

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF AIR

May 2001

Responsiveness Summary
for Public Questions and Comments on the
Construction Permit Application from
Power Energy Partners, LLC

Site Identification No.: 197030AAO
Application No.: 99120056

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FINAL DECISION

Power Energy Partners, LLC submitted an application for an air pollution control construction permit for an electric power generation facility in Crete. The proposed facility would have four simple cycle gas turbines six gas turbines to generate up to 356 megawatts of electricity. The facility is described as a peaking facility. As such it would operate primarily on hot summer days when the demand for electricity is greatest. It would also operate at other times as needed to meet the demand for electric power. The facility would burn natural gas, which is the cleanest commercially available fuel.

The proposed project is not considered a major source because the permitted emissions of pollutants from the facility would be less than major source thresholds. In addition to selection of fuel, the emissions of the turbines would be controlled by the design of their combustors. (The combustors are the part a turbine where the natural gas fuel is burned.)

Upon review of comments received during the public comment period and final review of the application, the Illinois EPA has determined that the application meets the standards for issuance of a construction permit. Accordingly, on February 28, 2000, the Illinois Environmental Protection Agency (Illinois EPA) issued a permit to construct the proposed electrical generation facility to Power Energy Partners, LLC. The facility must be constructed and operated in accordance with applicable regulations and the conditions of the permit.

COMMENT PERIOD AND PUBLIC HEARING

The Illinois EPA Bureau of Air processes applications for permits for sources of emissions to the atmosphere. An air permit application must appropriately address compliance with applicable air pollution control laws and regulations before a permit can be issued. Following its initial technical review of Power Energy Partners, LLC's application, the Bureau of Air made a preliminary determination that the application met the standards for issuance of a construction permit and prepared a draft permit for public review and comment.

The public comment period began on December 10, 2000, with the publication of a notice in the Crete Star Newspaper. Notices were also published in this paper on December 17 and 24, 2000. A public hearing was held on Tuesday, January 23, 2001 at 7:00 p.m. at the Crete-Monee Middle School in University Park to receive oral comments and answer questions regarding the application and draft air permit. The comment period remained open until February 22, 2001 to receive written comments.

CHANGES BETWEEN THE DRAFT AND FINAL PERMITS

The permit as issued includes the following significant changes compared to the draft permit.

Condition 1(b): The reference to 40 CFR 60.334(f), which affects turbines uses water injection to control emissions of nitrogen oxides (NOx) was

removed , as it is unnecessary for the proposed turbines, which will use dry lo-NOx burners to control NOx.

- Condition 3(d)(ii): The procedures for determining compliance with this condition, which sets limits on the annual emissions of the facility, were clarified.
- Condition 12: Recordkeeping requirements were added for opacity measurements and the annual review of operating procedures by the facility, while recordkeeping for “type of startup, i.e., scheduled or emergency” was removed.
- Condition 13(a): This condition, which requires notification to the Illinois EPA if NOx or CO emissions go above 160 tons during the course of a year, was clarified.
- Condition 15(a)(ii): A provision was added to highlight the source’s obligation to carry out practices during the construction and operation of the facility to minimize fugitive dust and prevent an air pollution nuisance.

QUESTIONS AND COMMENTS

General Questions

1. How will the proposed gas turbines make electricity?

A gas turbine is a rotary engine in which fuel is continuously burned with the force of the hot combustion gases as they expand pushing on a series of blades to rotate a shaft. When used in a power plant, the power shaft is connected to an electrical generator.

2. Can the proposed gas turbines use fuels other than natural gas?

The proposed facility would fire natural gas as its only fuel. Power Energy Partners has not applied to burn kerosene or distillate oil as a back-up fuel. Such an approval would require a new or revised Construction Permit from the Illinois EPA. The gas turbines are not physically able to burn coal or other solid fuel.

3. What is the difference between a peaking facility and so-called “base load” facilities?

Peaking facilities are intended to operate only when the demand for power is at its greatest (in Illinois, typically hot summer week days) and other times when less costly sources of power (such as coal-fired and nuclear plants) are not able to meet the demand for power. Base load power plants are developed so that they can be operated essentially year round, if there is a need for power at the price at which they can produce it.

