

217/782-3397
TDD 217/782-9143

October 31, 2001

Re: Letter, September 21, 2001
Public Hearings for Power Plants

Dear:

Thank you for your letter addressing the new peaking unit being proposed by Ameren at its existing Venice power plant. Your letter expresses concern that our decision to hold a public comment period without scheduling a public hearing is a significant change in the Illinois EPA's policy.

Let me assure you that the Illinois EPA is still committed to public participation on proposed new electric power facilities like Ameren's proposed project at Venice. Given the interest and concern by the public about some of these projects, public participation is important to inform the public that such projects are being considered and are required to obtain air pollution control permits from the Illinois EPA. It also allows for public input into the permitting process, as concerns and issues are raised by the public that are within the scope of our permitting. However, these objectives can be achieved without the expenditure of resources entailed by the public hearing. For example, as you are aware from your involvement with the Clean Air Act Permit Program (CAAPP), the public comment periods on draft CAAPP permits only include a public hearing if there is demonstrated interest in the facility, and otherwise provide simply for written comments. This practice is appropriate given the level and nature of public interest in most CAAPP permits.

In this regard, the Bureau of Air identified the specific circumstances of Ameren's Venice project as also presenting a potential opportunity to forgo the expenditure of resources entailed in a public hearing. With respect to operation and emissions, as the proposed new unit would be located at an existing power plant, Ameren must comply with provisions for modification under the federal rules for Prevention of Significant Deterioration (PSD). It must also comply with provisions for both VOM and NO_x under nonattainment New Source Review (NSR) as Venice is in the Metro-East ozone nonattainment area, which has not been granted a "NO_x waiver" from

NSR by USEPA. In such circumstances, Ameren has applied for the proposed new unit to be permitted for annual NO_x emissions that are less than 40 tons. Ameren is also accepting limits on the operation of the new units that are consistent with operation as a peaking unit. In particular, Ameren has not requested a permit that would allow the proposed new unit to operate above the levels at which it would cease to be treated as a peaker plant under the federal Acid Rain Program.

With respect to other aspects of this project, it is located at an existing power plant. The proposed new unit would be placed next to the existing peaking unit already at the site. Thus this project does not entail a change in the usage of the site.

These circumstances are very different from those projects that involve construction of entirely new power plants, which would comply with PSD by being non-major sources and which would be located at sites at which there are not currently power plants. Accordingly, a project-specific decision was made for this proposed new turbine unit not to schedule a public hearing as part of the public comment period on the draft permit.

The significance of these different circumstances and the appropriateness of forgoing a public hearing on the Ameren project are confirmed by the absence of any written comments on this project other than yours.

In this regard, your interest in new power plants and air permit generally is truly appreciated. Thank you again for your letter.

Sincerely,

Renee Cipriano
Director

cc: David J. Kolaz, Chief, Bureau of Air