rocky Road Power, LLC is located at 1221 Power Drive in East Dundee. The source operates stationary combustion turbines for the purpose of generating electricity.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
T1	135 MW Natural Gas Fired Turbine (1,439 mmBtu/hr)	Feb 1999	Low NOx Burners
T2	135 MW Natural Gas Fired Turbine (1,439 mmBtu/hr)	Feb 1999	Low NOx Burners
T3	35.2 MW Natural Gas Fired Turbine (367.4 mmBtu/hr)	Feb 1999	Water Injection
T4	135 MW Natural Gas Fired Turbine (1,439 mmBtu/hr)	Oct 1999	Low NOx Burners

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year
Volatile Organic Material (VOM)	17.0
Sulfur Dioxide (SO <sub>2</sub> )	5.0
Particulate Matter (PM)	47.0
Nitrogen Oxides (NO <sub>x</sub> )	245.0
HAP, not included in VOM or PM	-
Total	314.0

#### IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the source must comply with Illinois' Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the permit. The permit contains provisions restricting the seasonal emissions of VOM from the source to less than 10 so that this source does not qualify as a participating source and does not have to hold allotment trading units for its emissions.

This source will be an affected source subject to the NOx Trading Program. This is a new interstate market-based program designed to reduce NOx emissions from electric power plants and other large NOx sources beginning in 2004. One of the administrative requirements of this permit for an affected source is to hold a "budget permit," which sets forth the various requirements of the NOx Trading Program that would apply to the affected source. The Illinois EPA is proposing to include this budget permit in Section 6.0 of this CAAPP.

#### V. PROPOSED PERMIT

##### CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

##### Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant

Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.