In this regard, the gas turbines in peaking power facilities are installed in a “simple cycle” configuration, as they exhaust directly to the atmosphere, without using boilers to recover the energy in the hot exhaust gases. This means that peaker plants are also less efficient and more costly to run than “combined cycle” turbines. In a combined cycle turbine, the hot exhaust gases discharged from the gas turbines do not go directly to the atmosphere but instead are ducted through a waste heat boiler and used to make steam. This steam is then used to drive a steam turbine generator, to produce more electricity, which increases the overall output of the system compared to the gas turbine by itself. The recovery of steam in this manner increases the energy efficiency of a combined cycle plant by about 50 percent compared to a simple cycle turbine. However, the greater efficiency and lower operating costs of a combined cycle turbine come at a higher capital cost for the additional equipment, including the waste heat boiler, the steam turbine generator and a cooling tower to condense and reuse the steam, which are not present with a simple cycle turbine.

4. What is a “merchant power plant?”

A merchant power plant sells electricity on a wholesale basis to other companies that then sell the power on a retail basis to individual residential, commercial and industrial customers. Under deregulation of electricity generation, the developer of a merchant power plant is not guaranteed a return on its investment and must compete in a free economic market to sell the power it can produce. A merchant power plant can be either a peaking facility or a base load facility.

5. The proposed facility would not operate as a true peaker based upon the hours of operation for which it is effectively being permitted.

The permitted level of annual operation of the proposed facility is not inconsistent with operation as a peaking facility. Moreover, the aspect of this facility that restricts its operation to peaking operation is the permitted equipment, i.e., natural gas fired simple cycle turbines. Simple cycle turbines (peaking facilities) do not routinely operate when other types of plants are able to meet the demand for power. This is because the cost of electricity, in dollars per megawatt generated by an simple cycle turbine is significantly higher than the cost of electricity produced by nuclear power plants, coal-fired plants or natural gas fired combined cycle plants.

With respect to the proposed facility’s permitted level of operation, sources routinely apply for permitted levels of operation that are greater than those at which they expect to operate. This provides capacity or room to accommodate additional operation based on unusually high demand for services. This is certainly an interest of peaking facilities. The operation of peaking facilities can vary greatly from year to year based upon the weather and other factors that affect the demand for power and the ability of other power plants to satisfy that demand. Accordingly, the permitted levels of operation should be understood for exactly what they are, which is the maximum level of operation for which a facility is permitted.

Developers of new natural gas fired combined cycle plants are also requesting permits that overstate the likely level of operation of their facilities. They apply for permits that would allow year-round operation like a base load power plant. Because the power that combined cycle plants produce will still be more expensive than power produced from base-load nuclear and coal-fired plants, these combined cycle plants would typically be expected to actually operate as

intermediate or cyclic load plants. Nevertheless, the companies developing these facilities are pursuing permits that would allow continuous year-round operation.

6. How tall will the stacks be and how many will there be?

There will be four stacks one for each turbine. Each stack will be approximately 60 feet tall.

7. Why is there a new definition of “peaker” in the permit for the proposed facility?

The definition does not include a new definition of “peaker plant” but does include a definition for “peak mode operation.” This is because peak mode operation is a feature that is available with the proposed turbines that Power Energy Partners would like to have available to it. In particular, Power Energy Partners has requested to be able to operate the turbines at the proposed facility, which is a peaking power plant, in a “peak mode,” as well as a “normal mode.” During peak mode operation, a turbine is operated at a capacity that is higher than its normal maximum capacity. This increases electricity output but also increases emissions and wear and tear on the turbine. As a practical matter, a turbine would only rarely run in peak mode in emergency situations when the significantly higher cost of the increased maintenance on a turbine would be justified. A definition of “peak mode operation” is included in the permit to allow this alternative mode of operation to be addressed, which is limited to no more than 800 hours per year for all of the turbines combined.

Facility Emissions

8. What pollutants would be emitted from the proposed facility?

The pollutants emitted by the proposed facility are the pollutants associated with burning of natural gas for any purpose. The pollutant of greatest concern for a natural gas fired power plant is NO_x . Other pollutants emitted include carbon monoxide (CO) and, in smaller amounts, particulate matter (PM), volatile organic material (VOM) and sulfur dioxide (SO_2). Some of the compounds that make up the VOM are hazardous air pollutants (HAP).

9. What is average temperature in Illinois? Why were the facility’s emission limits based upon 59° F.

The annual average temperature in Illinois is approximately 50° F. For other than peak mode operation, Power Energy Partners proposed short term (hourly) emission rates in its application based on operation at 59° F. The Illinois EPA determined that these limits would adequately address operation of the facility on an hourly basis and used them in the permit. The facility’s annual emission limits were developed based on operation at 59° F. because that was the approach to calculating annual emissions taken by Power Energy Partners in its application. In particular, Power Energy Partners made its calculations of annual emissions using the hourly emission data for the turbines when operated at an ambient temperature of 59° F. This is an acceptable approach for calculating annual emissions in the permit application since the majority of the proposed facility’s operation should occur during the summer months and the turbines will routinely operate well above 59° F. The nature of turbines is such that fuel consumption and

output of turbines go down with increasing ambient temperature, so that emissions from a turbine also go down with increasing temperature.

In any case, irrespective of how emission limits were established, Power Energy Partners must comply with both the short-term (hourly) and long-term (annual) emission limit contained in the permit based on actual operation and emissions of the turbines given actual temperature conditions.

10. How will the Illinois EPA know if/when the annual emissions of the facility reach 160 tons of NO_x?

Power Energy Partners must keep operating records for operating hours and fuel usage by the facility as well as other relevant data needed to determine the facility's emissions. It must also use these records to determine emissions. Based on this recordkeeping, Power Energy Partners must notify the Illinois EPA within ten days if emissions reach 160 tons during the course of a year.

11. Emission records should be compiled on a monthly basis.

The permit, Condition 12(e)(iii), does require Power Energy Partners to compile emissions data on at least a monthly basis for the purpose of determining compliance with annual emission limits.

12. Is there a standard formula that the proposed facility must use to compute its emissions?

In this permit, which is a construction permit, the Illinois EPA has not established a specific formula that must be used to calculate annual emissions from the facility (other than to specify that annual emissions are determined as the sum of monthly emissions). The Illinois may still establish such formula(s) in the operating permit for the facility, if it is found to be necessary at that time after the facility is built and emission testing is performed. In particular, the methodology used to determine annual NO_x emissions would have to be consistent with the methodologies that are acceptable under the federal Acid Rain program.

In this regard, the need for and nature of such a formula depends on the overall approach taken by the source to determining emissions of a particular pollutant and the conservatism contained within that approach. For example, for a particular pollutant, Power Energy Partners might elect to use the conservative emission factor contained in its application, as verified by emission testing. Alternatively, it might propose to use lower emission factors that reflect the actual results of emission testing and vary based on turbine load. In the former case, emissions during regular operation could be determined as the product of monthly operation and the single conservative emission factor. In the latter case, emissions during regular operation would have to be determined on an hour-by-hour basis, to account for the load in each hour. In either case, a separate calculation would have to be performed as needed to account for the emissions during the month associated with startups, peak mode operation, or other periods of irregular operation.

13. Why did the Illinois EPA assume startup emission levels rather than requiring proof from the manufacturer?

The original application provided manufacturer's emission data that were lower than that for the Carlton project (where one of the alternatives would use the same type of turbines being proposed for this facility). The Illinois EPA used Carlton data to be conservative. Testing must be performed once the turbines are installed to verify that emission factors used for startup fully account for the facility's actual emissions.

14. Is it appropriate to use startup emission rates from another facility?

Startup emission rates for the Power Energy Partners permit were based on the Carlton permit, where the same type of turbines are being proposed. It is appropriate to use comparable emission data from another proposed facility if the same types of turbines are being used. It would be inappropriate to use emission data from a different type of turbine. Power Energy Partners may also use updated emission factors derived from the manufacturer or specific data obtained from testing of the turbines.

15. Why doesn't Illinois EPA limit or cap startup to 200 times per year?

It is not necessary or justified to constrain the operation of the proposed facility by limiting the number of startups, given the nature of startups, which are only 20 minutes in length, and the provisions that are being imposed to address startups. The permit includes ample provisions to address emissions accompanying startup, including limits on annual emissions of the facility and procedures to account for emissions during startup when determining compliance with these limits. As a general manner, the facility is required to follow good air pollution control practice to minimize emissions from the turbines. The permit also has specific provisions requiring the facility to take reasonable measures to minimize the number of startups and the emissions accompanying startups.

16. Startup emissions should be addressed clearly separately and distinctly in the permit.

The permit does address startup separately. Specifically, the permit sets start up emissions limits separate from normal operation and requires emission testing during startup to verify and define these limits.

17. If the facility has higher start up emissions, they could be subject to the federal rules for Prevention of Significant Deterioration (PSD)?

The application indicates that the proposed facility would not be a major source. Different assumptions could be made about the operation of the proposed facility that would then result in it appearing as a major source. However, this does not demonstrate that Power Energy Partner's representation of the proposed facility is unrealistic or fundamentally flawed. When the representations in an application that demonstrate compliance are reasonable, an applicant is

entitled to a permit and the permit is developed with appropriate conditions to verify and track compliance with the representations in the application.

18. Will emissions of pollutants other than NO_x be elevated in peak mode?

The application only identifies an alternative emission rate for peak mode operation for NO_x. For pollutants other than NO_x, the application indicates that the rates of emissions will be within the hourly limits with which the turbines must normally comply. However, the Illinois EPA expects that emissions of other pollutants will be higher. Certainly, peak mode operation increases the firing rate of a turbine. Nevertheless, the source must comply with the hourly emission limits set in the permit, which only establish an alternative emission limit for NO_x during peak mode operation. It must also fully account for emissions of all pollutants from peak mode operation in determining the facility's annual emissions.

19. Some other permits have limits on low load of the turbines. Is it necessary to put a low load range into this permit?

Additional provisions addressing low-load operation of the turbines are not needed in this permit. The need for such provisions in a permit depends on the emission characteristics of the turbines to be used at a proposed facility, as described in the application. In this case, where the proposed facility will use frame turbines rather than the smaller aero-derivative turbines, the maximum emissions of the turbines do not change significantly with load. Thus it is not necessary to establish alternative emission limits for the turbines, in pounds per hour, that apply to low load operation or to restrict operation below a certain load level.

Applicable Requirements

20. The permittee should comply with the emission limits in the permit no matter what load or temperature the gas turbines are operating.

This is correct. The permittee must comply with their emission limits whatever their operating temperature or load.

21. Since Power Energy Partners claimed in its application that the turbines could meet 20% opacity, why does the permit allow 30%? Is there a federal opacity limit?

The Illinois EPA expects that the exhaust of the turbines will normally have essentially 0% opacity. In this regard, the permit merely cites the applicable state rule, 35 IAC 212.123, which generally limits opacity of the exhaust from most emission units in Illinois, including turbines, to no more than 30 percent. The federal New Source Performance Standards for turbines, 40 CFR 60, Subpart GG, does not contain standards for opacity.

22. Power Energy Partners requested an annual NO_x limitation of 163 tons in its application. Why does the permit allow 220 tons of NO_x?

While Power Energy Partners originally requested an annual limit of 163 tons, in December, it submitted a revision to its application. This revision requested a NO_x limit of 220 tons.

23. The lower heat value for natural gas in application was 900 BTU per standard cubic foot. What was used in permit?

The heat content value of natural gas provided by Power Energy Partners in the application, i.e. 900 BTU/SCF, was used to develop the limitations on fuel usage contained in the permit.

Other Impacts

24. When and with whom should the public pursue issues other than air quality.

Issues such as land use, facility appearance, lighting nuisance, etc. are regulated at the local level. These issues need to be pursued as part of the specific review of the proposed facility at the local level, and more generally, as local land use plans and ordinances are developed.

With respect to the Illinois EPA, in addition to air emissions, the Illinois EPA also permits water discharges that do not go to a municipal sanitary system. The Illinois EPA also provides assistance or investigation and enforcement on other environmental issues such as noise and fugitive dust that are not addressed by permitting.

25. Proposed power plant facilities should perform noise modeling as part of their construction permit application.

This permitting process is for air emissions only and cannot address noise. The Illinois EPA does agree that compliance with noise standards needs to be addressed by a company before a proposed facility is built, by performance of appropriate noise studies to confirm the adequacy of planned noise abatement measures. Actual compliance with noise standards should also be verified by actual noise measurements once a facility is built and is operating.

26. Power Energy Partners stated at the hearing that they have performed a noise study. Is this study available?

The Illinois EPA does not have a copy of the noise study. Contact a representative of Power Energy Partners to request a copy of the noise study, e.g., Katherine Panczak at 734/913-2080

27. How much water will be used by the facility and what aquifer will it come from?

Power Energy Partners stated at the hearing that the proposed facility would use approximately 175 gallons a minute and that the facility would get this water from the city and supplemental water from a well that it will be drilling.

28. Will there be a berm built around the facility?

Power Energy Partners indicated at the hearing that a berm would be established on the west side of the facility.

29. Why isn't Power Energy Partners building berms on the east or north, where more houses are located?

Power Energy Partners indicated at the hearing that they established the berm's location based on the noise modeling that had been performed.

30. What are the noise standards?

Illinois' Noise Standards are at 35 Illinois Administrative Code Subtitle H (Part 901 and following) and are available at the Pollution Control Board's website, www.ipcb.state.il.us/Title_35/main.htm. For more information on noise, please contact Greg Zak of the Illinois EPA at 217/782-3397.

31. Fugitive dust during construction will be a problem.

Power Energy Partners can readily take steps to prevent fugitive dust from being a nuisance during construction. Condition 15(a)(ii) was added to the issued permit to specifically highlight the fact that included in the various environmental regulations with which Power Energy Partners must comply are requirements that apply to fugitive dust. If fugitive dust problems are experienced, please contact the Illinois EPA's regional office in Des Plaines, 847/294-4000, as well as the source, so that the Illinois EPA can pursue the matter.

General Comments

32. Who makes determination that immediate delivery of power is needed?

The request for immediate delivery of power is made by the entity purchasing power from the facility.

33. The provision would allow entities outside of Illinois to request immediate delivery of electric power should be taken out of the permit.

It is not practical, legal or appropriate for the permit to distinguish between immediate needs for electricity that occur in Illinois and outside of Illinois. As a practical matter, purchasers of power will not necessarily be able to identify the specific location of the need for power, certainly within the time frame within which a response is needed. Moreover, the existence of such need may relate back to and have consequences for companies in Illinois. As a legal matter, for the Illinois EPA to differentiate based on the location of the power shortage would be illegal restraint of trade as such action would interfere with free conduct of interstate commerce. Finally, shortages of electric power that occur anywhere in the area that this facility could

address would threaten the power supply and welfare of residents of Illinois, as both the electric power transmission system or grid and the regional economy cross state boundaries.

34. Who is the parent company of Power Energy Partners?

The company stated at the hearing that Power Energy Partners is a joint venture of MCN Energy Group in Detroit, Michigan, DTE Energy Services of Ann Arbor, Michigan and Entergy Power Group of Woodlands, Texas.

35. Are turbines taxed as real or personal property?

Power Energy Partners stated at the hearing that the facility would be taxed as personal property.

36. How many people will the proposed facility employ?

Power Energy Partners stated that the facility would employ five full time equivalent positions at the facility.

37. What gas company will the proposed facility get natural gas from?

Power Energy Partners stated at the hearing that they had not yet entered into a contract for a supplier of natural gas.

38. Is Power Energy Partners an Alternative Electrical Retail Supplier (AERS)?

Power Energy Partners stated at the hearing that this facility would not operated as an AERS. It would provide power on a wholesale basis.

39. I would like to know the assessed valuation of the proposed facility.

You will need to contact Power Energy Partners to obtain this information.

Testing Procedures

40. How often will the emissions be tested?

Although not initially required by the permit. The Illinois EPA believes that Power Energy Partners soon will be required to install continuous emission monitors for NOx as part of the State Implementation Plan.

41. Does the facility have to test for Hazardous Air Pollutants (HAP)?

Depending on the test method used for testing for VOM emissions, HAP will be determined as either a component of VOM emissions or under Test Method 18 specifically speciated.

42. Test method standards should be spelled out.

The permit lists the USEPA test methods that need to be followed. Prior to testing the facility must submit and receive approval of the testing protocol.

43. What is normal operating range of turbines? What are four points in operating range that testing would be conducted?

The company stated at the hearing that they would be testing across a range of 50% to 100% load. The facility is required to perform the testing at four points in the normal operating range, minimum, peak mode and two points in between. It should be noted that for this purpose, normal operating range means the range over which a turbine can be operated, not the typical range in which the turbine is actually operated.

Modeling Procedures

44. What other large sources were considered in air modeling?

The Constellation Power facility southwest of the intersection of Central Avenue and Dralle Road in University Park was the other facility included in the modeling.

**45. How do modelers determine which facilities to include in the modeling?
The modeling should have included the Duke and PPL facilities.**

The Illinois EPA generally will include existing sources in the modeling or sources that are further along in the permit process, i.e. already permitted although maybe not constructed or whose application the Agency has already reviewed. Sources that have not yet submitted an application to the Illinois EPA or that are not reviewed yet by permit section staff would not be included.

All nearby sources need not be included in the modeling to conclude that a proposed facility would not threaten air quality. Sources in the vicinity of a proposed facility are generally accounted for by the “background” air quality values used in the air quality analysis, which are taken from a representative monitoring station operated by the Illinois EPA. However, selected major sources already in an area and other major new facilities for which applications are pending or which are permitted but not yet operating, may be included in modeling for a proposed facility. This is routinely done when modeling for a proposed facility indicates significant air quality impacts. Even though this is not the case for the proposed, which shows insignificant impacts, selected sources in the immediate proximity of the proposed facility were included in the modeling to provide further corroboration that the proposed facility would not threaten air quality.

46. Dispersion modeling should include cumulative impact of other peakers.

The modeling for this facility did include the other peaker that is currently permitted for the area, Constellation Power in University Park.

Administrative Procedures

47. For how long would this construction permit be valid?

The source must begin construction of the facility within a year of the issuance of the permit or the permit lapses. In addition, the program of construction must be continuous, i.e., the construction activity must proceed on orderly schedule as typical for the proposed type of project. The permit would lapse if there were extended interruptions in construction activity, as this would indicate that only limited construction activities were initiated, not consistent with intent to pursue completion of the project in a timely manner, or that the project has been effectively abandoned.

48. The permit process should require public hearings and dispersion modeling for all peaker plants.

Current Illinois EPA policy is to require dispersion modeling and public hearings for all new peaker projects.

49. The Illinois EPA should hold the hearing in the town in which the facility will be located.

When scheduling a hearing the Illinois EPA does it's best to find a location close to the physical location of the facility without regard for political boundaries. This decision can also be complicated by factors such as building availability, handicap accessibility, capacity, operating hours of the facility, etc.

50. What are penalties if exceed the standards of permit?

If there is a numerical violation of a permit, the Illinois EPA takes steps to assure that the problem is corrected. The Illinois EPA would set up a compliance schedule, exact appropriate fines for the non-compliance, and take steps to bring a company into compliance.

Illinois Environmental Policy

51. The state should propose rulemaking to require Best Available Control Technology (BACT) for peaker plants that are "minor" sources under the federal PSD rules. When will the Illinois EPA pursue rulemaking?

In December, the Illinois Pollution Control Board issued some recommendations on peaker plants. The Board found that further investigation is needed to determine whether BACT should be imposed on the non-major source peaker plants in Illinois that are not currently subject to such a requirement. The Illinois EPA is in the process of conducting that analysis. It is also apparent, in light of the electric energy crisis in California that issues dealing with electric power must be dealt with on a comprehensive basis, rather than just considering new natural gas fired peaker power plants. As a result, under the leadership of Governor Ryan, the Illinois EPA and

other state agencies that deal with energy-related issues have been working to develop a comprehensive approach to Illinois' energy supply, which includes both coal and gas fired electric power plants.

52. The USEPA uses Environmental Justice (EJ) analysis in permit determinations. Did the Illinois EPA conduct an EJ analysis on this application?

The Illinois EPA is committed to protecting the health of the residents of Illinois and its environment, and supports the objectives of achieving environmental equity for all. To that end, prior to issuing this permit, the Illinois EPA provided the public with notice of its proposed action and prepared a draft permit for comment, elected to hold a non-mandatory public hearing on the proposed action without waiting for a specific request for a hearing, and prepared this detailed Responsiveness Summary addressing all significant public comments during the 75-day comment period.

Also, an air quality impact analysis for criteria pollutants emitted from the facility was required of the applicant upon submittal of its application, even though the facility is not a "major" source under the federal rules for Prevention of Significant Deterioration (PSD). This air quality impact analysis demonstrated that criteria air pollutant emissions from the facility would not have a significant air quality impact. The Illinois EPA also evaluated the impact that this facility would have in combination with the Constellation power plant also proposed for University Park. The air quality modeling, including the addition of the Constellation project showed there would be no significant impact on air quality from the facility. The Illinois EPA took these actions even though neither is required under environmental laws or regulations. Based on the results of these efforts, the Illinois EPA believes no further analyses are warranted.

FOR ADDITIONAL INFORMATION

Questions about the public hearing and permit decision should be directed as follows:

Public Hearing Procedures and Exhibits

William Seltzer, Hearing Officer
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Responsiveness Summary (question on or extra copies)

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